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Sunset Letter to PLUM

Doug Carstens

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Posted in group: **Clerk-PLUM-Committee**

Dear Clerk of PLUM,

Attached please find a letter for today's hearing, Agenda Item # 11.

Best Regards,

Douglas P. Carstens

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June 19, 2017

Hon. Jose Huizar, Chair
and Hon. Committee Members
Planning and Land Use Management (PLUM)
Committee of the Los Angeles City Council
City of Los Angeles
200 N. Spring St. Ste. 340
Los Angeles CA 90012-3239
c/o Deputy City Clerk Zina H. Cheng,
clerk.plumcommittee@lacity.org

Re: Support for Appeal of Haul Route Permit Application for Archer School, 11725 West Sunset Boulevard After Approval By the Board of Building and Safety Commissioners;
City Council File Number 15-0672-S1;
PLUM Hearing on June 20, 2017, Agenda Item # 11

Honorable Chair Huizar and Committee Members:

On behalf of the Sunset Coalition, Brentwood Residents Coalition, and Brentwood Hills Homeowners Association, we submit this further support¹ for our appeal from a decision by the Board of Building and Safety Commissioners (the Board) on May 16, 2017 to approve a haul route for the Archer School expansion.

Sunset Coalition is an unincorporated association that includes representatives of Westside of Los Angeles Neighborhood & Community Coalition, Upper Mandeville Canyon Association, Bundy Canyon Association, and numerous others. Sunset Coalition's mission includes, but is not limited to, reducing environmental impacts including traffic on Sunset Boulevard. The Brentwood Residents Coalition is a non-profit advocacy group dedicated to the preservation and enhancement of the environment

¹ On May 15, 2017, we submitted a letter to the Board of Building and Safety Commissioners objecting to the potential approval of the haul route. On May 24, 2017, we submitted an appeal of the Board's approval. Those letters, and the entire record in *Sunset Coalition et al. v. City of Los Angeles*, Los Angeles Superior court case number BS157811, Court of Appeal case number B279644, is incorporated by reference.

and quality of life in the Brentwood neighborhood of Los Angeles. Brentwood Hills Homeowners Association (BHHA) is a non-profit voluntary organization representing about 450 homes in the hills north of Sunset Blvd. and West of Mandeville Canyon. BHHA has been very active in advocating for properly scaled development in hillside areas, compliance with appropriate environmental review, protection of open space, and mitigating traffic impacts of development.

In summary, while an EIR was prepared for a conditional use permit (CUP) for the Archer School expansion project for which the haul route is required, there is significant new information and changes in circumstances that require preparation of a subsequent EIR as we discuss below. These impacts were not previously analyzed by the City or disclosed in the EIR. Furthermore, the EIR has various shortcomings and because the adequacy of the Archer expansion EIR is currently being challenged in pending litigation, the haul route review and potential approval should be deferred until the merits of that challenge are resolved. The following further summarizes our concerns, though no objections or statements in prior letters are waived:

--Construction truck traffic will be far more intense than was reported previously in the environmental impact report (EIR) for the Archer School expansion project.

--The Archer Draft EIR identified the preferred haul route as Sunset Boulevard to the I-405 but Archer's May 11, 2017 Application identifies Barrington-San Vicente-Wilshire as the preferred route, with no explanation or associated mitigation measures. The haul route approval limitation of 20 truck trips per hour on the alternate route of Barrington-San Vicente-Wilshire is no limitation at all. Alternate route trips should be more limited.

--Archer's construction truck traffic will be far more intense than was reported previously in the environmental impact report (EIR) for the Archer School expansion project, because the construction schedule was compressed from 74 months in the Draft EIR to 36 months in the final EIR, with only minor reductions in the work to be done. Although the DEIR provided detailed schedules by week and by vehicle type of the construction vehicles (including various types of haul trucks) for the 74-month schedule, the City has not received or made public the comparable details for the 36-month project.

--Sunset Boulevard traffic will be made worse because of the intensity of truck traffic and frequency of traffic stoppage on Sunset as flagmen stop traffic an average of every 3 minutes to allow heavy construction haul trucks to enter or exit Archer's unsignalized driveway.

--The intensity of truck usage will more than double the air quality and health risk impacts of the construction phase compared to what was previously stated. Increases in

diesel particulate matter and smog forming gasses will create adverse health impacts that the EIR did not analyze.

--The Health Risk Assessment for the project included scientifically outdated information and miscalculations resulting in dangerous understatement of health risks from the project. Project Design Feature B-2 requires that prior to the start of construction involving the use of heavy duty construction equipment, the project applicant (Archer) must prepare an updated Health Risk Assessment (HRA), including any available guidance provided by SCAQMD, to utilize the then-most current version as applicable of Office of Environmental Health Hazard Assessment (OEHHA) Guidance manual. (FEIR, p. 14.) Such an updated Health Risk Assessment should be undertaken prior to approval of the haul route permit so those errors can be corrected and disclosed to the public, and further mitigation measures developed, which may involve changes in construction traffic intensity and routing. Archer has already begun construction activity (demolition of homes on Chaparal Street and Barrington and hauling of the debris), but without providing the required updated HRA.

-- CUP Condition 32c required a no right turn on red sign on Barrington northbound at Sunset as a neighborhood protection measure. LADOT has declined to implement that condition, so traffic on Sunset will be further slowed down if Sunset is used for hauling unless new mitigation measures are imposed.

-- A condition of approval required widening of Chaparal Street. However, this mitigation measure has not been implemented. Therefore, haul route traffic using this narrow residential street (in violation of the CUP) will cause significant safety and disruption problems unless new mitigation measures are imposed.

--Because of the increased intensity of Archer's construction activity, and lack of mitigation measures for the impacts, a supplemental environmental impact report should be prepared to address mitigation to reduce the impacts of the more intense construction activity and more intense use of the haul route not only by Archer's haul trucks but by scores of Archer's other concurrently-scheduled construction vehicles.

--Subsequent to the approval on August 4, 2015 of Archer's CUP, two other schools have filed documents as to their proposed major construction, which will overlap the Archer construction and will use Sunset Boulevard for construction vehicles.

A. Subsequent Environmental Impact Reports Are Required When New Information and Changes in Circumstances Occur Following Approval of an EIR.

While the City may intend to rely upon the Archer School expansion EIR that was approved in 2015 as it reviews the Haul Route application, a subsequent EIR is required. The California Environmental Quality Act (CEQA) requires preparation of a subsequent EIR if any of the following conditions is met:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

(Pub. Resources Code, § 21166.)

The CEQA Guidelines elaborate upon what constitutes a substantial change to the project or the circumstances, requiring a subsequent EIR when major revisions of a previous EIR or negative declaration are required “due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.” (CEQA Guidelines §15162, subd. (a)(1).) New information requiring preparation of a subsequent EIR includes:

- (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(CEQA Guidelines §15162, subd. (a)(3).) For the reasons set forth below, a subsequent EIR is required before a haul route may be approved.

B. Construction Truck Traffic Impacts on Sunset Boulevard Will Be Far More Intense Than Was Reported Previously in the EIR.

The requested haul route will potentially include heavy truck hauling on Sunset, Chaparral, and Barrington between the hours of 7 a.m. to 3 p.m. on weekdays and 8 a.m. to 6 p.m. on Saturdays, in addition to over 100,000 other Archer construction vehicle round trips (see Appendix C-2 to the Archer FEIR). The Haul Route Questionnaire states the amount of material to be removed is stated to be "80,632 cubic yards of earth from the project site."

As stated by traffic engineer Tom Brohard (Enclosure 2), significant construction impacts associated with the haul trucks will occur using either the primary or secondary haul route. This impact will occur at Sunset's intersection with Barrington Avenue, Barrington Place, and Church Lane. The secondary haul route would also significantly impact San Vicente/Federal and Wilshire.

Circumstances have changed very substantially since Archer's February 2014 Draft EIR analyzed construction that would be spread over 6 years, subsequently compressed to 36 months such that various phases of the project now overlap. Therefore updated impact analysis and mitigation must be set forth in a subsequent EIR under Public Resources Code section 21166 before the haul route is approved.

C. The Department of Transportation Has Stated Condition 32c of Archers' CUP Cannot Be Cleared.

We have obtained email correspondence pursuant to the Public Records Act that demonstrates that the Department of Transportation has objected to clearing CUP condition 32c.² Condition 32c, part of the Neighborhood Protection Plan, states:

c. Prior to the issuance of a certificate of occupancy for the North Wing Renovation, the School shall coordinate with the Department of Transportation to obtain approval for and, if approved, fund Department of Transportation installation of a "no right-turn-on-red" restriction on the northbound approach of Barrington Avenue at Sunset Boulevard to facilitate eastbound through traffic along Sunset Boulevard

In a Friday May 13, 2016 email, the Senior Transportation Engineer Mohammad Blorfroshan confirmed the following characterization of DOT's position was accurate:

² This enclosure was attached to the May 15, 2017 letter from appellants to the Board of Building and Safety Commissioners, which is incorporated by reference.

“The No Right Turn per condition 32c will NOT be approved by DOT since this request has been repetitively denied by DOT at this intersection and they will NOT approve it for our [Archer’s] project.”

(Enclosure 1 to our May 15, 2017 letter.)

Condition 32c was imposed as a mitigation measure for the Archer expansion project. This condition was included as “Project Design Feature K-2” in the “Mitigation Monitoring Program” adopted for the Project. (Mitigation Monitoring Program, p. 37; see AR 113.) The project applicant argued at the Board’s hearing that this so-called design feature is not a mitigation measure. However, measures that mitigate impacts of a project are properly regarded as mitigation measures, no matter what label an applicant or public agency chooses to apply to them. (*Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 657 [“Simply stating that there will be no significant impacts because the project incorporates ‘special construction techniques’ is not adequate or permissible.”])

As a mitigation measure, it must be enforced. (Pub. Resources Code § 21081.6(b); *Lincoln Place Tenants Ass’n v. City of Los Angeles* (2007) 155 Cal. App. 4th 425, 445 [“mitigation measures must be feasible and enforceable”]; *Lincoln Place Tenants Ass’n v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508 [“[m]itigating conditions [were] not mere expressions of hope”]; *Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1173; *Federation of Hillside & Canyon v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 126 [“The purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded”].)

D. Cumulative Traffic Impacts From Recently-Filed Concurrent Major Projects Nearby Must Now be Analyzed.

The Archer CUP EIR did not analyze cumulative impacts from several nearby projects that will contribute substantial construction vehicle and operational traffic to local streets such as Sunset Boulevard and Barrington. Subsequent to the approval of the Archer CUP, the City also approved the expansion of the Brentwood School and a major construction project on Dunstan Avenue.

The City Council approved the conditional use permit (CUP) for the Brentwood School (BWS) on February 21, 2017, permitting substantial construction on both its east and west campuses. (See Council File 17-0020, which incorporated by reference.) Although the construction vehicles relating to the expansion of the BWS East Campus will not use Sunset, all construction vehicles relating to the work on the West Campus

must use Sunset, and that work is expected to fully overlap Archer's 36 months of construction.

In addition, the Brentwood School EIR listed the following as projects potentially contributing to cumulative impacts:

1. 1975 San Vicente Boulevard Mixed use (retail) and Mixed use (restaurant) and Mixed use (office);
2. 11906–11920 San Vicente Boulevard Restaurant;
3. 11711 Gorham Avenue Retail center ;
4. 11669–11677 Wilshire Boulevard Mixed use (condominium) - Mixed use (office) and Mixed use (retail) ;
5. 11600–11620 Wilshire Boulevard Mixed use (office) - Mixed use (medical office);
6. 11900 Santa Monica Boulevard Mixed use (condominium) - Mixed use (retail);
7. 11857-11859 Santa Monica Boulevard -Mixed use (condominium) and Mixed use (retail);
8. 1466 Westgate Avenue YMCA recreation center;
9. 11701 Santa Monica Boulevard Restaurant;
10. 11660 Santa Monica Boulevard Supermarket;
11. 11725 West Sunset Boulevard Archer Forward project;
12. 12029–12035 Wilshire Boulevard Mixed use (residential) and Mixed use (retail);
13. Wilshire Boulevard and Stoner Avenue Mixed use (residential and retail)

A haul route for demolition of an existing building and construction of a proposed 54-unit apartment project at 11600 West Dunstan Way was approved in November 2016 in Board File number 160040, City Council File number 16-1155, which is incorporated by reference. The excavation and export of dirt for the Dunstan project will require the movement of 33,120 cubic yards of dirt including on Barrington.

Additionally, a major expansion of Mount Saint Mary's University (MSM) has been proposed, and a Notice of Preparation for an EIR for that expansion has been released. (Enclosure 5.) Due to the location of the MSM campus, *all* of the MSM construction vehicles will necessarily use Sunset to and from the I-405 Freeway.

As a result of the foregoing nearby new projects, the traffic analysis of the Archer CUP EIR must be supplemented in a subsequent EIR that addresses these projects as potential contributors to cumulative impacts that could be significant before a haul route permit can be granted.

E. The EIR for the Archer School Expansion Omitted Information in Two Key Respects that is Necessary to Determine the Impacts of the Proposed Haul Route.

Currently, the Sunset Coalition and others are challenging the adequacy of the EIR for the Archer School expansion in *Sunset Coalition et al. v. City of Los Angeles* (Court of Appeal Case no. B279644). Among other deficiencies in the EIR relevant to the haul route permit review process, the EIR failed to adequately disclose traffic impacts associated with the compressed three-year construction schedule and the health implications of air quality impacts of a major construction project adjacent to residential neighborhoods and the temporary trailers the Archer students will be housed in during construction. The shortcomings of the prior EIR are detailed below.

1. Updated Breathing Rates Data for Children and Elderly People Must Now Be Used to Analyze the Archer Project.

Archer shares a city block with five apartment complexes totaling over 200 units. (See Enclosure 9, p. 3.) For example, the apartment building at 150 Barrington has at least 80 residents, 20 of whom are children, and many of whom are elderly. Archer is also located near the highly-congested intersection of Sunset and Barrington, with the attendant high ambient levels of vehicle emissions.

As demonstrated by Environmental Audit, Inc., the City has incorrectly calculated cancer risks for these nearby “sensitive receptors”. (Enclosure 1.) If current scientific information is used, cancer risk calculations will show cancer risk estimates that exceed the allowable 10 per million threshold. (Enclosure 1, p. 4.) The EAI letter refers to the California Air Resources Board *Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk* promulgated in October 2003. A copy is attached. (Enclosure 6.)

In approving the Archer EIR, Archer and the City declined to use updated Office of Environmental Health Hazard Assessment (OEHHA) factual standards as part of the environmental review of the Project. However, the South Coast Air Quality Management District (SCAQMD) has now determined that the new guidelines *must* be used for CEQA significance analysis when an HRA is undertaken. The City must now apply these updated OEHHA guidelines as part of the environmental review of the Project.

As recently as November 2016, SCAQMD has determined that the new guidelines should be used for CEQA significance analysis. The updated SCAQMD guidelines are posted at this link: http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588_guidelines.pdf. This entire document is incorporated by reference.

The potential impacts of these guidelines are explained at this link, which is incorporated by reference: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2014/may-specsess-8b.pdf>. Supplemental guidelines promulgated in November 2016 are at this link (<http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588-supplemental-guidelines.pdf?sfvrsn=9>) and are incorporated by reference.

In the CEQA context, the use of current *factual* information (here, breathing rates data for children and nearby elderly residents) is mandatory. *Berkeley Keep Jets Over the Bay Committee v. Board of Port Com'rs* (2001) 91 Cal.App.4th 1344 is directly on point regarding the requirement to use the most current, scientifically accurate information available.

In *Berkeley Keep Jets Over the Bay*, the court set aside an analysis of Toxic Air Contaminants based on outdated California Air Resources Board (CARB) guidance about speciation profiles (a comprehensive profile of the organic species of gases contained in jet exhaust) after comments pointed out this flaw and the agency in the EIR declined to provide corrected analysis. (*Id.*, at p. 1367.) Thus, the agency's errors in *Berkeley Jets* included using scientifically outdated information despite expert comments pointing out error and attempting to discredit best current science by arguing it had not yet been published. (*Id.*) An EIR must use the best information available. (*Neighbors for Smart Rail v. Exposition Metro Line Const. Authority* (2013) 57 Cal.4th 439, 455 ["public and decision makers are entitled to the most accurate information on project impacts practically possible"].)

The exposure parameters in the OEHHA Guidance Manual reflect the best current scientific assessment of the existing environment when it comes to evaluating air pollution impacts that affect children's health. OEHHA's updated Guidance represents the most scientifically accurate facts about the "environmental setting" or "affected environment." These exposure parameters include breathing rates, exposure time, exposure frequency, exposure duration, averaging time, and intake factor for inhalation. Thus, the frequency of permitted arrivals, onsite dwelling times, and departures of construction vehicles, added to emission rates of onsite construction equipment plus ambient NO₂ and particulate matter from the heavy traffic on adjacent Sunset Boulevard must be analyzed, as well as mitigation measures, before informed haul route decisions can be made.

Without an accurate baseline assessment of the existing environment, an EIR is deficient because the true impact of the project cannot be ascertained. (*Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 87 ["Without accurate and complete information pertaining to the setting of the project and surrounding uses, it cannot be found that the

FEIR adequately investigated and discussed the environmental impacts of the development project.”]; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 952 [“Before the impacts of a project can be assessed and mitigation measures considered, an EIR must describe the existing environment. It is only against this baseline that any significant environmental effects can be determined.”])

As stated by Marcia Baverman of EAI, “while an applicant does not have to offer a construction HRA [Health Risk Assessment], if an applicant volunteers to provide one, the HRA must use the most current scientific data.” (Enclosure 3 to May 15, 2017 letter, Declaration of Marcia Baverman for Motion for New Trial, para. 17.) Here, Archer chose to provide a HRA – but it is dangerously inaccurate and misleading to the public.

Use of the most accurate information available is especially necessary because public health is at stake. The South Coast Air Quality Management District estimated that a six-month construction project for a typical one-acre office project could cause a significant health impacts. (SCAQMD Staff Presentation, Potential Impacts of New OEHHA Risk Guidelines on SCAQMD Programs, Agenda Item 8b, available at <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2014/may-specsess-8b.pdf>.)

The City in CUP mitigation measure PDF-B2 has required that Archer conduct an analysis using the updated OEHHA Guidance to be submitted to the Department of City Planning prior to construction using heavy duty construction equipment. (Enclosure 4.) That analysis must be conducted and shared with the public before the Haul Route is approved. In addition, the mitigation measures recommended in PDF-B2 including but not limited to the following should be required as part of the haul route permit conditions:

- Require the use of 2010 and newer diesel haul trucks;
- Require the use of off-road diesel-powered equipment that meets EPA Tier 4 diesel emissions control standards;
- Require the use of diesel particulate filters for off-road diesel-powered equipment; and
- Require the use of alternatively-fueled off-road powered equipment.

Air quality impacts to young children and the elderly living in the over 200 apartment units immediately adjacent to the Project can be especially problematic. Numerous sources of reliable information demonstrate the particular vulnerability of school age children to air pollution. These include the following:

- 1) Agency for Toxic Substances & Disease Registry [part of CDC], Environmental Health and Medicine Education - “Preconception Exposures and In Utero Exposures” and “Special Considerations Regarding Toxic

Exposures to Young and School Age Children and Adolescents,” <http://www.atsdr.cdc.gov/csem/csem.asp?csem=27&po=10> [“[T]he rapid growth, division, and differentiation of many cells [during puberty] may result in vulnerabilities. ... Metabolic rate of some xenobiotics [(foreign chemical substances in a body)] is reduced in response to the increased secretion of growth hormone, steroids, or both that occur during the adolescent years.” (Citing Gitterman and Barer, “A Developmental Approach to Pediatric Environmental Health” 2001).];

2) American Academy of Pediatrics, “Ambient Air Pollution: Health Hazards to Children” (2003), appearing in *Pediatrics*, the official journal of the AAP. <http://pediatrics.aappublications.org/content/114/6/1699.full#R8> and <http://pediatrics.aappublications.org/content/114/6/1699.full.pdf> [“Children are more vulnerable to the adverse effects of air pollution than are adults. ... Children have increased exposure to many air pollutants compared with adults because of higher minute ventilation and higher levels of physical activity. ... Children in communities with higher levels of urban air pollution (acid vapor, nitrogen dioxide, particulate matter with a median aerodynamic diameter of less than 2.5 μm) and elemental carbon [a component of diesel exhaust] had decreased lung function growth”];

3) Gilliland, FD, *et al.*, “The Effects of Ambient Air Pollution on School Absenteeism Due to Respiratory Illness,” appearing in *Epidemiology* 2001 [increase in ozone levels associated with increase in absenteeism due to respiratory-related symptoms]; Chen *et al.*, “Elementary School Absenteeism and Air Pollution” in *Inhalation Toxicology* (2000);

4) Children’s Health Study by USC, a longitudinal study of the impact of air pollution on children’s health. <https://healthstud.usc.edu/findings.php>; Findings published by, inter alia, Gauderman *et al.*, “Childhood asthma and exposure to traffic and nitrogen dioxide,” appearing in *Epidemiology* (2005).

Each of these studies is incorporated by reference.

2. Circulation of a Subsequent EIR with Updated Details Is Required to Address the Compressed Three Year Construction Schedule.

Restrictions on the numbers of haul trucks per hour, the number of trucks per day, and other feasible mitigation measures must be required as part of the haul route approval.

Archer's Draft EIR included detailed schedules, week by week for 74 months, of the numbers and types of onsite construction equipment (Appendix C-1) and construction vehicles, including haul trucks (Appendix C-2). Those details are essential to any meaningful analysis of traffic impacts, as well as total airborne emissions and their impacts on cancer risks.

After Archer subsequently chose to compress the construction activities, including two phases of heavy hauling, into 36 months, the final EIR did not update the weekly data to reflect that two or more major project elements will now take place concurrently in different parts of the small worksite, and will involve increased intensity of airborne contaminants from onsite construction equipment as well as vehicle contaminants. Archer's Final EIR misleadingly retained the original Appendices C-1 and C-2, still showing the emission sources spread over 74 months.

A failure to disclose and analyze information required by CEQA is a failure to proceed in the manner required by law. (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435; *Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99,118; *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 212.) “[W]hether an EIR is sufficient as an informational document is a question of law subject to independent review by the courts.” (*Madera Oversight Coal., Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102.)

A subsequent EIR is required to address the informational deficiencies of the original EIR. After the Archer Draft EIR was made available to the public in February 2014, the City received a series of substantive submissions (some of which were misleadingly labeled “Errata” when they actually reflected substantial changes to the Project itself) within days of the final City Council vote on August 4, 2015. (AR 35E:5598-35F:5698.)

The very day before the final City Council hearing approving the Project, the City apparently received a memorandum that for the first time illustrated in a simple one-page graph how the original 74-month schedule would be compressed into a 36-month schedule. (AR 5:140; see enclosure 8.) This graph showed the overlap that would occur among various major construction activities that formerly had been

sequential but would now be concurrent. But (as detailed in the Declarations of Brohard and Baverman submitted with our May 15, 2017 letter) even the final submissions did not provide the details of the compressed 36-month construction schedule (such as had been provided for the original 74-month schedule) that are absolutely necessary for meaningful analysis of the traffic, air quality and health impacts of that new schedule. (Brohard ¶ 5; Baverman ¶ 7).

References to a possible “accelerated construction schedule” in the Archer DEIR of February 2014 did not give the public, public agencies such as Caltrans and LADOT, or decisionmakers the notice they needed to evaluate and analyze the possibility of a specifically 36-month construction schedule with specific phase overlaps. In Errata 2, page 10 (AR 35B: 5493) and many places thereafter, the documents submitted by Archer and/or incorporated into City documents such as the so-called Errata repeat the opaque and meaningless assertion that “the 3-year construction schedule tiers off of the accelerated construction schedule”. (E.g., page A-9 [AR013164] of Attachment A to the Aug. 3, 2015 Latham & Watkins letter, page 3 [AR013170] of the Eyestone Environmental memorandum which is Exh. 1 to that letter, and page 5 [AR013186] of the Fehr & Peers memorandum which is Exh. 2 to that letter, page 5 of Errata 6 (AR 35F; 5669), page 2 (AR 35F:5676) of the Matt Construction letter which is page 11 of Errata 6.) The latter appears to refer to Appendix C-3 to the DEIR, titled “Accelerated Construction Schedule Assumptions”, which is a short two-page letter from Matt Construction (with three one-page attachments) that contains no specific length of time, no supporting details, and indeed specifies that such accelerated schedule was “not proposed by Archer.”

On a closely related point, the Matt Construction letter in Errata 6 contains a statement on page 2 that simply cannot be reconciled with the attached construction schedule chart. (May 15, 2017 letter, Brohard Declaration, Exhibit D). The letter states that for various reasons “the maximum on-site activities cannot be increased,” (AR 5:138) but then the chart shows the North Wing Restoration project element now completely overlapping the previously concurrent Underground Parking Garage/Aquatic Facility and Multipurpose Facility elements for fourteen months. (AR 5:140.) Clearly the concurrent onsite activities (and the construction vehicles needed to support them) *could* be increased, very substantially (compare to May 15, 2017 letter, Brohard Exhibit C with Exhibit D.) – thereby certainly increasing their impacts on air quality, health risks and nearby traffic. (May 15, 2017 letter, Brohard Declaration, ¶ 18; Baverman Declaration, ¶ 13.)

With the EIR specifically informing the public that an accelerated schedule was “not proposed by Archer,” there was no reason the public would have examined it or commented upon it. Having earlier told the public that an accelerated schedule was not proposed, when Archer later decided on a specific 36-month timetable (without any

supporting analysis of the types and detail included in the DEIR for the 74-month schedule), the City was required to update the relevant analyses and recirculate the EIR, not just assert that there would be no new significant impacts. (CEQA Guidelines § 15088.5(a)(4); [“The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043).”])

With regard to air quality and health impacts from an “accelerated schedule”, Appendix C-3 to the February 2014 Archer DEIR consists simply of a short two-page letter from Matt Construction with three attachments. (AR 41: 7086.) At the foot of page 1 of the letter, Matt states that under an accelerated schedule, the onsite construction equipment would be “modified” from that in the body of the DEIR, and attaches a single table, “Assessment of Peak *Noise* from Construction Equipment” (emphasis added) – which only lists some equipment and presents no “assessment.” (AR 41:7089.) Importantly as to air quality and health impacts, no details are presented as to what all the referenced onsite equipment “modifications” would be, week to week (as in Appendix C-1), for any “accelerated” schedule, much less a specific three-year schedule.

With the new overlap of various construction phases, greater traffic impacts would clearly be created in the form of higher daily construction vehicle trips (including haul trucks) than if the phases were sequentially conducted as originally analyzed. (May 15, 2017 letter, Brohard Declaration, ¶ 18.) Because peak onsite equipment operations would now be much greater than what was anticipated in the DEIR, and peak construction traffic would be much greater than what was anticipated, peak air pollution impacts and related cancer risks would also be much greater than what was what which was presented to the public and the City in the DEIR. (May 15, 2017 letter Baverman Declaration, ¶ 13, 21.)

A subsequent EIR is required to address these very substantial changes in traffic impacts and health risks.

3. A Subsequent EIR is Required to Give the Public an Adequate Opportunity to Review Significant New Information.

A subsequent EIR is required to address late-filed significant changes to the project, as well as important intervening information that the public had no notice of, let alone a chance to review and comment upon.

Applications for various entitlements such as temporary modular classrooms were filed on July 24, 2015. (Administrative Record in *Sunset Coalition v. Archer*

case, hereinafter (AR) 118:13187-13200.) Errata 5 was posted on or about July 27, 2015. (AR 35E:5598-5664; AR 892:30703.) Errata 6 was not prepared until August 2015 and apparently not made available to the public until the very day of City Council approval on August 4, 2015, when it was part of the motion (over 100 pages) made by Councilmember Bonin to approve the project. (AR 5:52-159.)

Revised health risk calculations using mathematically corrected values were not prepared until August 3, 2015 – and did not address the intensified 36-month construction schedule or use the updated breathing rates. That letter still contains miscalculations that are identified and discussed in Enclosure 1 to this letter.

In addition, as discussed above, although Archer compressed the project from 74 months to 36 months, Archer has not provided a updated phase diagram showing the overlaps of hauling with construction traffic from other major projects that are now known to generate construction traffic on Sunset concurrent with the Archer haul trucks. Further, all haul vehicles will need to exit the Archer worksite via the unsignalized driveways that open directly onto Sunset, and Archer has not presented information as to how often it will need flagmen to block traffic in both directions so that the haul trucks and other vehicles can turn left across traffic to reach the 405 Freeway.

Because the EIR for the CUP for the Archer expansion provided insufficient meaningful information about this major project's traffic, air quality, public safety and other impacts, a subsequent EIR is required.

F. Public Safety Impacts Could be Significant.

The use of double-bottom haul trucks along Sunset can create significant safety and traffic impacts. The use of such haul trucks as well as hundreds of other construction vehicles on the narrow residential streets of Chaparal and Barrington could create unacceptable safety impacts and should be prohibited altogether with a requirement that only smaller 10-wheeler dump trucks be used if residential streets are used at all.

We have been informed that in January 2017 a double-bottom truck overturned on Sunset. More recently, in May 2017, a double-bottom dump truck attempting to make a turn on Barrington from Sunset was involved in a multiple car accident. The City's Department of Transportation should investigate the causes of these accidents and how to prevent them through appropriate conditions on the Archer haul route approval.

G. Widening of Chaparal Street Was Deleted Without Explanation and Significant Construction Traffic Impacts to Chaparal Were Not Avoided as is Feasible.

The Chaparal Street Traffic Calming Plan was contemplated at page 61 of the Traffic Study supporting the EIR to include improvements that “can enhance pedestrian safety and improve operations at the intersections and in the general vicinity.” (Traffic Study, p. 61.) The City’s Bureau of Engineering required widening of Chaparal Street. (See Enclosure 3.) Without public review or notice, the City has apparently deleted the requirement to widen Chaparal Street. (*Ibid.*) Construction truck safety would be enhanced if Chaparal were widened. Therefore, the reason for dispensing with widening of Chaparal, and any substitute mitigation measures, must be set forth in a subsequent EIR so that those may be reviewed by the public.

The Chaparal Street segment between Barrington and Westgate was identified as significantly impacted during Phase 2. (FEIR, p. IV.K-98 and -99.) This significant impact can be avoided by restricting the haul route to the primary route, with no usage of the alternate route that includes Chaparal. This feasible mitigation measure must be adopted.

The City is legally required to adopt a statement of overriding considerations for the haul route’s significant impacts (Public Resources Code section 21081) but has not proposed to do so in connection with the haul route. Even if the City proposed such a statement, the City may not adopt such a statement of overriding considerations without adopting the feasible mitigation measure of requiring haul route traffic to avoid Chaparal Street and other feasible mitigation measures such as limits on hours and numbers of haul trucks.

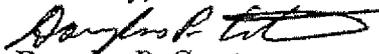
CONCLUSION.

Before further considering the issuance of a Haul Route permit for the Archer expansion project, the City must require preparation of a legally adequate subsequent EIR. Furthermore, we ask that instead of issuing the haul route permit, the City defer a decision on the haul route application until the conclusion of the litigation on the adequacy of the Archer expansion EIR and propriety of the CUP for it.

Thank you for your consideration of these comments. For your convenience, we are also attaching letters from others supporting this appeal. (Enclosure 7.)

We request pursuant to Public Resources Code section 21092.2 copies of any notices related to this haul route permit, especially any Notice of Determination regarding the potential approval of this haul route be sent to the undersigned in a prompt manner.

Sincerely,


Douglas P. Carstens

Enclosures:

1. June 12, 2017 Environmental Audit Letter re Evaluation of Cancer Risks
2. June 12, 201 Tom Brohard Letter re Haul Route Issues
3. May 12-13, 2016 Email of City of Los Angeles regarding widening of Chaparal
4. July 2015 EIR Errata 6 page 14, PDF-B2 with mitigation measures
5. August 4, 2016 Mount Saint Mary's Initial Study excerpt
6. CARB's October 9, 2003 *Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk*
7. Various letters supporting appeal of haul route, June 2017
8. August 3, 2015 Bar Chart of 36-Month Construction Schedule
9. Maps of Cancer Risk Contour (October 1, 2013 and July 31, 2015) and surrounding vicinity of Archer School

June 12, 2017 Environmental Audit Letter re Evaluation of
Cancer Risks

ENCLOSURE 1



ENVIRONMENTAL AUDIT, INC.®

1000-A Ortega Way, Placentia, CA 92870-7162

714/632-8521 FAX: 714/632-6754

www.envaudit.com

38th ANNIVERSARY
dstevens@envaudit.com
mbaverman@envaudit.com
mchoi@envaudit.com

June 12, 2017
Project No. 2955

Douglas P. Carstens
Chatten-Brown & Carstens LLP
2200 Pacific Coast Highway, Suite 318
Hermosa Beach, CA 90254

SUBJECT: Evaluation of Cancer Risk Calculations in the Environmental Impact Report for the Archer Forward Project.

Dear Mr. Carstens:

In connection with Archer School's pending haul route permit application, we have reviewed the Archer Forward Project Final Environmental Impact Report (EIR) and continue to conclude that the health risk analysis (HRA) for construction included therein continues to be inadequate and incorrect. The HRA fails on several fronts listed below:

1. The HRA used incorrect emission rates for diesel particulate matter (DPM).
2. The HRA used incorrect daily breathing rates (DBR) from the 2003 OEHHA guidance.
3. The HRA used the outdated 2003 OEHHA guidance for calculating health risk, instead of the approved 2015 OEHHA guidance.

These technical and methodological errors underestimate the health risk posed to the sensitive populations near the proposed project site, and should be corrected and disclosed to the public for further independent review.

1.0 Incorrect Diesel Particulate Matter (DPM) Calculation

In their letter submitted on August 3, 2015 (the day before Project approval and without allowing time for review or rebuttal), Eyestone Environmental (Eyestone) explicitly stated that they used the following to get the DPM emission rate used in the HRA:

"This was calculated as follows: Total DPM emissions of 856 pounds / total construction days of 1,261 days / 8 hours per day / 60 minutes per hour / 60 seconds per minute x 453.54 grams per pound x the ratio of actual construction days (1,261 days / calendar days over 58 months)."

This calculation (resulting 0.008 grams per second) gives an annualized number instead of the actual emission rate during construction hours. Using this value in a model that already corrects for hours of construction would result in an incorrect dilution of emissions. The above calculations would be valid if the model did not account for hours of construction. The actual cancer risk calculation for a 4.8 year construction period (page 199 of Appendix F-2), using the model with hourly adjustments, should have been:

Total DPM emissions of 856 pounds / total construction days of 1,261 days / 8 hours per day / 60 minutes per hour / 60 seconds per minute x 453.54 grams per pound.

This calculation (0.0107 grams per second) gives the correct DPM emissions rate during the hour when actual construction activities occur. Using the diluted DPM emission factor instead of the actual DPM emission factor understated the associated cancer risk for construction activities by 34 percent $((0.0107 - 0.008)/0.008 = 0.34)$. Considering the reported cancer risk of 8.2 cases per million, the cancer risk would certainly exceed the 10 per million CEQA threshold if the correct emission rate was used.

Eyestone also claims that compressing the construction schedule would not change the DPM emission factor. This is incorrect. The emission rate would increase if the construction schedule is compressed, since the number of actual construction days would decrease while the total emissions would stay the same, and there is no significant reduction in work performed by the onsite construction equipment or the number of construction vehicles arriving and departing the worksite. EAI did not attempt to quantify the 3 year DPM emission rate in the original response because we did not have access to the actual number of construction days in the 3 year schedule. However, if we use the simplifying assumptions that the number of construction days scales proportionally from 4.8 year to 3 years, and the total DPM emissions stay the same, the resulting calculations would be:

Total DPM emissions of 856 pounds / total construction days of 788 days / 8 hours per day / 60 minutes per hour / 60 seconds per minute x 453.54 grams per pound.

The assumed 3 year DPM emission rate would be approximately 0.017 grams per second, or 2.14 times larger than the diluted emission factor presented by Eyestone. However, the exposure length is reduced by one third, so doubling the emission factor and reducing the exposure duration would increase the total cancer risk by approximately 42 percent.

The actual DPM emission rate may vary, since we do not have the actual DPM emissions nor the actual number of days of construction, but the principle remains the same; the compression of the construction schedule can absolutely have a profound and negative effect on the health risk. These technical errors can underestimate the cancer risk, and will only become exacerbated by the methodological error that was made.

2.0 Incorrect Daily Breathing Rate (DBR) from the 2003 OEHHA Guidance

The HRA prepared by Eyestone uses incorrect DBR for the 2003 OEHHA guidance. The HRA presented in the EIR uses 271 liters per kilogram of body weight per day (L/kg-day) for DBR, which is the 60th percentile breathing rate for a 70 kilogram adult. The recommended DBR for the 2003 OEHHA guidance is actually 332 L/kg-day, which is the midpoint between the 60th (271 L/kg-day) and 95th (393 L/kg-day) percentile of adults for 70 year exposure, and the 95th percentile for shorter exposures. This recommendation is from the California Air Resources Board in their *Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk*, and would represent a 23% to 45% increase in cancer risk over the already incorrect value found in the EIR.

Further, it appears that the DBR is adjusted by a factor of 0.5 for children and 0.3 for adults. These exposure adjustments are not explained and do not follow any OEHHA guidance.

3.0 The Health Risk Assessment Should have used the 2015 OEHHA Guidance

In the August 3, 2015 letter, Eyestone claims that the AQMD has not adopted the new OEHHA guidance for CEQA, and that the EIR correctly used the older OEHHA guidance.

“Per the South Coast Air Quality Management District's (SCAQMD) direction, the analysis was conducted consistent with SCAQMD's Risk Assessment Procedures for Rules 1401 and 212 and is based on OEHHA's Guidance Manual from August 2003. Contrary to what is stated in this comment, the SCAQMD has not adopted the new version of the Guidance Document for use in CEQA analyses. According to Jillian Wong, Ph.D., SCAQMD CEQA Program Supervisor, SCAQMD is currently evaluating the new Guidance Manual and will start the public participation process this summer as they develop recommendations on its use for SCAQMD CEQA analyses.”

Context is important; the email exchange between Eyestone and Jillian Wong (SCAQMD) can be found in page 54 of the response to comments. The actual question they asked Jillian was whether the SCAQMD had any guidance for construction health risk. The AQMD has never had any guidance specifically for construction health risk, but they have absolutely adopted the new 2015 OEHHA guidance for both CEQA and permitting purposes. Therefore, an applicant does not have to offer a construction HRA, but if an applicant volunteers to provide one, they should be using the most current guidance. The approved (June 15, 2015) SCAQMD Rule 1401, which follows the new 2015 OEHHA guidance can be found on the SCAQMD website (<http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf?sfvrsn=4>).

The most important change in the 2015 OEHHA guidance is that it has specific parameters for different age groups, which would be more appropriate for a school project. As shown on Page 5-25 of the 2015 OEHHA Guidance, the DBR for children between 0 and 16 years old ranges from 1.090 to 745 (L/kg-day), which is 4.02 to 2.75 times higher than the adult breathing rate used in the EIR. Further, the 2015 OEHHA guidance has an additional adjustment factor for

age, known as the “Age Sensitivity Factor” (ASF) on page 8-5 of guidance. The ASF for children 0 to 2 years is 10 times greater than an adult, and the ASF for children 2 to 16 is three times greater than an adult. Since the construction schedule has been compressed to three years, and the 2015 OEHHA guidance requires that the youngest populations are exposed before the adult population, the health risk would increase considerably over what was presented in the EIR due to the increased breathing rates and the ASF for children. The new guidance also lowers the averaging time for cancer risk from 70 years to 30 which is a 43% reduction. However, as summarized in Table 1, the increases to risk from the 2015 OEHHA methodology far outweigh any decreases. Therefore, the cancer risk presented in the EIR underestimates the actual cancer risk, especially in children.

Table 1

Difference Between the Project EIR and the 2015 OEHHA Guidance

Factor	Units	EIR	2015 Guidance					Percent Change from EIR ⁽¹⁾	
			3rd Trimester	0<2 year	2<9 years	9<16 years	16<30 years	Minimum	Maximum
Breathing Rate	L/kg-day	271	361	1090	861	745	335	318%	402%
Age Sensitivity Factor	Unitless	1	10	10	3	3	1	300%	1000%
Averaging Time ⁽²⁾	years	70	0.25	2	7	7	15	-43%	-43%
Exposure Duration	years	4.5	0.25	2	2.25	0	0	0	0

(1) Percent change from EIR only includes age groups where exposure duration is greater than zero.
 (2) Averaging time for cancer risk reduced from 70 years to 30 years for the 2015 OEHHA guidance.

Conclusion

The technical flaws in the HRA presentation are easily correctable, should be made, and are expected to result in health risk estimates that exceed the 10 per million threshold. The methodological error is more involved, but will create a more accurate representation of health risks involved with the construction phase of the project, especially to children. Both errors should be corrected and disclosed to the public.

We note that Project Design Feature B-2 requires that prior to the start of construction involving the use of heavy duty construction equipment, the project applicant must prepare an updated HRA, including any available guidance provided by SCAQMD, to utilize the then-most current version as applicable of OEHHA’s Guidance manual. (FEIR, p. 14.) Such an updated HRA should be undertaken prior to approval of the haul route permit so the errors we have identified can be corrected and disclosed to the public, and further mitigation measures developed.

Archer HRA Review
June 12, 2017
Page 5

Please contact me if you have any further questions or comments.

Sincerely,

ENVIRONMENTAL AUDIT, INC.



Marcia Baverman
Project Manager
714-632-8521x237



Michael M. Choi
Air Quality Specialist
714-632-8521x227

DBS:mc

June 12, 201 Tom Brohard Letter re Haul Route Issues

ENCLOSURE 2

Tom Brohard and Associates

June 12, 2017

Douglas P. Carstens, Attorney at Law
Chatten-Brown & Carstens
2200 Pacific Coast Highway, Ste. 318
Hermosa Beach, CA 90254

SUBJECT: Archer School Project – Haul Route Issues

Dear Mr. Carstens:

As you requested, I have reviewed the May 11, 2017 Application to Export 80,632 Cubic Yards of Earth (Application) and have compared it to the February 2014 Draft Environmental Impact Report (Draft EIR) for the Archer School Project. As noted below, contradictions and inconsistencies exist between the Application and other documents associated with the proposed Archer School Project as follows:

Significant Construction Traffic Impacts – The Sunset Haul Route is now identified as the primary haul route whereas the Barrington-San Vicente-Wilshire haul route was previously identified as the preferred route. Why has the preferred haul route been changed?

Traffic Management Plan - Page IV.K-94 of the Draft EIR states "Archer would implement... a Traffic Management Plan which would help to minimize the amount and the effect of peak-hour construction traffic." The Application no longer contains the Traffic Management Plan that was prepared by Fehr & Peers in October 2016. That plan included maximum daily construction vehicle equivalents (PCE) at the three site access points as well as an overall maximum PCE for the site. Without a plan to measure construction vehicle equivalents, there are no established limits on the construction activities for the Project. Furthermore, no penalties or remedial actions have been established for exceeding PCE limits that must be established in a Traffic Management Plan.

The October 2016 Traffic Management Plan for Archer fails to consider cumulative traffic impacts of Traffic Management Plans for other projects in the area. While LADOT is required to coordinate construction vehicle activities associated with other projects, there is no evidence that this coordination has or will be done to reduce the cumulative construction traffic impacts.

Changed Project Construction Phases and Schedules - Much has changed since the February 2014 Draft EIR including the consolidated construction of the Project over 3 years rather than 6+ years. Various phases of construction of the Project will now overlap but the specific details of construction traffic associated with each of the Project components have never been documented or analyzed. To properly analyze the Project construction impacts, traffic associated with the currently proposed consolidated construction must be established, identified, and analyzed.

Mr. Douglas P. Carstens
Archer School Project – Haul Route Traffic Issues
June 12, 2017

Cumulative Construction Impacts - In regard to cumulative construction impacts, Page IV.K-105 of the February 2014 Draft EIR states: "...with the exception of the Brentwood School, related projects... may or may not be developed within the same construction schedule as the Project. In addition, per standard City practice, the construction of large development projects would occur in accordance with project-specific construction management plans, as is the case with the Project." Without a traffic management plan for the Project, "standard City practice" will not be followed in an attempt to address cumulative construction traffic impacts.

Page IV.K-105 of the February 2014 Draft EIR also states "As construction management plans are reviewed and approved by LADOT, it is anticipated that through this process, LADOT would coordinate construction activities among the projects that would have the potential to result in cumulative intersection impacts." Without a Traffic Management Plan for the Project, cumulative construction traffic impacts cannot be addressed.

No Right Turn on Red - From the February 2014 Traffic Study by Fehr & Peers on Page 60, prohibiting right turns on red for the northbound traffic on Barrington Avenue at Sunset Boulevard. This measure would reduce congestion and facilitate eastbound through traffic along Sunset Boulevard as well as southbound traffic making a left turn." Page 61 also stated "...the improvements can enhance pedestrian safety and improve operations at the intersections and in the general vicinity." Without any explanation, LADOT denied this request that would have reduced congestion at this failing intersection. At the same time, LADOT approved the installation of "Do Not Block Intersection" signage on each leg of the intersection as suggested on Page 61 of the Traffic Study. The inconsistent responses defy explanation and must be reconsidered.

Errata 2 to the Draft EIR - The Archer School Project, originally planned for construction over six+ years, has been modified to a compressed three-year construction period, with only minor reductions in the scope of the expansion. Deferral of the start of Archer construction now creates overlaps with construction of another proposed school expansion and with construction traffic associated with other projects in the immediate area. There has been no meaningful analysis of the Archer School construction traffic on top of the construction traffic associated with other projects. Errata 2 to the Draft EIR dated April 2015 claims to analyze the compressed three-year construction schedule starting in summer of 2017 but no data or analyses are presented to support the claim of "no new significant construction traffic impacts." Haul route truck traffic has not been evaluated in conjunction with other construction projects in the immediate area as required.

Errata 2 presented the compressed three-year construction period but it does not include the number of construction trips by vehicle type for each phase of all components of the school expansion, basic information required for proper analyses of traffic impacts. With a compressed three-year schedule, construction

Mr. Douglas P. Carstens
Archer School Project – Haul Route Traffic Issues
June 12, 2017

phases and the associated construction vehicle trips will overlap rather than being stretched out over six years.

Changes in the construction schedule for the Archer School Project require further study, analysis, and explanation in a revised and recirculated EIR before the City of Los Angeles considers the Project Haul Route. If you have questions regarding these comments, please call or email me.

Respectfully submitted,

Tom Brohard and Associates

Tom Brohard

Tom Brohard, PE
Principal



May 12-13, 2016 Email of City of Los Angeles regarding
widening of Chaparal

ENCLOSURE 3



Eddie Guerrero <eddie.guerrero@lacity.org>

BOE Investigation report for Archer Girls School & request for relief from widening Chaparal St with DOT concurrence

4 messages

Kimberlina Whettam <kimberlina@kwhettam.com>

Thu, May 12, 2016 at 3:59 PM

To: "edmond.yew@lacity.org" <edmond.yew@lacity.org>

Cc: Ted Allen <ted.allen@lacity.org>, Eddie Guerrero <eddie.guerrero@lacity.org>, Mohammad Blorfroshan <mo.blorfroshan@lacity.org>, Sean Haeri <sean.haeri@lacity.org>

Edmond,

Hi. I hope you are doing great this week. We're working on the Archer Girls School project per case # CPC-2014-666-VCU-ZAA-SPR/CF-15-062 (attached). There is a condition in the BOE letter that calls for widening of Chaparal Street (attached). However, we worked for quite some time with the community to ensure that there were nothing but "traffic calming" measures on Chaparal. That is also backed up by the Environmental Report (page attached).

We've followed up with DOT to see if they could see any other "traffic calming" measures for Chaparal and they said that there WAS NOT anything else that we could do to calm the traffic. The WLA DOT office is in support of relief from widening Chaparal and treating this street like a local limited street. There are already traffic speed humps on the street and no other measures that we could offer to reduce traffic. I've copied Eddie Guerrero, Mohammad Blorfroshan and Sean Haeri from DOT who have all be working on this project and in this community and they confirmed for us that they would concur that we should not widen Chaparal Street.

With their concurrence, can BOE remove the condition to widen Chaparal Street? It would be great to get a response ASAP on this so that we can submit to B-permit section for our overall improvements and exclude the widening for Chaparal.

Please let me know what you think and thank you for considering our request.

Sincerely,

Kimberlina

Kimberlina Whettam, Principal

Kimberlina Whettam & Associates

241 S. Figueroa Street Suite 370

LA, CA 90012

213-228-5303 (O)

3 attachments

 **SLand-Devel15102714070.pdf**
113K

 **III_Responses Pg 591-592 1.pdf**
15K

 **Archer Girls School VCU 2014 Conditions of Approval.pdf**
3088K

Edmond Yew <edmond.yew@lacity.org>

Thu, May 12, 2016 at 4:54 PM

To: Kimberlina Whettam <kimberlina@kwhettam.com>

Cc: Ted Allen <ted.allen@lacity.org>, Eddie Guerrero <eddie.guerrero@lacity.org>, Mohammad Blorfroshan <mo.blorfroshan@lacity.org>, Sean Haeri <sean.haeri@lacity.org>, Dale Williams <dale.williams@lacity.org>

Eddie, Mohammad and Sean,

Please confirm that DOT doesn't require the roadway widening along Chaparal Street in conjunction with any traffic calming proposal.

Thanks.

Edmond

[Quoted text hidden]

-

Edmond Yew, P.E.

Land Development and GIS Division | Division Manager

Bureau of Engineering | Department of Public Works

201 N. Figueroa Street, Rm 200

Los Angeles, CA 90012

O: (213) 202-3490 | F: (213) 202-3499

ENGINEERING


CITY OF LOS ANGELES



Eddie Guerrero <eddie.guerrero@lacity.org>

Fri, May 13, 2016 at 5:23 PM

To: Edmond Yew <edmond.yew@lacity.org>

Cc: Kimberlina Whettam <kimberlina@kwhettam.com>, Ted Allen <ted.allen@lacity.org>, Mohammad Blorfroshan <mo.blorfroshan@lacity.org>, Sean Haeri <sean.haeri@lacity.org>, Dale Williams <dale.williams@lacity.org>

Edmond,

Yes, in conjunction with the traffic calming discussions that have taken place, DOT is agreeable to not requiring the widening of Chaparal for this project.

[Quoted text hidden]

-

Eddie Guerrero

Transportation Engineer
West L.A. / Coastal Planning and Development
Review

Los Angeles Department of Transportation

213.485.1062



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Kimberlina Whettam <kimberlina@kwhettam.com> Fri, May 13, 2016 at 5:25 PM
To: Eddie Guerrero <eddie.guerrero@lacity.org>, Edmond Yew <edmond.yew@lacity.org>
Cc: Ted Allen <ted.allen@lacity.org>, Mohammad Blorfroshan <mo.blorfroshan@lacity.org>, Sean Haeri <sean.haeri@lacity.org>, Dale Williams <dale.williams@lacity.org>

Thank you!!!!

From: Eddie Guerrero [mailto:eddie.guerrero@lacity.org]
Sent: Friday, May 13, 2016 5:24 PM
To: Edmond Yew <edmond.yew@lacity.org>
Cc: Kimberlina Whettam <kimberlina@kwhettam.com>; Ted Allen <ted.allen@lacity.org>; Mohammad Blorfroshan <mo.blorfroshan@lacity.org>; Sean Haeri <sean.haeri@lacity.org>; Dale Williams <dale.williams@lacity.org>
Subject: Re: BOE Investigation report for Archer Girls School & request for relief from widening Chaparal St with DOT concurrence

[Quoted text hidden]

July 2015 EIR Errata 6 page 14, PDF-B2 with mitigation
measures

ENCLOSURE 4

Rather, use of a non-permanent audio system solely for use during Graduation would continue.

2. Air Quality

Final EIR, Volume I, Section II, Corrections and Additions to the Draft EIR, page II34, add Project Design Features B-2 as follows:

Project Design Feature B-2: Prior to the start of construction involving the use of heavy duty construction equipment, the Project Applicant shall prepare an updated Health Risk Assessment, including any available guidance provided by SCAQMD, to utilize the then-most current version as applicable of the Guidance Manual for Preparation of Health Risk Assessments, Air Toxics Hot Spots Program, issued by the Office of Environmental Health Hazard Assessment. The updated Health Risk Assessment shall assess the potential for the Project to generate certain emissions that could cause an exceedance of the standards identified in Section (V.B.3.a)(3) of the Draft EIR. If and to the extent necessary based on the updated Health Risk Assessment, the Project shall incorporate additional measures to reduce such emissions and keep the Project below the standards, including, but not limited to, any of the following measures:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export, as applicable).
- Require the use of off-road diesel-powered equipment that meets EPA Tier 4 diesel emissions control standards.
- Require the use of diesel particulate filters for off-road diesel-powered equipment.
- Require the use of alternatively-fueled off-road powered equipment.

Verification of Project compliance with this measure shall be provided by submittal of the updated Health Risk Assessment, identifying the additional measures (if any) to ensure that the Project would not cause an

exceedance of then-applicable standards to the
Department of City Planning.

This Errata 5 amends the EIR and Mitigation Monitoring Program to include the above additional Project Design Feature B-2.

3. Noise

Final EIR, Volume I, Section II, Corrections and Additions to the Draft EIR, page II42, revise Project Design Feature I-8 as follows:

Project Design Feature I-8: Use of the proposed underground pedestrian pathway, which would extend from the underground parking structure to the Multipurpose Facility and the Performing Arts Center shall be required after 8:00 P.M. 6:00 P.M. Monday through ~~Saturday~~ Friday, except for guests arriving for Special Events. Use of the underground pedestrian pathway from the underground parking structure to the Multipurpose Facility and the Performing Arts Center shall be required on Saturday and Sunday, except for guests arriving for performances in the Performing Arts Center. Guests arriving for and leaving Special Events and Interscholastic Athletic Competitions in the Multipurpose Facility or the Performing Arts Center after 8:00 P.M. shall be directed by staff to the required use of the underground pedestrian pathway. Additional notification measures may ~~shall~~ include: signage, temporary rope lines, stanchions, or other additional notification strategies.

Final EIR, Volume I, Section II, Corrections and Additions to the Draft EIR, page II42, revise Mitigation Measure I-4 as follows:

Mitigation Measure I-4: Saturday use of the athletic field for Extracurricular Activities (e.g., athletic practice) and for Interscholastic Athletic Competitions (e.g., games) shall be prohibited, permitted for four (4) hours between 10:00 A.M. to 6:00 P.M. for ten (10) days per year. Flexibility for overtime shall be provided for the Interscholastic Athletic Competitions.

August 4, 2016 Mount Saint Mary's Initial Study excerpt

ENCLOSURE 5

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

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INFORMATION
<http://planning.tcdty.org>

INITIAL STUDY

BRENTWOOD – PACIFIC PALISADES COMMUNITY PLAN AREA

**Mount Saint Mary's University Chalon Campus Wellness Pavilion
Project**

Case Number: ENV-2016-2319-EIR

Project Location: Mount Saint Mary's University's Chalon Campus 12001 Chalon Road, Los Angeles, CA 90049

Council District: 11 – Mike Bonin

Project Description: Mount Saint Mary's University (MSMU), the Applicant, proposes to construct a Wellness Pavilion (the "Project") at its Chalon Campus ("Campus") to replace the existing outdated fitness, recreation, and wellness facilities located on the Campus. The existing fitness facilities are limited to an approximately 1,100 square foot ("SF") structure that houses a small collection of exercise equipment, along with an adjacent outdoor pool area and two tennis courts.

The 3.8-acre Project Site is located within a developed area of the northern portion of the 45-acre Campus in the same general area as the current fitness facilities. The Project would require the demolition and removal of the existing pool, tennis courts, fitness trailer, facility maintenance offices, surface parking, and landscaping. The Project involves the construction of the proposed Wellness Pavilion, a two-story, approximately 38,000 SF multiuse building, which would house a recreation and practice gymnasium, multipurpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e., lockers, showers, restrooms, equipment storage, and mechanical spaces). The Project would also include a new outdoor pool area, landscaped open space, and a new accessory parking deck immediately adjacent and to the north of the proposed multiuse building. The accessory parking deck would include parking at grade with one level above grade atop a concrete deck. A total of 279 parking spaces would be provided, compared to the existing 226 spaces, a net increase of 53 spaces. The additional 53 parking spaces would increase the number of parking spaces located on the Campus, reducing the number of student vehicles currently parking along Chalon Road.

The Project Site would be located entirely within existing developed areas of the Campus and would not include construction activities beyond the current Campus boundaries. The on-site fitness and recreation facility would primarily be used by MSMU's student body, staff and faculty, as well as

provide a practice facility for MSMU's club sports teams (volleyball, basketball). The facility would not be used for intercollegiate competition. If approved, construction of the Project is projected to begin as early as winter 2018, with construction activities continuing for approximately 22 months until fall 2019. Full use of the Project would occur upon completion of the construction activities.

The Applicant is requesting:

- **Plan Approval (Deemed-to-be-Approved) (Per LAMC § 12.24 M) and Determination to Permit a Building Height Modification (Per LAMC § 12.24 F):** The City may grant a Plan Approval to allow new buildings to be erected on a portion of a lot that is currently permitted as a deemed-approved conditional use pursuant to LAMC Section 12.24 L. In addition, in connection with a Plan Approval for a deemed-approved conditional use, the City may permit buildings to exceed the applicable height standards. MSMU is requesting approval of the proposed Wellness Pavilion, outdoor pool area, landscaped open space, and accessory parking deck on the Chalon campus, where an Educational Institution is permitted as a deemed-approved conditional use, with a building height up to 42-feet, in lieu of the 30-foot maximum that would otherwise apply.
- **Zoning Administrator's Approval for Additional Grading in Hillside Area (Per LAMC § 12.24 X.28 (a)(5)):** MSMU is requesting a Zoning Administrator's Approval to exceed the "by-right" maximum for non-exempt grading (under the Baseline Hillside Ordinance) on a site in the RE40 Zone.
- **Demolition Permits:** Required to remove the existing on-site structures to allow for construction of the proposed buildings.
- **Construction permits, including building, grading, excavation, foundation, and associated permits.**
- **Other approvals as needed.**

<p align="center">Applicant: Mount Saint Mary's University 10 Chester Place Building 10, Third Floor Los Angeles, CA 90007</p>	<p align="center">Prepared By: ESA PCR 2121 Alton Parkway, Suite 100 Irvine, CA 92606</p>	<p align="center">On Behalf of: City of Los Angeles Department of City Planning Major Projects Section</p>
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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

**INITIAL STUDY
AND CHECKLIST**

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY City of Los Angeles Department of City Planning	COUNCIL DISTRICT 11 – Mike Bonin	DATE August 4, 2016
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RESPONSIBLE AGENCIES

City of Los Angeles Department of City Planning, Regional Water Quality Control Board, South Coast Air Quality Management District (SCAQMD), Los Angeles Board of Public Works, Los Angeles Building and Safety Department, Los Angeles Department of Water and Power (Board of Water and Power Commissioners), Los Angeles Cultural Heritage Commission, and Los Angeles Fire Department.

PROJECT TITLE/NO. Mount Saint Mary's University Chalon Campus Wellness Pavilion Project	CASE NO. ENV-2016-2319-EIR
---	--------------------------------------

PREVIOUS ACTIONS CASE NO. N/A	<input type="checkbox"/> DOES have significant changes from previous actions. <input checked="" type="checkbox"/> DOES NOT have significant changes from previous actions.
---	---

PROJECT DESCRIPTION:

Mount Saint Mary's University (MSMU), the Applicant, proposes to construct a Wellness Pavilion (the "Project") at its 45-acre Chalon campus ("Campus") to replace the existing outdated fitness facilities. The existing facilities at the Campus are limited to an approximately 1,100 square foot ("SF") structure that houses a small collection of exercise equipment, along with an adjacent outdoor pool area, and two tennis courts.

The 3.8-acre Project Site is located within a developed area of the northern portion of the Campus in the same general area as the current fitness facilities. Under the Project the existing pool, tennis courts, fitness trailer, facility maintenance offices, surface parking, and landscaping would be demolished and removed. In addition, the Project Site would be developed with the proposed Wellness Pavilion, a two-story, approximately 38,000 SF multi-use building, which would house a recreation and practice gymnasium, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e., lockers, showers, restrooms, equipment storage, and mechanical spaces). The Project would also include a new outdoor pool area, landscaped open space, and a new accessory parking deck immediately adjacent and to the north of the proposed Wellness Pavilion. The accessory parking deck would include parking at grade with one level above grade atop a concrete deck. A total of 279 parking spaces would be provided, compared to the existing 226 spaces, a net increase of 53 spaces. The additional 53 parking spaces would increase the number of parking spaces located on the Campus, reducing the number of student vehicles currently parking along Chalon Road.

The Project Site would be located entirely within existing developed areas of the Campus and would not include construction activities beyond the current Campus boundaries. The on-site fitness and recreation facility would primarily be used by MSMU's student body, staff and faculty, as well as provide a practice facility for MSMU's club sports teams (volleyball, basketball). Under the existing conditions, MSMU's volleyball team practices are held off-site and require the team to be shuttled to and from the off-site practice facilities. Due to the limitations of the existing facilities, the basketball team practices, which are anticipated to commence in late August 2016, would also be held off-site. However, upon completion of the Project both team practices would be held on-site, eliminating the team shuttle trips to and from the Campus. The facility would not be used for intercollegiate competition. MSMU anticipates commencing construction as early as winter 2018, with construction activities occurring for approximately 22 months until fall 2019. Full use of the proposed Wellness Pavilion would occur upon completion of the construction activities.

ENVIRONMENTAL SETTING:

From a broad perspective, the Campus appears as a classic hill-town, with red tile-roofed buildings perched at the top of a tall ridge. The Campus incorporates large open space areas surrounded by buildings that are, for the most part, of a Spanish Colonial Revival style. The existing Campus facilities are comprised of academic and administrative uses, residential uses, spiritual uses, recreational uses and campus operational uses including parking, facilities operations and maintenance. The Campus landscape is well-distributed, particularly in the central areas of the Campus, where the Circle and landscaped open space between the Humanities Building and the Mary Chapel form the centerpiece of the Campus. Arcaded walkways and hardscape patios provide a distinct setting for Campus events and activities within this central area of the Campus.

The existing buildings on the Campus that would be demolished and removed under the Project include the Facilities Management Buildings (approximately 4,970 SF total) and the Fitness Center (approximately 1,030 SF). The Facilities Management Buildings consist of a two- and one-story structure currently occupied by Campus facilities management staff. The current cardio and weight training facilities in the Fitness Center consist of a handful of free weights, three treadmills, one stair machine, two elliptical machines and a few strength-training machines. Unlike a majority of the Campus buildings, both the Facilities Management and Fitness Center buildings are vernacular and utilitarian in style and function, and are not of the Spanish Colonial Revival style. In addition, the pool and two tennis courts located between the Facilities Management and Fitness Center Buildings would be demolished and removed. Further, various landscaped areas, internal roads, and surface parking areas would be demolished and removed. Surface parking to be removed would include the following parking areas: Parking Lots E (4 stalls), Lot F (15 stalls), Lot G (19 stalls), G3 (9 + 13 = 22 stalls), Lot H (42 stalls), Lot I (76 stalls), and Lot J (48 stalls). Thus, the number of stalls to be removed would be 226 stalls.

Adjacent to the Project Site to the north is Building 12 (Yates, Aldworth, and Burns Houses) and an associated existing parking canopy (11 spaces). This 3-story residential building is the northernmost building on the Campus. This building was constructed in a Mediterranean Revival style, unlike the older Spanish Colonial Revival style buildings in the mid- and southern portions of the Campus. No changes would be made to Building 12 and/or the parking canopy as part of the Project.

South of the Project Site, the nearest buildings (from west to east) include: Building 8 (Carondelet Hall – 4 stories); Building 9 (Brady Hall -3 stories); Building 1 (Mary Chapel -2 stories with a low-pitched gable roof); and Building 2 (Rossiter Hall – 2 stories). These buildings vary in height, are multi-story, and are constructed in the Spanish Colonial Revival style. The buildings in the southern portion of the Campus support a variety of Campus uses.

PROJECT LOCATION:

The Project Site is located within Mount Saint Mary's University's Chalon campus located at 12001 Chalon Road, Los Angeles, CA 90049. The approximate 45-acre Campus is located along a ridge crest on the southern flank of the Santa Monica Mountains approximately one mile north of Sunset Boulevard and 0.3 miles west of the San Diego Freeway (I-405).

The Campus is located within the City of Los Angeles Brentwood neighborhood. The developed portion of the Campus is bounded on the north, west and east by undeveloped open space, owned by MSMU. The Getty Center owns open space approximately 0.4 miles to the southwest, which abuts the Campus. Single-family residential uses along Bundy Drive are located to the west downward of a steep sloping open space area. Single-family residential uses are also located along Chalon Road south of the Campus. Immediately south and adjacent to the Campus is the Carondelet Center (accessed off Chalon Road), a large building that serves as the provincial headquarters for the Sisters of St. Joseph of Carondelet, a separate entity from MSMU. While this property is separate from MSMU property, access to the Campus is through the Carondelet property.

The topography of the Campus slopes downward from north to south. The northern portion of the Campus is located at an elevation of approximately 1,150 feet above mean sea level (amsl), while the southern portion of the Campus is located at approximately 900 feet amsl. The Project Site topography varies from approximately 1,100 feet amsl in the northern portion to approximately 1,075 in the southern portion.

For further discussion see Project Description Attachment A.

PLANNING DISTRICT

Brentwood – Pacific Palisades Community Plan

STATUS:

- PRELIMINARY
- PROPOSED
- ADOPTED

EXISTING ZONING RE40-1-H	MAX. DENSITY ZONING 3:1 FAR	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN
PLANNED LAND USE & ZONE Zoning = Remain as RE40-1-H Land Use = Remain as Minimum Residential	MAX. DENSITY PLAN --	<input type="checkbox"/> DOES NOT CONFORM TO PLAN
SURROUNDING LAND USES See above Setting Discussion and Attachment A, Project Description.	PROJECT DENSITY --	<input type="checkbox"/> NO DISTRICT PLAN

 **DETERMINATION (To be completed by Lead Agency)**

On the basis of this initial evaluation:

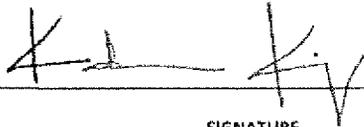
I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



SIGNATURE

Assistant Planner

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | | |

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

 **BACKGROUND**

PROPONENT NAME Mount Saint Mary's University Contact: Chris McAlary, Vice President Administration and Finance	PHONE NUMBER (213) 477-2905
PROPONENT ADDRESS Mount Saint Mary's University 10 Chester Place Building 10, Third Floor Los Angeles, CA 90007	
AGENCY REQUIRING CHECKLIST City of Los Angeles Department of City Planning	DATE SUBMITTED August 1, 2016
PROPOSAL NAME (if Applicable) Mount Saint Mary's University Chalon Campus Wellness Pavilion Project	

 **DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)**

PREPARED BY Michael Harden ESA PCR 2121 Alton Parkway, Suite 100, Irvine, CA 92606	TITLE Principal Planner	TELEPHONE # (213) 694-3296	DATE July 2016
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 ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IX. HYDROLOGY AND WATER QUALITY. Would the project result in:				
a. Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other governmental services (including roads)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XV. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XVI. TRANSPORTATION/CIRCULATION. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ATTACHMENT A: PROJECT DESCRIPTION

A. INTRODUCTION

Mount Saint Mary's University (MSMU) is an independent, Catholic, liberal arts university with two campuses in the City of Los Angeles, California: the 15-acre Doheny Campus just north of the University of Southern California near downtown Los Angeles, which opened in 1962 on the historic Doheny family estate; and the 45-acre Chalon campus established in 1928 in the Brentwood neighborhood. Mount Saint Mary's is the only women's university in Los Angeles. A leading liberal arts institution with a total student enrolment of over 3,400, MSMU is known nationally for its research on gender equity, its innovative health and science programs, and its commitment to community service. In fall 2015, 1,561 students were enrolled at the Chalon campus.

The proposed Wellness Pavilion (the "Project") would be constructed on the Chalon campus ("Campus") and would replace the existing outdated fitness, recreation, and wellness facilities. The existing facilities are limited to an approximately 1,100 square foot ("SF") structure which houses a small collection of exercise equipment, along with an adjacent outdoor pool area, and two tennis courts.

The 3.8-acre Project Site is located within a developed area of the northern portion of the 45-acre Campus in the same general area as the current fitness facilities. The Project would require demolition and removal of the existing pool, tennis courts, fitness trailer, facility maintenance offices, surface parking, and landscaping. The Project involves the construction of the proposed Wellness Pavilion, a two-story, approximately 38,000 SF¹ multiuse building, which would house a recreation and practice gymnasium, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e., lockers, showers, restrooms, equipment storage, and mechanical spaces). The Project would also include a new outdoor pool area, landscaped open space, and a new accessory parking deck adjacent and to the north of the proposed Wellness Pavilion. The accessory parking deck would include parking at grade with one level above grade atop a concrete deck. A total of 279 parking spaces would be provided, compared to the existing 226 spaces, a net increase of 53 spaces. The additional 53 parking spaces would increase the number of parking spaces located on the Campus, reducing the number of vehicles currently parking along Chalon Road.

The on-site fitness and recreation facility would primarily be used by MSMU's student body, staff and faculty, as well as provide a practice facility for MSMU's club sports teams (volleyball, basketball). Under the existing conditions, MSMU's volleyball team practices are held off-site and require the team to be shuttled to and from the off-site practice facilities. Due to the limitations of the existing facilities, the basketball team practices, which are anticipated to commence in late August 2016, would also be held off-site. However, upon completion of the Project both team practices would be held on-site, eliminating the team shuttle trips to and from the Campus. The facility would not be used for intercollegiate competition.

¹ The Wellness Pavilion's square footage represents the total floor area of the building, as calculated using the definition of "Floor Area" in Section 12.03 of the Los Angeles Municipal Code (LAMC) which excludes various facilities, including, but not limited to, basement storage, parking areas with associated driveways and ramps, and stairways and building-operating equipment.

1. Project Information

Project Title: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Project Location: 12001 Chalon Road Los Angeles, CA 90049

Project Applicant: Mount Saint Mary's University

Lead Agency: City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

2. Organization of this Initial Study

This initial study is organized into three sections as follows:

- **Project Description/Introduction:** This section provides introductory information such as the Project title, the Applicant and the lead agency for the Project as well as a detailed description of the environmental setting and the Project, including Project characteristics and environmental review requirements.
- **Initial Study Checklist:** This section contains the completed City of Los Angeles Initial Study Checklist.
- **Environmental Impact Analysis:** Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. Potentially significant effects identified in the Initial Study Checklist will be evaluated further in the EIR.

B. PROJECT LOCATION, ACCESS AND SURROUNDING USES

The 45-acre Campus is located along a ridge crest on the southern flank of the Santa Monica Mountains approximately one mile north of Sunset Boulevard and 0.3 mile west of the San Diego Freeway (I-405). Through an agreement with the Brentwood Homeowners Association and in order to divide traffic between the two streets leading directly to the Campus, the prescribed route for vehicle traffic traveling from Sunset Boulevard to the Campus is Norman Place to Chalon Road, while the prescribed route for traffic leaving the Campus is Chalon Road, south on Bundy Drive to Sunset Boulevard. **Figure A-1, Regional and Local Vicinity Map**, illustrates the location of the Campus from a regional and local perspective.

The Campus is located within the City of Los Angeles Brentwood neighborhood. The developed portion of the Campus is bounded on the north, west and east by undeveloped open space owned by MSMU. The Getty Center owns open space approximately 0.4 miles to the southwest, which abuts the Campus. Single-family residential uses along Bundy Drive are located to the west downward of the steep sloping open space area which supports the elevated Campus Site. Single-family residential uses are also located along Chalon Road south of the Campus. Immediately south and adjacent to the Campus is the Carondelet Center (accessed off Chalon Road), a large building that serves as the provincial headquarters for the Sisters of St. Joseph of Carondelet, a separate entity from MSMU. While this property is separate from MSMU property, access to the Campus is through the Carondelet property. **Figure A-2, Aerial View of Project Site**, shows an aerial view of the Campus, the Project Site, and surrounding land uses.

*CARB's October 9, 2003 Recommended Interim Risk
Management Policy for Inhalation-Based Residential
Cancer Risk*

ENCLOSURE 6



Air Resources Board
Alan C. Lloyd, Ph.D.
Chairman

State of California

Governor Gray Davis



Office of Environmental
Health Hazard Assessment
Joan E. Denton, Ph.D.
Director

October 9, 2003

To Interested Parties:

AIR RESOURCES BOARD RECOMMENDED INTERIM RISK MANAGEMENT POLICY FOR INHALATION-BASED RESIDENTIAL CANCER RISK

The Office of Environmental Health Hazard Assessment (OEHHA) recently released the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments (HRA Guidance Manual). The HRA Guidance Manual was prepared pursuant to the requirements of Health and Safety Code section 44300 et seq. and contains a description of the calculations, recommended exposure parameters, and cancer and noncancer health values needed to perform a health risk assessment (HRA) for air toxics. The HRA Guidance Manual supercedes the risk assessment methods previously presented in the 1993 California Air Pollution Control Officer's Association Risk Assessment Guidelines.

State law requires the use of the new HRA Guidance Manual for implementing the requirements of the Hot Spots (AB 2588) Program. The Air Resources Board (ARB) recommends that the tiered-approach to risk assessment, methods, and health values found in the HRA Guidance Manual also be used to assist risk managers in permitting and project approval decisions for activities with air toxics. However, OEHHA is evaluating further refinements to the exposure assessment methods that may result in significant changes to exposure estimates for the breathing (inhalation) pathway for residential receptors. Therefore, we recommend that the enclosed **ARB Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk** be used to augment the HRA Guidance Manual where a single cancer risk value (rather than a range of risk) is needed or prudent for characterizing risk or where a single risk value is used for risk management decision-making for residential receptors.

The ARB's Interim Policy was established in consultation with OEHHA. OEHHA supports the ARB's efforts to provide clear, health protective guidance that addresses the risk management of air toxics. OEHHA believes the ARB's Interim Policy is consistent with the methods included in OEHHA's HRA Guidance Manual and, based on current health risk and exposure information is protective of public health.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency
1001 I Street, Sacramento, California 95814
Printed on Recycled Paper

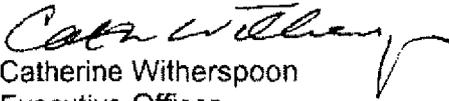
To Interested Parties
October 9, 2003

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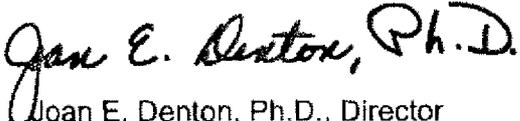
This interim policy recommends determining the range of potential cancer risk by using the mean (65th percentile for the breathing pathway) and the high-end (95th percentile) exposure values or by using the full data distributions of exposure, as outlined in the HRA Guidance Manual. However, where a single cancer risk value for a residential receptor is needed for risk management decisions, we recommend the cancer risk estimate for the breathing pathway be based, at a minimum, on the midpoint (80th percentile) value of the percentile range between the mean and high-end points of exposure. Based on existing exposure information, the interim use of the 80th percentile value for the breathing pathway will continue to give health protective estimates for a residential receptor that are consistent with previous risk methods and provides continuity for the regulated community during the period of forthcoming changes to the risk assessment exposure methodology. Further description of this new policy is attached. ARB and OEHHA believe this to be an appropriate interim policy until OEHHA completes the updates to its risk assessment methodologies.

If you have any questions regarding ARB's Interim Policy, please contact Mr. Dan Donohoue, Chief, Emissions Assessment Branch, Stationary Source Division, ARB at (916) 322-6023. If you have any questions regarding OEHHA's HRA Guidance Manual, please contact Ms. Melanie Marty, Ph.D., Chief, Air Toxicology and Epidemiology Section, OEHHA at (510) 622-3154.

Sincerely,


Catherine Witherspoon
Executive Officer
Air Resources Board

Sincerely,


Joan E. Denton, Ph.D., Director
Office of Environmental Health
Hazard Assessment

Enclosure

cc: Dan Donohoue, Chief
Emissions Assessment Branch
Stationary Source Division

Melanie Marty, Ph.D., Chief
Air Toxicology and Epidemiology Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, 16th Floor
Oakland, California 94612

**AIR RESOURCES BOARD
RECOMMENDED INTERIM RISK MANAGEMENT POLICY
FOR INHALATION-BASED RESIDENTIAL CANCER RISK
(October 2003)**

In an ongoing commitment to use the best available scientific data, the Air Resources Board (ARB) recommends that the risk assessment methods and health values found in the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments (HRA Guidance Manual) be used to characterize health impacts associated with exposure to toxic air contaminants. Health and Safety Code section 44360 requires that health risk assessments prepared for the Air Toxics Hot Spots Program (AB 2588) be developed in accordance with the guidelines established by OEHHA. The ARB recommends that the tiered-approach, methods, and health values found in the HRA Guidance Manual also be used to assist risk managers in permitting and project approval decisions for activities with air toxics emissions and for estimating health impacts in ambient air. We further recommend that this interim policy be used to augment the HRA Guidance Manual where a single cancer risk value (rather than a range of risk) is needed or prudent for characterizing residential cancer risk or where decisions based on a single cancer risk value for a residential receptor are required.

ARB is recommending this interim policy to address two issues. The first issue is the evolving nature of risk assessment and the potential for changes to the HRA Guidance Manual in the near future. OEHHA is evaluating further refinements to exposure assessment methods that may result in significant changes to exposure estimates for the breathing (inhalation) pathway for residential receptors. OEHHA anticipates that the new exposure information will be released over the next few years. Since all risk assessments include the breathing pathway, the ARB believes that this interim guidance is timely and prudent.

The second issue is the ongoing need to use a single cancer risk value to address some risk management situations. Current district programs often rely on a single cancer risk value to trigger specific actions (e.g., notification, risk reduction audit and plans, installation of toxics best available control technology, and project permitting). Because of this ongoing need, ARB believes that interim guidance is appropriate and necessary.

Therefore, the ARB, in consultation with OEHHA, is recommending an interim policy that utilizes the HRA Guidance Manual's range of exposure for determining potential cancer risk at the mean (65th percentile for the breathing pathway) and high-end (95th percentile) values. For the breathing pathway, this policy further recommends the use of the midpoint value of the percentile range (i.e., the 80th percentile) between the mean and high-end as the minimum exposure level for risk management decisions where a single cancer risk value must be used for a residential receptor.

Based on existing exposure information, the ARB, with concurrence from OEHHA, is recommending the interim use of the 80th percentile value (breathing pathway) for risk management decisions for residential receptors. This will continue to give health protective estimates that are consistent with previous risk assessment methods and provides continuity for the regulated community during the period of forthcoming changes to the risk assessment exposure methodology. The use of any single risk assessment result that is based on exposures less than the 80th percentile is not considered to be health protective nor prudent public health policy. The ARB will reconsider this interim risk management policy in its entirety as new scientific data (e.g. exposure information) are released by the ARB or OEHHA. At that time, all data, full exposure distributions, and methods that are published by the ARB or OEHHA will be used to determine future policies that are protective of public health.

For all new carcinogenic risk assessments that are based on the breathing (inhalation) exposure pathway only, we recommend that the following interim policy be used when presenting information in risk assessments and making risk management decisions where a single cancer risk value must be used for residential receptors. All exposure information included in a Tier-2 and Tier-4 risk assessment should be approved by OEHHA. See the attached table for a summary of the interim policy.

- ◆ For a Tier-1 or Tier-2 risk assessment, the potential cancer risk should be reported using the high-end (95th percentile), mean (65th percentile), and the 80th percentile breathing rate. When a single cancer risk value is required for a risk management decision (e.g., permitting or the Hot Spots Program), the potential cancer risk should be based, at a minimum, on the breathing rate representing the 80th percentile. If a Tier-2 risk assessment includes site-specific exposure adjustments other than changes to the breathing rate, then the breathing rate based on the 95th percentile should be used for the risk management decision.
- ◆ For a Tier-3 or Tier-4 (stochastic) risk assessment, the potential cancer risk should be reported using the entire breathing rate distribution; however, specifically highlighting the 95th, 80th, and 65th percentiles. When a single cancer risk value is required for a risk management decision (e.g., permitting or the Hot Spots Program), the potential cancer risk should be based, at a minimum, on the breathing rate representing the 80th percentile. If a Tier-4 risk assessment includes site-specific exposure adjustments other than changes to the breathing rate, then the breathing rate based on the 95th percentile should be used for the risk management decision.

For all new carcinogenic risk assessments that are based on multiple exposure pathways (multipathway assessment), we recommend that the following interim policy be used when presenting information in risk assessments and making risk management decisions where a single cancer risk value must be used for residential receptors. All exposure information included in a Tier-2 and Tier-4 risk assessment should be approved by OEHHA. See the attached table for a summary of the interim policy.

- ◆ For a Tier-1 or Tier-2 multipathway risk assessment, the potential cancer risk should be reported using the derived cancer risk method outlined in the OEHHA HRA Guidance Manual and secondly, the derived cancer risk that uses the 80th percentile breathing rate. The derived cancer risk that uses the 80th percentile breathing rate is referred to as the derived (adjusted) cancer risk. When a single cancer risk value is required for a risk management decision (e.g., permitting or the Hot Spots Program) or for presenting ambient air toxics data, the potential cancer risk should be based, at a minimum, on the derived (adjusted) cancer risk. If a Tier-2 multipathway risk assessment includes site-specific exposure adjustments other than changes to the breathing rate, then the derived cancer risk method outlined in the OEHHA HRA Guidance Manual should be used for the risk management decision.
- ◆ For a Tier-3 or Tier-4 (stochastic) multipathway risk assessment, the potential cancer risk should be reported for the full distribution of exposure from all pathways included in the risk assessment. When a single cancer risk value is required for a risk management decision (e.g., permitting or the Hot Spots Program) or for presenting ambient air toxics data, the potential cancer risk from a Tier-3 or Tier-4 multipathway risk assessment should be based on the 95th percentile cancer risk.

In light of this interim policy, the ARB does not feel it is necessary to recalculate the potential cancer risk of new or historical ambient data that are based on the breathing pathway unless there are new or updated cancer health values (i.e., cancer potency factors and unit risk factors). If cancer potency and unit risk factors were unchanged, existing published results that are based on the breathing pathway would not change significantly when recalculated using the breathing rate that is based on the 80th percentile for residential receptors. However, if the risk manager determines the presentation appropriate, then the range of potential cancer risk based on point-estimates corresponding to the high-end (95th percentile), mean (65th percentile), and the 80th percentile breathing rate can be presented.

Updates to Hot Spots risk assessments should be conducted in accordance with Air Pollution Control or Air Quality Management District (District) procedures and the AB 2588 regulatory requirements. While this risk management policy pertains primarily to cancer risk assessment, the District also needs to ascertain whether the latest Reference Exposure Levels for non-cancer toxicological endpoints were utilized in the risk assessment. For information on current cancer potency factors, unit risk factors, and non-cancer acute and chronic Reference Exposure Levels see the tables on OEHHA's website at http://www.oehha.ca.gov/air/hot_spots/index.html. If the values used in the previous risk assessment are not the same as in these tables, the risk assessment should be updated. If there is a new health value for an emitted chemical for which there was previously no value, the risk assessment should be updated.

The HARP software can perform all of the calculations described in the OEHHA HRA Guidance Manual and those needed to implement this Interim Risk Management Policy. The HARP software will be released in late 2003. Information regarding the HARP software can be found on ARB's website at <http://www.arb.ca.gov/toxics/harp/harp.htm>.

If you have policy questions regarding this interim policy, please contact Mr. Dan Donohoue, Chief, Emissions Assessment Branch, Stationary Source Division, at (916) 322-6023. If you have technical questions regarding this interim policy, please contact Mr. Richard Boyd, Manager, Emissions Evaluation Section, at (916) 322-8285, or Mr. Greg Harris of his staff, at (916) 327-5635. If you have questions regarding ambient data presented in the Almanac or on the ARB's website, please contact Ms. Marcella Nystrom, Staff Air Pollution Specialist, Air Quality Analysis Section, Planning and Technical Support Division, at (916) 323-8548. If you have any questions regarding OEHHA's HRA Guidance Manual, please contact Dr. Robert Blaisdell, Chief, Exposure Modeling Unit, Air Toxicology and Epidemiology Section, Office of Environmental Health Hazard Assessment, at (510) 622-3142.

**Attachment Summarizing the ARB's Interim Risk Management Policy for Residential Receptors
(October 2003)¹**

Exposure Pathway(s) Included in the Risk Assessment	Analysis Method ²	Adjustment(s) to the Breathing Pathway of Exposure ³	Minimum Exposure Information Reported in Risk Assessment ⁴	Recommended Percentile, Risk Level, or Method to Use for Risk Management Decisions Requiring A Single Cancer Risk Value ⁵
Inhalation Only	Tiers 1 & 2	No Change	High-end, Mean, and 80 th Percentile	80 th Percentile/Cancer Risk
	Tier-2	New Breathing Rate Only		
		Other than a New Breathing Rate	High-end, Mean, and 80 th Percentile	High-end (95 th) Percentile/Cancer Risk
	Tiers 3 & 4	No Change	Entire Distribution; Highlight the High-end, Mean, and 80 th Percentile Exposures	80 th Percentile/Cancer Risk
		New Breathing Rate Distribution Only		
	Tier-4	New Breathing Rate Distribution Only	Entire Distribution; Highlight the High-end, Mean, and 80 th Percentile Exposures	High-end (95 th) Percentile/Cancer Risk
Other than a New Breathing Rate Distribution				
Multipathway	Tiers 1 & 2	No Change	Derived (OEHHA) Cancer Risk and Derived (Adjusted) Cancer Risk	Derived (Adjusted) Cancer Risk ⁶
	Tier-2	New Breathing Rate Only		
		Other than a New Breathing Rate	Derived (OEHHA) Cancer Risk and Derived (Adjusted) Cancer Risk	Derived (OEHHA) Cancer Risk ⁷
	Tiers 3 & 4	No Change	Entire Distribution from all Exposure Pathways	95 th Percentile of Cancer Risk
		New Breathing Rate Distribution Only		
	Tier-4	New Breathing Rate Distribution Only		
Other than a New Breathing Rate Distribution				

- Applies to all new health risk assessments when a single cancer risk value is required for a risk management decision for a residential receptor (e.g., permitting or the Hot Spots Program).
- The OEHHA Guidance Manual recommends a four-tiered approach to risk assessment. The OEHHA Guidance Manual requires that a Tier-1 risk assessment be included with all Tier-2 through Tier-4 risk assessments. Tiers 1 and 2 use point estimates of exposure. Tiers 3 and 4 use data distributions of exposure.
- OEHHA should review and approve all the data that supports the site-specific exposure assumptions used in a Tier 2 and Tier 4 risk assessments.
- The high-end breathing rate is defined as the 95th percentile of the distribution; the mean for this distribution falls on the 65th percentile.
- All exposures are based on lifetime exposure (70-year). The HARP software can perform all identified calculations.
- The 80th percentile of exposure is used for the breathing pathway only. All other exposure pathways included in the assessment use the point estimates of exposure identified in the OEHHA HRA Guidance Manual. The Derived (Adjusted) Cancer Risk uses the derived calculation method outlined in the OEHHA HRA Guidance Manual.
- Methodology outlined in the OEHHA HRA Guidance Manual.

Various letters supporting appeal of haul route, June 2017

ENCLOSURE 7

PPRA

Pacific Palisades Residents Association

June 12, 2017

Hon. Jose Huizar, Chair
and Hon. Committee Members
Planning and Land Use Management (PLUM)
Committee of The Los Angeles City Council
City of Los Angeles
200 N. Spring St. Ste. 340
Los Angeles CA 90012-3239
c/o Deputy City Clerk Zina H. Cheng,
clerk.plumcommittee@lacity.org

Re: Support for Appeal of Haul Route Permit Application for Archer School,
11725 West Sunset Boulevard After Approval By the Board of Building and
Safety Commissioners; City Council File Number 15-0672-S1;
PLUM Hearing on June 13, 2017

Honorable Chair Huizar and Committee Members:

Pacific Palisades Residents Association supports the appeal of Sunset Coalition, Brentwood Residents Coalition, and Brentwood Hills Homeowners Association of the Board of Building and Safety Commissioners' approval of a haul route for the Archer School expansion project.

For decades, Pacific Palisades Residents Association (PPRA) has worked to preserve the environment and scenic nature of Pacific Palisades and surrounding areas and to ensure that all development and infrastructure improvements are done in compliance with applicable law. Residents of Pacific Palisades traveling down Sunset Boulevard to or past the 405 freeway will be negatively affected every day by heavy construction trucks using the Archer School haul route, especially around the Sunset/Barrington intersection.

--Construction truck traffic will be far more intense than was reported in the environmental impact report (EIR) for the Archer School expansion project because of the compression of construction activities into a 36-month schedule rather than 74-month schedule.

--Construction traffic will be made even worse because of the intensity of truck traffic and frequency of traffic stoppage on Sunset as flagmen stop traffic an average of every 3 minutes to allow vehicles to enter or exit Archer School 's unsignalized driveway.

PPRA, established 1958, a 501(c)(3) nonprofit, all volunteer, community-wide organization

--The intensity of truck usage will more than double the air quality impacts of the construction phase compared to that in the approved EIR. Increases in diesel particulate matter and smog forming gasses will create adverse health impacts that the approved EIR did not analyze.

--Therefore, the health risk assessment for the project now includes scientifically outdated information and miscalculations resulting in understatement of health risks from the project. **These calculations need to be updated with current and correct information.**

--The City in CUP mitigation measure PDF-B2 required that Archer conduct an air quality analysis using the updated Office of Environmental Health Hazard Assessment (OEHHA) Guidance to be submitted to the Department of City Planning prior to construction using heavy-duty construction equipment. **That analysis must be conducted and shared with the public before the Haul Route is approved.**

--A condition of approval required the widening of Chaparral Street. However, this mitigation measure will not be implemented. Therefore, haul route traffic using this small residential street will cause significant safety and disruption problems.

Construction activity (demolition of homes on Chaparral) already has begun, but necessary mitigation measures (separation wall for noise and dirt) are NOT being implemented.

Because of the changes in the intensity of construction activity, and lack of mitigation measures for the impacts, a supplemental EIR must be prepared

Before further consideration of the issuance of a Haul Route permit for the Archer expansion project, the City must require preparation of a legally adequate supplemental EIR to disclose the impacts of the haul route as it is now proposed and provide for ways to reduce significant impacts not previously addressed.

Respectfully,



Sarah Conner
President



BCA

Bundy Canyon Association

June 10, 2017

Honorable Chair Huizar and Committee Members:

On behalf of Bundy Canyon Association (BCA), we support the appeal of Sunset Coalition, Brentwood Residents Coalition, and Brentwood Hills Homeowners Association of the Board of Building and Safety Commissioners' approval of a haul route for the Archer School expansion project.

We represent 545 homes in the geographical area of Bundy Canyon—from north of Sunset Boulevard, from Barrington to Bowling Green, up to Mount St. Mary's College at Challon.

Our members would be impacted everyday by heavy construction trucks using the haul route as they traverse Sunset Boulevard, especially around its intersection with Barrington.

We all ready have an issue with Sunset vehicles cutting through Chaparal to avoid the Bundy to Barrington Sunset traffic, leaving residents to sit at Barrington and Sunset's light for 20-minutesto 45-minutes on most work/school days.

We simply cannot leave our neighborhood after 3:00 pm due to thousands of commuters using Sunset to the 405. We are trapped.

We are also in an area with heavy brush, and reports coming from local fire people, fire experts, et all, note that this will be the highest fire potential in this area in years.

What that means for our homeowners is an existing bottleneck at Barrington and Sunset, and now, due to this Archer construction schedule at the bottom of our canyon, potentially creating an increased crisis issue to life-threatening evacuation efforts for homeowners should a fire break out—the majority who live on the upper part of our canyon. We just witnessed this for our neighbors in Mandeville Canyon, which burned 55 acres.

******We ask you this. If we currently can not egress from our Bundy Canyon utilizing Barrington and Sunset, which all ready take homeowners 20-45 minutes at that light (without construction traffic from Archer) how would we evacuate 545 homes in an emergency safely out of our canyon in an emergency?***

As noted:

--Construction truck traffic will be far more intense than was reported previously in the environmental impact report (EIR) for the Archer School expansion project because of the compression of construction activities into a 36-month schedule rather than 74-month schedule.

--Construction traffic will be made even worse because of the intensity of truck traffic and frequency of traffic stoppage on Sunset as flagmen stop traffic an average of every 3 minutes to allow vehicles to enter or exit Archer's un-signalized driveway.

--The intensity of truck usage will more than double the air quality impacts of the construction phase compared to what was previously stated. Increases in diesel particulate matter and smog forming gasses will create adverse health impacts that the EIR did not analyze.

--The health risk assessment for the project included scientifically outdated information and miscalculations resulting in understatement of health risks from the project. They need to be updated with current and correct information.

--The City in CUP mitigation measure PDF-B2 required that Archer conduct an air quality analysis using the updated Office of Environmental Health Hazard Assessment (OEHHA) Guidance to be submitted to the Department of City Planning prior to construction using heavy-duty construction equipment. That analysis must be conducted and shared with the public before the Haul Route is approved.

--The City is abandoning the requirement for a neighborhood protection measure of a no right turn on red sign on Barrington northbound at Sunset. Condition 32c, part of the Neighborhood Protection Plan, stated: "c. Prior to the issuance of a certificate of occupancy for the North Wing Renovation, the School shall coordinate with the Department of Transportation to obtain approval for and, if approved, fund Department of Transportation installation of a "no right-turn-on-red" restriction on the northbound approach of Barrington Avenue at Sunset Boulevard to facilitate eastbound through traffic along Sunset Boulevard." This measure will no longer be implemented, so traffic on Sunset will be further slowed down.

--A condition of approval required widening of Chaparal Street. However, this mitigation measure will not be implemented. Therefore, haul route traffic using this small residential street will cause significant safety and disruption problems.

--Because of the changes in the intensity of construction activity, and lack of mitigation measures for the impacts, a supplemental environmental impact report must be prepared to address mitigation to reduce the impacts of the more intense construction activity.

--Construction activity (demolition of homes on Chaparal) has already begun but necessary mitigation measures (separation wall for noise and dirt) are not being implemented.

Before further considering of the issuance of a Haul Route permit for the Archer expansion project, the City must require preparation of a legally adequate supplemental EIR to disclose the impacts of the haul route as it is now being proposed and provide for ways to reduce those impacts.

Signed,

Bundy Canyon Association

Founders:

David Diaan

Joanne Solov

Stefanie Michaels

June 11, 2017

Planning and Land Use Management (PLUM) Committee
 Los Angeles City Council
 200 N. Spring St. Ste. 340
 Los Angeles CA 90012-3239
 c/o Deputy City Clerk Zina H. Cheng,
clerk.plumcommittee@lacity.org

Re: Support for **Appeal** of Archer School Haul Route Permit Application, CCF
 Number 15-0672-S1

Honorable Chair Huizar and Committee Members:

I write to you on behalf of Bel Air Skycrest Property Owners' Association (BASPOA) to express our community's concerns regarding Building and Safety's issuance of a Haul Route Approval for the Archer School expansion project. As you know, since the Environmental Impact Report (EIR) for this project was published, there have been very significant changes in project scheduling, the impacts of which have yet to be properly analyzed. The compression of construction activities from a 74 to a 36 month period means that construction truck traffic will be far more intense than originally reported, as will other construction impacts.

Bel Air Skycrest is one of several communities of roughly a hundred homes each, located in the northeast corner of Brentwood, in the Santa Monica Mountains. Although we do not live in the heart of Brentwood, residents of these "satellite" communities are nonetheless dependent on access to Brentwood for our daily needs. And, like all who must regularly travel to, or through, the Brentwood Village/Sunset Boulevard west-of-the-405 area, we are impacted on a daily basis by all the construction on (and off) Sunset. We therefore support the Sunset Coalition, Brentwood Residents Coalition, and Brentwood Hills Homeowners Association in their haul route appeal and request for a legally adequate Supplementary EIR that gives full consideration to the following issues and their mitigation:

- ❖ Increased disruption and slowing of traffic due to intensification of truck usage and increased frequency of traffic stoppage on Sunset as flagmen halt traffic an average of every 3 minutes to allow vehicles to enter or exit Archer's unsignalized driveway.
- ❖ Increased air quality impacts of the construction phase, due to intensification of truck usage. Higher concentrations of diesel particulate matter and smog forming gasses will create adverse health impacts that the EIR did not analyze.

IN ADDITION:

The original health risk assessment for the Archer project used scientifically outdated information and miscalculations, resulting in understatement of health risks. This assessment needs to be revised using *up-to-date information and accurate calculations*.

Air quality analysis should have been done using the *updated Office of Environmental Health Hazard Assessment (OEHHA) Guidelines*, with the analysis submitted to the Planning Department prior to construction and shared with the public before Haul Route approval (CUP mitigation measure PDF-B2). What happened?

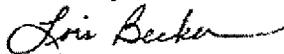
The City has abandoned the neighborhood protection measure of a "no-right-turn-on-red" sign on Barrington northbound at Sunset. Why? Without this mitigation, Sunset traffic will experience further slowing and disruption.

Also abandoned: one of the conditions of approval required widening Chaparral Street. Loss of this mitigation measure means that haul route traffic using this small residential street will give rise to additional safety and disruption problems.

And what about the failure to implement necessary mitigation measures (a separation wall for noise and dirt) before commencement of construction activity -- i.e., the demolition of homes on Chaparral! Abandoned?

With the unanalyzed changes to the haul route schedule, and the lapses in process in so many other areas, *abandoned* seems to be the operative word here. The community feels *abandoned*. We need a supplemental EIR to disclose new project impacts, correct old mistakes, and provide accurate information and adequate mitigations. And we need the City to follow its own rules and fulfill its responsibilities with realistic actions, not false news and empty promises. What we particularly do NOT need is premature approval of an inadequately analyzed haul route that will increase and intensify negative impacts of the already cumulative construction nightmare on Sunset, the main traffic artery on which we rely. Please hear our voice and protect our community.

Sincerely,



Lois Becker
 BASPOA Community Liaison

----- Original message -----

From: John Binder <jfbinder@roadrunner.com>

Date: 6/10/17 4:57 PM (GMT-08:00)

To: clerk.plumcommittee@lacity.org

Subject: Support for Appeal of Haul Route Permit Application for Archer School

June 10, 2017

Hon. Jose Huizar, Chair and Hon. Committee Members

Planning and Land Use Management (PLUM)

Committee of The Los Angeles City Council

200 N. Spring St. Ste. 340

Los Angeles CA [90012-3239](tel:90012-3239)

c/o Deputy City Clerk Zina H. Cheng, clerk.plumcommittee@lacity.org

Re:Support for Appeal of Haul Route Permit Application for Archer School, 11725 West Sunset Boulevard After Approval By the Board of Building and Safety Commissioners;

City Council File Number 15-0672-S1; PLUM Hearing on June 13, 2017

Honorable Chair Huizar and Committee Members:

Upper Mandeville Canyon Homeowners Association supports the appeal of Sunset Coalition, Brentwood Residents Coalition, and Brentwood Hills Homeowners Association of the Board of Building and Safety Commissioners' approval of a haul route for the Archer School expansion project.

UMCA represents 300 homeowners in a neighborhood highly impacted everyday by heavy construction trucks using the haul route at Sunset Boulevard and Barrington, which is often described as the most congested intersection all of Los Angeles.

No matter how impeccable the permitting procedure may be, adding so many construction vehicle trips at this notorious chokepoint is insanity. It is also an affront to the majority of residents, workers and commuters, who share these routes.

The inaccuracies and inadequacies of the EIR have been explained to us. It seems obvious that the EIR should be redone with more honest facts and figures. The increase in traffic, noise and air pollution, ill health effects, home value reduction, and quality of life are all marks against a development of this size at this location.

The Residents of Upper Mandeville Canyon, whose travel and quality of life is greatly effected, beg you to reconsider and reduce the scope and impact of this project. Please deny permission for it continue as planned.

Thanks for your consideration and for the vital service you perform.

Sincerely

John Binder

President, Upper Mandeville Homeowners Association

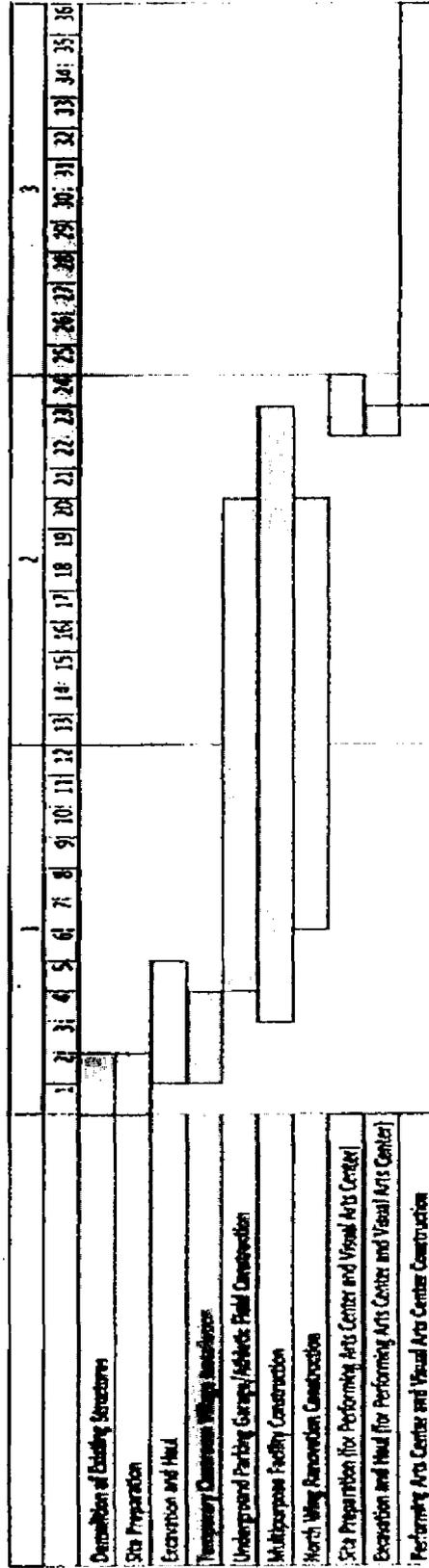
August 3, 2015 Bar Chart of 36-Month Construction
Schedule

ENCLOSURE 8



9814
 NORWALK BOULEVARD
 SUITE 100
 SANTA FE SPRINGS
 CALIFORNIA
 90670-2936
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 562 903-2290 FAX
 www.mattconstruction.com

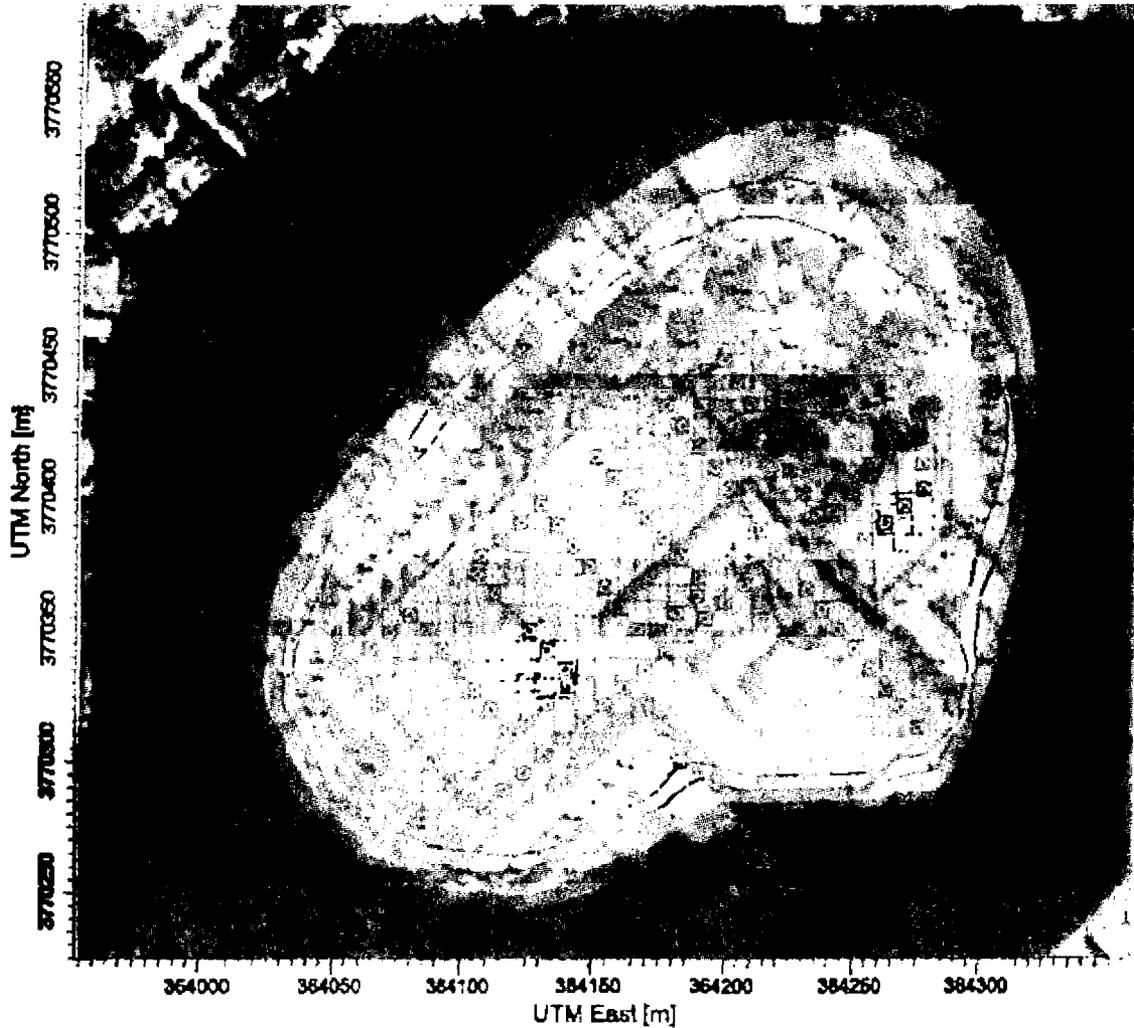
Exhibit 1
36-Month Construction Schedule



Maps of Cancer Risk Contour (October 1, 2013 and July 31, 2015) and surrounding vicinity of Archer School

ENCLOSURE 9

PROJECT TITLE:
**Archer School for Girls
 Cancer Risk Contour**



PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL

ug/m³

COAGULANTS: Construction Cancer Risk Contour 1 in a million	SOURCES: 1 RECEPTORS: 801 OUTPUT TYPE: Concentration MAX: 36.41003 ug/m ³
COMPANY NAME: MODELER: SCALE: 1:2,500 	DATE: 10/1/2013 PROJECT NO.:

