

Errata 3

Archer Forward: Campus Preservation and Improvement Plan Final Environmental Impact Report

A. Background and Introduction

In accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, the City of Los Angeles prepared and circulated a Notice of Preparation for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties for a 30-day review period, beginning January 3, 2012. Subsequently, a Draft Environmental Impact Report (EIR) was prepared and, in accordance with CEQA, the Draft EIR was initially circulated for a 46-day public comment period beginning February 27, 2014, and ending April 14, 2014. In response to public comments, the comment period was extended an additional 15 days through April 29, 2014, to provide more time for responsible and trustee agencies, as well as the public, to comment on the Draft EIR. A Final EIR that included responses to comments on the Draft EIR and corrections and additions to the Draft EIR was prepared and distributed in November 2014. An Errata to the Final EIR (referred to as Errata 1) that described further refinements to the Project was also prepared and made available to the public in December 2014.

Subsequent to completion of the Final EIR, the City of Los Angeles Hearing Officer, on behalf of the City Planning Commission, conducted a public hearing on December 8, 2014 at which members of the public had an opportunity to present oral and written testimony regarding the Project. In order to provide the opportunity for additional comments, written comments were also accepted for an additional week after the public hearing. An Errata to the Final EIR (referred to as Errata 2) was then prepared in April 2015 to address commonly raised topics during the public hearing process and provide further clarification on other topics previously raised during the public comment period for the Draft EIR.

On April 23, 2015, the City Planning Commission, as the initial decision-maker, conducted a meeting at which members of the public had an opportunity to present oral and written testimony. Written comments were also received prior to the City Planning Commission meeting. The City Planning Commission found that the Project conforms to

the purpose and intent of the findings required for a conditional use under the Los Angeles Municipal Code and approved the Project with modified conditions at the City Planning Commission meeting. Based on a review of the oral and written testimony presented at the Planning Commission meeting and the written comments received prior to the meeting, the City determined that the environmental issues raised regarding the EIR have already been addressed. This Errata to the Final EIR (referred to herein as Errata 3) describes the Project refinements made at the City Planning Commission meeting and provides additional clarification of the information presented in the EIR regarding noise generated from the Temporary Classroom Village under a three-year construction schedule. The Draft EIR, Final EIR, Errata 1, Errata 2, and this Errata 3 comprise the EIR for the Project.

B. Project Refinements/General Corrections and Clarifications

1. Special Events

As described in the Final EIR, in response to comments on the Draft EIR, the maximum number of Special Events was reduced from 98 Special Events to 86 Special Events per year. As provided in Errata 2, as a result of further Project refinements and in response to topics raised after release of the Final EIR and during the public hearing process, the maximum number of Special Events was reduced from 86 Special Events to 76 Special Events per year. In response to additional comments raised prior to and during the City Planning Commission meeting, the Project has been further conditioned to reduce the maximum number of Special Events from 76 Special Events to 65 Special Events per year with the appropriate findings included in the Letter of Determination.

2. Academic and Family Events

In response to comments raised prior to and during the City Planning Commission meeting, the Project has been further refined to provide for a maximum of six Academic and Family Events per year, of which no more than two may occur on Saturdays. As defined in the Conditions of Approval, Academic and Family Events are small planned events that involve up to 80 guests and may include, but are not limited to, academic and leadership functions, admissions functions, alumnae functions, music functions, parent and family functions, student enrichment functions, and visual arts functions.

3. Annual Trip Cap

In response to comments raised during the City Planning Commission meeting, the Project has been conditioned to include an annual trip cap. With this annual trip cap, a

maximum of 3,145 vehicles may be generated annually by guests arriving between 6:00 P.M. to 7:00 P.M. for Interscholastic Athletic Competitions and Special Events. The maximum annual trip cap would not apply to Interscholastic Athletic Competitions and Special Events that start at 7:30 P.M. or later.

4. Noise from Temporary Classroom Village

Prior to the City Planning Commission meeting, comments regarding noise from the location of the Temporary Classroom Village within the Chaparal Parcel and the Barrington Parcel were received from Strumwasser & Woocher LLP and Wilson Ihrig & Associates. A review of these comments, which have been incorporated into the administrative file, was conducted by the noise consultant AES. The memorandum prepared by AES addressing these comments is included as Appendix A to this Errata 3 and summarized below.

Comments from Wilson Ihrig & Associates claimed that additional noise calculations have not been provided to support the conclusion that use of the Temporary Classroom Village under a 3-year construction schedule would not exceed 10 dBA above the ambient noise levels at any of the off-site noise sensitive receptors. As detailed in Appendix A of this Errata 3, the 3-year construction schedule tiers off of the accelerated construction schedule evaluated in the Draft EIR. The 3-year construction schedule would locate the Temporary Classroom Village within the Chaparal Parcel and the Barrington Parcel similar to that proposed under the accelerated construction schedule in the Draft EIR. In addition, the number of classrooms and the anticipated number of students and administrative staff to be provided within the Temporary Classroom Village under a 3-year construction schedule would be the same as that analyzed under the accelerated construction schedule in the Draft EIR. Therefore, the noise analysis provided in Errata 2 regarding the Temporary Classroom Village under a 3-year construction schedule is based on the noise analysis for the accelerated construction schedule as provided in the Draft EIR (refer to Section IV.I, Noise, page IV.I-74 and Table IV.I-31, Temporary Classroom Village Noise Levels Under Accelerated Construction Schedule, on page IV.I-75, and Appendix N, page 77).

Other comments made by Wilson Ihrig & Associates noted that the Temporary Classroom Village on the Chaparal Parcel would be nearest to receptor LR06, as identified in the Draft EIR. As shown in Table IV.I-31, Temporary Classroom Village Noise Levels Under Accelerated Construction Schedule, on page IV.I-75 of Section IV.I, Noise, of the Draft EIR, the noise analysis for the Temporary Classroom Village under the accelerated construction schedule evaluated potential noise impacts for the identified off-site sensitive receptors, including Receptor LR06. As provided in Table IV.I-31, the estimated noise levels from the Temporary Classroom Village under the accelerated construction schedule would result in a maximum of 4 dBA above the lowest measured ambient noise level at

Receptor LR06, the nearest off-site sensitive receptor to the Temporary Classroom Village located within the Chaparal Parcel and Barrington Parcel.

Additional comments from Wilson Ihrig & Associates indicated that there is no supporting documentation on how the noise levels for use of the Temporary Classroom Village were calculated. The information related to the Project's noise calculation methodology/procedures is provided in Appendix N, Assessment of Environmental Noise, of the Draft EIR, including: the description of the computer noise model used for the on-site operation noise sources (refer to Appendix N, page 18) and the detailed information for the Temporary Classroom Village analysis (refer to Appendix N, pages 58, 59 and 77).

Wilson Ihrig & Associates also commented that the Temporary Classroom Village would serve 300 students and administrative staff and referenced that the School's total enrollment for the 2014-2015 academic year is reported at 480 students. As described on page IV.I-54 of Section IV.I, Noise, of the Draft EIR, during construction, classroom instruction currently occurring in the existing North Wing would be temporarily relocated to the Temporary Classroom Village. The Temporary Classroom Village is not intended to accommodate the entire campus. The Main Building would continue to be used during construction along with the Temporary Classroom Village.

Wilson Ihrig & Associates further suggested that the noise analysis associated with voices using the Temporary Classroom Village should have been an "area source" analysis with sound attenuations as a function of distance defined as somewhere between a line-source (which generally applies to a noise source with continuous movement, such as a freeway) and a point-source (which generally applies to stationary/small sources). However, in conducting their own analysis of voices associated with use of the Temporary Classroom Village, Wilson Ihrig & Associates did not perform a noise calculation using an "area source" method. Rather, they performed a noise calculation using a line source. However, Wilson Ihrig & Associates' line-source calculation to convert the individual point sources (individual voices) to a line-source (line of individuals) was not correctly translated. Therefore, the estimated noise level by Wilson Ihrig & Associates using the line source method is grossly overestimated (based on the source level conversion).

A noise model was created using the SoundPlan computer model to evaluate the potential noise impacts from use of the Temporary Classroom Village associated with student voices to the adjacent residence to the east along Chaparal Street, using the line-source methodology as suggested by Wilson Ihrig & Associates. The line-source analysis was performed by locating two line sources representing student voices. One source was located to the west the other source was located to the south of the adjacent residence. The estimated noise level using the line-source methodology, as suggested by Wilson Ihrig

& Associates, at the nearest residence to the east of the Project Site is 55 dBA, which is significantly lower than the estimated noise level of 71 dBA provided by Wilson Ihrig & Associates. This is likely due to the fact that the calculations performed by Wilson Ihrig & Associates placed all students (i.e., voices) at one location (i.e., as for a point-source). A figure illustrating the noise analysis using the line-source methodology is provided in Appendix A of this Errata 3.

The noise analysis for determining noise from use of the Temporary Classroom Village provided in the Draft EIR is based on a standard point source methodology wherein each individual voice is a point source. This methodology for calculating noise associated with voices as a point source and not as a line source or an “area source” is based on standard engineering and industry standards.¹

In addition to the line source analysis discussed above, Wilson Ihrig & Associates conducted an analysis of the potential noise impacts associated with the Temporary Classroom Village using standard acoustics methodologies for point sources, which would be applicable to individual voices. Based on that analysis, Wilson Ihrig & Associates determined that noise levels at Receptor LR06 (the nearest off-site sensitive receptor to the Temporary Classroom Village within the Chaparal Parcel and the Barrington Parcel) would also be below the 10 dBA significance threshold (consistent with the conclusion provided in Errata 2). However, it should be noted that based on a review of the calculations provided by Wilson Ihrig & Associates, these calculations do not take into account the additional sound attenuation provided by the perimeter wall and the Temporary Classroom Village buildings themselves (located along the eastern property line), which would serve to buffer noise generated from use of the Temporary Classroom Village.

Finally, Wilson Ihrig & Associates also suggested that the noise calculations for the Temporary Classroom Village were adjusted from a 10-minute Leq to an hourly Leq, or a negative adjustment of 7 to 8 dB (from 10-minute to hourly Leq). The noise analysis for use of the Temporary Classroom Village was not adjusted.

In summary, the conclusion with respect to noise impacts from use of the Temporary Classroom Village under a 3-year construction schedule, as provided in Errata 2, is based on the noise analysis (calculations) provided in the Draft EIR for the accelerated construction schedule, which analyzed the Temporary Classroom Village on Barrington Parcel and Chaparal Parcel. As concluded in the Draft EIR, impacts from use of the Temporary Classroom Village within the Chaparal Parcel and the Barrington Parcel would

¹ Caltrans, *Technical Noise Supplement, Chapter 2.1.4 Sound Propagation, November 2009.*

be less than significant. There is no new significant noise impacts associated with the operation of the Temporary Classroom Village as presented in Errata 2. Therefore, analysis of the Temporary Classroom Village was fully analyzed in the Draft EIR.

5. Water Supply

Other comments made prior to the City Planning Commission meeting included the Project's water demand and current drought conditions. The Project's potential impacts relative to water supply and infrastructure were evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply, of the Draft EIR. As noted on page IV.L.1-22 of the Draft EIR, the estimated average daily water demand for the Project is conservative as the water demand associated with the individual Project uses and the water demand from the student population are calculated separately. As discussed on page IV.L.1-22 of the Draft EIR, if only considering the anticipated water demand associated with the increase in the number of students, irrigation, and maintenance of the artificial turf, the campus would generate an average daily water demand that would be less than the total existing water usage at the Project Site. As further discussed on page IV.L.1-22 of Section IV.L.1, Utilities and Service Systems—Water Supply, of the Draft EIR, LADWP's 2010 Urban Water Management Plan concludes that projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2035. The Project's estimated net increase in water demand would comprise approximately 0.0021 percent, 0.002 percent, and 0.002 percent, respectively, of the water demand for the City in 2020 during an average year, single-dry year, and multiple-dry year period. Therefore, the Project would be well within the available and projected water supplies for normal, single-dry, and multiple-dry years.

In response to comments regarding current drought conditions, it is noted that in April 2015, after release of the Draft EIR for the Project and preparation and distribution of the Final EIR, Governor Edmund G. Brown, Jr. issued an executive order with mandatory water reduction measures directed at conserving water use. The goal of the executive order is to reduce urban water usage by 25 percent statewide. The executive order directed the California Energy Commission to adopt emergency regulations establishing standards to improve the efficiency of water appliances, including toilets, urinals, and faucets. As discussed on page IV.L.1-6 of Section IV.L.1, Water Supply, of the Draft EIR, the City of Los Angeles Plumbing Code (Chapter IX, Article 4, of the LAMC) incorporates by reference the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. In addition, the City has adopted several ordinances in the Los Angeles Municipal Code in an effort to reduce water consumption, including mandating installation of high efficiency plumbing fixtures in residential and commercial buildings. Based on a review of the standards established by

the California Energy Commission, the majority of the plumbing fixture standards already in place by the Plumbing Code or the City's Green Building Ordinance are more restrictive than those established by the California Energy Commission. The only standard adopted by the California Energy Commission more restrictive than standards currently in place is for residential lavatory faucets with a max flow rate of 1.2 gallons per minute. The Project does not include a residential component and would therefore not be subject to this standard. Therefore, as concluded in the Draft EIR, no significant impacts regarding water supply would occur.

C. Corrections and Additions to the EIR

1. Additional Refinements to Proposed Campus Operations

Section II, Project Description, of the Draft EIR included the proposed campus operations with implementation of the Project. In response to comments received after release of the Draft EIR and Final EIR, additional refinements to the proposed campus operations were made in the Final EIR, Errata 1, and Errata 2. The revised campus operations listed below incorporate the changes from Errata 2 with additional deletions shown in ~~strikethrough~~ and additions shown in underline.

- General Hours of Operation shall include Instruction, Extracurricular Activities, and Customary School Activities.
 - Instruction is defined as all teaching and learning at the School. Instruction includes physical education classes. Instruction shall be permitted at varying times based on the Instruction location.
 - Instruction shall be permitted in all School Buildings and Courtyards, Monday through Friday from 7:00 A.M. to 6:00 P.M., and Saturday from 9:00 A.M. to 6:00 P.M. Instruction and Extracurricular Activities on Saturday in School Buildings and Courtyards shall be limited to no more than 30 percent of enrolled students. For reference, the Draft EIR proposed to permit Instruction in School Buildings and Courtyards, beginning at 7:00 A.M. on Saturday, with no limit on the number of participating students.
 - Instruction shall be permitted on the Athletic Field Monday through Friday from 7:40 A.M. to 6:00 P.M., and Saturday from 10:00 A.M. to 6:00 P.M. instruction on the Athletic Field on Saturday shall be limited to 4 hours per day and 10 days

- per year and shall be limited to no more than 30 percent of enrolled students. For reference, the Draft EIR proposed to permit Instruction on the Athletic Field beginning at 7:00 A.M. Monday through Saturday. The Draft EIR also proposed to permit Instruction on the Athletic Field with no limits on the number of hours per day, days per year, or participating students.
- Extracurricular Activities are defined as student activities with faculty and/or parent volunteer oversight, which do not involve guests. Extracurricular Activities include, but are not limited to, athletic team practices, rehearsals, and student organizations. Extracurricular Activities shall be permitted at varying times based on the Activity location.
 - o Extracurricular Activities in all School Buildings and Courtyards shall be permitted Monday through Friday from 7:00 A.M. to 10:00 P.M. and Saturday from 9:00 A.M. to 6:00 P.M. Instruction and Extracurricular Activities in School Buildings and Courtyards on Saturday shall be limited to no more than 30 percent of enrolled students. For reference, the Draft EIR proposed to permit Extracurricular Activities in all School Buildings and Courtyards on Saturday beginning at 7:00 A.M., with no limit on the number of participating students.
 - o Extracurricular Activities on the Athletic Field shall be permitted Monday through Friday from 7:40 A.M. to 6:00 P.M. and Saturday from 10:00 A.M. to 6:00 P.M. Extracurricular Activities on the Athletic Field on Saturday shall be limited to 4 hours per day and 10 days per year and shall be limited to no more than 30 percent of enrolled students. For reference, the Draft EIR proposed to permit Extracurricular Activities on the Athletic Field Monday through Friday beginning at 7:00 A.M. The Draft EIR also proposed to permit Extracurricular Activities on the Athletic Field on an unlimited number of Saturdays, with no limit on the number of participating students.
 - Customary School Activities include trustee meetings, parent/teacher conferences, and other school activities related to teaching, learning, and school operations that involve no more than 50 guests on campus. Customary School Activities shall be permitted in all School Buildings and Courtyards Monday through Friday from 7:00 A.M. to 10:00 P.M. and Saturday from 9:00 A.M. to 6:00 P.M. For reference, the Draft

EIR proposed to permit Customary School Activities in all School Buildings and Courtyards on Saturday beginning at 7:00 A.M.

- Interscholastic Athletic Competitions are defined as student activities generally involving visiting athletic competitors/teams and guests. Interscholastic Athletic Competitions shall be permitted at varying times based on the Competition location.
 - Interscholastic Athletic Competitions in the Multipurpose Facility shall be permitted Monday through Friday from 7:00 A.M. to 10:00 P.M. and Saturday from 9:00 A.M. to 6:00 P.M. For reference, the Draft EIR proposed to permit Interscholastic Athletic Competitions in the Multipurpose Facility on Saturday beginning at 7:00 A.M.
 - Interscholastic Athletic Competitions on the Athletic Field shall be permitted Monday through Friday from 7:40 A.M. to 6:00 P.M. and Saturday from 10:00 A.M. to 6:00 P.M. Interscholastic Athletic Competitions on the Athletic Field on Saturday shall be limited to 4 hours per day and 10 days per year. For reference, the Draft EIR proposed to permit Interscholastic Athletic Competitions on the Athletic Field Monday through Friday from 7:00 A.M. to 8:00 P.M. and Saturday beginning at 7:00 A.M. on an unlimited number of Saturdays.
 - While anticipated that most Interscholastic Athletic Competitions will be concluded within the permitted times, Interscholastic Athletics Competitions hours shall provide flexibility for overtime.
- Saturday use of the Athletic Field for Instruction, Extracurricular Activities, and Interscholastic Athletic Competitions shall be permitted for 4 hours between 10:00 A.M. to 6:00 P.M. for 10 days per year. Instruction and Extracurricular Activities shall be limited to no more than 30 percent of enrolled students. While anticipated that most Interscholastic Athletic Competitions will be concluded within the permitted times, flexibility for overtime shall be provided for the Interscholastic Athletic Competitions.
- Special Events are defined as planned functions that involve students and/or guests on campus. In response to comments on the Draft EIR, the maximum number of Special Events was reduced from 98 to 86 per year. The categories of Special Events are modified to eliminate Interscholastic Athletic Tournaments. As a result of further Project refinements and response to topics raised after release of the Final EIR and during the public hearing

process, the maximum number of Special Events ~~has been~~ was reduced from 86 to 76 per year. In response to additional comments raised prior to and during the City Planning Commission meeting, the Project has been further conditioned to reduce the maximum number of Special Events from 76 Special Events to 65 Special Events per year.

- Categories of Special Events shall include Academic and Leadership Functions; Admissions Functions; Alumnae Functions; Dances and Socials; Graduation; Music Functions; Parents and Family Functions; Performances; Student Enrichment Functions; and Visual Arts Functions. The specific Special Events may vary each Academic Year depending on Archer's instructional needs.
- Special Events in all School Buildings and Courtyards shall be permitted Monday through Friday from 10:00 A.M. to 10:00 P.M., on Saturdays from 9:00 A.M. to 10:00 P.M., and Sunday from 12:00 P.M. to 7:00 P.M. Six Special Events shall be permitted to conclude by 11:00 P.M. on Fridays ~~and Saturdays~~. No more than 16 Special Events shall be permitted on Saturday. No more than 4 Special Events shall be permitted on Sunday. Upper School Graduation shall be permitted on the Athletic Field from 10:00 A.M. to 4:00 P.M. on one Saturday per year.
- Of the ~~76-65~~ proposed Special Events, Archer would be limited to 24-15 Special Events with up to 100 guests, ~~20-32~~ Special Events with up to 200 guests, 27-12 Special Events with up to 300 guests, ~~6-5~~ Special Events with up to 500 guests, ~~1~~ Special Event with up to 650 guests, and 1 Special Event (Graduation) with up to 800 Guests.
- Academic and Family Events are defined as small planned events that involve up to 80 guests on campus, but are distinguished from Instruction, Extracurricular Activities, Interscholastic Athletic Competitions, and Special Events.
 - Academic and Family events may include, but are not limited to, academic and leadership functions, admissions functions, alumnae functions, music functions, parent and family functions, student enrichment functions, and visual arts functions.
 - Academic and Family Events shall only be permitted in the Main Building, the North Wing, and the Main Building courtyards and during the following hours: Monday through Friday from 10:00 A.M. to 10:00 P.M. and on Saturday from 9:00 A.M. to 6:00 P.M. A maximum of 6

Academic and Family Events may occur per Academic Year, of which no more than 2 may occur on Saturdays.

- Administration, maintenance personnel, and security personnel may be present on the campus at any time.
- Outdoor facilities maintenance, including grounds maintenance or any mechanized maintenance activities, shall be permitted Monday through Friday from 8:00 A.M. to 6:00 P.M. and Saturday from 8:00 A.M. to 6:00 P.M. Outdoor facilities maintenance shall be permitted outside of these times in emergency repair situations.

As part of the Project, summer academic and camp programs may occur for up to six weeks when the academic year is not in session between the hours of 8:00 A.M. and 5:00 P.M. Monday through Friday. Schools in Los Angeles routinely offer summer academic and camp programs for purposes of academic remediation, enrichment, or acceleration, and athletic skill development. With appropriate facilities, the School's summer program also would be able to offer traditional camp programs, which include sports (e.g., volleyball, basketball, soccer, and softball), games, arts, crafts, nature, and cooking. The School's program would serve up to 350 students primarily in the School Buildings and Courtyards. The athletic field may be used between the hours of 10:00 A.M. and 4:00 P.M. The number of students on the athletic field is anticipated to be similar to a typical fitness class during the academic year. All participants in the summer programs would arrive and depart on buses. There would be no parent drop offs or pick-ups allowed at the School or in the surrounding neighborhood.

The Project previously proposed community use of the facilities a maximum of 24 days per year. In response to comments on the Draft EIR, the Project has been refined to remove the proposed community use of the facilities.

The Project also previously proposed the rental, lease, and use of the facilities for non-School use (e.g., club athletics, weddings, private parties) a maximum of 24 days per year. In response to comments, the Project has been refined to remove the proposed rental, lease, and use of the facilities for non-School Uses.

As set forth in the Draft EIR, filming on the campus for commercial purposes would continue to be prohibited except when the School is not in

session and provided the filming revenue is placed in the School's scholarship fund. Filming would be permitted for no more than 24 days per year. All trucks and equipment would be required to use the School's underground parking structure. Parking on neighborhood streets would be strictly prohibited. No outdoor lighting or amplified noise would be allowed on the athletic field, North Garden, Arts Plaza, or in the Court of Leaders. Filming would only be permitted when the School is not in session (i.e. during the summer, non-school days, and after school on weekdays). Hours would be further restricted, with filming beginning no earlier than 9:00 A.M. and concluding no later than 6:00 P.M., and no filming on Sunday. Upon agreement with the production companies, when filming occurs on campus, the School would require that students enrolled in the Advanced Film class be given the opportunity to visit the set, interact with the crew, and participate in a real-world, hands-on filming experience.

As part of the Project, new pedestrian pathways and access routes would be provided to access the Multipurpose Facility, the Visual Arts Center, the Performing Arts Center, and the underground parking structure. The Project has been refined to require mandatory use of the underground pedestrian pathway, which extends from the underground parking structure to the Multipurpose Facility and the Performing Arts Center, after 8:00 P.M. In addition, the Project no longer proposes the use of a new portable public address system. Rather, use of a non-permanent audio system solely for use during Graduation, ~~as permitted under the Applicant's existing CUP~~, would continue.

2. Appendix B

Final EIR, Volume 6, Appendix FEIR-B, Proposed Special Events has been replaced with revised Appendix FEIR-B, Proposed Special Events, which is appended to this Errata 3.

D. Effect of Corrections and Additions

This Errata 3 documents additional changes to the EIR (comprising the Draft EIR, Final EIR, Errata 1, and Errata 2). As demonstrated by the following discussion, the modifications to the EIR do not result in new significant impacts and do not warrant recirculation of the EIR.

CEQA Guidelines Section 15088.5 requires that an EIR that has been made available for public review, but not yet certified, be recirculated only if significant new information has been added to the EIR. Pursuant to CEQA Guidelines section 15088.5(c), the entire document need not be circulated if revisions are limited to specific portions of the document. The relevant portions of CEQA Guidelines section 15088.5 read as follows:

- (a) *A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:*
- (1) *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
 - (3) *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.*
 - (4) *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*
- (b) *Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.*

The information contained in this Errata 3 merely clarifies, amplifies, or makes insignificant changes to the information that has already been presented in the EIR. In

addition, the modifications to the EIR are not significant because the EIR is not changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project. Based on the above, the clarifications to the EIR would not result in any new significant impacts or a substantial increase in the severity of any impact already identified in the EIR. In addition, the clarifications and additions to the EIR merely clarify, amplify or make insignificant refinements to the information that has already been presented in the EIR. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met, and recirculation is not required.

Appendix A



Memorandum Addressing Noise Comments
from Strumwasser & Woocher LLP and
Wilson Ihrig & Associates

To	Stephanie Eyestone-Jones / Eyestone Environmental	Project number 2013101
cc	Amir Yazdaniyaz, PE/ AES	File reference Memo-Archer-04-20-15
From	Sean Bui, PE	Date April 22, 2015
Subject	Archer Forward: Campus Preservation and Improvement Plan – Response to Letter from Strumwasser & Woocher LLP and Wilson Ihrig & Associates, dated April 20, 2015	

This memorandum addresses comments received from Strumwasser & Woocher LLP and Wilson Ihrig & Associates regarding noise from the location of the Temporary Classroom Village within the Chaparal Parcel and the Barrington Parcel, as evaluated in the Draft EIR under the accelerated construction schedule and as similarly proposed under a 3-year construction schedule.

Comments from Wilson Ihrig & Associates alleged that additional noise calculations have not been provided to support the conclusion that use of the Temporary Classroom Village under a 3-year construction schedule would not exceed 10 dBA above the ambient noise levels at any of the off-site noise sensitive receptors. As discussed in Errata 2 to the Archer Forward: Campus Preservation and Improvement Plan Final Environmental Impact Report (hereafter referred to as Errata 2), the 3-year construction schedule tiers off of the accelerated construction schedule and assumes no increase in maximum numbers of construction equipment, grading, construction truck and construction worker trips, or construction hours of operation above that were already evaluated for the peak construction day within the Draft EIR. The 3-year construction schedule would also locate the Temporary Classroom Village within the Chaparal Parcel and the Barrington Parcel similar to that proposed under the accelerated construction schedule. In addition, the number of classrooms and the anticipated number of students and administrative staff (i.e., 300) to be provided within the Temporary Classroom Village under a 3-year construction schedule would be the same as that analyzed under the accelerated construction schedule in the Draft EIR. Therefore, the noise analysis provided in Errata 2 regarding the Temporary Classroom Village is based on the noise analysis for the accelerated construction schedule as provided in the Draft EIR (refer to Section IV.I, Noise, page IV.I-74 and Table IV.I-31, Temporary Classroom Village Noise Levels Under Accelerated Construction Schedule, on page IV.I-75, and Appendix N, page 77).

Other comments made by Wilson Ihrig & Associates noted that the Temporary Classroom Village on the Chaparal Parcel would be nearest to receptor LR06, as identified in the Draft EIR. As shown in Table IV.I-31, Temporary Classroom Village Noise Levels Under Accelerated Construction Schedule, on page IV.I-75 of Section IV.I, Noise, of the Draft EIR, the noise analysis for the Temporary Classroom Village under the accelerated construction schedule evaluated potential noise impacts for the identified off-site

sensitive receptors, including Receptor LR06. As provided in Table IV.I-31, the estimated noise levels from the Temporary Classroom Village under the accelerated construction schedule would result in a maximum of 4 dBA above the lowest measured ambient noise level at Receptor LR06, the nearest off-site sensitive receptor to the Temporary Classroom Village located within the Chaparal Parcel and Barrington Parcel.

Additional comments from Wilson Ihrig & Associates alleged that there is no supporting documentation on how the noise levels for use of the Temporary Classroom Village were calculated. The information related to the Project's noise calculation methodology/procedures is provided in Appendix N, Assessment of Environmental Noise, of the Draft EIR, including: the description of the computer noise model used for the on-site operation noise sources (refer to Appendix N, page 18) and the detailed information for the Temporary Classroom Village analysis (refer to Appendix N, pages 58, 59 and 77).

Wilson Ihrig & Associates also commented that the Temporary Classroom Village would serve 300 students and administrative staff (assuming 270 of these would be students) and referenced that the School's total enrollment for the 2014-2015 academic year is reported at 480 students. As described on page IV.I-54 of Section IV.I, Noise, of the Draft EIR, during construction, classroom instruction currently occurring in the existing North Wing would be temporarily relocated to the Temporary Classroom Village. The Temporary Classroom Village is not intended to accommodate the entire campus. The Main Building would continue to be used during construction along with the Temporary Classroom Village. For instance, the following uses that are currently located in the Main Building would continue to occur in the Main Building during use of the Temporary Classroom Village:

- Science Classrooms and Labs
- Art Classrooms
- Humanities Classrooms
- The Saban IDEALab
- MediaSpace
- Library
- Administrative uses and offices

Wilson Ihrig & Associates further suggested that the noise analysis associated with voices using the Temporary Classroom Village should have been an "area source" analysis with sound attenuations as a function of distance defined as somewhere between a line-source (which generally applies to a noise source with continuous movement, such as a freeway) and a point-source (which generally applies to stationary/small sources). However, in conducting their own analysis of voices associated with use of the Temporary Classroom Village, Wilson Ihrig & Associates did not perform a noise calculation using an "area source" method. Rather, they performed a noise calculation using a line-source. However, Wilson Ihrig & Associates' line-source calculation to convert the individual point sources (individual voices) to a line-source (line of individuals) was not correctly translated. Specifically, the source level for the line-source was adjusted upward by the total number of individuals assumed to be talking. That is, the line source levels were adjusted upward between 9 and 16 dBA (depending on the voice level). This is not a

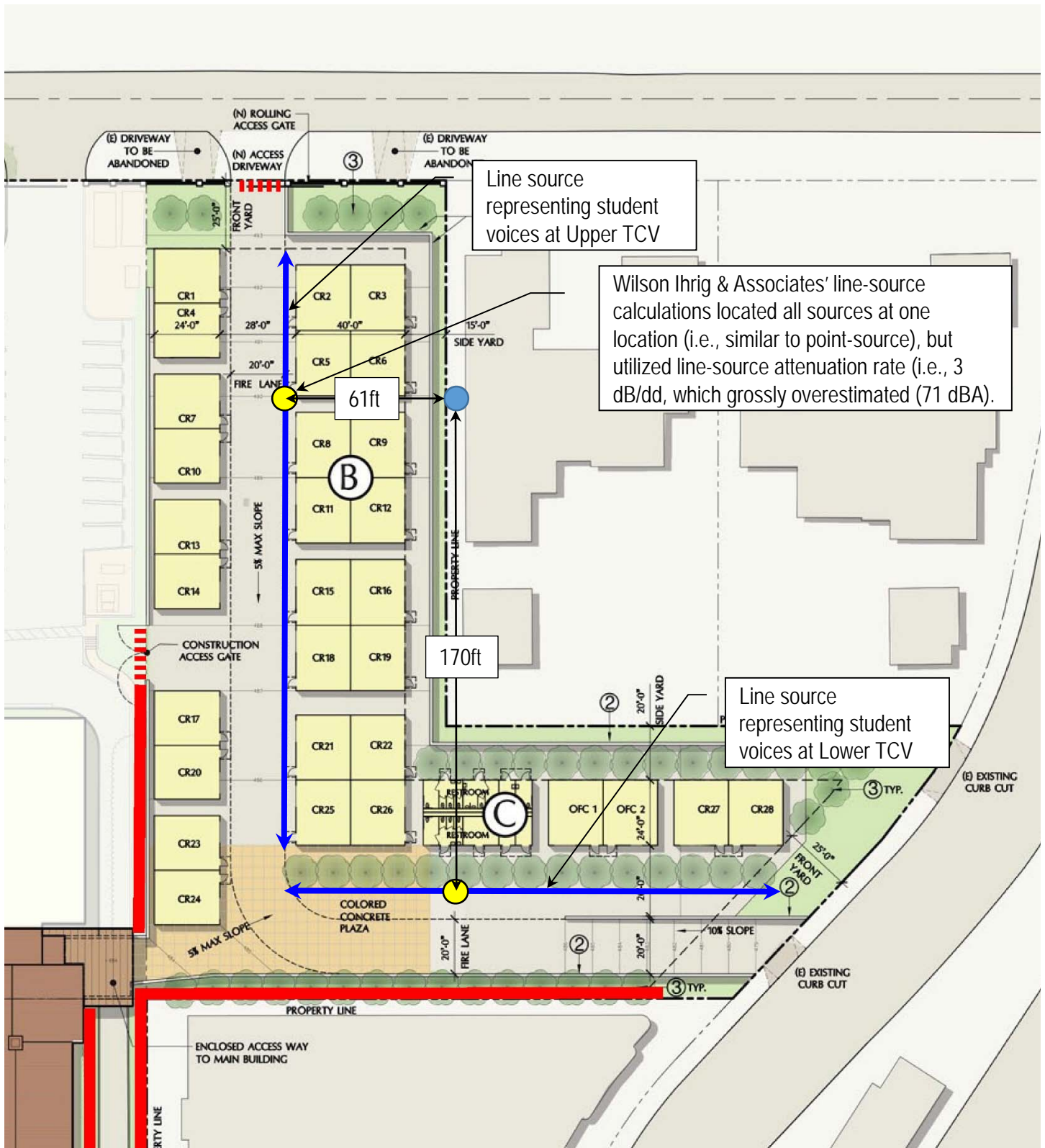
correct method for converting individual point sources to a line source. The proper way would be to calculate the total sound power level generated by the individual point sources and distributed out evenly along a defined length for the line-source. Therefore, the estimated noise level by Wilson Ihrig & Associates using the line-source method is grossly overestimated (based on the source level conversion).

The noise analysis for determining noise from the used of the Temporary Classroom Village provided in the Draft EIR is based on a standard point source wherein each individual voice is a point source. This methodology for calculating noise associated with voices as a point source and not as a line source or an “area source” is based on standard engineering and industry standards.

In addition to the line source analysis discussed above, Wilson Ihrig & Associates conducted an analysis of the potential noise impacts associated with the Temporary Classroom Village using standard acoustics methodologies for point sources, which would be applicable to individual voices. Based on that analysis, Wilson Ihrig & Associates determined that noise levels at Receptor LR06 (the nearest off-site sensitive receptor to the Temporary Classroom Village within the Chaparal Parcel and the Barrington Parcel) would also be below the 10 dBA significance threshold (consistent with the conclusion provided in Errata 2). However, it should be noted that based on a review of the calculations provided by Wilson Ihrig & Associates, these calculations do not take into account the additional sound attenuation provided by the perimeter wall and the Temporary Classroom Village buildings themselves (located along the eastern property line), which would serve to buffer noise generated from use of the Temporary Classroom Village.

Finally, Wilson Ihrig & Associates also suggested that the noise calculations for the Temporary Classroom Village were adjusted from a 10-minute Leq to an hourly Leq, or a negative adjustment of 7 to 8 dB (from 10-minute to hourly Leq). The noise analysis for use of the Temporary Classroom Village was not adjusted.

In summary, the conclusion with respect to noise impacts from use of the Temporary Classroom Village under a 3-year construction schedule, as provided in Errata 2, is based on the noise analysis (calculations) provided in the Draft EIR for the accelerated construction schedule, which analyzed the Temporary Classroom Village on Barrington Parcel and Chaparal Parcel. As concluded in the Draft EIR, impacts from use of the Temporary Classroom Village within the Chaparal Parcel and the Barrington Parcel would be less than significant. There is no new significant noise impacts associated with the operation of the Temporary Classroom Village as presented in Errata 2. Therefore, analysis of the Temporary Classroom Village was fully analyzed in the Draft EIR and recirculation of the Draft EIR as suggested by Strumwasser & Woocher LLP is not warranted.



	SPL (3.281ft)	Lw	Dist. (ft)	SPL at Rec.
Upper TCV	83	91	61	57 dBA
Lower TCV	80	88	170	45 dBA
			Total SPL	55 (using SoundPlan computer noise model)

TCV Noise Calculations Using a Line-Source Methodology
(calculations based on SoundPlan computer noise model)

Revised Appendix FEIR-B

Proposed Special Events



Appendix FEIR-B

Proposed Special Events

Special Events are defined as planned functions that involve students and/or guests on campus, but are distinguished from Instruction, Extracurricular Activities, Interscholastic Athletic Competitions, and Academic and Family Events. Special Events in all School Buildings and Courtyards shall be permitted Monday through Friday from 10:00 A.M. to 10:00 P.M., Saturdays from 9:00 A.M. to 10:00 P.M., and Sundays from 12:00 P.M. to 7:00 P.M. Six Special Events shall be permitted to conclude by 11:00 P.M. on Fridays. No more than 16 Special Events shall be permitted on Saturday. No more than four (4) Special Events shall be permitted on Sundays. Upper School Graduation shall be permitted on the athletic field from 10:00 A.M. to 4:00 P.M. on one Saturday per Academic Year.

The following table includes additional limitations on the proposed hours and days for the proposed Special Events within the permitted hours and days proposed for Special Events. For informational purposes only, the table includes illustrative examples of the proposed Special Events. The Special Events listed are illustrative of the types of Special Events that could occur; the specific Special Events may vary each Academic Year to address the instructional needs of existing and future programs provided by Archer. Categories of Special Events shall include Academic and Leadership Functions; Admissions Functions; Alumnae Functions; Dances and Socials; Graduation; Music Functions; Parents and Family Functions; Performances; Student Enrichment Functions; and Visual Arts Functions.

	Special Event Additional Limitations		Illustrative Example
	Size	Hours and Days	
1.	Special Event with up to 100 Guests	M–F: 10 A.M. to 2 P.M.	Women of Archer
2.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	Alumnae Parent Reception
3.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	Alumnae Social and Alumnae Gallery Opening
4.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	Middle School Parent Education Night
5.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	NOLS Education Night
6.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	8th Grade Parent Ed Night
7.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	9th Grade Parent Ed Night
8.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	10th Grade Parent Ed Night
9.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	11th Grade Parent Ed Night
10.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	Final Stretch Meeting for Senior Parents
11.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	Parent College Night
12.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	Parent College Night
13.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	Gallery
14.	Special Event with up to 100 Guests	M–F: 7 P.M. to 9 P.M.	Gallery
15.	Special Event with up to 100 Guests	Su: 5 P.M. to 7 P.M.	Maypole Event
16.	Special Event with up to 200 Guests	M–F: 7 P.M. to 9 P.M.	Gallery
17.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Dance Showcase
18.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Junior College Night
19.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Shakespeare on the Green
20.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Empty Bowls Dinner
21.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Dance Banquet
22.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Student Directed One-Acts
23.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Guest Artist Director / Archer Theater Company
24.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Guest Artist Director / Archer Theater Company
25.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Upper School Play
26.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Middle School Play
27.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Winter Concert
28.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Upper School Musical
29.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Middle School Musical
30.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Spring Concert
31.	Special Event with up to 200 Guests	M–F: 7 P.M. to 10 P.M.	Winter Concert
32.	Special Event with up to 200 Guests	M–F: 7 P.M. to 11 P.M.	Dances and Socials
33.	Special Event with up to 200 Guests	M–F: 7 P.M. to 11 P.M.	Dances and Socials
34.	Special Event with up to 200 Guests	M–F: 7 P.M. to 11 P.M.	Dances and Socials
35.	Special Event with up to 200 Guests	M–F: 7 P.M. to 11 P.M.	Dances and Socials

	Special Event Additional Limitations		Illustrative Example
	Size	Hours and Days	
36.	Special Event with up to 200 Guests	M–F: 7 P.M. to 11 P.M.	Dances and Socials
37.	Special Event with up to 200 Guests	M–F: 7 P.M. to 11 P.M.	Dances and Socials
38.	Special Event with up to 200 Guests	Sa: 12 P.M. to 5 P.M.	Admission Interview Day
39.	Special Event with up to 200 Guests	Sa: 2 P.M. to 6 P.M.	Upper School Musical
40.	Special Event with up to 200 Guests	Sa: 2 P.M. to 6 P.M.	Middle School Musical
41.	Special Event with up to 200 Guests	Sa: 2 P.M. to 6 P.M.	Upper School Play
42.	Special Event with up to 200 Guests	Sa: 2 P.M. to 6 P.M.	Middle School Play
43.	Special Event with up to 200 Guests	Sa: 2 P.M. to 6 P.M. or 6 P.M. to 10 P.M.	Spring Concert
44.	Special Event with up to 200 Guests	Sa: 6 P.M. to 10 P.M.	Upper School Play
45.	Special Event with up to 200 Guests	Sa: 6 P.M. to 10 P.M.	Middle School Play
46.	Special Event with up to 200 Guests	Sa: 6 P.M. to 10 P.M.	Upper School Musical
47.	Special Event with up to 200 Guests	Sa: 6 P.M. to 10 P.M.	Middle School Musical
48.	Special Event with up to 300 Guests	M–F: 10 A.M. to 2 pm	STEM Symposium
49.	Special Event with up to 300 Guests	M–F: 10 A.M. to 2 pm.	8th Grade Recognition Ceremony
50.	Special Event with up to 300 Guests	M–F: 7 P.M. to 10 P.M.	Parent Orientation
51.	Special Event with up to 300 Guests	M–F: 7 P.M. to 10 P.M.	Women in Film
52.	Special Event with up to 300 Guests	Sa: 9 A.M. to 2 P.M. (WITHIN 3 HOUR PERIOD)	Back to School Night
53.	Special Event with up to 300 Guests	Sa: 9 A.M. to 2 P.M. (WITHIN 3 HOUR PERIOD)	Back to School Night
54.	Special Event with up to 300 Guests	M–F: 7 P.M. to 9:30 P.M.	Upper School Sports Awards Night
55.	Special Event with up to 300 Guests	M–F: 7 P.M. to 10 P.M.	Dance Troupe
56.	Special Event with up to 300 Guests	M–F: 7 P.M. to 10 P.M.	Senior Dessert Night
57.	Special Event with up to 300 Guests	Sa: 8:30 A.M. to 3:30 P.M.	Digital Citizenship & Cybersafety Workshop
58.	Special Event with up to 300 Guests	Sa: 2 P.M. to 6 P.M.	Dance Troupe
59.	Special Event with up to 300 Guests	Sa: 6 P.M. to 10 P.M.	Dance Troupe
60.	Special Event with up to 500 Guests	M–F: 10 A.M. to 2 P.M.	Grandparents and Special Friends Day
61.	Special Event with up to 500 Guests	M–F: 7 P.M. to 10 P.M.	Parent Orientation
62.	Special Event with up to 500 Guests	Su: 12 P.M. to 5 P.M.	Admission Open House
63.	Special Event with up to 500 Guests	Su: 12 P.M. to 5 P.M.	Admission Open House
64.	Special Event with up to 500 Guests	Su: 12 P.M. to 5 P.M.	Admission Open House
65.	Special Event with up to 800 Guests	Sa: 10 A.M. to 4 P.M.	Upper School Graduation