

I. EXECUTIVE SUMMARY

INTRODUCTION

This Executive Summary provides an overview of the environmental analysis contained in this Environmental Impact Report, for use by decision makers and the public and to provide the information required per Section 15123 of California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*. Accordingly, this section includes a discussion of the environmental review process; a summary of impacts found not to be significant during the scoping process; an overview of EIR organization and the scope of analysis; a description of the Proposed Project, a list of requested actions by the City of Los Angeles; and a discussion of areas of known controversy and issues to be resolved. This is followed by a summary of the potential environmental impacts that could occur as a result of the Proposed Project, including impact significance determinations, mitigation measures, and the level of impact after mitigation. Finally, this section summarizes alternatives to the Proposed Project that are evaluated in Section VI, Alternatives, of the Draft EIR.

1.0 THE ENVIRONMENTAL REVIEW PROCESS

CEQA requires that an environmental review be conducted for activities and approvals that involve discretionary actions. CEQA applies to all California government agencies at all levels, including local agencies; regional agencies; and state agencies, boards and commissions. An Environmental Impact Report (EIR) is an informational document required by CEQA when substantial evidence exists that a project may have a significant physical environmental effect. The EIR is intended to provide information to decision makers, agency staff and the public about (1) the potential environmental impacts of a project, (2) ways in which the significant effects of a project might be minimized or avoided, and (3) alternatives to the project that could reduce or avoid the significant impacts associated with the project.

CEQA applies to projects for which a governmental agency can use its judgment or discretion in deciding whether to carry out or approve the project. The public agency that has the principal responsibility for carrying out or approving the project is termed the "Lead Agency." For the purpose of this EIR, the City of Los Angeles City Planning Department is the Lead Agency. This EIR will also be used by other agencies in their decision-making processes. Responsible Agencies include any public agencies, other than the Lead Agency, that have discretionary approval power over a project. Trustee Agencies are those state agencies that have jurisdiction by law over natural resources held in trust for the people of the State of California. Additionally, Reviewing Agencies includes those agencies that do not have discretionary power over the project but that are expected to review the EIR for adequacy and accuracy.

The initial steps of the environmental review process are to determine whether CEQA applies to a proposed action and whether an EIR is required. For the Proposed Project, the City Planning Department determined that CEQA did apply and, after review of the Proposed Project description, which indicated the possibility of significant environmental impacts, the preparation of an EIR was determined to be necessary.

As a first step of the EIR process, the Lead Agency distributes a Notice of Preparation (NOP). The NOP is intended to solicit input from responsible agencies and other interested parties. The City Planning Department circulated an NOP for the Proposed Project on May 23, 2008, beginning a 30-day review period. A Key Group Meeting and Scoping Meeting were held on June 11, 2008 on LMU's campus in Los Angeles. Written comments were received from agencies and from interested individuals and community groups in response to the NOP, Key Group Meeting, and Scoping Meeting. Copies of the Notice of Preparation, Initial Study, and public comments received during the Key Group Meeting and Scoping Meeting and on the NOP and Initial Study are provided in the Draft EIR in Appendix I.

Subsequent to the NOP review period, a Draft EIR was prepared. The Draft EIR was circulated for a 61-day public review period, which exceeded by 16 days the 45-day review period required by the *State CEQA Guidelines* Section 15087. The review period began on Thursday, January 14, 2010 and ended on Monday, March, 15, 2010. During this review period, the City Planning Department accepted comments from agencies and the public. After the close of the public review period, written responses have been prepared to all comments received on the Draft EIR. The comments and their respective responses are included in **Section II, List of Commenters and Responses to Comments**, of this Final EIR.

Several comment letters were received after the 61-day public review and comment period for the Draft EIR closed. CEQA only requires written responses to comments that are received during the public comment period for a Draft EIR. An agency may choose not to respond to any comment received after the close of the Draft EIR public comment period, and an EIR cannot be deemed inadequate for failure to respond to comments received after the close of the public comment period. Nevertheless, the City of Los Angeles accepted comment letters submitted after the close of the comment period and is providing responses within **Section II** of this Final EIR.

The Final EIR comprises comments and responses in **Section II; Section III, Corrections and Additions; Section IV, Preliminary Mitigation Monitoring and Reporting Program**; appendices to the Final EIR; and the text of the Draft EIR. The Final EIR will be presented to the decision makers and must be certified as adequate and complete before any discretionary actions may be taken to implement the Loyola Marymount University Master Plan Project.

2.0 DOCUMENT ORGANIZATION

This Final EIR is organized into the following sections.

I. Executive Summary presents an overview of the significant effects of the Proposed Project, proposed mitigation, and alternatives.

II. List of Commenters and Responses to Comments includes all written comments and responses to those comments received both during and after the 61-day public review period on the contents in the Draft EIR.

III. Corrections and Additions presents revisions, corrections, and/or additions to text included in the Draft EIR.

IV. Preliminary Mitigation Monitoring and Reporting Program contains a list of all mitigation measures with their associated responsible parties and phasing of implementation.

The Final EIR also includes the Draft EIR, which is incorporated by reference.

3.0 DISCRETIONARY ACTIONS REQUESTED AND PERMITS REQUIRED

The Los Angeles Department of City Planning is acting as Lead Agency as defined by CEQA for the environmental review of this Proposed Project. Approvals required for the Proposed Project would include, but may not be limited to, the following:

- General Plan Amendment – Pursuant to Los Angeles Municipal Code (LAMC) Section 11.5.6.A and Charter Section 555, General Plan Amendment to change the Westchester-Playa del Rey Community Plan (CPC-1998-0010CPU) designation for LMU from Low Residential Density to High Medium Residential Density.
- Zone Change – Pursuant to LAMC 12.32, Zone Change from [Q]R4-1 to R4-1 to replace existing, “Q” conditions through the establishment of the LMU Specific Plan.
- Specific Plan – Pursuant to LAMC Sections 11.5.7 and 12.32, establishment of a Specific Plan for LMU to establish development regulations for implementation of the Loyola Marymount University Master Plan.
- Development Agreement – Pursuant to California Government Code Section 65865, 20-year Development Agreement between LMU and the City of Los Angeles.
- Concurrent Consideration – Concurrent consideration of all entitlement requests pursuant to LAMC Section 12.36 and Charter Section 564, including General Plan Amendment, establishment of Specific Plan, Zone Change, and Development Agreement.

- Certification of an Environmental Impact Report.
- Demolition, grading, excavation, foundation, and associated building permits.
- Any additional actions deemed necessary.

4.0 PROPOSED PROJECT

4.1 Project Location and Surrounding Uses

The Loyola Marymount University (LMU) campus is located in the West Los Angeles community of Westchester, approximately 1.25 miles east of the Pacific Ocean and 1 mile north of Los Angeles International Airport (LAX). Westchester generally extends from the Pacific Ocean and the beachfront community of Playa del Rey east to the cities of Inglewood and Culver City, and from Ballona Creek on the north to the City of El Segundo and LAX on the south. Surrounding communities and municipalities include the unincorporated community of Marina del Rey and the City of Los Angeles communities of Del Rey and Venice to the north, the City of Culver City and the unincorporated community of Ladera Heights to the northeast, the City of Inglewood to the east, the City of El Segundo to the south, and the Pacific Ocean to the west. Other institutions of higher learning in the area include Otis College of Art and Design near the intersection of Lincoln Boulevard and Manchester; the Graduate School of Pepperdine University in northeast Westchester; and Intercontinental College in northern Westchester.

Regional access to Westchester and LMU is provided by the San Diego Freeway (I-405), the Marina Freeway/Expressway (State Highway 90), and Lincoln Boulevard (State Highway 1).¹ The San Diego Freeway/Marina Freeway interchange is approximately 2 miles northeast of the campus.

The campus occupies approximately 142 acres atop the Westchester Bluffs, part of a range of cliffs called the Ballona Escarpment that extends from the coast eastward approximately 3.5 miles to the intersection of Centinela and Sepulveda Boulevards. The bluffs, which rise approximately 120 feet above sea level in the vicinity of the campus, form the northern campus boundary. Teale Street and Playa Vista, less than 10 feet above sea level, lie at the foot of the bluffs; Playa Vista is a mixed-use multi-family residential and community commercial development. Light industry and office uses are located north of Playa Vista, across Jefferson Boulevard. The campus is generally bordered on the east by McConnell Avenue, on the west by Lincoln Boulevard, and on the south by W. 78th and W. 80th Streets. The campus is suburban in nature and surrounded by low-density, single-family residential neighborhoods to the east, west, and south.

¹ *City of Los Angeles General Plan, "Westchester-Playa del Rey Community Plan," Generalized Circulation Map. 2004.*

4.2 Project Characteristics

Through the Proposed Project, LMU seeks to improve its facilities to accommodate the evolving needs of LMU's academic, administrative, and student-support programs, to enhance the educational experience for students, and to improve facilities and programs for students, faculty, and staff, all within the existing enrollment limits currently in place for LMU. As part of a comprehensive planning process initiated in 2005, LMU reviewed its existing campus building stock and identified approximately 28 percent of campus buildings as needing replacement because they are functionally obsolete. LMU also reviewed its academic and administrative divisions and identified space demands over the next 20 years. Based on these reviews, the Proposed Project is meant to guide future campus improvements over the next 20 years.

The Proposed Project proposes the development of approximately 508,000 net new gross square feet (gsf) of academic, administrative, and student support facilities, approximately 476,000 net new gsf of student residential facilities, approximately 28,000 net new gsf of indoor athletic facilities, and approximately 4.8 net new acres of outdoor athletic facilities. New buildings proposed under the Proposed Project are intended to be similar in massing to the existing buildings to remain, with attention to the spatial enclosure of forecourts, courtyards and other usable outdoor spaces, pedestrian permeability, and pedestrian connectivity. As such, the Proposed Project also would reconfigure inadequate campus athletic facilities and open space areas, roadways, parking facilities, and pedestrian circulation accommodations, and would implement infrastructure upgrades as needed.

Currently, LMU's enrollment cap, as approved by the City in 2000 with a conditional use permit, is 7,800 full-time equivalent (FTE) students.² In Fall 2008, LMU's actual enrollment was 6,868 FTE students. Notwithstanding the higher enrollment permitted by the City approvals, all analysis in the EIR is based on the actual FTE enrollment as of Fall 2008 and assesses the impacts of increasing the actual enrollment to 7,800 FTE students, in addition to evaluating the impacts associated with upgrading, renovating, and replacing a substantial portion of the existing campus facilities.

To implement the Proposed Project, LMU is requesting the establishment of the LMU Specific Plan, which would unify Burns, Leavey, and Hughes Campuses under one set of land use regulations. The

² FTE is a unit of measurement used to calculate enrollment for academic and master planning purposes, as opposed to student headcount. One undergraduate FTE student is defined as one undergraduate student taking 12 course units, which represents a full course load. Students taking fewer course units are considered to constitute a fraction of an FTE student, whereas students taking more than 12 units constitute more than one FTE student. One graduate FTE student is defined as one graduate student taking 9 course units, which represents a full course load. Graduate students taking fewer course units are considered to constitute a fraction of an FTE student, whereas students taking more than 9 units constitute more than one FTE student.

Proposed Specific Plan would establish Planning Areas generally defining the future locations on campus of future academic/administrative, residential, and athletic facilities as well as open space. The Specific Plan provides guidelines for future development on campus. Although at this time LMU does have ideas regarding the types of buildings that may be constructed on campus in the future, ultimately the Specific Plan provides the university with flexibility regarding these decisions. Proposed facilities and other characteristics of the Proposed Project are discussed below.

4.2.1 Academic and Administrative Facilities and Associated Support Facilities

Academic and administrative facilities on LMU's campus currently total approximately 1,651,000 million gsf, and include classrooms, seminar rooms, laboratories, offices, libraries, and similar uses. The majority of these buildings are housed on Burns Campus flanking the Alumni Mall. Additionally, University Hall houses the Bellarmine College of Liberal Arts, College of Business Administration, Seaver College of Science and Engineering, School of Education, and administrative offices. Facilities Management, Transportation, Public Safety, and other physical plant facilities are located along the eastern edge of Burns Campus.

The Proposed Project would retain approximately 1,136,000 gross square feet (gsf) of existing academic and administrative facilities, demolish the remainder, and build approximately 1,023,000 gsf, for a total academic and administrative square footage on campus of approximately 2,159,000 gsf (a net increase of approximately 508,000 gsf).

Academic and administrative facilities to be retained without substantial modification include University Hall, Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel. LMU also proposes a new, approximately 1,500-seat conference center, and an outdoor columbarium containing approximately 2,000 niches, which would be a place for the respectful storage of cinerary urns.

LMU is in the process of developing conceptual plans to relocate the campus' recycling and waste management area, which is currently located along the eastern boundary of Burns Campus, to within the lower subterranean level of the existing Drollinger Parking Plaza on Leavey Campus. LMU intends to relocate the recycling area to this location if the Master Plan is approved by the City Council; however if it becomes infeasible to relocate the recycling area to this location, it will be relocated to an alternate location.

4.2.2 Student Residential and Residential Support Facilities

Undergraduate student housing is currently concentrated in two areas on campus: Leavey Campus and the northeastern portion of Burns Campus. Approximately 3,218 undergraduate students, or 60 percent

of LMU's undergraduate student enrollment, are housed on campus in approximately 16 residential buildings totaling approximately 942,000 gsf. Approximately 43 faculty/staff also live on campus.

Among the Key Project Objectives guiding the Proposed Project, LMU seeks to ensure the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved housing opportunities on campus. In turn, this Objective is part of LMU's intention to create an updated cohesive campus community and environment that allows it to more fully implement its core mission. Accordingly, LMU has developed six Key Residential Objectives focused on improving the amount and quality of residential housing on campus for students. The proposed increase in housing is also critical to LMU's ability to fulfill the Key Sustainability Objectives, as housing plays an important role in reducing Proposed Project-related trip generation and associated vehicular emissions.

For these reasons, LMU proposes to house a greater percentage of LMU undergraduate students on campus than at present, from approximately 60 percent to approximately 75 percent. The Proposed Project would retain approximately 572,000 gsf of existing student residential facilities, demolish the remainder, and build approximately 846,000 gsf, for a total of approximately 1,418,000 gsf of student residential housing (a net increase of approximately 476,000 gsf). This would result in an increase of approximately 989 beds on campus, from approximately 3,261 beds to approximately 4,250 beds, approximately 50 of which would be used by faculty/staff and visitors.

Although ultimately the Specific Plan provides flexibility for the university to develop the campus over the next 20 years, due to the age and design of the current residential buildings, except for the recently built Del Rey North and South freshman residences, housing on Burns Campus would likely be replaced under the Proposed Project. Leavey Campus housing and existing Jesuit Community housing is expected to be retained.

4.2.3 Athletic Facilities

Existing indoor athletic facilities total approximately 185,000 gsf, primarily contained within Gersten Pavilion and Burns Recreational Center. Existing outdoor athletic facilities total approximately 15.2 acres. Varsity outdoor athletic facilities are concentrated in the southeastern portion of Burns Campus and include the George C. Page Baseball Stadium, Sullivan Field, Smith Softball Field, Higgins Golf Center, the LMU Tennis Center, and the University Pool.

The Proposed Project proposes a number of potential enhancements to LMU's existing athletic facilities. In response to comments, proposed seating has been reduced from that identified in the Draft EIR. Proposed improvements to the existing Page Stadium may include replacement of the existing 600 seats

and addition of approximately 900 seats (reduced from 1,400 seats), for a total of approximately 1,500 seats (reduced from 2,000 seats); a new team clubhouse; new press box; increased size of concessions; and permanent nighttime illumination capability. The existing Sullivan Field may be retained as the primary varsity field for soccer and enhanced to meet LMU and spectator demand with an increase of approximately 860 seats (reduced from 1,360 seats), for a total of approximately 2,000 seats (reduced from 2,500 seats); a changing room; restrooms; concession facilities; an audio system; and permanent nighttime illumination capability. The existing Smith Field may be retained as a softball field with additional seating for approximately 200 spectators (reduced from 500) for a total of approximately 400 seats (reduced from 700); a press box, and appropriate nighttime illumination; the adjacent existing Higgins Golf Center may also be illuminated. Improvements proposed for the existing University Pool include nighttime illumination, additional locker rooms, a team meeting room, and additional office space for coaches. The existing Leavey Field may be retained and enhanced with appropriate nighttime illumination.

Proposed new outdoor athletic facilities include a new full-sized intramural soccer field and additional intramural field; intramural tennis courts; and a new diving well near the existing swimming pool.

The Proposed Project proposes a new enclosed Sports Pavilion in the southern portion of Burns Campus to replace Gersten Pavilion. The Sports Pavilion may be approximately 108,000 square feet with approximately 6,000 seats, and would provide new locker rooms, faculty offices, Athletics Program coaching, training and administrative staff offices, strength training space, and physical education teaching stations.

Proposed Project implementation would add approximately 4.8 net new acres of outdoor athletic facilities for a total of approximately 20 acres at buildout, and would construct approximately 28,000 net new square feet of indoor athletic facilities for a total of approximately 213,000 gsf at buildout.

4.2.4 Open Space

LMU's campus contains more than 25 acres of landscaped open space in addition to outdoor athletic facilities. Campus open space includes an approximately 10-acre area of the Westchester Bluffs, which forms the northern edge of the campus, and approximately 15 acres of open space within the Sunken Garden, Regent's Terrace, Alumni Mall, and Palm Walk. The Proposed Project would reconfigure and enhance existing campus open space through the careful placement of new buildings, with attention to the spatial enclosure of quadrangles and small lawns as unifying elements. Proposed Project implementation would increase open space on campus overall by approximately 5.0 acres, for a total of 30 acres.

4.2.5 Pedestrian and Vehicular Circulation

Although a network of pedestrian pathways exists on LMU's campus, only Burns Campus was specifically designed to accommodate pedestrians. However, increases in vehicular traffic on campus and accommodations made for traffic over the years have compromised the pedestrian circulation system on campus and effectively isolated portions of the campus from each another. The Proposed Project would reestablish a pedestrian orientation on the campus through enhancement and expansion of the existing pedestrian network, including a primary pedestrian route via LMU Drive through the core of campus, a secondary southern route connecting University Hall more directly to Burns Campus, and a network of tertiary routes connecting individual facilities on campus.

The Proposed Project does not propose major changes with respect to the existing points of campus entry or the vehicular network on campus. LMU Drive would remain the primary vehicular entrance to campus, and Loyola Boulevard and Ignatian Circle would be a secondary route. Proposed Project objectives for vehicular circulation include continuing to emphasize the campus entrance at LMU Drive and Lincoln Boulevard; clarification of the vehicular circulation routes between the campus academic core, William H. Hannon Library, and University Hall; traffic calming on LMU Drive and Ignatian Circle; strategic relocation of parking closer to the academic, residential, and athletic areas of campus; and the reduction of automobile-pedestrian interaction.

The Proposed Project also proposes designated bicycle lanes on all primary, secondary, and tertiary campus roads and bicycle parking racks at all new buildings.

4.2.6 Parking

LMU is currently required by the City of Los Angeles to provide 3,807 parking spaces on its approximately 142-acre campus for the previously approved 7,800 FTE students enrollment cap.³ The actual campus parking supply is approximately 4,100 parking spaces contained in 15 facilities, including structured parking in Drollinger Parking Plaza and University Hall, which each contain approximately 25 percent of campus parking; Del Rey Founders Pavilion; surface lots; and on-campus street parking.

The Proposed Project would increase the overall LMU campus parking supply by 609 spaces to approximately 4,742 spaces. Accordingly, the Proposed Project proposes the phased replacement of the existing remote parking lots with above-grade parking structures in the southern portion of campus.

³ LMU's required parking supply is defined by the City in two conditional use permits: ZA 2000-0712-CU-ZV requires 1,084 spaces for University Hall on Hughes Campus, and ZA-97-0645-ZV requires 2,723 spaces for Burns and Leavey Campuses.

Structured and surface parking is proposed in the areas designated in the proposed Specific Plan for Athletic uses.

4.2.7 Height Areas

A number of height restrictions currently apply to development on Leavey and Hughes Campuses. Development on Leavey Campus is limited by CPC 92-0088 to 75 feet in height above finished grade. With the approval of the 2001 Conditional Use Permit for the Hughes Campus, residential buildings on the Leavey Campus were further limited to 55 feet in height while non-residential buildings were still permitted to be up to 75 feet in height. Development on Hughes Campus, acquired in 2000, is limited by Ordinance 175,981 to a height of 139 feet above mean sea level. No building height limits are imposed on Burns Campus.

The Proposed Project as proposed and analyzed in the Draft EIR imposed height controls at least as strict as those permitted under current zoning by establishing three Height Areas on LMU's campus. Height Area 1, which governs Hughes Campus, had a height limit of 139 feet above mean sea level. Height Area 2, which in the Draft EIR regulated only Leavey Campus, had a height limit of 75 feet above finished grade. Height Area 3, which in the Draft EIR regulated Burns Campus, defined graduated height limits on Burns Campus through a series of setbacks from the campus boundaries along McConnell Avenue, W. 80th Street, and Fordham Road. No new buildings are proposed within 40 feet of the campus's southern or eastern boundaries. The Draft EIR concluded in Section IV.A.1, Aesthetics and Views, that the Proposed Project would result in less than significant impacts.

In response to comments, LMU has agreed to further restrict the maximum heights proposed for both the Leavey and Burns Campuses. No changes are proposed for Height Area 1 and no new buildings or structures are proposed within 40 feet of the campus boundaries.

The revised height limits proposed would redefine Height Area 2 to include those portions of the Leavey and Burns Campuses in the core of campus, farthest from adjacent residential neighborhoods. The redefined Height Area 2 would maintain the proposed height limit of 75 feet from grade, which would be a restriction compared to the unlimited height limits currently established for the Burns Campus.

The revised Height Area 3 includes the southern portion of the Leavey and Burns Campuses, and the eastern portion of the Burns Campus, which are closest to adjacent residential uses. The height limits for these portions of the campus would be lower as compared to those described in the Draft EIR. No buildings or structures would be permitted between 0 feet and 40 feet of the Burns Campus boundary, consistent with the proposal described in the Draft EIR; however, LMU has agreed to extend the 25-foot height limit for new buildings to between 40 feet and 99.9 feet of the Burns Campus property line, instead

of between 40 feet and 74.9 feet of the property line. This would effectively push new buildings taller than 25 feet above grade an additional 25 feet farther from adjacent residences. New buildings would be limited to 37.5 feet above grade between 100 feet and 149.9 feet of the Burns Campus property line, consistent with the Draft EIR. Between 150 feet of the Burns Campus property line and the core of the campus (Height Area 3), new buildings would be capped at 55 feet above grade, a reduction of 20 feet as compared to the heights analyzed in the Draft EIR.

Figure II-8, Proposed Height Areas, illustrates the proposed height limitations and **Figure II-9, Proposed Campus Building Setbacks**, illustrates the 40-foot setback along the campus's boundaries. The height restrictions for Height Area 3 are provided in **Table II-2, Proposed Height Restrictions for Height Area 3 within the Burns Campus** provided in **Section III, Corrections and Additions**. Additional information is provided in **Topical Response No. 5, Building Heights, Building Setbacks, and Views Topical Response**, in **Section II, List of Commenters and Responses to Comments**, in this **Final EIR**. The new height limits are included in the revised LMU Specific Plan attached as **Appendix F-II** to this **Final EIR**.

4.2.8 Green Building Design

All new construction in the State of California is subject to the Building Energy Efficiency standards set forth in Title 24 of the California Code of Regulations. Buildings constructed on campus under the Proposed Project would meet Title 24 standards and comply with the City's Green Building Program Ordinance, adopted in April 2008. New buildings would also be designed to the 2008 Leadership in Energy and Environmental Design (LEED) Certified Criteria (or equivalent criteria) or better. In addition to green building design, LMU would incorporate drought-tolerant landscape materials and water conservation features into future landscape improvements. These project features are discussed in detail in the Draft EIR in Section IV.L.1, Water Supply, and Section IV.L.4, Energy.

4.3 Project Phasing

LMU expects to replace facilities on campus in a manner that takes into consideration academic program and student needs. Accordingly, the Proposed Project would be implemented in four major phases, each approximately five years in duration, beginning in 2010. A maximum of up to approximately 600,000 gsf would be constructed in the first phase of implementation; up to approximately 500,000 gsf in each of the second and third phases, and the remainder, up to approximately 400,000 gsf, in the fourth and final phase. Phasing of demolition would be roughly proportional to the construction phases. Specific facilities to be built have not been defined, since Proposed Project implementation is intended to be sufficiently flexible to meet LMU's evolving needs and would be dependent on available funding.

5.0 PROJECT OBJECTIVES

Through the Proposed Project, LMU seeks to improve its facilities to accommodate the evolving needs of LMU's academic, administrative, and student-support programs, to enhance the educational experience for students, and to improve facilities and programs for students, faculty, and staff, all within the existing enrollment limits currently in place for LMU. As part of a comprehensive planning process initiated in 2005, LMU reviewed its existing campus building stock and identified approximately 28 percent of campus buildings as needing replacement because they are functionally obsolete. LMU also reviewed its academic and administrative divisions and identified space demands over the next 20 years. Based on these reviews, the Proposed Project is meant to guide future campus improvements over the next 20 years.

The objectives of the Proposed Project are listed below.

5.1 Key University Objectives

- U-1. Implement LMU's three-fold mission: (1) the encouragement of learning, (2) the education of the whole person, and (3) the service of faith and promotion of justice, by creating an updated cohesive campus community and environment with a critical mass of approximately 7,800 full-time equivalent (FTE) students.
- U-2. Attain certainty regarding future development on campus by gaining entitlements that allow for measured, well-managed, and sustainable growth over the next 20 years (growth that will further the pursuit of LMU's mission and promote LMU's key university, academic, residential, and sustainability objectives) to facilitate the establishment a long-term financial plan for the development of the campus, including fundraising from philanthropic sources, grants, and long-term capital dedication.
- U-3. Ensure the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved housing opportunities on campus, including themed housing.

5.2 Key Academic Objectives

- A-1. Replace academic, administrative, and athletic spaces and buildings that are functionally obsolete to create a functionally cohesive environment on campus.
- A-2. Build sufficient state-of-the-art facilities to house future academic, research, and residential uses on campus, to aid in the recruitment and retention of top students, the recruitment of faculty and conversion from part-time to full-time status, and the creation of the best possible academic community and student social living and learning environment.

5.3 Key Residential Objectives

- R-1. Contribute to alleviation of the regional housing shortage through the creation of new student on-campus housing.
- R-2. Increase the percentage of undergraduate FTE students that can be housed on campus from approximately 60 percent to approximately 75 percent through the provision of additional campus housing options.
- R-3. Enhance campus student life, improve educational environment, and aid in student recruitment by raising the standard of campus housing through increased unit size and improved amenities.
- R-4. Foster community and a communal educational environment on campus among the student body by increasing the number of undergraduate FTE students living on campus and by replacing outdated student housing units with updated social-living units that allow for more communal living and educational exchange.
- R-5. Replace aging student residential rooms and apartments with modern residential accommodations on campus to improve the educational environment on campus and aid in student recruitment.
- R-6. Address existing community concerns regarding students living off-campus by moving more undergraduate residential students onto campus.

5.4 Key Sustainability Objectives

- S-1. Create a sustainable campus environment by incorporating green building and landscaping practices, reducing the production of GHG emissions and solid waste, and reducing consumption of water, electricity, natural gas, and energy.
- S-2. Move more undergraduate students into campus housing (increasing the percentage of undergraduate residential students from approximately 60 percent of FTE students to approximately 75 percent) to reduce traffic trips and vehicle miles traveled to and from the LMU campus.

5.5 Planning and Design Objectives

- PD-1. Achieve physical improvements in the spatial structure of the campus, and improve pedestrian connections within the campus, to achieve greater integration of academic, administrative, athletic, and residential divisions.
- PD-2. Improve land use compatibility on campus and between the campus and neighboring properties.

5.6 Pedestrian and Vehicular Circulation Objectives

- C-1. Minimize LMU-related traffic trips to campus, and within campus, through measures that include housing approximately 75 percent of undergraduate FTE students on campus.

5.7 Athletic and Open Space Objectives

AOS-1. Provide sufficient and appropriate open space and athletic facilities to meet demand for instructional athletics, intramural and intercollegiate athletics, and informal recreation by students, faculty, and staff, by expanding, increasing access to, and appropriately illuminating LMU's athletic facilities for use during daytime and nighttime hours.

6.0 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Comments received from the public, agencies and interested parties on the circulated NOP and Initial Study, the Draft EIR and at the public Scoping Meeting highlighted environmental issues of concern regarding the Proposed Project. Review of comments received during the 30-day comment period for the NOP and 61-day comment period for the Draft EIR indicated areas of controversy, including aesthetics and visual resources (i.e., building heights, setbacks and compatibility, shadow impacts, obstruction of existing views, building design, light and glare); air quality; global climate change; biological resources; cultural resources; water resources; land use and planning; noise; public services (police, fire, and recreation); traffic, parking and circulation; and utilities (water, wastewater, solid waste, and energy). All of the areas of controversy are addressed in the EIR.

7.0 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table I-1, Summary of Project Impacts, provides an overview of potential environmental impacts associated with the Proposed Project. A summary of the potential environmental impacts for each topical area follows.

**Table I-1
Summary of Project Impacts**

Environmental Issue Area	Less Than Significant Impact	Less Than Significant Impact with Mitigation	Significant and Unavoidable Impact
A. AESTHETICS AND VISUAL RESOURCES			
Aesthetics & Views			
Aesthetic Character – Construction		X	
Aesthetic Character – Operation	X		
Obstruction of Views	X		
Shading			
Shading	X		
Light & Glare			
Construction Lighting		X	
Operational Lighting		X	
Construction Glare	X		
Operational Glare		X	
B. AIR QUALITY			
Air Quality			
Construction Emissions	X		
Construction – Localized Significance Thresholds			X
Operational Emissions	X		
Global Climate Change			
Global Climate Change – Construction	X		
Global Climate Change – Operation	X		
C. BIOLOGICAL RESOURCES			
Biological Resources		X	
D. CULTURAL RESOURCES			
Paleontological Resources		X	
Archaeological Resources		X	X (cumulative impacts)
Historical Resources		X	
E. GEOLOGY			
Geologic Hazards		X	
F. HAZARDS			
Hazards and Hazardous Materials – Construction		X	
Hazards and Hazardous Materials – Operation	X		

Environmental Issue Area	Less Than Significant Impact	Less Than Significant Impact with Mitigation	Significant and Unavoidable Impact
G. SURFACE WATER HYDROLOGY AND WATER QUALITY			
Surface Water Hydrology & Drainage – Construction		X	
Surface Water Hydrology & Drainage – Operation		X	
Surface Water Quality – Construction		X	
Surface Water Quality – Operation		X	
H. LAND USE			
Land Use Consistency	X		
I. NOISE			
Construction			X
Operation		X	
J. PUBLIC SERVICES			
Police Protection – Construction		X	
Police Protection – Operation		X	
Fire Protection and EMS – Construction	X		
Fire Protection and EMS – Operation	X		
Recreation and Parks	X		
K. TRANSPORTATION			
Access & Circulation – Construction		X	
Access & Circulation – Operation		X	
Parking – Construction		X	
Parking – Operation		X	
L. PUBLIC UTILITIES			
Water Supplies			
Water Supplies	X		
Wastewater			
Wastewater		X	
Solid Waste			
Solid Waste – Construction	X		
Solid Waste – Operation			X (project level and cumulative impacts)
Energy			
Electricity		X	
Natural Gas		X	

7.1 Aesthetics and Visual Resources

7.1.1 Aesthetics and Views

Project Impacts

Construction Impacts

Construction of the components of the Proposed Project would periodically subject the campus and neighboring land uses to the presence of construction equipment, incomplete structures, stockpiled cut soil material, and areas in landscaping transition. Accordingly, construction would alter the aesthetic conditions of the campus. Construction activity occurring on the perimeter of Burns Campus would be intermittently visible from W. 78th Street, Fordham Road, W. 80th Street and McConnell Avenue, but would generally not be visible from other, more distant vantage points. However, as described in mitigation measure **MM-AES-1**, views of construction activity occurring within the campus interior would be screened from neighboring land uses by the proposed placement of fencing and screening along construction edges. These impacts would occur over a 20-year period and would be temporary. Since construction activity would not be substantially visible from off-site vantage points, aesthetic impacts during Project construction would be considered less than significant with the implementation of mitigation measure **MM-AES-1**.

Operational Impacts

Visual Character

The Proposed Project would not alter, degrade, or remove any of the features that define the visual character of the campus. Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel and the associated Chapel Tower, which are the campus's oldest buildings and thus heritage features that exhibit valued architectural qualities, would be retained. The buildings proposed for removal do not possess unique architectural qualities and are not considered important examples of the work of their respective architects, nor are they otherwise highly valued contributors to the visual character of the campus. Therefore, removal of these buildings would not have a significant adverse impact on the valued visual quality of the campus.

Certain mature trees on campus may be removed to accommodate the construction of new buildings. However, all landscaping plans would be required to comply with the City of Los Angeles Tree Ordinance (Ordinance Number 177404), which protects certain Southern California native tree species measuring 4 inches or more in cumulative diameter at a height of 4.5 feet above ground level. Future

landscaping plans would consider the aesthetic and biological value of protected trees and other individual mature trees and preserve those determined to be important, or, if necessary, implement mitigation pursuant to the Tree Ordinance.

The Westchester Bluffs and the Ballona Wetland are the closest natural open space areas to the Proposed Project site, and they would not be altered or disturbed as a part of the Proposed Project.

Other existing features that contribute to the valued visual character of the LMU campus, such as the fountain at the LMU Drive entrance, the axial/cross-axial alignment on Burns Campus, the abundance of open space, its modest suburban scale, and its historically pedestrian accommodations, would also be maintained or enhanced through implementation of the Specific Plan's proposed Height Areas, design standards, and open space improvements. Furthermore, by retaining the axial alignment and open space between buildings, the Proposed Project also would maintain view corridors through campus. The eucalyptus grove flanking the chapel is proposed to remain, as is the LMU logo on the bluffs.

Therefore, the Proposed Project would not alter, damage, or remove any features that substantially contribute to the valued visual character of the LMU campus. Impacts would be less than significant.

Visual Contrast

The Proposed Project is designed to minimize contrast with the existing visual character of the campus and surrounding area by maintaining the small, suburban scale of the campus, implementing a unified architectural setting, and ensuring adequate open space and landscaping. The reconfiguration and improvements proposed by the Proposed Project, with attention to building configuration, height, architecture, and open space distribution, are anticipated to ensure that Proposed Project features are consistent with and enhance those existing features contribute to the valued aesthetic image of the campus. Proposed Project implementation is also anticipated to systematically improve existing campus features such as the entry sequence and perimeter landscaping that contributes to the existing aesthetic image of the surrounding community by enhancing the public face of the campus. In response to comments, LMU has agreed to additional limitations on uses within the 40-foot setback areas along the campus boundaries and to increased landscaped buffers on the Burns Campus property lines. Proposed Project impacts on the visual character and the aesthetic style or image of the campus and surrounding community are anticipated to be generally beneficial and would be less than significant.

Regulatory Compliance

The Proposed Project would comply with applicable sections of the Los Angeles Municipal Code regulating aesthetics and visual quality. All landscaping plans are required to comply with the City of

Los Angeles Tree Ordinance (Ordinance Number 177404). The Proposed Project would comply with the City of Los Angeles Landscape Ordinance (Ordinance No. 170,978) by promoting more sustainable landscape management principles through ongoing use of recycled water for irrigation, installation of diverse canopy tree planting, and the selection of more drought tolerant vegetation on campus. The Proposed Project is designed to be consistent with the applicable aesthetics regulations of the Westchester-Playa Del Rey Community Plan. A Zone Change is requested as part of the Proposed Project to change the campus designation from [Q]R4-1 to R4-1 and establish the proposed LMU Specific Plan. Additionally, the land use designation for the campus would be changed from "L" Low Density Residential to "HM" High-Medium Density Residential for consistency with the campus's existing density. Since the Proposed Project would comply with the above policies of the Los Angeles Municipal Code and Westchester-Playa del Rey Community Plan, impacts related to compliance with applicable guidelines and regulations applicable to aesthetics would be less than significant.

Views from Long-Range Public Vantage Points

Views of the northern edge of campus atop the Westchester Bluffs are available from multiple public vantage points to the north and northwest. The Proposed Project would not substantially modify views of the campus from these off-site vantage points. Long-range views of the campus are not available from public vantage points to the east or south due to the intervening housing and the lack of elevated topography facilitating discernable views of the campus. The northern perimeter of the campus atop the Westchester Bluffs is intermittently visible from Culver Boulevard, which is approximately 0.34 mile to the north and designated as a scenic highway by the Westchester-Playa del Rey Community Plan, from the bicycle lane that runs along Culver Boulevard, which is designated as a Class I bikeway by the Transportation Element, and from the bike path along Ballona Creek. Implementation of the Proposed Project would not affect long-range views from Culver Boulevard or the Ballona Creek bike path. No equestrian or hiking trails exist in the immediate vicinity of the Proposed Project site. Thus, impacts to views from long-range public vantage points would be less than significant.

Views from Short-Range Public Vantage Points

Short-range views of the campus entrance are available from the intersection of Lincoln Boulevard and LMU Drive and from the West Bluffs development. Any additional construction in the place of or near University Hall might alter its appearance, but would not interfere with valued views. Therefore, views of features at the campus entrance from Lincoln Boulevard and West Bluffs would be retained. Generally, the west- and north-facing views from Altavan Avenue, W. 78th Street and the Campion Drive cul-de-sac would not be altered since the existing height restriction of 139 feet above mean sea level on Hughes Campus would remain in place. Because of the height limits defined in the proposed LMU Specific Plan,

the roofline of the conference center proposed on Hughes Campus would be lower than the elevation of residences along Altavan Avenue, W. 78th Street, and Campion Drive. Therefore, construction on Hughes Campus would not alter views from these vantage points.

W. 78th Street, Fordham Road, W. 80th Street, and McConnell Avenue have northeast-, east-, north-, and west-facing views, respectively, of Burns Campus, where the majority of improvements would occur. These roadways would continue to have views of the campus perimeter, which may be enhanced by landscaping and fencing. Existing views of valued view resources on- or off-campus are very limited from Fordham Road, W. 80th Street, and McConnell Avenue; therefore, the Proposed Project would not substantially increase view obstruction or otherwise degrade existing long-range views. The revised Specific Plan's proposed Height Areas ensures that taller buildings are set back from these boundaries, prohibits crowding of buildings near the Burns Campus edge, and contributes open airspace to the foreground of residential viewsheds. Therefore, impacts to views from these roadways would be less than significant.

Project Design Features and Mitigation Measures

- PDF-AES-1 The Proposed Project shall site buildings in compliance with the requirements of the proposed LMU Specific Plan, to retain the distinctive axial and cross-axial alignment of the Alumni Mall and Sunken Garden.
- PDF-AES-2 The Proposed Project shall comply with the height and setback restrictions established by the proposed LMU Specific Plan.
- PDF-AES-3 The LMU campus shall provide, at a minimum, the acreage of open space and outdoor athletic facilities required by the proposed LMU Specific Plan.

The following mitigation measure would reduce construction impacts on views.

- MM-AES-1 The Project applicant shall implement screening measures, which may include, but are not limited to, temporary visual barriers such as fencing around construction areas in order to limit views of the construction site(s).

Level of Impact After Mitigation

All project-specific impacts would be less than significant; therefore, no unavoidable significant aesthetics or views impacts would result from Proposed Project implementation.

Cumulative Impacts

The majority of related projects are outside the Proposed Project's visual setting. No projects are proposed within the residential neighborhood immediately surrounding the LMU campus, and related projects are too distant to contribute to a cumulative loss of views. Three related projects, Playa Vista Phases I and II and the Playa Vista Plant Site, are located at the base of the Westchester Bluffs and therefore are visually connected to the campus. Buildout of Playa Vista would alter the valued visual appearance of the bluff base and obstruct views of the bluffs from Jefferson Boulevard. However, the Proposed Project would not contribute to this change in visual setting, or the loss of views of the bluffs. Therefore, the Proposed Project would not contribute to a cumulatively significant aesthetic or view impact.

7.1.2 Shade and Shadow

Project Impacts

Certain segments of the surrounding residential neighborhood that are currently unshaded by campus structures would remain unshaded despite proximity to the campus. Since the sun travels from east to west, shadows from campus structures are not projected directly to the south. Therefore, the single-family residences along W. 80th Street directly south of Burns Campus would not be shaded by the improvements in the southern portion of campus. Residences to the east of University Hall would not be shaded by any new structures since the Specific Plan would limit new buildings on Burns Campus to a height of 139 feet above mean sea level, which is below the elevation of residences to the east.

As shown in Section IV.A.2, Shading, of the Draft EIR, shade diagrams were prepared to evaluate potential shade/shadow impacts resulting from Proposed Project implementation during the summer solstice and winter solstice. During the summer solstice, off-site shadow lengths and trajectory would be substantially similar to those under existing conditions. Shadows are cast to the west in the morning from 9:00 AM until 12:00 PM (noon), but are confined to campus. Shadow projections are minimized by 12:00 PM and remain confined to the campus as they project eastward through 5:00 PM. Therefore, between 9:00 AM and 5:00 PM, no shading of off-site uses would occur. Since no new off-site shadows are projected, the Proposed Project would not result in new off-site shadows for more than 4 hours between 9:00 AM and 5:00 PM during the summer solstice. Therefore, impacts would be less than significant.

During the winter solstice, Proposed Project shadows that are cast by buildings and structures on the campus following Proposed Project buildout at 9:00 AM are cast to the west over the bluffs and onto portions of Playa Vista. By 10:00 AM, these shadows retreat onto campus. Shadows generated by other portions of the campus remain on site throughout the morning. Shadow projections are minimized by

12:00 PM and are confined to the campus as they begin to project eastward during the early afternoon. At 3:00 PM, shadows project to the northeast, but remain on the campus. Therefore, between 9:00 AM and 3:00 PM, no shading of off-site uses would occur for more than 2 hours. Therefore, implementation of the Proposed Project would not result in new off-site shadows for more than 3 hours between 9:00 AM and 3:00 PM during the winter solstice. For this reason, impacts would be less than significant.

Project Design Features and Mitigation Measures

PDF-SH-1 The Proposed Project shall comply with the height and setback restrictions established by the proposed LMU Specific Plan.

Since no significant impacts were identified, no mitigation is required.

Level of Impact After Mitigation

All Proposed Project-specific shading impacts would be less than significant; therefore, no significant unavoidable shading impacts would result from Proposed Project implementation.

Cumulative Impacts

The related projects are too far from the Proposed Project site to result in cumulative shade/shadow impacts in the vicinity of the LMU campus. The Proposed Project would contribute to shading of the bluff, Playa Vista Phases I and II, and the Playa Vista Plant during the winter equinox, as stated above. Three related projects, Playa Vista Phases I and II and the Playa Vista Plant, are located at the base of the Westchester Bluffs adjacent to LMU. However, these related projects would not contribute to shading of the portion of the bluff affected by the Proposed Project, since buildings do not cast shadows to the south at the latitude of the Los Angeles region. Therefore, the Proposed Project, considered together with related projects, would result in a less than considerable contribution to cumulatively significant impacts related to the shading of sensitive land uses in the area surrounding the campus.

7.1.3 Light and Glare

Light

Construction Impacts

Construction of the Proposed Project would occur over a 20-year period. During this time, nighttime lighting would be maintained on individual construction sites for security purposes. Since the campus and surrounding uses currently generate a certain level of nighttime illumination, construction lighting would represent a marginal increase, if any, in existing ambient light levels. However, such lighting on or

near the campus perimeter could generate light spillover onto adjacent residential properties on Fordham Road, W. 80th Street, and McConnell Avenue. Implementation of mitigation measures **MM-LIGHT-1** and **MM-LIGHT-2** would reduce ambient light levels by limiting the use of construction security lighting to only those sites requiring illumination and requiring all security lights to be properly shielded and projected downwards. Furthermore, construction lighting would be temporary and removed upon completion of construction. With implementation of mitigation, impacts due to alteration of the ambient illumination level and interference or an adverse affect on day or nighttime views with the performance of an off-site activity would be less than significant during construction.

Operational Impacts

The Proposed Project would implement a Specific Plan for the campus that would require that a 40-foot setback for new buildings be maintained along the eastern and southern edges of the campus, which would provide a buffer between lighting mounted on future buildings and nearby residences. As required by mitigation measure **MM-LIGHT-3**, lighting fixtures and visors would be adjusted upon installation, and vegetation and other screening or filtering devices would be maintained or added at the edges of lit fields or on the campus perimeter to help screen the light generated on campus. The revised Specific Plan, provided as **Appendix F-II** to the Final EIR, includes additional restrictions on the Proposed Project's building heights and setbacks, as compared to the earlier draft of the Specific Plan provided with the Draft EIR, which would further reduce the potential for lighting impacts.

Digital or illuminated scoreboard signs may be installed at some athletic facilities. Such illuminated scoreboard signs would be designed not to produce a light intensity greater than 3-foot-candles above ambient light levels as measured at the property line of the nearest residence, consistent with the Municipal Code. The illumination of any illuminated scoreboard sign that is visible from adjacent land uses would be shut off by 10:00 PM, unless extra innings or overtime run beyond that time. In response to comments, LMU has agreed to prohibit new illuminated signage in the Specific Plan's proposed buffer areas. With adherence to these specifications, as well as mitigation measure **MM-LIGHT-3**, light produced by animated scoreboard signs would have a less than significant impact at off-site locations.

Proposed new outdoor athletic facilities include intramural fields and tennis courts, which may be located on roof decks over proposed parking structures, may be illuminated to allow for nighttime recreational use. Additionally, the Proposed Project proposes the addition of nighttime lighting to existing athletic facilities. The heights of new light poles would range from 70 feet to 110 feet above grade and light poles may support multiple luminaires and illuminate more than one surface through a back-to-back mounting configuration. Implementation of mitigation measures **MM-LIGHT-4** and **MM-LIGHT-5** would reduce light spillover onto off-site locations and control skyglow by requiring that

all light fixtures be directed downward to illuminate only the intended surface and be equipped with louvers, shields, hoods, or other screening devices. **MM-LIGHT-6** would limit the use of field lighting within all outdoor athletic facilities to only those hours during which the fields are being utilized, which shall not surpass 10:00 PM, except in the case of overtime or extra innings. With implementation of mitigation measures, the Proposed Project would not substantially alter the ambient illumination levels in the campus vicinity.

While the siting of specific buildings has not yet been determined, upon approval of the Proposed Project, LMU may site a 1,500-seat conference center along the south façade of University Hall facing Lincoln Boulevard. The conference center would be visible from Lincoln Boulevard and residences within the West Bluffs neighborhood, but lighting would be limited to exterior building security fixtures and visible interior building illumination, and the deep setback from Lincoln Boulevard would reduce the potential for any off-site light spillover. Outdoor lighting would not generate light spillover due to its location downslope of sensitive residential uses in the neighborhood above.

The construction of above-grade parking structures would introduce new interior and exterior light sources to illuminate parking surfaces and vehicle/pedestrian access points. Other improvements proposed as part of the Proposed Project include the replacement and reconfiguration of residential and non-residential facilities. The addition of new facilities is not expected to substantially increase ambient nighttime light levels over those currently generated by the campus. The addition or reconfiguration of lighting within the campus interior would be too distant from the campus perimeter to result in off-site light spillover.

The residential properties on W. 78th Street, Fordham Road, W. 80th Street, and McConnell Avenue, and the residences within Playa Vista at the base of the Westchester Bluffs, are the nearest light-sensitive uses to the campus and, therefore, most susceptible to light spillover from the campus. Residences within Playa Vista would not be subject to light spillover from the campus due to the open space buffer provided by the bluffs and the absence of field lighting along the bluff edge.

Residential properties along W. 78th Street, W. 80th Street and McConnell Avenue could be subject to light spillover from lighting installed in existing athletic fields. Potential light levels are calculated below; however, these do not account for any existing intervening screening or vegetation between the light sources and nearby properties. Lighting proposed to be installed in Leavey Field would generate a maximum spillover at the property lines of residential properties south of the campus along W. 78th Street of approximately 0.50 foot-candles, and would not exceed the maximum spillover level of 2 foot-candles allowed by the Municipal Code. Lighting installed on facilities located in the southeastern corner of campus, primarily Sullivan Soccer Field and Page Baseball Stadium, would generate a maximum light

spillover at the residential property lines along W. 80th Street of 2.01 foot-candles. Therefore, light spillover on these properties could slightly exceed the maximum spillover level of 2 foot-candles. Lighting installed in the southeastern corner of campus, primarily at Page Baseball Stadium, Smith Softball Field, and Higgins Golf Center, would generate light spillover at adjacent residential property lines along McConnell Avenue at levels ranging from 0.08 to 10.42 foot-candles. While it is conservatively assumed that light levels on the McConnell Avenue properties immediately east of Page Baseball Stadium would exceed the maximum spillover level of 2 foot-candles, the actual light spillover level would likely be below 10.42 foot-candles due to intervening barriers such as walls and vegetation. Light spillover levels would be below 2 foot-candles at the remaining property lines along McConnell Avenue.

Outdoor lighting may be introduced in the southern portion of Burns Campus to illuminate a new intramural field that could be located at grade or above a future parking structure. Lighting associated with this new facility in this portion of Burns Campus could generate spillover onto residential properties across Fordham Road to the west or across W. 80th Street to the south. In order to reduce light spillover onto residential properties along W. 78th Street, Fordham Road, W. 80th Street, and McConnell Avenue, mitigation measure **MM-LIGHT-3** requires that lighting fixtures and visors be adjusted upon installation to focus the lighting on intended surfaces, and requires that vegetation and other screening or filtering devices be maintained or supplemented at the edges of lit fields or at the campus perimeter such that light spillover would not exceed an intensity of 2 foot-candles on nearby residential properties. Additionally, implementation of mitigation measures **MM-LIGHT-4** through **MM-LIGHT-6** would reduce the potential for off-site light spillover by requiring that light fixtures be directed downward and adequately screened, and by limiting the use of field lighting in outdoor athletic facilities. With implementation of these mitigation measures, Proposed Project light sources would comply with the Municipal Code and would not substantially interfere with the performance of an off-site activity or adversely affect day or nighttime views. Impacts would therefore be less than significant after mitigation.

Glare

Construction Impacts

Construction activities are not anticipated to create sources of glare that could affect visibility in the area since LMU would use building materials that are low-reflective in nature, and construction is not expected to involve bright light sources that would be visible from off-campus locations. Therefore, impacts due to glare generation would be less than significant during construction.

Operational Impacts

No sources of substantial glare are anticipated with implementation of the Proposed Project. Only low-reflective building materials are anticipated to be used, and the setbacks of proposed campus structures from surrounding roadways as well as the presence of intervening landscaping and structures would inhibit any new sources of potential daytime glare from affecting off-campus activities or adverse effects on views. The revised Specific Plan, provided as **Appendix F-II** to the Final EIR, includes additional restrictions on the Proposed Project's building heights and setbacks, as compared to the earlier draft of the Specific Plan provided with the Draft EIR, which would further reduce the potential for glare impacts. The creation of nighttime glare would be minimized with implementation of mitigation measures **MM-LIGHT-3** through **MM-LIGHT-7**. Therefore, Proposed Project-related glare impacts would be less than significant.

Project Design Features and Mitigation Measures

No Project Design Features are proposed.

The following mitigation measures would address potential light and glare impacts and reduce impacts to less than significant levels.

- MM-LIGHT-1 The use of nighttime lighting during Project construction shall be limited to only those features on the construction site requiring illumination.
- MM-LIGHT-2 All security lights shall be properly shielded and projected downwards during construction such that light is directed only onto the work site.
- MM-LIGHT-3 Lighting fixtures and visors shall be adjusted upon installation to reduce spillover onto adjacent residential properties, while still maintaining adequate lighting to allow safe use of outdoor athletic facilities. Additionally, vegetation and other screening or filtering devices shall be maintained or supplemented at the edges of lit fields or at the campus perimeter at all times, such that light spillover shall not be permitted at any time to exceed an intensity of 2 foot-candles on residential property lines located along W. 78th Street, Fordham Road, W. 80th Street, and McConnell Avenue.
- MM-LIGHT-4 All outdoor lighting shall be directed downward to illuminate the intended surface (i.e., playing fields, pedestrian pathways and other high-traffic areas such as building entrances and plazas in the campus interior).

- MM-LIGHT-5 All new outdoor lighting shall be equipped with louvers, shields, hoods, or other screening devices.
- MM-LIGHT-6 The use of field lighting within all outdoor athletic facilities shall be limited to only those hours during which the facilities are being utilized, which shall not surpass 10:00 PM except in the case of overtime or extra innings.
- MM-LIGHT-7 The Applicant shall use exterior building materials and facades which eliminate or minimize highly reflective materials. At the time of plan check review for specific development projects, building materials shall be reviewed to assure that they do not exceed the reflectivity of standard building materials. If the Applicant should desire to use more reflective materials in locations isolated from major thoroughfares, adequate analysis must be presented to the Department of Building and Safety to determine that the building, due to location, would not cause glare impacts on motorists or nearby population.

Level of Impact After Mitigation

All impacts would be less than significant after mitigation; therefore, no unavoidable significant impacts related to nighttime illumination and glare would result from Proposed Project implementation.

Cumulative Impacts

The majority of the related projects are too far from the Proposed Project site to result in cumulative ambient nighttime light levels impacts in the vicinity of the LMU campus. Three related projects, Playa Vista Phases I and II and the Playa Vista Plant, located at the base of the Westchester Bluffs would increase ambient nighttime light levels at the base of the bluffs by introducing development and associated lighting to presently undeveloped land. However, the Proposed Project would not contribute to this increase in ambient nighttime light levels along the bluff base since no development is proposed along the bluff edge or face under the Proposed Project. Furthermore, all related projects would be required to comply with Municipal Code requirements governing light spillover onto residential properties. The Proposed Project does not propose the use of reflective building materials. Consequently, the Proposed Project, considered together with these uses, would not result in cumulatively significant nighttime illumination and glare impacts.

7.2 Air Quality and Global Climate Change

7.2.1 Air Quality

Project Impacts

Construction Impacts

Construction Emissions

Construction emissions include all emissions associated with the construction equipment, grading and demolition activities, worker trips, on-road diesel trucks, and outgassing of building coatings or finishes. It was assumed that construction equipment would operate 6 to 8 hours per workday. In reality, based on South Coast Air Quality Management District (SCAQMD) surveys at construction sites, construction equipment often operates cyclically for only a fraction of each workday. The California Air Resources Board (CARB) has implemented an anti-idling regulation that limits idling of diesel equipment to no more than 5 minutes, and has adopted an *In-Use Off-Road Diesel Vehicle Control Measure* that would reduce fleet-average emissions of oxides of nitrogen (NO_x) and diesel particulate matter. The measures would require fleet operators to retrofit existing engines with emission control technologies, repower existing equipment with newer, less-polluting engines, or accelerate fleet turnover by a specified percentage. Construction equipment used as part of the Proposed Project would be subject to these measures at the time construction activity is estimated to occur. Therefore, it is reasonable to assume that some of the equipment used on the campus would meet the more stringent NO_x and PM₁₀ (particulate matter less than 10 microns in diameter) emission standards. However, since emission reductions associated with both the anti-idling and *In-Use Off-Road Diesel Vehicle Control Measure* are not accounted for in the Proposed Project's construction emissions model, the calculated emissions represent a conservative estimate. Emissions due to construction of the Proposed Project are not expected to exceed the SCAQMD significance thresholds. Therefore, construction emissions would result in a less than significant impact.

Localized Significance Threshold

The SCAQMD recommends the evaluation of localized PM₁₀, particulate matter less than 2.5 microns in diameter (PM_{2.5}), NO₂ and carbon monoxide (CO) impacts as a result of on-site construction activities to sensitive receptors in the immediate vicinity of the Proposed Project site. The construction of the Proposed Project would not generate on-site emissions in excess of the site-specific localized significance thresholds for NO_x and CO. Construction of the Proposed Project would generate on-site emissions in excess of the threshold for PM₁₀ and PM_{2.5} at residential receptors adjacent to the campus. The maximum impacts associated with PM₁₀ and PM_{2.5} emissions were demonstrated to occur at residential receptors

directly to the south of the LMU campus, when construction activity was modeled to take place at the southern end of Burns Campus. However, localized significance threshold (LST) impacts could potentially occur at any residential receptor adjacent to construction activity on portions of the campus located near that particular residential receptor, depending on the level of construction activity and specific meteorological conditions. With respect to school receptors, the maximum impacts associated with PM₁₀ emissions were demonstrated to occur at the northeast end and along the eastern edge of the planned Playa Vista Elementary School site when construction activity was modeled to take place on Leavey and Hughes Campuses, respectively. Impacts related to PM_{2.5} would be less than significant at school receptors. Based on this assessment, the localized impacts for PM₁₀ and PM_{2.5} would be potentially significant during construction when construction activity is taking place near off-site sensitive receptors.

Health Risk Assessment

The Office of Environmental Health Hazard Assessment (OEHHA), CARB, and the U.S. Environmental Protection Agency (EPA) have developed methodologies to evaluate the potential health impacts from toxic air contaminants. The potential impacts from toxic air contaminants were assessed using a screening health risk assessment. Based on the screening health risk assessment, the cancer and chronic non-cancer risks from diesel particulate matter associated with construction activities would not exceed the SCAQMD significance thresholds. The SCAQMD developed these thresholds to evaluate the significance of operational-related toxic air contaminants, assuming a maximum lifetime exposure period of 70 years. As noted above, construction would last approximately 20 years. Therefore, the analysis assumes that toxic air contaminants would be generated during the first 20 years, after which time toxic air contaminants associated with construction of the Proposed Project would no longer be emitted. Therefore, health impacts are less than significant.

Operational Impacts

Primary Impacts

Operational emissions would be generated by both stationary and mobile sources as a result of normal day-to-day activity on the site after occupation. Stationary emissions would be generated by the consumption of natural gas for space and water heating devices, the operation of landscape maintenance equipment, and the use of consumer products. Mobile emissions would be generated by motor vehicles traveling to and from the Proposed Project site. URBEMIS2007 was used to quantify mobile source, landscape equipment, consumer product, and architectural coating emissions of volatile organic compounds (VOC), NO_x, CO, sulfur oxide (SO_x), PM₁₀ and PM_{2.5}.

The majority of emissions that occur from operation of the existing campus are generated by the operation of mobile sources. The net change in operational emissions after Proposed Project buildout would not exceed SCAQMD's significance thresholds. The campus emissions after the Proposed Project would result in a reduction in VOC, NO_x, and CO emissions relative to the existing campus primarily due to efficiencies in vehicle emission control technologies. CARB has forecasted future emission reductions based on previous, current, and near-term trends in emission control technologies and these reductions have been incorporated by CARB into the EMFAC2007 model. Therefore the Proposed Project would not result in an increase in emissions that would exceed the significance thresholds, therefore the Proposed Project would result in a less than significant impact on air quality in the region.

Secondary Impacts

Projects that are consistent with growth forecasts identified by the Southern California Association of Governments (SCAG) are considered consistent with the Air Quality Management Plan (AQMP) growth projections. The Proposed Project would not increase population figures over those that have been planned for the area, would be consistent with the AQMP forecasts for this area, would be considered consistent with the air quality-related regional plans, and should not jeopardize attainment of state and federal ambient air quality standards in the South Coast Air Basin.

The Proposed Project site is located in close proximity to several modes of public transportation, including bus and rail lines, and it is expected that some portion of the Proposed Project's population would utilize public transportation. The Proposed Project would also implement transportation demand management (TDM) policies to further reduce emissions associated with mobile sources. Furthermore, the Proposed Project would move more students into on campus housing, thereby reducing vehicle trips to campus. As a result, vehicle miles traveled and, consequently, air pollutant emissions from mobile sources, would be further reduced, consistent with the AQMP.

The Proposed Project was evaluated to determine if it would cause a CO hotspot utilizing a simplified CALINE4 screening model. This methodology assumes worst-case conditions and provides a screening of maximum, worst-case, CO concentrations. Intersections operating at a level of service (LOS) of D, E, or F are considered to have the potential to create a CO hotspot. The CALINE4 screening procedure predicts that, under worst-case conditions, future CO concentrations at each study intersection operating at a LOS D or below would not exceed state or federal standards with the development of the Proposed Project. Therefore, no significant CO hotspot impacts would occur to sensitive receptors in the vicinity of these intersections.

The land uses associated with the Proposed Project are not expected to be a source of persistent odors. Additionally, the Proposed Project may relocate the existing waste management and recycling area from the eastern edge of Burns Campus to the lower level of the enclosed Drollinger Parking Plaza on Leavey campus, approximately 200 feet from the nearest sensitive residential receptor to the south on W. 78th Street.

The land uses associated with the Proposed Project are not anticipated to use hazardous or acutely hazardous materials in appreciable quantities.

Based on the above, all secondary impacts are anticipated to be less than significant.

Toxic Air Contaminants

The educational uses of the Proposed Project may potentially emit trace amounts of toxic air contaminants, primarily during the operation of campus laboratories, which could contain small amounts of chemicals typical of a university classroom laboratory. Only a portion of these chemicals may contain regulated toxic air contaminants. Therefore, trace quantities of toxic air contaminants may be emitted during periodic classroom laboratory experiments. However, such trace emissions would occur infrequently, given the size of the student population, and would not exceed the thresholds contained in SCAQMD Rule 1401, New Source Review of Toxic Air Contaminants (incremental increase in maximum individual cancer risk of 10 in 1 million, chronic hazard index of 1.0, or acute hazard index of 1.0). Thus, LMU would not be subject to the rule's requirements. Furthermore, laboratory equipment used for chemical or physical analysis is exempt from SCAQMD permit requirements via Rule 219 (Equipment Not Requiring a Written Permit Pursuant to Regulation II). In addition, diesel-fueled delivery and recycling trucks would drive to and from the campus resulting in emissions of diesel particulate matter. However, only a limited number of trucks would be associated with operation of the Proposed Project and these additional trucks would not result in diesel emissions that would exceed health-based standards. Furthermore, emissions from diesel-fueled trucks are not regulated by SCAQMD regulations (local agencies do not have jurisdiction to regulate mobile sources). Consequently, no significant impacts from such emissions are anticipated.

There are no facilities that emit toxic air contaminants above the SCAQMD reporting threshold as required by Rule 1401 (New Source Review of Toxic Air Contaminants) within a 0.25 mile of the campus. The LMU campus is not located within 500 feet of a freeway or near any urban roads with 100,000 vehicles or more per day, where health effects are generally elevated. For example, Lincoln Boulevard, which passes by the campus and is a Class I major highway, averages 50,000 cars per day during those months of heaviest traffic.

The LMU campus is located in a grid with an estimated background cancer risk of 955 in 1,000,000. The estimated background cancer risk for nearby surrounding grids ranges from 776 to 1,063 in 1,000,000. Based on this analysis, it is not anticipated that the Proposed Project would expose sensitive receptors to substantial increases in health risks and pollutant concentrations relative to the general population.

Based on the above, impacts due to toxic air contaminants would be less than significant.

Project Design Features and Mitigation Measures

The Proposed Project would implement a number of Project Design Features which would reduce the Air Quality emissions of the Proposed Project. For a complete list of these Project Design Features, see Section IV.K, Transportation, Section IV.L-4, Energy, and Section IV.L.1, Water Supply, in the Draft EIR.

Construction of the Proposed Project would result in significant localized impacts of PM₁₀ and PM_{2.5}. The following mitigation measures are required to be implemented during Project construction.

- MM-AQ-1 General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.

- MM-AQ-2 All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

- MM-AQ-3 General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall turn their engines off when not in use to reduce vehicle emissions. Construction emissions shall be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

- MM-AQ-4 Electricity rather than temporary diesel- or gasoline-powered generators shall be used at least half of the time.

- MM-AQ-5 All construction vehicles shall be prohibited from idling in excess of 5 minutes, both on and off site.

- MM-AQ-6 The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations.

- MM-AQ-7 The Applicant shall schedule routine deliveries during off-peak traffic periods to encourage the reduction of trips during the most congested periods.

MM-AQ-8 LMU shall require all on-site off-road construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:

- April 2010 through December 31, 2011: All offroad diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- January 1, 2012 through December 31, 2014: All offroad diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 4 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT determination, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

MM-AQ-9 For equipment not covered by **MM-AQ-8** above, the Project Applicant shall evaluate the potential for reducing exhaust emissions from on-road and off-road construction equipment, and implement such measures. Control technologies to be considered may include particulate traps and filters, selective catalytic reduction, oxidation catalysts, air enhancement technologies, and the use of alternatively (non-diesel) fueled engines. Considerations will include commercial availability of appropriate California Air Resources Board verified technologies.

MM-AQ-10 The Applicant shall install shaker plates at construction site exits, to minimize dirt track out and dust generation.

- MM-AQ-11 The Applicant shall operate street sweepers that comply with SCAQMD Rules 1186 and 1186.1 on roads adjacent to the construction site in a nearly continuous manner so as to minimize dust emissions. Paved parking and staging areas shall be swept daily.
- MM-AQ-12 An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.
- MM-AQ-13 LMU shall require the contractor to limit construction activity over unpaved surfaces to 5 acres of disturbance per day or less.
- MM-AQ-14 LMU shall require the contractor to Provide temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow.
- MM-AQ-15 LMU shall require the contractor to replace ground cover in disturbed areas as quickly as possible as permitted by the sequence of the Master Plan's project schedule.

Level of Impact After Mitigation

With implementation of **MM-AQ-1** through **MM-AQ-12**, impacts associated with emissions of PM₁₀ and PM_{2.5} during construction would be substantially reduced. Nonetheless, PM₁₀ and PM_{2.5} impacts on nearby residential and school receptors would remain significant and unavoidable during construction.

Cumulative Impacts

The Proposed Project is expected to have a population equivalent to 9,600 FTE students, faculty, and staff. The campus after Proposed Project buildout would provide up to 4,250 beds in on-campus housing. Population data for Los Angeles County were based on SCAG projections. These figures, along with the Proposed Project Average Daily Trip (ADT) volume included in the traffic impact study prepared for the Proposed Project and traffic data for Los Angeles County obtained from the EMFAC2007 on-road motor vehicle emissions factor model developed by CARB, were used to calculate and compare the ratio of Project ADT to Los Angeles County ADT and the ratio of the Proposed Project population to the future population in Los Angeles County. The ADT ratio is less than the population and employment ratios at Proposed Project build out in 2030. As such, cumulative impacts would be less than significant based on this criterion.

In addition, individual projects that exceed the SCAQMD-recommended daily thresholds for project-specific impacts would be considered to cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. The Proposed Project's construction emissions would not exceed the project-level significance thresholds for any criteria pollutant. Also, the Proposed Project's net operational emissions would not exceed the project-level significance thresholds for any criteria pollutant. While the Proposed Project would exceed the localized significance threshold for PM₁₀ and PM_{2.5}, by definition it would not result in regional cumulative impacts. Therefore, construction and operation of the Proposed Project would not result in a considerable contribution to cumulatively significant regional air quality impacts.

7.2.2 Global Climate Change

Construction Impacts

Construction greenhouse gas emissions were quantified from combustion emissions associated with construction equipment, grading and demolition activities, worker trips, and on-road diesel trucks. The emissions were calculating using the same factors and assumptions used in the air quality analysis. The annualized construction emissions are determined by dividing the total construction emissions by the estimated Proposed Project's lifetime. The buildings scheduled to be replaced were largely built in the 1950s, 1960s, and 1970s with largely out-of-date building methods. Therefore, a conservative estimate of the Proposed Project lifetime of 50 years was used in this analysis. Construction is estimated to emit 13,369 metric tons of carbon dioxide equivalents (MTCO_{2e}) or 267 MTCO_{2e} per year when annualized over the Proposed Project lifetime of 50 years.

Operational Impacts

Operation of the Proposed Project would result in emissions of direct greenhouse gases due to natural gas consumption and mobile source emissions. The Proposed Project would also result in indirect greenhouse gas emissions due to the electricity demand and water demand. The estimated emissions due to electricity demand take into account the mix of energy sources used to generate electricity in Southern California and the relative carbon intensities of these sources, and includes natural gas, coal, nuclear, large hydroelectric, and other renewable sources of energy. The Proposed Project would also result in increased use of reclaimed water, primarily for outdoor landscaping. The existing campus currently uses reclaimed water on approximately 60 percent of existing outdoor areas. The Proposed Project would increase the use of reclaimed water to 100 percent of the outdoor areas at Proposed Project buildout.

Reclaimed water uses much less energy to produce and distribute compared to potable water.⁴ Therefore, the increased use of reclaimed water on campus reduces the overall carbon footprint associated with water demand on a per gallon basis. The net change in greenhouse emissions between the existing campus and the campus after the Proposed Project buildout is 6,451 MTCO₂e per year. While the Proposed Project would increase total greenhouse gas emissions on a mass-basis, the Proposed Project's greenhouse gas intensity would decrease by 16.1 percent on a per gross square foot basis and decrease by 0.4 percent on a per full-time equivalent basis. This reduction in greenhouse gas (GHG) intensity is attributed to the energy efficiencies and sustainable Project design features associated with the Proposed Project.

The emissions associated with the campus after the Proposed Project buildout likely represents a conservative assessment of the actual greenhouse gas emissions that would result from development of the Proposed Project. The construction emissions were based on the assumption that equipment would operate continuously throughout an 8-hour workday. In reality, construction equipment tends to operate cyclically for only a portion of the workday. Greenhouse gas emissions from motor vehicles represent over half of the total emissions associated with the campus after Proposed Project buildout. Neither the state nor the federal government regulates tailpipe greenhouse gas emissions. However, several regulatory actions have taken place at the federal and state level that would reduce future tailpipe greenhouse gas emissions from motor vehicles, and these reductions were not accounted for in the model. This assessment also is conservative because it does not account for improvements in fuel economy standards for cars, light trucks, and sport utility vehicles, relative to current levels. Similarly, the greenhouse gas emissions associated with electricity, natural gas, and water consumption represent conservative estimates. As building code standards require even more energy efficiency measures in the future and as mandates to decrease the carbon footprint of electricity in California are adopted by the legislature and signed by the Governor, the assessment will be even more conservative. For these reasons, the GHG emissions associated with electricity, natural gas, and water consumption represent conservative estimates.

Project Design Features and Mitigation Measures

The Proposed Project would implement a number of Project Design Features that would reduce the GHG emissions of the Proposed Project and reduce potential impacts on global climate change to less than significant levels. For a complete list of these Project Design Features, see Section IV.K, Transportation, Section IV.L.4, Energy, and Section IV.L.1, Water Supply, in the Draft EIR.

⁴ R. C. Wilkinson, et. al, California Department of Water Resources, *Water Sources "Powering" Southern California*. n.d.

The Proposed Project would not have a significant impact on global climate change and therefore mitigation measures are not required.

Level of Impact After Mitigation

With implementation of the Proposed Project design features that are consistent with the guidance documents previously described, impacts associated with emissions of greenhouse gases during construction and operation would be less than significant.

Cumulative Impacts

Global climate change is by definition a cumulative impact as greenhouse gas emissions do not have a localized impact; they impact the globe as a whole. The State of California as well as local governments have released guidance documents on reducing greenhouse gas emissions from development projects. The chief emission reduction strategies are detailed in the California Climate Action Team Report to the Governor and the Legislature, the City of Los Angeles Green Plan, the Office of Planning and Research's CEQA and Climate Change technical advisory, and the CARB Assembly Bill 32 Climate Change Scoping Plan. These guidance documents recommend strategies to assist in the reduction of greenhouse gas emissions. Since no numeric thresholds has been adopted by any state or local agency to assess the impacts of greenhouse emissions, the Proposed Project's cumulative impacts are assessed in terms of consistency with the recommended reduction strategies. The Proposed Project is consistent with the goals, strategies, and control measures established under the California Climate Action Team Report to the Governor and the Legislature, the City of Los Angeles Green Plan, the Office of Planning and Research CEQA and Climate Change technical advisory, and the CARB Assembly Bill 32 Climate Change Scoping Plan. Since these reports, plans, and policies are intended to facilitate the reduction of GHG emissions in California to meet the greenhouse gas emissions reduction targets detailed in AB 32, the potential impact on global warming resulting from implementation of the Proposed Project would not be cumulatively significant.

7.3 Biological Resources

Project Impacts

Construction Impacts

Potential nesting habitat for a variety of protected bird species occurs within trees, shrubs, and ground cover within the LMU campus, in addition to the habitat associated with the bluffs. The removal or destruction of individual birds or active nests (including eggs and young) would be considered a

violation of the Fish and Game Code of California and the Federal Migratory Bird Treaty Act. Proposed Project construction on campus in close proximity to trees could result in impacts on common nesting bird species. Such impacts to nesting birds can be mitigated to less than significant levels with implementation of mitigation measure **MM-BIO-1**.

Twenty-five special-status plant and 30 special-status wildlife species are recorded to have the potential to occur in the Proposed Project vicinity. The only special-status plant or wildlife observed on the LMU campus were two transient, migratory monarch butterflies, which were observed in the groves near the Sacred Heart Chapel and the sump. No clusters of over-wintering monarch butterflies were observed or are expected on the LMU campus site. Field surveys and the developed nature of the campus indicate that there is no suitable habitat to support the 25 special status plant species or 30 special status wildlife species on LMU's campus and Proposed Project implementation would have no impact on such resources, with the potential exception of the monarch butterfly. Implementation of **MM-BIO-2** would reduce this impact to a less than significant level.

Two tree species protected by the City's Protected Tree Regulations are present on the campus: coast live oak and western sycamore. With implementation of mitigation measure **MM-BIO-3**, which specifies requirements for replacement of protected trees in accordance with the City's regulations, impacts to protected trees would be less than significant.

Operational Impacts

Impacts associated with biological resources, locally designated natural habitat or plant community, wildlife movement/migration corridors, jurisdictional wetland habitat, habitat required for long-term survival of a sensitive species, riparian or other sensitive natural communities, local, regional, or state habitat conservation plans, reduction of the habitat of a fish or wildlife species, fish and wildlife populations, and plant and animal communities, would all be less than significant.

Since the suburban LMU campus habitat is similar to the surrounding neighborhood and LMU campus habitat, and only relatively small portions of the campus would be under construction at any given time (i.e., specific building or facility sites), no significant impacts would result to any transient migratory individual monarch butterflies on or around campus due to the operation of the Proposed Project.

The bluff that makes up the northern border of LMU is heavily disturbed and planted primarily with invasive, non-native vegetation, although remnant coastal sage scrub species, including California buckwheat, toyon, and white sage, are intermittently present. As such, it is unlikely that this area would support special-status plant or wildlife species, or serve as a wildlife habitat corridor. Additionally, the Proposed Project does not propose any development in this area. The LMU campus and the bluff do not

contain any locally designated natural habitat or plant community, or habitat supporting any locally designated species.

The LMU campus is not a component of a wildlife migration corridor due to the topography and the setting of the campus, which is urbanized on the west, east, and south. Although the Ballona wetlands are adjacent on the north of the Proposed Project site, movement from the wetlands up to the LMU campus 120 feet above is limited for most wildlife due to the topography of the bluffs. The bluff would continue to remain undeveloped with the implementation of the Proposed Project and therefore would not interfere with any currently existing wildlife movement along the LMU campus bluff area.

The manmade sump terminates on site and flows into the City's storm-drain system near the Drollinger Parking Plaza. The sump would not be altered by the Proposed Project. LMU would be required to maintain the sump's National Pollutant Discharge Elimination System permit. Additionally, the riparian corridor on the Playa Vista site at the base of the bluffs is not part of the Proposed Project site and is not expected to be impacted by any activities associated with the Proposed Project. Consequently, no significant impacts to existing wetland habitat would occur from the Proposed Project.

The Proposed Project site is not identified as part of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other habitat conservation plan. The Proposed Project site does not contain any habitat for a fish species and implementation of the Proposed Project would not substantially reduce habitat for wildlife species that have adapted to the developed urban setting of the existing LMU campus. The ornamentally landscaped areas on campus and the proposed additional approximately 5 acres of open space are not of sufficient size to sustain entire wildlife populations. Additionally, only relatively small portions of the campus would be under construction at any given time (i.e., specific building sites), and wildlife would be able to take advantage of areas not under construction elsewhere on campus. The removal and replacement of urbanized landscaped areas would not threaten to eliminate a plant community or an animal community; therefore, impacts to plant or animal communities would be less than significant.

Project Design Features and Mitigation Measures

PDF-BIO-1 Development of the Proposed Project shall comply with the land use regulations for open space areas established by the proposed LMU Specific Plan.

Prior to implementation of mitigation, Proposed Project construction and operation could have potentially significant impacts on biological resources on the Proposed Project site. The following mitigation measures shall be implemented to reduce these impacts.

MM-BIO-1 Prior to any earthmoving activities during the breeding and nesting season from March 1 through August 31, the Applicant shall have a survey conducted by a qualified biologist to determine if active nests for breeding birds are present within the area of potential influence of the species. This area of influences shall include the nest site as well as an appropriate buffer determined by the biologist based on field observations and the biology of the species. This survey shall be conducted within three days before the clearing/grubbing. If nesting birds protected under the Migratory Bird Treaty Act or California Fish and Game Code are found, the breeding/nesting area(s) shall be protected according to the biologist's recommendation that include, but are not limited to, suitable buffer area around the nest, which shall not be disturbed until the young have fledged.

MM-BIO-2 Prior to any removal of trees during the months of October through February, the Applicant shall have conducted by a qualified biologist a survey to determine if monarch butterfly clusters are present within the trees to be affected by removal. Removal of trees occupied by monarch butterfly clusters during the months of October through February shall be prohibited unless it is determined by the City that such removal is necessary by reason of good forestry practice, disease of the tree, or safety considerations. Any such determinations shall be accompanied by a written evaluation of the impacts of the proposed action on the monarch butterfly by a qualified expert.

Major construction activity within 100 feet of any trees occupied by monarch butterfly clusters shall be prohibited between October and February while the monarch butterflies are present unless a qualified expert is present and determines that construction activities will not disturb the monarch butterfly cluster.

MM-BIO-3 For each protected tree intended for removal in implementation of the Project, replacement trees shall be planted in accordance with Section 46.01 of the Los Angeles Municipal Code.

Level of Impact after Mitigation

Implementation of mitigation measures **MM-BIO-1** through **MM-BIO-3** would reduce the potential significant impacts to common and special-status wildlife species and protected trees to less than

significant levels. No other impacts to biological resources would occur with Proposed Project implementation.

Cumulative Impacts

Impacts to wildlife movement corridors in the vicinity of the LMU campus would not occur because neither the campus nor related projects in the area contain any prominent corridors; the urbanized environment offers no core habitat areas capable of sustaining wildlife species. Implementation of the Proposed Project together with related projects in the urbanized Westchester area would not impact open space available for plant and animal habitat, wildlife foraging areas, wintering grounds, and nest sites. The Proposed Project site hosts no natural plant and wildlife habitats, so the Proposed Project, in combination with the above related projects, would not contribute to the cumulative loss of such areas. Therefore, cumulative construction impacts resulting from the Proposed Project combined with related projects in the region would be less than significant.

Current LMU operations have some indirect impacts on biological resources in the Proposed Project area; such impacts are caused by the presence of humans, non-native plants in the area, light and glare, and stormwater runoff. With implementation of the Proposed Project, indirect impacts on biological resources in adjacent areas of open space, such as the Ballona Ecological Preserve, would be slightly increased. Indirect effects on biological resources during and following Proposed Project buildout would be similar to LMU's present indirect impacts on those resources. The cumulative operational impacts from related projects would not result in substantial damage to sensitive species or habitats, due in large part to the low biological diversity found on the LMU campus. Therefore, cumulative operational impacts to biological resources resulting from the Proposed Project, in combination with related projects, would be less than significant.

7.4 Cultural Resources

7.4.1 Paleontological Resources

Project Impacts

Construction Impacts

Paleontological resources would be potentially affected by direct and indirect impacts resulting from earthmoving activities associated with implementation of the Proposed Project. Direct impacts might be caused by any earthmoving activity that buried previously undisturbed strata, thereby rendering the strata and associated paleontological resources unavailable for future scientific investigation. Indirect

impacts might result from easier access to fresh exposures of fossiliferous strata and the accompanying potential for unauthorized fossil collecting.

There is high potential for currently unrecorded fossil sites being encountered during earthmoving activities in areas of campus immediately underlain by the Palos Verdes Sand or non-marine terrace cover, or where earthmoving activities would extend to a depth sufficient to encounter these rock units below the Holocene dune sand elsewhere on campus. As discussed in the Draft EIR in Section IV.D.1, Paleontological Resources, and as indicated by excavation at the William H. Hannon Library site, while the Palos Verdes Sand and terrace cover are not exposed at the surface in any area of campus on top of the bluffs, they underlie the campus at varying depths below the surface and are exposed at varying elevations below the bluff top along the northern and western edges of campus. The bluff face is designated in the proposed Specific Plan as Buffer/Open Space and no development or disturbance is planned in this area. However, earthmoving activities in other areas of the LMU campus, where Palos Verdes Sand and terrace cover are present at varying depths below the surface, might result in the loss of scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data. This potential loss would be considered a significant impact. However, implementation of mitigation measures **MM-PALEO-1** through **MM-PALEO-5**, which requires construction monitoring by a certified paleontologist and recovery and evaluation of any fossil remains encountered during construction, would reduce this impact to a less than significant level.

Holocene dune sand immediately underlies the surface of most of the Campus. The dune sand is considered to have a low paleontological potential, Proposed Project-related disturbance of this rock unit would have a less than significant impact on paleontological resources.

Operational Impacts

Because the rock units underlying the campus would not be disturbed following completion of construction activities, no impacts on paleontological resources are anticipated during Proposed Project operation.

Project Design Features and Mitigation Measures

PDF-PALEO-1 The Proposed Project shall be consistent with the open space land use regulations established by the proposed LMU Specific Plan.

The following mitigation measures would address potential impacts to paleontological resources and reduce impacts to less than significant levels:

MM-PALEO-1 Retention of Paleontologist. Prior to the initiation of construction-related earthmoving activities and excavation at depths of 5 feet below the surface of campus, the services of a qualified paleontological consulting firm approved by the City and the Natural History Museum of Los Angeles County Vertebrate Paleontology Section shall be retained and consulted. Using field observations, bore logs, geologic reports, and construction plans, the paleontologist shall determine when and where any monitoring of earthmoving activities will be required.

MM-PALEO-2 Preconstruction Coordination and Environmental Awareness Training. If monitoring is required, the paleontologist or another mitigation program staff member shall coordinate with appropriate construction contractor personnel to provide information regarding applicable requirements concerning the protection of paleontological resources. Contractor personnel, particularly heavy-equipment operators, shall also be briefed on procedures to be followed in the event that fossil remains and a currently unrecorded fossil site are encountered by earthmoving activities, particularly if a paleontological construction monitor is not on site. The briefing shall be presented to new contractor personnel as necessary. Names and telephone numbers of the monitor and other appropriate mitigation program personnel shall be provided to appropriate contractor personnel.

MM-PALEO-3 Paleontological Monitoring and Fossil Specimen and Sample Recovery. When required, monitoring shall consist of visually inspecting debris piles and freshly exposed strata to allow for the discovery and recovery of larger fossil remains, and periodically dry test screening rock, sediment, and debris to allow for the discovery and recovery of smaller fossil remains. As soon as practicable, the monitor shall recover all larger vertebrate fossil remains, a representative sample of invertebrate or plant fossil specimens, or any fossiliferous rock or sediment sample that can be recovered easily. If recovery of a large or unusually productive fossil occurrence is warranted, earthmoving activities shall be diverted temporarily around the fossil site and a recovery crew shall be mobilized as necessary to remove the occurrence as quickly as possible. If not on site when a fossil occurrence is uncovered by such activities, the activities shall be diverted temporarily around the fossil site and the monitor called to the site to evaluate and, if warranted, recover the occurrence. If the paleontologist or monitor determines that the fossil site is too unproductive or the fossil remains not worthy of recovery by the monitor, no further

action will be taken to preserve the fossil site or remains, and earthmoving activities shall be allowed to proceed through the site immediately. The location and proper geologic context of any recovered fossil occurrence or rock or sediment sample shall be documented.

Any recovered rock or sediment sample from the Palos Verdes Sand or non-marine terrace cover shall be processed to allow for the recovery of smaller fossil remains that normally are too small to be observed by the monitor. Pursuant to Society of Vertebrate Paleontology (1995) standard measures, no more than 6,000 pounds (12,000 pounds total) of the rock or sediment shall be processed from either the Palos Verdes Sand or terrace cover.

MM-PALEO-4 Final Laboratory Tasks. All fossil specimens recovered from the Project area as a result of mitigation, including those recovered as the result of processing rock or sediment samples, will be treated (i.e., prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. Rock or sediment samples will be submitted to commercial laboratories for microfossil, pollen, radiometric dating, or other analysis, as appropriate.

MM-PALEO-5 Reporting. The monitor shall maintain daily monitoring logs that include the particular tasks accomplished, the earthmoving activity monitored, the location where monitoring was conducted, the rock unit(s) encountered, the fossil specimens recovered, and associated specimen data and corresponding geologic and geographic site data. A final technical report of results and findings shall be prepared by the paleontologist in accordance with any City requirement and archived at the museum repository.

Level of Impact After Mitigation

With implementation of mitigation measures **MM-PALEO-1** through **MM-PALEO-5**, Project and cumulative impacts related to paleontological impacts would be less than significant.

Cumulative Impacts

Cumulative impacts on paleontological resources would occur if the Proposed Project, in combination with related projects, would lead to a cumulative loss of such resources contained within the Palos Verdes Sand or non-marine terrace cover rock units. This loss might occur as a result of earthmoving activities and unauthorized fossil collecting, or the loss of access to these resources where they are covered by new buildings. However, all proposed projects in the City of Los Angeles are subject to CEQA

requirements for protecting paleontological resources. Because subsurface paleontological resources would be protected upon discovery, as required by law, impacts on these resources would be reduced to a less than significant level. In compliance with CEQA, mitigation measures **MM-PALEO-1** through **MM-PALEO-5** would reduce impacts of the Proposed Project on paleontological resources to a less than significant level. Accordingly, implementation of the Proposed Project is not expected to result in a significant cumulative impact on paleontological resources.

7.4.2 Archaeological Resources

Project Impacts

Construction Impacts

The Native American Heritage Commission stated that there are no sacred sites in the immediate vicinity of the LMU campus. However, should human remains be discovered, **MM-ARCH-7** would reduce impacts to a less than significant level. Additionally, the campus contains three recorded archaeological sites: LAN-61, LAN-212, and LAN-1018. Thus, there is potential for impacts to these sites and to areas outside of the boundaries.

LAN-61 is recorded as a large, prehistoric archaeological site primarily located on Leavey Campus. Previous research on this site indicated that this was a multicomponent site containing complex archaeological features, human burials and isolated human remains, and substantial stratigraphic integrity. Recent field survey, testing, and data recovery work indicates that the site is larger than previously thought, extending further north and east. Portions of this tentatively extended site boundary extend into Burns Campus. Much of this archaeological site underwent data recovery and subsequent controlled grading as part of the development of Leavey Campus. However, while the majority of the site is likely no longer intact, recent archaeological work indicates that portions of the site (including some located to the east on Burns Campus) are still present. Implementation of the Proposed Project has the potential to disturb, damage, or degrade archaeological resources or their settings in and around LAN-61, which may be able to address scientifically consequential and reasonable archaeological questions. As a result, implementation of the Proposed Project could have a potentially significant impact on archaeological resources or their settings. However, implementation of mitigation measures **MM-ARCH-1** through **MM-ARCH-12** would reduce the impacts to a less than significant level.

Little is currently known about LAN-212. Originally recorded in the 1950s, this site's record at the South Central Coastal Information Center has not been updated since it was created. Original site boundaries indicate the site is immediately to the south of Sacred Heart Chapel, in Burns Campus. Recent field survey, testing, and data recovery work suggests that the site boundary may extend farther than

previously recorded, extending to the north along the edge of the bluff, to the north of Sacred Heart Chapel. The Proposed Project implementation has the potential to disturb, damage, or degrade archaeological resources or their settings in and around LAN-212, which can address scientifically consequential and reasonable archaeological questions. As a result, implementation of the Proposed Project could have a potentially significant impact on archaeological resources or their settings. However, implementation of mitigation measures **MM-ARCH-1** through **MM-ARCH-12** would reduce the impacts to a less than significant level.

LAN-1018 may have been heavily disturbed. This site was first documented in 1936 but was not formally recorded until 1979. Whereas there are site boundaries recorded for this site at the South Central Coastal Information Center, the apparent disturbance to the site over the years makes the exact boundaries of the site difficult to discern at this point in time. Previous testing identified prehistoric, historical period, and modern artifacts at this location. Recent testing in 1990 at this site revealed large quantities of shell associated with historical-period artifacts, as well as assorted modern refuse. A single prehistoric artifact was recovered during this testing. Generally, this site is thought to be disturbed but may contain important scientific information. If intact portions of the site are found, radiocarbon dating of the midden could offer important information on when this site was occupied. In addition, artifacts and/or features that may be present may have importance to Native Americans and archaeologists. The Proposed Project implementation has the potential to disturb, damage, or degrade archaeological resources or their settings in and around LAN-1018, which can address scientifically consequential and reasonable archaeological questions. As a result, implementation of the Proposed Project could have a potentially significant impact on archaeological resources or their settings. However, implementation of mitigation measures **MM-ARCH-1** through **MM-ARCH-12** would reduce impacts to a less than significant level.

There is the potential for archaeological deposits outside of the known site boundaries for LAN-61, LAN-212, and LAN-1018. Recent research has tentatively extended the site boundaries of LAN-61 and LAN-212, based either on testing or on a recent field survey of the campus. Additionally, during the recent field survey, which was designed to be preliminary, certain areas of campus were found to have dark, sandy soil that may represent archaeological site material. Intact archaeological material may be present on the surface or under a layer of soil (also called fill) in open areas of campus and areas underneath standing buildings. For example, in urban areas, it is not unusual to find that there is intact archaeological material directly underneath the slabs of older building that did not have substantial soil preparation prior to construction. In these cases, the buildings and fill may be capping, and thus protecting, archaeological resources. Although the oldest buildings on campus are more likely to cap archaeological deposits, this is a possibility on the entire campus, depending on construction techniques historically used. For these reasons, implementation of the Proposed Project has the potential to disturb,

damage, or degrade archaeological resources or their settings in and around the remainder of the LMU campus that could address scientifically consequential and reasonable archaeological questions. As a result, implementation of the Proposed Project could have a potentially significant impact on archaeological resources or their settings. Implementation of the recommended mitigation measures **MM-ARCH-1** through **MM-ARCH-12** would reduce impacts to a less than significant level.

Operational Impacts

LMU operations following Proposed Project buildout would not normally require grading, excavation, or other ground-disturbing activities. Routine maintenance activities, such as replacement of underground pipes requiring ground-disturbing activities, could have a potentially significant impact on archaeological resources or their settings. However, implementation of mitigation measures **MM-ARCH-1** through **MM-ARCH-12** would reduce impacts to a less than significant level.

Project Design Features and Mitigation Measures

PDF-ARCH-1 The Proposed Project shall be consistent with the open space land use regulations established by the proposed LMU Specific Plan.

The mitigation measures presented below are required to reduce impacts on archaeological resources to a less than significant level.

MM-ARCH-1: Archaeological resources shall be avoided, or unavoidable disturbance shall be mitigated through data recovery, documentation, analysis, and curation. Archaeological treatment plans shall be developed and implemented, as applicable. All materials and records resulting from implementation of the archaeological treatment plans shall be curated in accordance with 36 Code of Federal Regulations, Part 79 (Curation of Federally Owned and Administered Archaeological Collections).

MM-ARCH-2: Prior to starting ground-disturbing activities such as construction work on campus, LMU shall retain a project archaeologist who meets the Secretary of the Interior's guidelines and is listed in the Register of Professional Archaeologists. In addition, a Native American member of the Gabrieleno/Tongva Tribal community shall be retained under contract as a monitor.

MM-ARCH-3: Before beginning the planned ground-disturbing activities (such as material grading and excavation activities), LMU shall consult with the archaeologist to determine if any potential exists as a result of the planned ground-disturbing activities for disturbance or

damage to archaeological resources. The Proposed Project archaeologist shall conduct a preliminary archaeological evaluation (which may include subsurface evaluation) to determine if there are archaeological resources present. If none are determined to be present within the area of planned ground-disturbing activity, then the archaeologist shall determine there is no potential for disturbance or damage to archaeological resources and the area may be cleared for construction work without the need for further archaeological work.

- MM-ARCH-4: If the archaeologist determines there is potential for damage to archaeological resources due to planned ground-disturbing activities, all ground-disturbing activities shall be monitored by the Proposed Project archaeologist and a Native American member of the Gabrieleno/Tongva Tribal community and mitigation for any potential adverse effects to archaeological resources from construction, as identified in mitigation measures **MM-ARCH-5** through **MM-ARCH-12** (below), shall be conducted.
- MM-ARCH-5: If based on a preliminary archaeological evaluation the archaeologist determines there are no archaeological resources present, but archaeological resources are encountered, work shall halt and LMU shall consult again with the archaeologist to determine if any potential exists as a result of the planned ground-disturbing activities for disturbance or damage to archaeological resources (see mitigation measure **MM-ARCH-3**).
- MM-ARCH-6: If archaeological discoveries are identified during monitoring of ground-disturbing activity, the archaeologist may order the temporary diversion of work outside a 200-foot radius around the discovery until the archaeologist has evaluated the nature and significance of the find.
- MM-ARCH-7: If potential human remains are encountered during ground-disturbing activities, all work shall halt, and the Los Angeles County Coroner's Office shall be notified, as prescribed in Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, and as required by the *State CEQA Guidelines* (Section 15126.4(b)(3) of the California Code of Regulations). If the Coroner determines that the remains are of Native American origin, the Coroner shall proceed as directed in Section 15064.5(e) of the *State CEQA Guidelines*. LMU shall follow all guidelines outlined in Public Resources Code Section 5097.98 and Section 5097.94(k).
- MM-ARCH-8: If significant archaeological resources are encountered, a data recovery plan to mitigate potential adverse effects of construction to a less than significant level shall be developed

and implemented. This data recovery plan shall include methods for hand-excavation, analysis, and report writing and also shall provide procedures for the curation of any collected material at a facility meeting professional standards.

MM-ARCH-9: After the archaeologist determines that potential impacts to archaeological resources have been mitigated, where necessary, work may resume in the area where the archaeological resources were encountered.

MM-ARCH-10: Any artifacts uncovered shall be recorded and removed for storage at a location to be determined by the archaeologist.

MM-ARCH-11: If archaeological resources are encountered outside of presently recorded site boundaries of CA-LAN-61, CA-LAN-212, and CA-LAN-1018, the site shall be recorded in accordance with requirements of the State Office of Historic Preservation (i.e., using Department of Parks and Recreation [DPR] 523 forms) and evaluated.

MM-ARCH-12: Draft reports on archaeological findings shall be prepared by the Proposed Project archaeologist for submission to the City of Los Angeles for review. Final versions of these reports shall be submitted to the City of Los Angeles, LMU, and the South Central Coastal Information Center at California State University, Fullerton. The report shall outline the data recovery plan in place for mitigation and shall describe the history of the Proposed Project area, research questions, the field and laboratory methods and results, and how these findings coincide with both the project research questions and the broader context of archaeology in the region. Collected material and project paperwork shall be curated at a facility meeting professional standards.

Level of Impact After Mitigation

With implementation of the recommended mitigation measures **MM-ARCH-1** through **MM-ARCH-12**, Proposed Project impacts would be less than significant; however, contributions to cumulatively significant impacts on archaeological resources would remain significant.

Cumulative Impacts

Development of the related projects may also require grading and excavation that could potentially affect archaeological resources. Related Projects Nos. 21, 22, and 23, all located within Playa Vista, are being developed in an area where archaeological resources are known to be present. Other related projects in the area, including West Bluffs and MDR Towers, have been or will be developed in areas where

unique archaeological resources are located. In some cases, projects will impact only a portion of the archaeological sites (Playa Vista) whereas others will remove the entire recorded site for development (West Bluffs and MDR Towers). The cumulative effect of these projects could contribute to the loss of subsurface cultural resources if these resources are not protected upon discovery. CEQA requirements for protecting archaeological resources are applicable to development of related projects. Mitigation measures are required that would reduce the Proposed Project's impacts on archaeological resources to less than significant levels. However, the cumulative total of all related development and the Proposed Project creates the potential for cumulative impacts to archaeological resources. Although each project must develop adequate mitigation measures to substantially lessen or avoid impacts on an individual basis, the incidental loss of portions of numerous archaeological resources in the Proposed Project area may constitute a significant cumulative impact. Consequently, the Proposed Project's contribution to cumulatively significant impacts would be cumulatively considerable and, therefore, the Proposed Project's contribution to cumulative impacts would be significant.

7.4.3 Historical Resources

Project Impacts

As discussed in the Draft EIR in Section IV.D.3, Historical Resources, Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, and the bluff-face letter "L" are considered historic resources for purposes of CEQA. All four resources were determined to be associated with historic events that, in this instance, include the founding of LMU's Westchester Campus in 1928 and the establishment of its identity as a Catholic-affiliated educational institution. The Proposed Project does not propose to substantially alter, convert, or rehabilitate Xavier Hall, St. Robert's Hall, or Sacred Heart Chapel such that the integrity or significance of the resources would be reduced. If, in the future, it is decided that conversion, rehabilitation, or alteration of any of the historic buildings on campus is required either to maintain safety standards or improve facilities to accommodate the evolving needs of LMU, all construction would be conducted in conformance with the Secretary of the Interior's Standards. However, to ensure that potential impacts continue to be avoided as the Proposed Project is implemented, mitigation measures **MM-HIST-1** and **MM-HIST-2** are recommended. **MM-HIST-1** requires documentation of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel prior to issuance of a construction permit for any work on those buildings, and **MM-HIST-2** requires renovation and rehabilitation of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel to conform to the Secretary of the Interior's Standards.

The Proposed Project proposes the possible addition of an outdoor columbarium, a place for the respectful storage of cinerary urns, in the form of a memorial wall to be located in the landscaped groves

flanking Sacred Heart Chapel to the east or west. However, this addition would not require any physical alteration to the Chapel. Therefore, impacts would be less than significant.

All other structures and objects on the campus are not considered historic resources for purposes of CEQA, and their removal would not constitute a significant impact. Since no historic resources would be demolished or relocated, impacts would be less than significant.

While typical groundborne vibration levels from construction activities very rarely reach levels that can damage structures, intensive vibration levels can be generated from pile drivers, large bulldozers, and other equipment used for earth excavation. Pile drivers would not be used as part of the Proposed Project's construction. To ensure that potential impacts due to earth excavation, earth moving activities, and possible settlement due to the removal of adjacent soil are avoided as the Proposed Project is implemented, mitigation measure **MM-HIST-3** is recommended. **MM-HIST-3** requires creation of a shoring plan to ensure the protection of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel prior to issuance of a permit for earth excavation or earth moving activities that could impact those buildings.

Project Design Features and Mitigation Measures

PDF-HIST-1 Xavier Hall, St. Robert's Hall, Sacred Heart Chapel and the bluff-face letter "L" shall be retained under the Proposed Project. Any renovations to these historic resources shall be made in compliance with the Secretary of the Interior's Standards.

No impacts to historic resources are expected to occur, however to ensure that potential impacts continue to be avoided, mitigation measures **MM-HIST-1** through **MM-HIST-2** are recommended. Additionally, to ensure that potential impacts to historic resources during construction are avoided, **MM-HIST-3** is recommended.

MM-HIST-1 LMU shall prepare documentation of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel prior to issuance of a construction permit for any work on those buildings. This documentation shall include:

- A brief written construction history in narrative format for each building.
- A site plan showing the location of each building. This site plan shall include a photo key.
- A sketch floor plan for each building.
- Field photographs (35 mm) based on Historic American Buildings Survey guidelines. Views shall include contextual views, all exterior elevations, detailed views of

significant exterior architectural features, and interior views of significant historical architectural features or spaces (if any).

- Available historic photographs and historic plans.

MM-HIST-2 Renovation and rehabilitation of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel shall conform to the Secretary of the Interior's Standards.

MM-HIST-3 Prior to issuance of a permit for earth excavation or earth moving activities that could impact Xavier Hall, St. Robert's Hall, or Sacred Heart Chapel, LMU shall create a shoring plan to ensure the protection of Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel.

Level of Impact After Mitigation

Potential impacts related to implementation of the Proposed Project would be less than significant after mitigation; therefore, no adverse effects to historic resources would result from Project implementation.

Cumulative Impacts

Impacts upon historic resources tend to be site-specific and are assessed on a site-by-site basis. Where resources in close proximity or with similar valued characteristics would be adversely affected, implementation of cumulative development would represent an incremental adverse impact on historic resources. However, implementation of the Proposed Project would not adversely impact any historic resources on campus. The historic resources on LMU's Campus, which include Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, and the bluff-face "L," would be retained as part of the Proposed Project, and mitigation measures would be implemented to ensure no impacts to historic resources would occur during construction. Therefore, Project implementation would not result in a cumulatively significant impact on historic resources.

7.5 Geology

Project Impacts

Project-level geotechnical evaluations will be required prior to finalizing grading and construction plans for individual Proposed Project buildings and campus improvements. The buildings and campus improvements proposed for implementation under the Proposed Project would be designed and constructed in accordance with all applicable requirements, which are outlined in the most current addition of the California Building Code and the Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations and fills. Design and construction would also adhere to applicable requirements of

the Department of the State Architect and federal building code requirements. Project-level hydrology plans will also be required prior to finalizing grading, drainage, and construction plans for individual Proposed Project buildings and campus improvements.

Geological Hazards

Proposed Project impacts related to geological hazards would be less than significant with preparation of building-specific geotechnical investigations and adherence to applicable building codes and the Los Angeles Municipal Code. Mitigation measures **MM-GEO-1** and **MM-GEO-2** are recommended to ensure compliance with building and municipal code requirements pertaining to geological hazards.

Expansive and Corrosive Soils

The campus near-surface soils are generally granular and nonexpansive. Expansion testing will be performed to confirm the expansion potential of any import soils. Any required import fill and at least the upper 2 feet of fill beneath the floor slab and beneath other concrete slabs and walks would consist of relatively non-expansive soils. Proposed Project impacts related to expansive soils would be less than significant with adherence to applicable building codes. Mitigation measure **MM-GEO-3** is recommended to ensure compliance with applicable building code requirements governing expansive soils.

Some campus soils are considered mildly to moderately corrosive. Accordingly, corrosion testing would be performed during the comprehensive geotechnical investigation required for individual buildings and structures, and proper corrosion protection would be implemented where needed. Proposed Project impacts related to corrosive soils would be less than significant with adherence to the applicable building codes. Mitigation measure **MM-GEO-4** is recommended to ensure compliance with applicable building code requirements governing corrosive soils issues.

Groundwater

Given the geology of the area, the depth of the groundwater table below the LMU campus is likely to be 10 to 23 feet above mean sea level. Elevations on LMU's campus range from approximately 66 feet above mean sea level near the LMU Drive campus entrance to approximately 120 feet above mean sea level near the eastern edge of the bluffs on campus, to approximately 150 feet above mean sea level on Burns Campus. Therefore, historic high groundwater levels are between 43 and 56 feet below the surface in the low-lying portions of campus and between 127 and 140 feet below the surface in the highest-elevation areas of campus. Excavation for building foundations, basements, infrastructure, and other subterranean structures would not exceed 35 feet in depth below grade on campus. Therefore, Proposed Project-related

excavation and below-grade construction would not approach or intercept groundwater beneath the campus and associated impacts would be less than significant.

Seismicity

The campus is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. The closest Alquist-Priolo Earthquake Fault Zone, established for the active Newport-Inglewood fault, is located approximately 3.2 miles east of the campus. Based on the available geologic data, no active or potentially active faults with the potential for surface fault rupture are located beneath or projecting toward the campus. Therefore, the potential for surface rupture at the campus due to fault plane displacement propagating to the ground surface during the life of the Proposed Project is considered low.

Although the campus could be subjected to strong ground shaking in the event of an earthquake, this hazard is common in Southern California. The location of the campus relative to known active or potentially active faults indicates that it is not exposed to a greater seismic risk than other sites in the area. Moreover, the effects of ground shaking can be mitigated by proper engineering design and construction in conformance with current building codes and engineering practices. Proposed Project impacts related to seismicity would be less than significant with adherence to applicable building codes. Mitigation measures **MM-GEO-1** and **MM-GEO-2** are required to ensure compliance with applicable building code requirements governing seismicity.

Slope Stability

The LMU campus is not located within a Landslide or Hillside Area as mapped by the City of Los Angeles. However, the Westchester Bluffs below the campus are located in a State of California Earthquake-Induced Landslide Hazard Zone because the bluffs' angle is greater than 19 degrees, or 3:1 horizontal: vertical. A slope is considered safe (e.g., sufficiently stable for proposed uses) if it has a factor of safety of greater than 1.5. Those slopes have been determined to possess the required safety factor. However, because of the sandy, uncemented nature of bluff materials, the bluff face is generally considered susceptible to erosion and sloughing. Project-level geotechnical evaluations, including slope stability studies to verify the factor of safety of the bluff slope, will be required prior to finalizing site selection, grading plans, and foundation and building design for individual Proposed Project buildings and campus improvements adjacent to the bluffs. Remedial design measures will be implemented in accordance with applicable building codes to ensure that the factor of safety is at least 1.5. Furthermore, no buildings or structures will be constructed within the northern portion of campus on the bluffs, which is designated by the proposed LMU Specific Plan as a Buffer/Open Space Planning Area.

The Proposed Project's impacts related to slope stability would be less than significant with preparation of Project-level (i.e., building-specific) geotechnical evaluations, including slope stability analyses, and adherence to applicable building codes governing slope stability. Mitigation measures **MM-GEO-1**, **MM-GEO-2**, and **MM-GEO-5** are recommended to ensure compliance with code requirements governing slope stability.

Liquefaction

As discussed above, the LMU campus is not located within an area identified as having potential for liquefaction. Based on previous borings,⁵ groundwater is at a depth of greater than 50 feet in areas where liquefiable soils may be present.⁶ Therefore, the potential for liquefaction, and the associated ground deformation beneath the LMU campus, is considered to be very low, and impacts related to liquefaction would be less than significant.⁷

Other Geological Hazards

The potential for other geologic hazards such as seismic-induced settlement, tsunamis, inundation, seiches, flooding, volcanic eruption, and subsidence affecting the campus is considered low. Therefore, impacts related to liquefaction, seismic-induced settlement, tsunamis, inundation, seiches, flooding, volcanic eruption, and subsidence would be less than significant.

Sedimentation and Erosion

Erosion and sedimentation are the windborne and waterborne transport of exposed soil. Because of the sandy, uncemented nature of the Westchester Bluffs materials, the bluff face is susceptible to erosion and sloughing (mass erosion or shedding on steep slopes). Project-level (i.e., building-specific) hydrology plans will be required prior to finalizing grading, drainage, and construction plans for individual Proposed Project buildings and campus improvements. Storm drain collection devices for the Proposed Project would be designed in conformance with applicable grading and building codes to ensure that all runoff would be collected and transferred to the proper collection devices. As part of the Proposed Project, LMU is required to comply with the requirements of the National Pollution Discharge Elimination System Permit set forth by the Los Angeles Regional Water Quality Control Board, and to prepare and submit a Storm

⁵ Reports by LeRoy Crandall, LAW/Crandall, and MACTEC Engineering and Consulting, Inc, 1956–2007. (Refer to Section 6.0, Bibliography, of the geotechnical evaluation provided in the Draft EIR in Appendix IV.E.).

⁶ MACTEC Engineering and Consulting, Inc, *Geotechnical Evaluation: Proposed Master Plan Project, Loyola Marymount University*, provided in the Draft EIR in Appendix IV.E.

⁷ MACTEC Engineering and Consulting, Inc, *Geotechnical Evaluation: Proposed Master Plan Project, Loyola Marymount University*, provided in the Draft EIR in Appendix IV.E.

Water Pollution Prevention Plan. The Storm Water Pollution Prevention Plan would incorporate Best Management Practices to ensure that potential water quality impacts during construction from erosion would be reduced to less than significant levels. In addition, LMU would adhere to Southern California Air Quality Management District's Rule 403, Fugitive Dust, during construction activities, which would further prevent impacts associated with dust generation and wind erosion. All grading activities would require grading permits from the Department of Building and Safety, which include requirements and standards designed to control sedimentation and erosion.

Proposed Project impacts related to sedimentation and erosion would be less than significant with adherence to the applicable building codes and current local, state, and federal regulatory requirements governing sedimentation and erosion, which require the preparation of Project-level plans to address surface hydrology and water quality. Mitigation measures **MM-GEO-6** through **MM-GEO-8** are recommended to ensure compliance with these requirements.

Landform Alteration

There are no unique geologic features present within the developed area of the campus. Therefore, no impacts related to landform alteration would occur.

Project Design Features and Mitigation Measures

No Project Design Features are proposed.

The following mitigation measures would address potential geotechnical impacts and ensure that impacts remain less than significant.

Geological Hazards

MM-GEO-1 Project-level (i.e., building-specific) geotechnical investigations shall be required prior to finalizing grading and construction plans for individual Proposed Project buildings and campus improvements.

MM-GEO-2 Individual buildings and improvements shall be designed and constructed in accordance with the requirements outlined in the most current edition of the California Building Code and the Los Angeles Uniform Building Code, as well as all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavation, and fill, Department of the State Architect requirements, and federal building code requirements.

- MM-GEO-3 Prior to issuance of a grading permit for an individual building or improvement, expansion testing shall be performed in accordance with UBC Standard 29-2 and ASTM Standard D4829 to determine the expansion potential of any import soils. Any required import fill and at least the upper 2 feet of fill beneath floor slabs and beneath other concrete slabs and walks shall consist of relatively non-expansive soils with an Expansion Index of less than 35.
- MM-GEO-4 Prior to issuance of a grading permit for an individual building or improvement, corrosion testing shall be performed and proper corrosion protection shall be implemented where required in accordance with the Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations and fills.
- MM-GEO-5 Slope stability evaluations shall be performed prior to issuance of a grading permit for buildings and improvements adjacent to bluff slopes. Slope stability evaluations shall be performed along critical cross sections of the slope adjacent to each area of potential development during the design-level geotechnical studies. The design minimum factors of safety under static and pseudostatic loading conditions shall be taken as 1.5 and 1.1, respectively, following accepted geotechnical practices and agency guidelines.

Sedimentation and Erosion

- MM-GEO-6 Project-level hydrology plans shall be required prior to finalizing grading and construction plans for individual Proposed Project buildings and campus improvements. Hydrology plans shall be designed in conformance with current local, state, and federal regulatory requirements.
- MM-GEO-7 Prior to the start of soil-disturbing activities at the site, a Notice of Intent and Storm Water Pollution Prevention Plan shall be prepared in accordance with, and in order to partially fulfill, the California State Water Resources Control Board Order No. 99-08-DWQ, National Pollution Discharge Elimination System General Permit No. CAS000002 (General Construction Permit) and Chapter 6 Article 4.4, Stormwater and Urban Runoff Pollution Control from the Los Angeles Municipal Code. The Storm Water Pollution Prevention Plan shall meet the applicable provisions of Sections 301 and 402 of the California Water Act and Chapter 6 Article 4.4, Stormwater and Urban Runoff Pollution Control from the Los Angeles Municipal Code, by requiring controls of pollutant

discharges that utilize best available technology economically achievable and best conventional pollutant control technology to reduce pollutants.

MM-GEO-8 General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.

Level of Impact After Mitigation

No unavoidable significant impacts with respect to geological hazards, sedimentation and erosion, or landform alteration would result from implementation of the Proposed Project.

Cumulative Impacts

Potential geologic hazards associated with the Proposed Project are site-specific and would not represent a cumulative impact. Implementation of the Proposed Project and other projects in the Southern California region would cumulatively increase the number of structures and people exposed to geologic- and seismic-related hazards. As long as design and construction of related projects occurs consistent with proper engineering practices and the requirements of applicable portions of the Municipal Code as they apply to each related project component, seismic and regional geologic hazards would not be considered cumulatively considerable. Potential sedimentation, erosion, and landform alteration associated with the Proposed Project are also site-specific and would not contribute to a cumulative impact.

7.6 Hazards

Project Impacts

Construction Impacts

Handling of Hazardous Materials

Construction of the Proposed Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the campus. Therefore, impacts from the use of these hazardous substances during construction of the Proposed Project would be less than significant.

Asbestos, Lead and PCBs

Sampling of all suspect asbestos-containing building materials, such as roofing, wall finishes, and non-friable floor finishes, as well as surveying for lead-based paint and polychlorinated biphenyls (PCBs), would be conducted for all buildings planned for demolition prior to obtaining a demolition permit. In the event hazardous materials are found to be present, they will be remediated and/or disposed of in compliance with all federal, state, and local regulations. With implementation of mitigation measures **MM-HAZ-1** through **MM-HAZ-4**, hazardous materials impacts during construction would be less than significant.

Methane

Different portions of the campus are mapped as being within a Methane Zone and Methane Buffer Zone, and non-classified zone by the Los Angeles Department of Building and Safety. Five subsurface gas probes were placed on the site of the William H. Hannon Library in April 2007, prior to the commencement of the library's construction. Methane gas was not detected at any of the five probe locations. However, appropriate precautionary measures should be taken to ensure construction worker safety. Implementation of mitigation measure **MM-HAZ-5** would reduce potential impacts to construction workers to a less than significant level.

Construction of new buildings and paved areas constructed located within a Methane Zone or Methane Buffer Zone under the Proposed Project would be required to comply with the City's Methane Seepage Regulations and the specifications of the Los Angeles Department of Building and Safety, as stated in mitigation measure **MM-HAZ-6**. Therefore, compliance with the City's Methane Seepage Regulations would reduce impacts to a less than significant level.

Operational Impacts

Handling of Hazardous Materials

Increased transport, use, storage, and disposal of hazardous materials at LMU may result from the greater number of people on campus and higher campus square footage. However, implementation of the Proposed Project would not introduce new hazardous materials onto the LMU campus; instead, quantities of existing hazardous materials used on campus would incrementally increase as the campus population increases.

The transport, use, and disposal of hazardous materials would be overseen by the LMU Environmental Health and Safety Department in compliance with federal, state, and local regulations. Additional use of

hazardous materials would be documented in the annual Unified Program Forms and would be subject to the Environmental Health and Safety Department's existing programs, policies, and procedures related to hazards and materials safety. In the unlikely event of a real or potential release, the Environmental Health and Safety Department's emergency procedure for hazardous materials spills and releases would be employed. This procedure requires immediate notification of the real or potential release to the Environmental Health and Safety Department, which then contacts the Los Angeles Fire Department and the California Environmental Protection Agency. Therefore, impacts related to the release of hazardous materials or exposure to health hazards would be less than significant.

Emergency Response or Evacuation Plan

Development of the Proposed Project would take place only within the existing LMU campus and would take into account existing emergency routes, response procedures, and action plans. During both construction and operation, the potential exists for partial impedance and/or alteration of existing response routes, procedures, and evacuation plans within the campus. LMU would review and update all emergency preparedness recommendations and campus emergency response and evacuation procedures to reflect changes in campus layout through implementation of the Proposed Project. All emergency response plans are adaptable to the Proposed Project. Therefore, implementation of the Proposed Project would not substantially interfere with the campus's adopted emergency preparedness recommendations and/or the emergency response procedures. Impacts on existing emergency response and evacuation plans would be less than significant.

As discussed in the Draft EIR in Section IV.B-1, Air Quality, no elementary, middle, or high schools are currently located within 0.25 mile of LMU. However, the Los Angeles Unified School District (LAUSD) has approved construction of a new school, Playa Vista Elementary School, on Bluff Creek Drive at the base of the bluffs near the southwestern end of LMU's campus. The proposed school would constitute a sensitive receptor within 0.25 mile of the LMU campus.

LMU uses and stores some hazardous materials on campus that are considered standard materials necessary to support university operations, such chemicals handled in science laboratories, cleaning products, paints, and oil, but these materials are stored and maintained in compliance with all applicable regulations. Additionally, the campus Environmental Health and Safety Department has an established set of emergency procedures that it would follow in the unlikely event of hazardous materials spills or releases. Additionally, Proposed Project operation would not result in significant air quality impacts. Therefore, there would be a less than significant impact by the Proposed Project's potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

No portion of the campus is listed on the Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Evaluation, School Investigation, LUFT/LUST or SLIC databases.⁸ Therefore, the Proposed Project would not create a significant hazard to the public or the environment from building on a listed site and impacts would be less than significant.

Project Design Features and Mitigation Measures

PDF-HAZ-1 The transport, storage, use, and disposal of hazardous materials shall be overseen by the LMU Environmental Health and Safety Department in compliance with federal, state, and local regulations. In the unlikely event of a real or potential release, the LMU Environmental Health and Safety Department's emergency procedure for hazardous materials spills and releases shall be employed.

The following mitigation measures would address potential hazards impacts and reduce impacts to less than significant levels:

MM-HAZ-1 Prior to issuance of a demolition permit for a building, LMU shall submit verification to the City of Los Angeles Department of Building and Safety that an asbestos survey of the building has been conducted. If asbestos is found, such asbestos shall be removed prior to demolition in accordance with SCAQMD Rule 1403 and any other applicable regulations.

MM-HAZ-2 Prior to issuance of a demolition permit for a building, LMU shall submit verification to the City of Los Angeles Department of Building and Safety that a lead-based paint survey of the building has been conducted. If lead based paint is found, LMU shall follow all procedural requirements and regulations for proper removal and disposal of the lead based paint prior to demolition.

MM-HAZ-3 Fluorescent light ballast and other product labels shall be inspected prior to demolition. If the labels do not include the statement, "No PCBs," the product(s) shall be properly removed by a licensed PCB removal contractor and disposed of as PCB-containing waste prior to demolition.

MM-HAZ-4 All personnel potentially exposed to asbestos- or lead-containing materials shall be trained and protected in accordance with California Division of Occupational Safety and Health regulations.

⁸ California Department of Toxic Substances Control, "EnviroStor," <http://www.envirostor.dtsc.ca.gov/public/>. 2009.

MM-HAZ-5 During subsurface excavation activities, including borings, trenching, and grading, California Division of Occupational Safety and Health worker safety measures shall be implemented as required to preclude any exposure to unsafe levels of soil gases, including but not limited to methane.

MM-HAZ-6 Construction of new buildings and paved areas within the portions of campus located in a Methane Zone or Methane Buffer Zone as designated by the Los Angeles Department of Building and Safety shall comply with the City's Methane Seepage Regulations and the specifications of the Los Angeles Department of Building and Safety.

Level of Impact After Mitigation

With incorporation of mitigation measures **MM-HAZ-1** through **MM-HAZ-6**, all Proposed Project-specific impacts would be less than significant; therefore, no unavoidable significant hazards impacts would result from implementation of the Proposed Project.

Cumulative Impacts

The majority of related projects propose residential, retail, office or civic (i.e., school and fire station) uses. With the possible exception of the Los Angeles International Airport expansion, no related projects, including those within the immediate vicinity of the campus (Playa Vista Phases I and II and the Playa Vista Plant Site), would require the routine transport, use or disposal of hazardous materials that could pose a significant safety risk. Furthermore, all related projects must comply with federal, state, and local procedures for the safe removal and remediation of any hazardous substances. Additionally, since all related projects are located within existing emergency response service areas with adequate roadway access, no related projects would require a new emergency response or evacuation plan, or interfere with an existing emergency response or evacuation plan. As a result, the Proposed Project would not contribute to a significant cumulative hazards impact.

7.7 Surface Water Hydrology and Water Quality

Project Impacts

Surface Water Hydrology

Construction Impacts

During construction, a Storm Water Pollution Prevention Plan would be implemented and best management practices would be in place, in accordance with the California State Water Resources

Control Board, to provide temporary stormwater management for areas under construction to prevent the volume of stormwater from adversely affecting water bodies and the stormwater conveyance and treatment systems adjacent to the campus. Construction of the Proposed Project would not substantially reduce or increase the amount of surface water in the Ballona Channel and/or the riparian corridor. Mitigation measure **MM-HWQ-1**, which requires preparation of a Storm Water Pollution Prevention Plan, and **MM-HWQ-2**, which requires preparation of a Standard Urban Storm Water Mitigation Plan, are included to ensure compliance with regulations pertaining to surface water hydrology to ensure impacts remain less than significant.

Operational Impacts

The 8-inch and 12-inch storm drains currently leading from a 16-acre southwestern portion of Burns Campus to the Sunken Garden would be upsized and rerouted to the southeast to convey flows to McConnell Avenue Storm Drain and alleviate flooding in the Sunken Garden during heavy storm events. In addition, the 24-inch LMU-owned storm drain that conveys flows from the Sunken Garden into the Riparian Corridor, as well as the 12-inch LMU-owned storm drain immediately to the east that connects to the Sunken Garden outflow storm drain, would be upsized to increase their respective capacities and further alleviate flooding in the Sunken Garden. Proposed drainage system improvements would be designed to handle the total peak runoff rates and volumes generated by the Proposed Project. The City-owned McConnell Avenue Storm Drain already has the necessary excess capacity and would not need to be increased in size.

The Proposed Project would not cause flooding within the existing riparian corridor during a projected 50-year developed storm event that could harm people, damage property, or sensitive biological resources.

The Standard Urban Storm Water Mitigation Plan requires that stormwater facilities, be implemented to reduce the rate and volume of stormwater runoff that would be conveyed to the stormwater conveyance and treatment systems. The Proposed Project's Standard Urban Storm Water Mitigation Plan would treat the first 0.75 inch of rainfall from new impervious areas and infiltrate water whenever possible. When buildings and parking areas that currently do not adhere to this regulation (due to their construction prior to the implementation of these regulations) are replaced, the new buildings and parking areas would adhere to this regulation, consequently reducing the volume of rainfall runoff produced on the campus and sent to the riparian corridor and the McConnell Avenue Storm Drain. As several areas of the campus, including Burns Campus, were designed before current regulations were in place, implementation of the Proposed Project would bring the campus into compliance with current regulations.

Because the stormwater runoff rate and quantity is being reduced throughout the entire LMU campus, the receiving water bodies will experience a decrease in stormwater volume, with the exception of the McConnell Avenue Storm Drain. Additionally, the direction of surface runoff flow for the remainder of the campus would be similar to existing conditions.

For these reasons, the Proposed Project would not substantially reduce or increase the amount of surface water in the Ballona Channel and/or the riparian corridor, and potential impacts to off-campus stormwater conveyance and treatment systems related to stormwater runoff volumes would be less than significant with adherence to applicable regulations. Nonetheless, mitigation measures **MM-HWQ-1** and **MM-HWQ-2** are included to ensure compliance with regulations pertaining to surface water hydrology.

Surface Water Quality

Construction Impacts

During construction of Proposed Project buildings and facilities, construction-related grading activities could temporarily increase the amount of exposed soil and the potential for erosion and sedimentation (i.e., suspended solids carried off-campus via runoff). LMU would adhere to the requirements of the National Pollutant Discharge Elimination System, which includes preparation of a Storm Water Pollution Prevention Plan prior to the issuance of grading permits, and the Storm Water and Urban Runoff Pollution Control provisions from the Los Angeles Municipal Code, which includes the preparation of a Standard Urban Storm Water Mitigation Plan. Potential impacts associated with construction of the Proposed Project would be less than significant with adherence to applicable regulations. Nonetheless, mitigation measure **MM-HWQ-1**, which requires preparation of a Storm Water Pollution Prevention Plan, and **MM-HWQ-2**, which requires preparation of a Standard Urban Storm Water Mitigation Plan, as well as **MM-HWQ-3** through **MM-HWQ-7** are recommended to ensure compliance with regulations pertaining to surface water quality.

Operational Impacts

The current building standards for parking structures require the installation of oil and grease traps and other mechanisms to treat water before being sent to the storm drain system. The Proposed Project will replace significant areas of surface lot parking (which do not have these mechanisms in place to treat runoff) with structure parking above or below grade. LMU maintains on campus storage of herbicides, insecticides and rodenticides, which are commonly used on campus, in accordance with requirements of the California Department of Pesticide Regulation.

All improvements to the LMU campus would be designed to current water quality standards and regulations. Several areas of the campus were designed before current regulations. Therefore, when existing buildings and parking areas are replaced, the new buildings and parking areas would adhere to current regulations, consequently reducing the volume of rainfall runoff produced on the campus and sent to the riparian corridor and the McConnell Avenue Storm Drain. The Proposed Project would improve these areas to comply with current regulations and therefore, would improve water quality in these areas and reduce the volume of rainfall runoff produced on the campus and sent to the riparian corridor and the McConnell Avenue Storm Drain.

Potential impacts associated with operation of the Proposed Project would be less than significant with adherence to applicable regulations. Nonetheless, mitigation measure **MM-HWQ-1**, which requires preparation of a Storm Water Pollution Prevention Plan, and **MM-HWQ-2**, which requires preparation of a Standard Urban Storm Water Mitigation Plan, as well as **MM-HWQ-3** through **MM-HWQ-8** are recommended to ensure compliance with regulations pertaining to surface water quality.

The elevation of the campus ranges from approximately 66 to approximately 150 feet above mean sea level. According to the City of Los Angeles Safety Element, the LMU campus is not located within a tsunami run-up zone, which is the area that might be inundated during a tsunami. Therefore, tsunamis are not considered a significant hazard on the LMU campus. According to the City of Los Angeles Safety Element, the campus is not located in a potential inundation area that could adversely affect the campus in the event of earthquake-induced dam failures or seiches (wave oscillations in an enclosed or semi-enclosed body of water). Finally, the campus is not located in a City-designated Landslide or Hillside Area, however the Westchester Bluffs below the campus are located in a state-designated Earthquake-Induced Landslide Hazard Zone because of their steep angle. Due to the sandy, uncemented nature of bluff materials, the bluff face is generally considered susceptible to erosion and sloughing. However, Proposed Project impacts related to slope stability would be less than significant with preparation of Project-level (i.e., building-specific) geotechnical evaluations, including slope stability analyses to verify the factor of safety of the bluff slope, and adherence to applicable building codes governing slope stability. Moreover, no buildings or structures would be constructed within the northern portion of campus on the bluffs, as this area is designated by the proposed LMU Specific Plan as a Buffer/Open Space Planning Area. Given the above, impacts related to inundation by seiche, tsunami, or mudflow are considered to be a less than significant.

Project Design Features and Mitigation Measures

PDF-HWQ-1 The runoff from 16 acres at the southwest corner of Burns Campus shall be diverted to the McConnell Avenue storm drain by rerouting these storm drains to the southeast.

PDF-HWQ-2 During Proposed Project construction of components on Burns Campus, the 24-inch LMU-owned storm drain leaving the Sunken Garden and the 12-inch LMU-owned storm drain immediately to the east of the Sunken Garden, and the 8-inch and 12-inch storm drains at the southwest corner of Burns Campus, shall be upsized to alleviate flooding in the Sunken Garden area and to accommodate additional runoff volume.

The following mitigation measures would address impacts to surface water hydrology and water quality and ensure that impacts remain less than significant.

MM-HWQ-1 Prior to the start of soil-disturbing activities for individual projects on campus, a Notice of Intent (NOI) and Storm Water Pollution Prevention Plan shall be prepared in accordance with, and in order to partially fulfill, the California SWRCB Order No. 99-08-DWQ, National Pollutant Discharge Elimination System General Permit No. CAS000002 (General Construction Permit). The Storm Water Pollution Prevention Plan shall meet the applicable provisions of Sections 301 and 402 of the Clean Water Act and Chapter 6 Article 4.4, Storm Water and Urban Runoff Pollution Control from the City of Los Angeles Municipal Code by requiring controls of pollutant discharges that utilize best available technology economically achievable and best conventional pollutant control technology to reduce the rate and quantity of stormwater runoff. Examples of best available technology economically achievable and best conventional pollutant control technology that may be implemented during site grading and construction could include straw hay bales, straw bale inlet filters, filter barrier infiltration pits, stormwater cisterns, and silt fences.

MM-HWQ-2 LMU shall prepare and implement for individual projects on campus a Standard Urban Storm Water Mitigation Plan in accordance with the requirements of Chapter 6 Article 4.4, Storm Water and Urban Runoff Pollution Control, from the City of Los Angeles Municipal Code, to ensure that stormwater runoff water quality is managed through implementation of appropriate and applicable Best Management Practices. Prior to issuance of any grading or building permits for individual projects on campus, the City of Los Angeles Department of Public Works must approve the Standard Urban Storm Water Mitigation Plan.

MM-HWQ-3 During the construction of individual Proposed Project components, Proposed Project contractors shall properly store hazardous materials to prevent contact with precipitation or runoff.

- MM-HWQ-4 During Proposed Project construction and subsequent operation, Proposed Project contractors and LMU, respectively, shall develop and maintain effective monitoring and cleanup programs for spills and leaks of hazardous materials.
- MM-HWQ-5 During Proposed Project construction and subsequent operation, Proposed Project contractors and LMU, respectively, shall place equipment to be repaired or maintained in covered areas on a pad of absorbent material to contain leaks, spills, or small discharge.
- MM-HWQ-6 During Proposed Project construction and subsequent operation, Proposed Project contractors and LMU, respectively, shall provide periodic and consistent removal of landscape and construction debris.
- MM-HWQ-7 During Proposed Project construction and subsequent operation, Proposed Project contractors and LMU, respectively, shall sweep parking lots at regular, frequent intervals to remove debris and shall also remove any significant chemical residue on the Project site through appropriate methods.
- MM-HWQ-8 LMU shall prepare and implement for individual projects on campus a Wet Weather Erosion Control Plan during between October 1 and April 15 in accordance with the requirements of Section 7002 of the Los Angeles Building Code.

Level of Impact After Mitigation

All Proposed Project-specific construction and operational impacts would be less than significant; therefore, no unavoidable significant surface water hydrology and water quality impacts would result from implementation of the Proposed Project. Nonetheless, mitigation measures **MM-WR-1** through **MM-WR-7** are recommended to ensure compliance with regulations pertaining to surface water quality.

Cumulative Impacts

Several related projects are proposed and/or planned within the campus vicinity. All of the projects are proposed upstream of the Ballona Wetlands and Ballona Channel; none of the related projects are proposed upstream of the McConnell Avenue Storm Drain. The majority of these projects will need to implement a Stormwater Pollution Prevention Plan and a Standard Urban Stormwater Mitigation Plan. Compliance with these plans would result in a cumulative decrease in stormwater runoff rate and volume and, consequently, a decrease in the amount of pollutants carried by stormwater runoff. Considered together with related projects, the Proposed Project's contribution to cumulatively significant surface water hydrology and water quality impacts would be less than significant.

7.8 Land Use and Planning

Project Impacts

Land Use Designation

The Westchester-Playa del Rey Community Plan currently designates the LMU campus for “L” Low Density Residential uses. As of 2004 the zoning designation for the campus is [Q]R4-1 Residential – Multiple Dwelling Zone, Height District 1, with [Q] Qualified Conditions. The R4 zoning designation, according to the Los Angeles Municipal Code, expressly allows education institutions as well as multi-family residences, dormitories, sorority/fraternity houses, churches, hotels, and other uses; however, these uses are limited by the [Q] Qualified Conditions on the campus. The R-4 zone normally corresponds to the High-Medium Density Residential land use designation under the General Plan; however, LMU’s existing land use designation is Low Density Residential, which the City has previously found to be consistent with the campus’ R4 zoning due to the land use limitation of the campus’ [Q] Qualified Conditions.

To implement this Proposed Project, LMU proposes changing the General Plan designation of the campus from Low Density Residential to High Medium Density Residential, for compatibility with university uses and LMU’s residential density. The High-Medium Density Residential land use designation more accurately reflects the use of the Proposed Project site as an academic campus with residential uses. The Proposed Project would also change the zoning of the campus from [Q] R4-1 to R4-1, and establish a Specific Plan for the Westchester campus, which would impose development limitations similar to those currently applicable to the campus through the [Q] Qualified Conditions.

Should the General Plan Amendment and Specific Plan be approved and adopted, the requested Zone Change and establishment of the proposed Specific Plan would supersede the Municipal Code and land use impacts would be less than significant.

Plan Consistency

The Proposed Project would be consistent with applicable SCAG policies, the Los Angeles County Airport Land Use Plan, the City of Los Angeles General Plan Framework Element, the Westchester-Playa del Rey Community Plan, the City of Los Angeles Municipal Code, and the “Do Real Planning Guidelines” following approval of the requested Zone Change and adoption of the proposed Specific Plan. Therefore, impacts associated with plan consistency would be less than significant.

Additionally, the Proposed Project site is not identified as part of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other habitat conservation plan, and therefore, the Proposed Project would not conflict with an adopted habitat conservation plan.

Land Use Compatibility

The Proposed Project would not expand the borders of the LMU campus, all improvements planned under the Proposed Project would occur within the existing campus boundaries. Additionally, the Proposed Project proposes establishment of a Specific Plan that would institute a more comprehensive set of development standards to maintain compatibility with surrounding land uses. These development standards include a height and setback control plan on the campus. The proposed Specific Plan also establishes Planning Areas on the LMU campus that would primarily concentrate athletic uses in the southern portion of Burns Campus, maintain the campus's large expanses of open space, and configure new development to maintain scenic corridors through campus. Therefore, the Proposed Project would retain the modest suburban scale of the existing campus and protect surrounding uses. Other standards intended to minimize incompatibility with adjacent uses include vehicular access restrictions, under which LMU Drive would remain the primary route for visitor and truck traffic. For these reasons, the Proposed Project would be compatible with existing land uses and impacts associated with land use compatibility would be less than significant.

Project Design Features and Mitigation Measures

PDF-LU-1 The Proposed Project shall comply with the land use regulations established by the proposed LMU Specific Plan.

Since no significant impacts would result from implementation of the Proposed Project, no mitigation measures are required.

Level of Impact After Mitigation

All Proposed Project-specific and cumulative impacts would be less than significant; therefore, no unavoidable significant land use impacts would result from Proposed Project implementation.

Cumulative Impacts

The majority of related projects in the Westchester-Playa del Rey Community Plan Area, including buildout of Playa Vista Phases I and II and the Playa Vista Plant Site, propose multi-family housing, commercial uses, and/or office space concentrated along Jefferson Boulevard, Manchester Avenue, and Sepulveda Boulevard. These arterials are designated by the Westchester-Playa del Rey Community Plan

for the development of high-density residential and commercial uses. Since these related projects are proposed within mixed-use corridors that are intended for such development, they would not present land use conflicts arising from incompatibility with the existing single-family residential neighborhoods that comprise the majority of the Community Plan Area. Other related projects in and adjacent to the Community Plan Area include expansion of two existing schools (Westchester Neighborhood School and Westchester Lutheran School), which would not cause a significant change in the land use pattern of the area. The remaining related projects are located outside the Community Plan Area boundaries and are too far from the LMU campus to result in cumulative land use impacts.

All proposed projects within the Westchester and Playa del Rey communities are required to comply with the City's General Plan, Community Plan, and Municipal Code, or obtain approval of a General Plan Amendment, Zone Change, or variance, if necessary. These plans provide guidelines that regulate permitted uses, development density, building heights, site and building design, and transportation and public services/utilities demand. For these reasons and given that related projects identified in the Community Plan Area are consistent with land use patterns designated by the Community Plan, the Proposed Project would have a less than cumulatively considerable contribution to cumulatively significant land use impacts.

7.9 Noise

Construction Impacts

Construction Equipment Noise

Noise levels generated during Proposed Project implementation — that is, during construction of specific Proposed Project components — would depend upon the distance between the construction activity/site and the affected use(s), as well as upon the noise attenuation qualities of existing buildings on campus and any intervening development already built during earlier phases of the Proposed Project. The closest off-campus sensitive uses include single-family residential uses located along McConnell Avenue immediately east of Burns Campus, adjacent to the campus boundary. Other single-family residential uses near the campus are located along Campion Drive approximately 35 feet from Hughes Campus boundary, albeit at a higher elevation, and along Fordham Road, Altavan Avenue, the north end of Nardian Way and Belton Drive, and W. 78th and W. 80th Streets, with most residences approximately 60 feet or more from the campus boundary, separated by roadways.

Proposed Project-related construction noise could exceed the current ambient noise levels, which range from 56 community CNEL (community noise equivalent level) to 63.5 CNEL along the campus boundary, by 5 A-weighted decibels (dB(A)) at the nearest residential land use. The City's thresholds states that

construction activities lasting more than 10 days in a three-month period and exceeding existing ambient exterior noise levels by 5 dB(A) or more at a sensitive land use would result in a significant impact on that use. Proposed Project construction was modeled to potentially generate noise levels between 88.7 dB(A) and 95.6 dB(A) as measured 50 feet from noise sources, conservatively assuming simultaneous operation of multiple pieces of equipment at grade (vibratory rollers and sonic pile drivers were modeled at a distance of 50 feet). Conservatively assuming no intervening buildings or structures on campus that attenuate noise, construction in most areas of campus could potentially increase existing ambient exterior noise levels at off-site residences near the campus perimeter by 5 dB(A) or more. Therefore, the operation of construction equipment could result in significant off-campus noise impacts on off-site residents near the campus perimeter, particularly residences closest to campus along McConnell Avenue and potentially along Fordham Road, Altavan Avenue, the north end of Nardian Way and Belton Drive, and W. 78th and W. 80th Streets. Only the northwest corner of Burns Campus is sufficiently distant from residential uses to entirely preclude potentially significant noise impacts on these uses. **MM-NOISE-1** requires that all construction activity be conducted in accordance with Section 112.05 of the Los Angeles Municipal Code Noise Ordinance. **MM-NOISE-2** requires that heavily loaded trucks used during construction be routed away from residential streets. Even with implementation of mitigation, the impact would be significant.

Construction Traffic Noise

In addition to heavy-duty construction equipment noise, the movement of equipment, haul trucks and workers to and from the campus during construction would generate temporary traffic noise along access routes to the campus. The transport of heavy-duty construction equipment onto the campus would be minimized during construction by keeping construction equipment staged on campus for the duration of construction of specific Proposed Project components. For this reason, the movement of heavy-duty construction equipment is expected to result in a less than significant short-term effect on roadway noise levels. The operation of haul trucks and the daily transportation of construction workers via shuttle from an off-site parking facility during construction are expected to cause increases in noise levels along some roadways near the campus. However, it takes a doubling of average daily trips on roadways to increase noise by 3 dB(A) and the maximum haul truck and construction worker shuttle trips to the campus would not cause a doubling of average daily trips in the immediate area. As a result, the noise level increases along major arterials surrounding the campus would be less than 3 dB(A). Therefore, noise impacts associated with construction-related traffic would be less than significant.

Groundborne Vibration or Groundborne Noise

Persons residing and working in the area surrounding the Proposed Project could be exposed to the generation of groundborne vibration or groundborne noise levels related to construction activities. The

primary and most intensive vibration source associated with the development of the Proposed Project would be associated with the use of vibratory rollers and sonic pile drivers during construction and on-road haul trucks carrying demolition debris, soil, and building materials to and from the site. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Sensitive receptors located in the immediate vicinity of the Proposed Project site include single-family residences located to east of Burns Campus in the McConnell Avenue residential neighborhood and to the south and southeast in the W. 78th Street/Fordham Road residential neighborhood.

The operation of vibratory rollers within 50 feet of residences located along the campus boundary could generate vibration levels of 85 vibration decibels (VdB) at those residences. The operation of sonic pile drivers within 50 feet of residences located along the campus boundary could generate vibration levels of 84 VdB at those residences. It should be noted that the vibration levels generated by the types of equipment required for each phase of construction would be experienced intermittently, since construction equipment do not operate continuously. Unlike sonic pile drivers or rollers, haul trucks are not considered stationary equipment. Nonetheless, loaded haul trucks carrying demolition debris, soil, and building materials also result in vibration impacts. The operation of loaded haul trucks results in a vibration velocity level of 86 VdB measured at 25 feet.⁹

Based on the above analysis, vibratory rollers and sonic pile drivers operating at a minimum of 50 feet from residential land uses and loaded haul trucks operating 25 feet from residential land uses would result in vibration impacts that are less than the Federal Transit Administration's thresholds, and would therefore be less than significant. However, as a Project Design Feature, the operation of vibratory rollers and sonic pile drivers would be limited to a distance greater than 50 feet from the campus boundary. Therefore, construction-related vibration impacts on off-site sensitive receptors would be less than significant.

Operational Impacts

Roadway Noise

The predominant source of existing noise in the vicinity of the Proposed Project site is vehicular noise on local roadways. Development of the Proposed Project would increase the traffic volumes traveling along local roadways. To evaluate the potential permanent impact associated with increased vehicle trips

⁹ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment (FTA-VA-90-1003-06)*, (2006) 12-11 and 12-12.

generated by operation of the Proposed Project, noise prediction modeling utilizing the Federal Highway Administration (FHWA) noise prediction model was conducted for future (2030) traffic levels plus the additional traffic associated with the Proposed Project. Future baseline traffic levels account for ambient traffic growth in addition to the traffic generated by related projects in the study area.

Project operation would result in permanent ambient noise level increases of 0.3 dB(A) or less on the 25 surrounding roadways during the weekday. The greatest project-related noise increase of 0.3 dB(A) would occur on the following five roadway segments: Loyola Boulevard south of W. 80th Street; W. 80th Street east of Loyola Boulevard; Loyola Boulevard south of W. 83rd Street; W. 77th Street east of McConnell Avenue; and McConnell Avenue south of W. 77th Street. However, none of the roadway segments that were evaluated would experience an increase in CNEL of 3 dB(A) within the “normally unacceptable” or “clearly unacceptable” categories, as defined in the Draft EIR in Table IV.I-3, or a 5 dB(A) noise increase in any category. Therefore, roadway noise impacts associated with the Proposed Project would be less than significant.

Point Source Noise - On-Campus Housing

Noise levels for residential areas are typically between 48 and 52 dB(A) CNEL. Existing ambient noise levels along the campus boundary range from 56 to 63.5 dB(A) CNEL and are the result of numerous on- and off-campus noise sources in addition to campus residential housing, including vehicular roadway noise on- and off- campus; campus parking lot activity; campus athletic facility use and events; outdoor ceremonies and concerts; equipment operation in the campus recycling area and shops associated with Facilities Management and the Central Plant; operation of landscape maintenance equipment; operation of rooftop heating, cooling, and ventilation equipment; waste collection activities; and other campus operational activities. The highest ambient noise levels, 63.5 dB(A), were measured at the southern edge of Burns Campus, in proximity to Sullivan Soccer Field and Loyola Boulevard.

New campus residential uses would generate noise levels within the same range as existing campus residential uses, from 48 to 63.5 dB(A) CNEL. As previously discussed, noise is measured on a logarithmic scale and is not simply cumulative or additive; therefore, increased campus housing would not automatically increase community noise levels in the vicinity. As previously discussed, changes in noise levels of less than 3 dB(A) are not considered generally noticeable; an increase of greater than 5 dB(A) is considered readily noticeable; and a 10 dB(A) increase in sound level is considered to be a doubling of sound volume. In contrast, a doubling of sound energy (e.g., doubling the volume of traffic on a roadway) would result in only a 3 dB(A) increase in sound, a barely perceptible change in sound level. For this reason, the proposed additional on-campus housing, since it would be similar to existing student housing would not cause ambient noise levels to increase by 3 dB(A) in CNEL to or within the

“normally unacceptable” or “clearly unacceptable” categories. Therefore, impacts associated with the introduction of new residential uses on campus would have a less than significant noise impact.

Point Source Noise - Parking Facilities

Existing ambient noise levels along the campus boundary range from 56 dB(A) to 63.5 dB(A) CNEL. The nearest off-campus sensitive land uses are single-family residential uses located along McConnell Avenue abutting the eastern boundary of Burns Campus.

Parking areas can be a source of annoyance due to automobile engine start-ups and acceleration and the occasional accidental activation of car alarms. These intermittent noise events associated with parking areas can generate equivalent continuous noise levels (L_{eq}) of between 49 dB(A) L_{eq} (tire squeals) to 74 dB(A) L_{eq} (car alarms) at 50 feet. In general, noise associated with surface parking and parking structures are intermittent and short-term in nature and not of sufficient volume to exceed community standards based on the time-weighted CNEL scale. In addition, as stated under Project Design Features, proposed parking structures would include a half wall on the grade-level parking deck and/or full walls on the sides of the structure that face nearby receptors. Due to the minimum attenuation of 5 dB(A) associated with solid walls and the existing ambient noise level, the predicted noise level increase caused by activity within the parking structures would not increase ambient noise levels by 5 dB(A). Thus, to the extent parking is located underground or in a parking structure, noise associated with parking would be reduced. Given that noise associated with surface parking and parking structures is not of sufficient volume to exceed community standards based on the time-weighted CNEL scale, off-campus noise impacts associated with the proposed parking structures and surface parking would be less than significant.

Recreational Facilities and Outdoor Venue

Nighttime lighting would be installed at Sullivan Field, Page Stadium, Smith Field, and Burns Recreation Center Pool, which would extend the hours of operation at these facilities. Page Stadium, Smith Field, and the pool are equipped with permanent amplified audio systems. The improved audio system proposed for Sullivan Field would require speakers to be located on several of the proposed lighting poles. The installation of nighttime lighting would also extend the use of existing and improved audio systems associated with the facilities listed above. Use of audio systems at recreational facilities would randomly and intermittently increase sound levels at the fields during games. Implementation of mitigation measure **MM-NOISE-3** would limit the operation of audio systems associated with all outdoor athletic facilities to only those hours during which the fields are being utilized, which would not surpass 10:00 PM with the exception of unusual circumstances such as overtime or extra innings. Current

ambient noise levels along the campus boundary range from 56 CNEL to 63.5 CNEL, which are within the “normally acceptable” to “conditionally acceptable” noise category for residential uses. The closest sensitive receptors to the recreational facilities listed above are single-family residential uses located directly adjacent to the eastern boundary of Burns Campus and along W. 80th Street approximately 80 feet from the southern boundary of Burns Campus. Project design features would ensure that speakers associated with the improved and existing audio systems would be angled downward mounted in such a fashion that they face the bleachers and directed away from nearby residences. In addition, the settings would be fixed by the manufacturers’ representative to ensure that sound levels from the audio systems do not exceed off-campus ambient noise levels by 5 dB(A). Given the attenuation rate of 6 dB(A) for each doubling of distance, implementation of the audio system project design features, and implementation of **MM-NOISE-3**, the improved and existing audio systems would not cause the ambient noise level to increase by 5 dB(A). Therefore, off-campus noise impacts associated with the audio system would be less than significant with the incorporation of mitigation.

Additional seating is proposed for Page Baseball Stadium, Smith Softball Field, and Sullivan Soccer Field; however, in response to comments, LMU has reduced the amount of additional seating proposed at these facilities by a total of 1,300 seats. The proposed additional seating at Page Stadium is 900 seats (reduced from 1400 additional seats); the proposed additional seating at Smith Softball Field is 200 seats (reduced from 500 additional seats); and the proposed additional seating at Sullivan Soccer Field is 860 seats (reduced from 1,360 additional seats). The proposed total seating at these facilities is proposed to be 1,500 seats at Page, 400 seats at Smith, and 2,000 seats at Sullivan.

Recycling and Waste Management Area

In order to characterize noise generated by typical recycling and waste handling activities at the existing recycling and waste management area, noise monitoring was conducted at the existing location of on-campus recycling and waste management operations along the eastern boundary of Burns Campus. The noise levels of existing recycling and waste management are conservative, since LMU has ordered new, quieter equipment to replace existing equipment. However, noise levels associated with existing recycling and waste management equipment are used in the noise analysis.

As part of the Proposed Project, the following three development scenarios are proposed for LMU’s recycling and waste management operations: (1) the recycling and waste management area may remain in its current location, on Burns Campus east of the Facilities Management buildings, with no improvements; (2) the recycling and waste management area may remain close to its current location inside a structure built 40 feet from the eastern boundary to enclose operations; and (3) the recycling and

waste management area may be relocated to the lowest level of the existing Drollinger Parking Plaza on Leavey Campus. Noise impacts associated with each development scenario are discussed below.

a. No Changes to Recycling and Waste Management Area

No physical changes to the recycling and waste management area would occur under this scenario and the hours of operation would remain the same, noise associated with recycling and waste management equipment would remain the same when compared to existing conditions. Therefore, noise associated with recycling and waste management operations under this scenario would not cause ambient noise levels to increase by 5 dB(A) and a less than significant impact would occur.

b. Enclosed Recycling and Waste Management Area

Under this scenario, a structure would be constructed that would enclose the recycling and waste management operations in a location 40 feet from the eastern campus boundary. Enclosure of the recycling and waste management area would reduce noise levels associated with operations and would result in a reduced noise impact. Therefore, noise associated with enclosed recycling and waste management operations would not cause ambient noise level to increase by 5 dB(A) and a less than significant impact would occur.

c. Relocation of Recycling and Waste Management Area

Under this development scenario, recycling and waste management operations would be relocated to within the lower subterranean level of the existing Drollinger Parking Plaza on Leavey Campus. LMU intends to relocate the recycling area to this location if the Master Plan Project is approved by the City Council; however if it becomes infeasible to relocate the recycling area to this location, it will be relocated to an alternate location.

Drollinger Parking Plaza is a cement parking structure partially embedded into the hillside. Drollinger Parking Plaza has full walls on the side of the structure that faces the residential uses to the south. As a result, the line-of-sight from the equipment to closest off campus residential uses to the south would be obstructed. In addition, the solid walls closest to the off-campus residences would attenuate noise a minimum of 5 dB(A). All trash sorting, compacting, unloading and storage activities would take place within the indoor Drollinger Parking Plaza. Outdoor noise producing activities would be limited to activities such as trucks and utility vehicles picking up trash bins, pulling smaller trash bin trains, entering and exiting the facility via the proposed driveway, and trucks reversing in the turnaround area adjacent to the facility entrance.

Existing ambient noise levels along Leavey Campus southern boundary, north of the Nardian Way and W. 78th Street intersection, range from 58 dB(A) to 59.6 dB(A) CNEL. During 24-hour monitoring, existing maximum momentary noise levels along Leavey Campus southern boundary frequently exceeded 70 dB(A) throughout the day and night, and occasionally exceeded 80 dB(A). Given the distance of the closest off-campus residential uses to the south, outdoor truck reverse alarm noise levels experienced at the residential uses to the south would be 58 dB(A) L_{eq} with a maximum noise level of 62 dB(A) maximum equivalent continuous noise level (L_{max}). As a result, maximum noise due to truck reverse alarms occurring outdoors would be lower than current maximum noise levels along Leavey Campus southern boundary; and short duration average levels would be similar to current conditions. Given the distance of the closest off-campus residential uses to the south and an attenuation rate of 6 dB(A) per doubling of distance, outdoor trash container noise levels experienced at the off-campus residential uses would be 50 dB(A) L_{eq} with a maximum noise level of 54 dB(A) L_{max} . These noise levels would be lower than the existing daytime noise levels measured along Leavey Campus southern boundary, of 58 dB(A) and 59.6 dB(A) CNEL. In addition, noise levels experienced at the off-campus residential uses to the south would be 48 dB(A) L_{eq} with a maximum noise level of 51 dB(A) L_{max} due to stationary waste handling equipment, which would operate within the parking structure. However, these estimated noise levels do not take into account attenuation associated with operations occurring within the parking structure. Actual noise levels experienced off-site due to the proposed operations would be attenuated a minimum of 5 dB(A) since recycling and waste management operations would occur indoors. In addition, the proposed location of the recycling and waste management area is located at a lower elevation than the residential uses located to the south, which would further attenuate noise.

Based on noise measurements of equipment associated with the recycling and waste management operations, and the distance of the closest sensitive receptor, operation of the recycling and waste management equipment at the Drollinger Parking Plaza would not cause ambient noise levels to increase by 3 dB(A) in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category or by 5 dB(A) or greater. Therefore, impacts would be less than significant.

Project Design Features and Mitigation Measures

PDF-NOISE-1 During construction activities, the operation of vibratory rollers and sonic pile drivers shall occur at a minimum distance of 50 feet from the campus boundary, and shall occur at a minimum distance of 84 feet from Xavier Hall, St. Robert’s Hall, and Sacred Heart Chapel.

- PDF-NOISE-2 LMU shall provide construction worker parking at an off-site location in the campus vicinity. A shuttle service shall transport workers to and from campus in the morning and afternoon. No worker parking shall be permitted on residential streets.
- PDF-NOISE-3 All speakers for modified and new outdoor audio systems shall be mounted to face spectator areas, be directed away from adjacent residences, and be set to provide that sound levels from the systems do not exceed the off-campus ambient noise levels in Table IV.I-4 of the Draft EIR by 5 dB(A).
- PDF-NOISE-4 New parking structures shall include a half wall on the grade-level parking deck and/or full walls on the sides of the parking structure that face nearby residential receptors.
- PDF-NOISE-5 LMU's Department of Public Safety shall continue to respond to on-campus incidents regarding excessive noise and student violations shall be sanctioned as provided in LMU's Student Conduct Code.
- PDF-NOISE-6 No outdoor amplified sound system shall be installed or maintained on the LMU Campus within 150 feet of residential areas in the R1 zone, except within the Athletic Planning Area, where public address systems used in conjunction with athletic training and competitions may be used. However, emergency address broadcasts shall be exempted from these requirements.

Construction Mitigation Measures

The following mitigation measure would reduce construction noise impacts to the extent feasible.

- MM-NOISE-1 All construction activity shall be conducted in accordance with Section 112.05 of the Los Angeles Municipal Code Noise Ordinance, which states that all technically feasible measures shall be implemented to reduce noise levels of construction equipment operating within 500 feet of residential areas in cases where noise levels exceed 75 dB(A) at 50 feet from the noise source. The Project applicant shall therefore require in contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:
- Two weeks prior to the commencement of construction of new buildings, notification must be provided to surrounding land uses within 500 feet of a Project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period;

- Ensure that construction equipment is properly muffled according to industry standards and in good working condition;
- Place noise-generating construction equipment and locate construction staging areas away from sensitive uses;
- Schedule high noise- and vibration-producing activities between the hours of 8:00 AM and 5:00 PM to minimize disruption to sensitive uses;
- Implement noise attenuation measures, which may include, but are not limited to, temporary noise barriers such as curtains around construction areas or noise blankets around stationary construction noise sources in order to limit construction noise generation from exceeding existing ambient exterior noise levels by 5 dB(A) at a noise sensitive use;
- Use electric air compressors and similar power tools rather than diesel equipment, for construction equipment that is available and economically feasible;
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 20 minutes; and
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be posted clearly at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City of Los Angeles or the construction relations liaison receives a complaint, the liaison shall investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications shall be included in the project construction documents, which shall be reviewed by City of Los Angeles representatives prior to issuance of a grading permit.

The following mitigation measure would reduce construction vibration impacts to less than significant levels.

MM-NOISE-2 The Project Applicant shall require by contract specifications that heavily loaded trucks used during construction be routed away from residential streets. Contract specifications shall be included in the project construction documents, which shall be reviewed by the City of Los Angeles representatives by prior to issuance of a grading permit.

Operational Mitigation Measures

The following mitigation measure would reduce operational noise impacts to less than significant levels.

MM-NOISE-3 The use of existing or improved audio systems associated with Sullivan Field, Page Stadium, Smith Field, and Burns Recreation Center Pool shall be limited to only those

hours during which the facilities are being utilized, which shall not surpass 10:00 PM, except in the case of overtime or extra innings.

Level of Impact After Mitigation

Construction-Related Effects

Even with implementation of mitigation measures **MM-NOISE-1** through **MM-NOISE-2**, construction of the Proposed Project would result in potentially significant and unavoidable noise impacts at the off-campus residences closest to campus along McConnell Avenue and potentially along Fordham Road, Altavan Avenue, the north end of Nardian Way and Belton Drive, and W. 78th and W. 80th Streets, since construction would last more than 10 days in a three-month period and could exceed existing ambient noise levels by 5 dB(A) or more.

With implementation of mitigation measure **MM-NOISE-2**, construction vibration impacts would be less than significant.

Operational Impacts

With implementation of mitigation measure **MM-NOISE-3**, all operational noise impacts would be less than significant.

Cumulative Impacts

Construction Noise Impacts

There are 60 related projects located within the vicinity of the campus, all of which have the potential to produce construction noise impacts. Given that timing of construction activities for the related projects cannot be fully defined, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. In addition, each of the related projects would have to comply with the local noise ordinance, as well as mitigation measures that may be incorporated pursuant to CEQA required environmental review that would reduce construction noise for each project to the extent feasible. As such, individual construction noise impacts would only contribute to cumulative impacts when projects are in proximity to each other. No projects are proposed within the residential neighborhood immediately surrounding the campus. Four related projects, Playa Vista Phases I and II, Playa Vista Plant Site (Spruce Goose), and Central Region Elementary School No. 22, are located at the base of the Westchester Bluffs at a lower elevation than the campus. These related projects are located far enough from the campus, and are at a lower elevation, that the Proposed Project, considered together with these related projects, would not contribute to a cumulatively considerable noise impacts during construction.

Roadway Noise Impacts

Cumulative noise impacts would primarily occur as the result of increased traffic on local roadways due to ambient growth and other development in the vicinity of the campus. Future (2030) weekday roadway noise levels are compared to existing roadway noise levels. As previously described, future roadway noise levels are based on traffic generated by the Proposed Project as well as related projects in the study area, in addition to ambient traffic growth. Future roadway noise levels would increase existing ambient noise levels between 0.8 dB(A) and 2.5 dB(A) CNEL on surrounding roadways during the weekday. The greatest cumulative noise increase of 2.5 dB(A) would occur along the following roadway segments: Lincoln Boulevard north of Jefferson Boulevard, Lincoln Boulevard south of W. 83rd Street, Lincoln Boulevard south of La Tijera Boulevard, and Centinela Avenue north of Jefferson Boulevard. However, trips associated with the Proposed Project would only result in a 0.1 dB(A) increase to roadway noise level along Centinela Avenue north of Jefferson Boulevard. None of the roadway segments included in the assessment would result in an increase in CNEL of 3 dB(A) within the “normally unacceptable” or “clearly unacceptable” categories or by 5 dB(A) within the “normally acceptable” or “conditionally acceptable” categories. Therefore, cumulative roadway noise impacts would be less than significant. In addition, the greatest project-related roadway noise increase would be 0.3 dB(A) or less. Therefore, the Proposed Project’s contribution to cumulative roadway noise impacts would also be less than significant.

7.10 Public Services

7.10.1 Police Protection

Project Impacts

Construction Impacts

Potential crime and safety issues during construction include theft of building materials and construction equipment, malicious mischief, graffiti and general vandalism. Such activities at a construction site are not unusual, but are only occasional and do not typically place undue demands on police protection services. Additionally, LMU’s own 24-hour security patrol would guard against theft and vandalism at on-campus construction sites, further reducing demand on LAPD services. While the Proposed Project’s construction impact on police services is considered less than significant, mitigation measure **MM-POL-1**, which requires the securing of construction sites and use of security lighting to deter theft and vandalism, is recommended to further increase safety and reduce potential impacts related to crime.

Additionally, construction of the Proposed Project could increase traffic both on and adjacent to the campus during typical weekday working hours as commuting construction workers, trucks, and other

large construction vehicles could be added to normal traffic. Construction worker parking would be provided at an off-site location in the campus vicinity, to minimize the number of construction-related trips onto the campus. Necessary construction equipment would be staged on campus and, other than commuting, would not impact local roadways. This potential construction impact to emergency access is considered minor given the periodic nature of construction traffic and the short-term duration of construction of individual buildings over a 20-year period. Further, LMU requires its contractors to employ standard construction site precautions to safeguard against disruption of traffic or other ongoing activities on and around campus. Emergency access to active construction sites would be maintained consistent with LAPD requirements. Construction impacts related to emergency access would be less than significant.

Operational Impacts

Currently, LAPD's Pacific Division provides services for a total population of approximately 239,079 residents. The Proposed Project increase of approximately 989 residents on the LMU campus would represent a less than 0.41 percent increase in the Pacific Division's population over 2007 conditions. The 0.41 percent increase in population would result in a minimal increase in the officer to population ratio. In 2007, there were 292 patrol officers for 239,079 residents (a ratio of 1.221 patrol officers per 1,000 residents) in the Pacific Division. Adding 989 residents under the Proposed Project would change the ratio to 1.216 patrol officers per 1,000 residents. Therefore, the Proposed Project's impacts on the officer to population ratio at the Pacific Division would not be substantial and the impact would be less than significant.

LMU's 2008 crime/incident rate was approximately 0.07 per FTE students, faculty, and staff. The Proposed Project would increase the number of FTE students, faculty, and staff by approximately 1,248. Thus, using the 2008 rate, Proposed Project buildout could result in an additional 87 incidents per year from the addition of 1,248 FTE students, faculty, and staff on campus at buildout. This represents an increase of 1.34 percent over the 6,505 incidents that occurred in 2007 in the Pacific Division, which is a minimal increase. Therefore, the Proposed Project's impacts on the demand for police services in the Pacific Division would be less than significant.

In addition, the LMU Department of Public Safety provides first-response police protection services for the LMU campus and operates 24 hours a day, 365 days a year, which serves to further reduce the Proposed Project's demand on the City's police services. LMU also maintains an Emergency Preparedness program and action plan and Emergency Management Guide. The Department of Public Safety officers are trained to utilize the Incident Command System and National Incident Management

System in cases of emergency. The Department of Public Safety is also able to secure public campus entrances within minutes.

Since Proposed Project implementation would not result in substantial additional demand for police services and impacts on LAPD services are therefore, anticipated to be less than significant, the provision of new or expanded police protection facilities would not be necessary, and potential impacts associated with the construction of new or expanded police protection facilities would accordingly be less than significant.

Emergency access to LMU would be provided by the existing street system. City review of street widths, street lighting, and street signage would be based on an evaluation of requirements for the provision of emergency access. The Proposed Project would comply with all requirements with regard to emergency access. As such, impacts to emergency access would be less than significant.

While the Proposed Project's operational impacts on police services are considered less than significant, mitigation measures have nevertheless been included to ensure that the Proposed Project has addressed potential issues in a manner that is satisfactory to the LAPD. LMU would provide the LAPD's Crime Prevention Unit with an opportunity to comment on security and crime prevention measures for the Proposed Project, as required by mitigation measure **MM-POL-2**. In order to help the Pacific Division's commanding officers during responses to emergencies, the Applicant would provide a diagram demonstrating access routes to each portion of the Proposed Project site and buildings, as required by **MM-POL-3**. Mitigation measures **MM-POL-2** and **MM-POL-3** would ensure that operational impacts on the LAPD police services would remain less than significant.

Project Design Features and Mitigation Measures

PDF-POL-1 The LMU Department of Public Safety shall continue to provide first-response police protection services for the LMU campus and implement such security measures as maintaining a security booth located off Lincoln Boulevard, operating a network of security cameras on the campus, and securing all student resident halls by authorized key card entry.

While the Proposed Project's impacts would be less than significant, the following mitigation measures are proposed to ensure that impacts remain less than significant:

- MM-POL-1 During Project construction, construction sites shall be secured with fencing and locked entrances. Construction equipment, tools and materials shall be secured by locking or placing them within sheds and/or other inaccessible areas while not in use. Construction sites shall be lighted as necessary at night to deter theft and vandalism.
- MM-POL-2 Prior to the issuance of a building permit, the Los Angeles Police Department, Pacific Division, Crime Prevention Unit, shall have the opportunity to comment regarding security and crime prevention features.
- MM-POL-3 Upon completion of each building or facility, a diagram of each completed building or facility shall be provided to the Los Angeles Police Department Pacific Division Commanding Officer. The diagram shall include access routes, building locations, and any additional information that would facilitate police response.

Level of Impact After Mitigation

Impacts would remain less than significant.

Cumulative Impacts

The related projects within the City of Los Angeles would increase the number of residents in the Pacific Division from 239,079 by adding approximately 16,350 residents to the Pacific Division service area during the course of Proposed Project buildout. Buildout of the related residential projects within LAPD's Pacific Division's service area would result in an increase of approximately 441.5 crimes per year within the Pacific Division service area. Combined with the 87 annual incidents that would result from an increase of 1,248 FTE students, faculty, and staff on the LMU Campus, the cumulative increase in crimes would be 528.5 per year, or an increase of 8.1 percent above the 2007 rate of 6,505 crimes in the Pacific Division service area. This is not considered a substantial increase. Additionally, each project is required to comply with all statutory regulations and is subject to review by the LAPD to ensure that adequate access, visibility, and security is provided. The Proposed Project would comply with all statutory regulations. Therefore, the Proposed Project would not result in a cumulatively significant impact on police services.

7.10.2 Fire Protection and Emergency Medical Services

Project Impacts

Construction Impacts

Construction activities associated with implementation of the Proposed Project would occur in a variety of locations on the campus over a period of 20 years. However, the risk of fire is considered minimal since the Proposed Project would not be constructed all at the same time and fire suppression equipment specific to construction would be maintained on site. Slow-moving, construction-related traffic on campus and surrounding roadways, as well as potential temporary construction-related obstruction of roadways on campus, may temporarily reduce optimal traffic flows on those roadways and could conceivably delay emergency vehicles traveling through the area. However, the Los Angeles Department of Transportation requires implementation of Worksite Traffic Control Plans to ensure that any construction related effects are minimized, and LMU requires its contractors to employ standard construction site precautions to safeguard against disruption of traffic on and around campus. As required by OSHA and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations, which would include the monitoring and management of life safety systems and facilities. For these reasons, impacts would be less than significant during construction.

Operational Impacts

Emergency Access

LMU currently has through roads that provide for adequate vehicle circulation, including service for emergency vehicles. Service and emergency access to the site and circulation within LMU following Proposed Project buildout would typically follow the same routes as general traffic. The Proposed Project does not propose any changes to the existing points of campus ingress/egress, and intends to improve the vehicular network at LMU. The reconfiguration of buildings and recreational facilities are intended to improve circulation around and within LMU and is expected to improve emergency and service vehicle access by improving vehicular and pedestrian circulation, and, therefore, reduce chances for accidents involving vehicles and pedestrians. Additionally, some roadways would be designated specifically for service and emergency vehicles. LAMC Section 57.09.03 (D)3 requires those portions of a fire lane extending for 30 feet on either side of a private fire hydrant to have a minimum clear roadway width of 28 feet, with no parking permitted within that area. LAMC Section 57.09.03 (D)2 requires that, in the absence of a fire hydrant, fire roads may be as little as 20 feet in width where adjacent buildings are less than two stories and therefore don't require use of a ladder from the fire truck. Additionally, the Los

Angeles Fire Department requires that new structures and structures undergoing major modifications must be located within 150 feet of a fire lane. All roads would be designed in accordance with the recommendations and requirements of the Los Angeles Fire Department. All new structures and structures undergoing major modifications would also be located in accordance with the recommendations and requirements of the Los Angeles Fire Department. Mitigation measures **MM-FIRE-1** through **MM-FIRE-6** requiring compliance with all Fire Department codes would ensure that impacts remain less than significant. In addition, Proposed Project implementation may relocate the campus recycling and waste management area closer to LMU Drive and Lincoln Boulevard, which would reduce truck congestion within the campus core and improve access and circulation throughout the campus. For the reasons discussed above, operational impacts on emergency access would be less than significant.

Fire Flow Infrastructure

Sufficient fire flow and pressure would exist on campus at Proposed Project buildout. Therefore, impacts with regard to fire flow would be less than significant. Additionally, all buildings constructed under the Proposed Project would also be required to comply with applicable requirements regarding hydrant location and spacing, and building design and access. Furthermore, the Proposed Project would replace older buildings on campus with new construction that includes modern-day fire suppressant technology, such as fire sprinklers, fire alarms, and updated fire retardant building materials, thereby further reducing potential fire risks. Impacts to fire flow infrastructure would, therefore, be less than significant. Mitigation measures **MM-FIRE-1** through **MM-FIRE-7** requiring compliance with all Fire Department codes would ensure that impacts remain less than significant.

Response Distance and Time

The target response times within the City of Los Angeles are 5 minutes for first response and 8 minutes for paramedic response, and the maximum response distance for High Density Residential and Neighborhood Commercial development is 1.5 miles from the nearest fire engine or truck company.

The response distance and time are considered adequate because Fire Station No. 67 has a fire vehicle response time of approximately 3 minutes and a paramedic vehicle response time of approximately 7 minutes. Additionally, the response distance to the campus site from the nearest engine company (Fire Station No. 67) is approximately 0.8 mile, which is within the performance standard of 1.5 miles as required by the Los Angeles Fire Code for an engine company. The nearest truck company (Fire Station No. 5) is 1.4 miles from LMU, which is within the 1.5-mile requirement of the Los Angeles Fire Code. Impacts would be less than significant.

Demand for Services

The increase in FTE students associated with Proposed Project implementation would result in the generation of approximately 70 emergency incidents over existing conditions. This represents an increase of approximately 3.1 percent over the 2,300 incidents to which Fire Station 67 responded in Fiscal Year 2007–2008. This increase is not substantial, and therefore the impact would be less than significant.

Emergency Preparedness

LMU's Emergency Management Guide is consistent with the policies and regulations of the Governor's Office of Emergency Services, City of Los Angeles Fire Department, Los Angeles Police Department, and Federal Emergency Management Agency, which assures that the campus, is adequately prepared in the event of an emergency. Therefore, operational impacts associated with emergency preparedness would be less than significant.

Emergency Facilities

According to the City of Los Angeles Fire Department, adequate staff, equipment and fire protection services currently exist to meet the additional demands that would be generated through the implementation of the Proposed Project.¹⁰ Therefore, the provision of new or expanded fire protection facilities would not be necessary, and potential impacts associated with the construction of new or expanded fire protection facilities would be less than significant.

Project Design Features and Mitigation Measures

PDF-FIRE-1 LMU's Department of Public Safety shall continue to act as a first responder in emergencies and implement LMU's emergency procedures.

The Proposed Project would be required to meet the requirements of the Municipal Code for Fire Protection, and as described above, impacts of the Proposed Project would be less than significant. Nonetheless, to ensure that impacts remain less than significant, the following measures are recommended.

MM-FIRE-1 Prior to the issuance of any building permit, a plot plan shall be submitted to the Fire Department for approval.

¹⁰ Battalion Chief Michael Greenup, personal communication, November 22, 2008.

- MM-FIRE-2 Prior to the issuance of any building permit, definitive plot plan and specifications including fire prevention features for the Proposed Project shall be submitted to and approved by the Fire Department.
- MM-FIRE-3 Adequate off-site public and on-site private fire hydrants shall be required. The exact number and location of the hydrants shall be determined after the Fire Department reviews the plot plan. LMU shall be required to pay for any hydrant installations required by the Fire Department.
- MM-FIRE-4 Adequate vehicular access ways around all multi-story buildings shall be required by the Fire Department where buildings exceed two stories in height.
- MM-FIRE-5 Where fire apparatus will be driven onto the road level surface of a subterranean parking structure, the structural foundation of the subterranean parking structures shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.
- MM-FIRE-6 LMU shall covenant that all streets on campus shall be open to free travel of emergency vehicles.
- MM-FIRE-7 LMU shall work with the Los Angeles Department of Water and Power to construct or otherwise suitably guarantee the construction of water system improvements as needed to meet the on-site fire flow requirements set forth by LAFD. In the event off-site improvements are necessary, LMU shall contribute its fair share to water system improvements to meet the on-site fire flow requirements set forth by the Fire Department.

Level of Impact After Mitigation

Impacts would remain less than significant.

Cumulative Impacts

The Proposed Project combined with related residential projects could generate an additional 1,053 emergency incidents annually. Added to the 2,300 emergency incidents Fire Station 67 currently responds to, Fire Station 67 is anticipated to respond to approximately 3,353 emergency incidents upon buildout of the Proposed Project and related projects. Fire Station 67 would be able to accommodate the increase in emergency incidents associated with the Proposed Project in combination with the related residential projects. Furthermore, all related projects would comply with the Los Angeles Municipal Code and Building Code regulations pertinent to fire safety, access, and fire flow. Therefore, the Proposed Project in

combination with related projects would result in a less than significant cumulative impact relative to fire and emergency medical services.

7.10.3 Recreation and Parks

Project Impacts

The increase of students on campus associated with Proposed Project implementation would create additional demand for area parks and recreational facilities. With implementation of the Proposed Project, LMU would add approximately 28,000 net new gross square feet of indoor athletic facilities, for a total of approximately 213,000 gross square feet at buildout. LMU also plans to add approximately 4.8 net new acres of outdoor athletic facilities and approximately 5 net new acres of landscaped open space, through the provision of additional and larger plazas and courtyards. With buildout of the Proposed Project, therefore, LMU would add approximately 9.8 net new acres of outdoor athletic facilities and landscaped open space to campus, for a total of approximately 50 acres at buildout.

The Proposed Project includes establishment of a proposed Specific Plan for the campus that would require that a minimum acreage of open space be provided on campus. Accordingly, the open space requirements of Section 12.21.G do not apply because they are superseded by the proposed Specific Plan. Additionally, the Quimby Act does not apply because LMU is not requesting subdivision of the campus. However, the Proposed Project would provide sufficient open space on campus, as required by the proposed Specific Plan, to exceed the requirements of the Los Angeles Municipal Code and the Quimby Act.

As discussed in the Draft EIR in Section IV.J.3, Recreation and Parks, Section 12.21.G of the Los Angeles Municipal Code does not apply to the Proposed Project, but requires that applicable projects provide 100 square feet of open space for each dwelling unit having less than three habitable rooms, 125 square feet of open space for each dwelling unit having three habitable rooms, and 175 square feet of open space for each dwelling unit having more than three habitable rooms. Conservatively assuming that each of the 1,240 dwelling units provided on campus following Proposed Project buildout will have more than three habitable rooms, LMU would be required to provide 217,000 square feet, or approximately 5 acres, of open space on campus if Section 12.21.G did apply. As the campus would provide approximately 50 acres of outdoor athletic space and landscaped open space under the proposed Specific Plan, the Proposed Project far exceeds this standard even prior to full buildout of the Proposed Project.

The desired short- and intermediate-term standard for park acreage under the City of Los Angeles Public Recreation Plan is 1 acre of parkland per 1,000 residents within a service radius of 1 mile for neighborhood parks, and 1 acre per 1,000 persons within a service radius of 2 miles for community parks.

The desired long-term standard is 2 acres per 1,000 persons for neighborhood parks and 2 acres per 1,000 persons for community parks. Because implementation of the Proposed Project would increase the student population on campus by 989 students, increase the acreage of outdoor athletic facilities by 4.8 acres, and increase the amount of open space provided on campus by 5 acres, Proposed Project implementation would provide enough park and recreational facilities to exceed both the short- and long-term standards established by the Public Recreation Plan.

The Conservation Element of the Los Angeles General Plan addresses the community's parks and recreation goals, policies, objectives, and programs for implementation of these goals and objectives. In addition, the Community Plan fully supports and encourages continuing efforts to acquire and develop new open space, parkland, and recreational facilities in the community. The Proposed Project would increase the amount of open space contained on the campus. Thus, implementation of the Proposed Project would be consistent with the Conservation Element of the Los Angeles General Plan.

The Proposed Project would provide sufficient athletic facilities and open space on campus such that the demand on neighborhood parks and recreational services would be less than significant.

As shown in the Draft EIR in Table IV.J.3-2 and discussed above, with implementation of the Proposed Project, LMU would add approximately 28,000 net new gross square feet of indoor athletic facilities, for a total of approximately 213,000 gross square feet at buildout. LMU also plans to add approximately 4.8 net new acres of outdoor athletic facilities and approximately 5 net new acres of landscaped open space, through the provision of additional and larger plazas and courtyards. With buildout of the Proposed Project, therefore, LMU would add approximately 9.8 net new acres of outdoor athletic facilities and landscaped open space to the existing campus, for a total of approximately 50 acres at buildout. The Proposed Project does not propose to change the boundaries of the LMU campus. Since these recreational facilities are proposed as part of the Proposed Project, they are evaluated in the Draft EIR. As determined therein, the proposed recreational facilities would not have an adverse physical effect on the environment and, therefore, impacts would be less than significant.

Project Design Features and Mitigation Measures

PDF-REC-1 The LMU Campus shall provide, at a minimum, the acreage of open space and outdoor athletic facilities required by the proposed LMU Specific Plan.

Since no significant impacts would result from implementation of the Proposed Project, no mitigation measures are required.

Level of Impact After Mitigation

No unavoidable significant impacts are anticipated as a result of the development of the Proposed Project.

Cumulative Impacts

Buildout of related projects would introduce new residential units to the Westchester-Playa del Rey Community Plan Area, and would therefore increase the population and usage of public recreational facilities within the Community Plan Area. Although these related projects would cumulatively increase the demand for public recreational facilities, the LMU community's demand for athletic and recreational facilities and services would continue to be entirely met on campus. Furthermore, the Proposed Project would enhance existing facilities on campus through the provision of approximately 9.8 net new acres of outdoor athletic facilities and landscaped open space, for a total upon buildout of approximately 50 acres, and approximately 28,000 net new gross square feet of indoor athletic facilities, for a total upon buildout of approximately 213,000 gross square feet. Accordingly, the Proposed Project would not increase demand for City recreational and park resources. Therefore, the Proposed Project's contribution to cumulatively significant impacts on City recreational and park resources would be less than cumulatively significant.

7.10.4 Transportation

Project Impacts

In-Street Construction Impacts

No loss of access or loss of bus stops is anticipated as part of the Proposed Project. Construction worker parking would be provided at an off-site location in the campus vicinity, to minimize the number of construction-related trips onto the campus. Parking would be provided at a commercial or other parking lot where sufficient parking for the expected number of workers can be accommodated. A shuttle service would transport workers to and from campus in the morning and afternoon. No worker parking would be permitted on residential streets. Although construction of the Proposed Project could cause traffic disruptions in the vicinity of the campus, hazardous conditions for auto travelers, pedestrians, or bus riders would not occur during construction.

All construction activities associated with the Proposed Project shall be conducted in accordance with the construction hours and days of operations stated in Section 41.40 of the Los Angeles Municipal Code. In

addition, the transport of heavy-duty construction equipment onto campus would be minimized and the staging of construction equipment and all construction-worker parking would be accommodated on site.

Construction activity is typically concentrated in the first part of a 12-hour window, with most workers arriving and departing the Proposed Project site during off-peak traffic hours (i.e., arriving prior to 7:00 AM and departing between 3:00 and 4:00 PM), thereby avoiding generating trips during the 7:00 to 9:00 AM and 4:00 to 6:00 PM peak traffic periods. Therefore, construction-worker trips generated during peak hour traffic in the vicinity of the site would be negligible.

Construction of the Proposed Project could cause traffic disruptions due to an increase in truck traffic associated with removal or import of fill materials and delivery of construction materials. However, as required by the Department of Transportation and mitigation measure **MM-TRAF-1**, a Construction Traffic Management Plan would be implemented to minimize disruption to the public street system. In-street construction impacts would be less than significant with compliance of this requirement. Although a Construction Traffic Management Plan is required by the Department of Transportation, this standard requirement has been incorporated as mitigation to ensure project compliance.

Intersection Impacts

As indicated in the Draft EIR in Section IV.K, Transportation, the Proposed Project is expected to generate approximately 2,540 net new trips per day, which includes 176 net new trips during the AM peak hour and 223 net new trips during the PM peak hour. These Proposed Project-only traffic volumes were assigned at the study intersections. The Proposed Project traffic volumes were then added to the Future without Project (2030) traffic volumes to develop Future with Project (2030) traffic forecasts for the AM and PM peak hours. The addition of Project traffic is expected to result in potentially significant traffic impacts at the following two intersections at Proposed Project buildout in year 2030: Lincoln Boulevard at Jefferson Boulevard during the AM and PM peak hours and Centinela Avenue/Campus Center Drive at Jefferson Boulevard during the AM peak hour. No other study intersections are expected to be significantly impacted by Proposed Project traffic.

According to the 2006 City of Los Angeles CEQA Thresholds Guide, if an unsignalized intersection is projected to operate at LOS C, D, E, or F, the intersection shall be re-analyzed using the signalized intersection methodology to determine the significance of impacts. While only the two unsignalized intersections of Loyola Boulevard at 80th Street and Loyola Boulevard at 83rd Street require analysis using the 2006 City of Los Angeles CEQA Thresholds Guide signalized intersection methodology, additional intersections were also analyzed in order to be conservative. Analysis of unsignalized intersections using the City's signalized intersection methodology, per the 2006 City of Los Angeles CEQA Thresholds

Guide, indicates that the addition of Proposed Project traffic would not exceed the City's significance thresholds. As a result, unsignalized intersection impacts would be less than significant.

In accordance with the Los Angeles Department of Transportation (LADOT) Traffic Study Policies and Procedures manual (May 2009), unsignalized intersections that are adjacent to the Proposed Project site or integral to Proposed Project site access and circulation and would operate at LOS E or F under the Future with Project traffic condition were evaluated to determine whether they met signal warrants. Unsignalized study intersections were also evaluated using this LADOT methodology; this analysis was conservative because other intersections in addition to those integral to access to the Proposed Project were analyzed. All of the unsignalized intersections would operate at LOS D or better and, therefore, do not require signal warrant analysis under this methodology.

Regional Traffic Impacts

The following Congestion Management Plan (CMP) monitoring stations are closest to the Proposed Project site: Lincoln Boulevard and Manchester Avenue; Lincoln Boulevard and the Marina Freeway/Expressway (SR-90); Sepulveda Boulevard and Manchester Avenue; and Sepulveda Boulevard and Lincoln Boulevard. The Proposed Project is not expected to add more than 50 trips to any of the four closest CMP arterial monitoring stations or increase traffic by 2 percent of capacity at any of these locations. Since the Proposed Project does not exceed the CMP threshold criteria, impacts on CMP arterial monitoring stations are less than significant.

The CMP freeway monitoring station closest to the Proposed Project site is #1069, I-405 north of La Tijera Boulevard. Based on Proposed Project trip distribution patterns, approximately 10 percent of the Proposed Project trips would pass through this monitoring station. According to the trip generation estimates and trip distribution estimates, the Proposed Project is expected to result in a net increase of approximately 18 trips during the AM peak hour and 23 trips during the PM peak hour at the I-405 CMP monitoring location closest to the Proposed Project site. Since the Proposed Project would add fewer than 150 trips in either direction during the AM or PM peak hours at any of the CMP freeway monitoring locations in the vicinity of the study area, no further analysis of the freeway segments is required for CMP purposes and impacts would be less than significant.

Neighborhood Intrusion Impacts

Five street segments located south and east of the LMU campus were analyzed to determine Proposed Project impacts on local residential streets. As discussed above, the Proposed Project is expected to generate approximately 2,540 net new daily trips at full buildout. These daily trips were assigned to the roadway network based on the Proposed Project trip distribution pattern and then added to the Future

without Project (2030) conditions to obtain Future with Project (2030) daily traffic conditions. The greatest Proposed Project increase in traffic volume would occur along Loyola Boulevard between West 80th Street and West 83rd Street, with an estimated increase of 7.4 percent. However, the addition of Proposed Project traffic would not exceed the significance criteria for neighborhood street segments, and impacts would be less than significant.

Site Access and Safety Impacts

The primary entrance to the campus at LMU Drive is signalized at its intersection with Lincoln Boulevard, while the secondary entrance at Loyola Boulevard and W. 80th Street would remain unsignalized and stop-controlled. Based on the results of the intersection analysis summarized above, both campus driveway intersections are projected to operate at acceptable levels of service, LOS D or better, during both peak hours under Future with Project (2030) traffic condition. Therefore, the campus driveways could accommodate the increase in traffic resulting from the Proposed Project and impacts related to campus access would be less than significant.

Pedestrian crosswalks are present at both campus entrances. Intersection signal controls and crosswalks reduce the potential for hazardous conditions at the campus driveways. These crosswalks and intersection signal controls would remain following Proposed Project buildout, and no roadway design features or physical configurations are proposed that could adversely affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, nor the visibility of cars to pedestrians and bicyclists. Therefore, implementation of the Proposed Project is not anticipated create hazardous conditions at campus driveways and impacts would be less than significant.

Transit System Impacts

Potential Proposed Project-related increases in demand for mass transit were estimated according to CMP Guidelines. Using the CMP transit guidelines, it is estimated that the Proposed Project would generate 9 net new transit trips during the AM peak hour and 11 net new transit trips during the PM peak hour. This demand represents approximately 2 percent of the current hourly transit system capacity in the campus vicinity. Given that Proposed Project transit trips are 2 percent of the current hourly capacity, the capacity of the transit system serving the Proposed Project area would not be exceeded and impacts on the regional transit system would be less than significant.

Parking Impacts

The future peak parking demand of the Proposed Project is estimated to be 4,516 spaces during the daytime peak period. A parking supply that exceeds peak demand by 5 percent is considered necessary

to accommodate the projected peak demand. To allow for a parking supply that exceeds peak demand by five percent, a total of 4,742 parking spaces would need to be provided on campus to meet the recommended supply for the 9,600 total campus FTE students, faculty, and staff projected at buildout. A total of 4,133 parking spaces are currently provided on campus. Upon buildout of the Proposed Project, LMU would provide a minimum of 4,742 parking spaces on campus, which would meet the recommended parking supply. Therefore, parking impacts associated with the Proposed Project would be less than significant.

The Proposed Project provides for some new, larger venues on campus for events. For instance, Gersten Pavilion, which currently seats 4,120 people, would be demolished and replaced by a new sports pavilion which would seat approximately 6,000 people, for a net addition of 1,880 seats. The new sports pavilion would be used for basketball, among other sporting events. A new 1,500-seat conference center is proposed on the south side of University Hall, which would be used primarily by LMU affiliates and guests during the academic year.

Additional seating is proposed for Page Baseball Stadium, Smith Softball Field, and Sullivan Soccer Field; however, since the Draft EIR was published, LMU has agreed to reduce the amount of additional seating proposed at these facilities by a total of 1,300 seats. The proposed additional seating at Page Stadium is being reduced by 500 seats; the proposed additional seating at Smith Softball Field is being reduced by 300 seats; and the proposed additional seating at Sullivan Soccer Field is being reduced by 500 seats. The new total seating at these facilities is proposed to be 1,500 seats at Page, 400 seats at Smith, and 2,000 seats at Sullivan. Because the soccer season is in the fall (the primary period when the Sullivan seating would be used) and the baseball/softball seasons are in the spring, the total additional outdoor seating expected to be used at any one time would not exceed 2,000 seats in the fall and 1,900 seats in the spring (the latter only if baseball and softball games are occurring at the same time).

While additional seating at these athletic facilities will allow more people to attend games at LMU, this is not expected to result in significant parking impacts for several reasons as discussed in **Topical Response No. 7: Parking and Traffic**, and with implementation of mitigation measure **MM-TRAF-6** potential parking impacts from construction of the new sports pavilion and the addition of seating at athletic facilities would be reduced to less than significant.

In addition, LMU will maintain an Event Parking Management Plan to manage event parking to further reduce parking impacts and discourage LMU-related parking in the surrounding Westchester neighborhood. Implementation of mitigation measure **MM-TRAF-7** would ensure that parking impacts from campus events remain less than significant.

Emergency Access

LMU currently has through roads that provide for adequate vehicle circulation, including service for emergency vehicles. Service and emergency access to the site and circulation within LMU following Proposed Project buildout would typically follow the same routes as general traffic. The Proposed Project does not propose any changes to the existing points of campus ingress/egress, and intends to improve the vehicular network at LMU. The reconfiguration of buildings and recreational facilities are intended to improve circulation around and within LMU and is expected to improve emergency and service vehicle access by improving vehicular and pedestrian circulation, and, therefore, reduce chances for accidents involving vehicles and pedestrians. Additionally, some roadways would be designated specifically for service and emergency vehicles. LAMC Section 57.09.03 (D)3 requires those portions of a fire lane extending for 30 feet on either side of a private fire hydrant to have a minimum clear roadway width of 28 feet, with no parking permitted within that area. LAMC Section 57.09.03 (D)2 requires that, in the absence of a fire hydrant, fire roads may be as little as 20 feet in width where adjacent buildings are less than two stories and therefore don't require use of a ladder from the fire truck. Additionally, the Los Angeles Fire Department requires that new structures and structures undergoing major modifications must be located within 150 feet of a fire lane.¹¹ All roads would be designed in accordance with the recommendations and requirements of the City. City review of street widths, street lighting, and street signage would be based on an evaluation of requirements for the provision of emergency access. All new structures and structures undergoing major modifications would also be located in accordance with the recommendations and requirements of the City. The Proposed Project would comply with all requirements with regard to emergency access. As such, impacts to emergency access would be less than significant.

Alternative Transportation

As discussed above, the Proposed Project site is adjacent to a major transportation corridor within an urban area of Los Angeles. Several transit lines currently serve the campus. Lincoln Boulevard is currently on the route of several local bus lines and has been identified as the location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard. LMU encourages the use of public transportation to and from campus. The Proposed Master Plan Project also proposes designated bicycle lanes on all primary, secondary, and tertiary campus roads and bicycle parking racks at all new buildings.

¹¹ Captain Frank Comfort, personal communication, March 2, 2009.

SCAG Regional Transportation Plan, Coastal Transportation Corridor Specific Plan, Los Angeles County Metropolitan Transportation Authority's Congestion Management Program, Westchester-Playa del Rey Community Plan, and the Statewide Transportation Improvement Program all support alternative transportation. The Proposed Project is consistent with these policies and programs. As such, impacts would be less than significant.

Project Design Features and Mitigation Measures

No Project Design Features are proposed.

Construction Mitigation Measures

The following mitigation measures are required to reduce construction impacts.

MM-TRAF-1 Prior to the issuance of building demolition permits, a Construction Traffic Management Plan shall be prepared and submitted to the City of Los Angeles Department of Transportation for review and approval. The Construction Traffic Management Plan shall include information such as haul routes and staging plans. The Construction Traffic Management Plan shall include the following elements:

- Provisions to configure construction parking to minimize traffic interference and avoid parking on residential streets.
- Consolidating and coordinating haul trucks, deliveries, and pick-ups to reduce the potential for trucks waiting to load or unload for protracted periods of time.
- Construction equipment traffic from the contractors shall be controlled by flagman in order to minimize circulation conflicts and obstruction of through-traffic lanes.
- Maintaining access to residences and businesses.
- Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing, and protection barriers.

MM-TRAF-2 Construction worker parking shall be provided at an off-site location in the campus vicinity, where sufficient parking for the expected number of workers can be accommodated. A shuttle service shall be provided to transport construction workers to and from campus in the morning and afternoon. No construction worker parking shall be permitted on residential streets.

Operational Mitigation Measures

- MM-TRAF-3 The Proposed Project applicant shall implement at least one of the following Transportation Demand Management (TDM) strategies to mitigate Proposed Project-related intersection impacts during Project buildout.
- Increase number of residential beds to 4,250 from the 3,261 beds currently available (an increase of 989 beds). This mitigation measure would allow the campus to grow to 9,545 FTE students, faculty, and staff before a significant traffic-related significant impact occurs.
 - Implement a 5 percent faculty/staff TDM program as discussed in the *Transportation Impacts Analysis* prepared in December 2009 for the Proposed Project and increase the number of residential beds to at least 4,197 from the 3,261 beds currently available (an increase of 936 beds). This mitigation measure would allow the campus to grow to the full 9,600 FTE students, faculty, and staff buildout without significant traffic-related impacts.
 - Implement a 10 percent faculty/staff TDM program as discussed in the *Transportation Impacts Analysis* prepared in December 2009 for the Proposed Project and increase the number of residential beds to at least 4,032 from the 3,261 beds currently available (an increase of 771 beds). This mitigation measure would allow the campus to grow to the full 9,600 FTE students, faculty, and staff buildout without significant traffic-related impacts.
- MM-TRAF-4 The Transportation Demand Management (TDM) program implementation and monitoring shall be conducted in accordance with the guidelines set forth in the *Transportation Impact Analysis* prepared in December 2009 for the Proposed Project. The final, detailed TDM plan shall be presented to the Los Angeles Department of Transportation for approval.
- MM-TRAF-5 The Proposed Project shall add parking in phases with increases in the campus population, in conformance with the requirements of the proposed Specific Plan. The location of such additional parking shall be approved by the Department of Transportation.
- MM-TRAF-6 Prior to pulling building permits for the new sports pavilion (i.e., the replacement facility for Gersten Pavilion), or the construction of more than 1000 additional seats (individually or cumulatively) at Page Stadium, Smith Softball Field, and/or Sullivan Field, the Applicant shall obtain approval from the Department of Transportation of a parking plan for the new sports pavilion or the new sports facility seating at Page Stadium, Smith Softball Field, and/or Sullivan Field demonstrating sufficient parking availability for such

new sports pavilion or new sports facility seating at Page Stadium, Smith Softball Field, and/or Sullivan Field. Parking for the new sports pavilion or new sports facility seating at Page Stadium, Smith Softball Field, and/or Sullivan Field may be met by demonstrating sufficient capacity through a shared use study of the then-existing parking demand, construction of new parking spaces, or a special event parking plan which may include valet/stacked parking and/or shuttle services from University Hall to other locations on campus, or shuttle services to and from off-site parking locations.

MM-TRAF-7 LMU will maintain an Event Parking Management Program to accommodate occasional university functions expected to bring a large number of non-registered vehicles onto campus. The Event Parking Management Program will provide for a temporary increase in traffic management and parking personnel to accommodate the additional vehicles on the campus. LMU shall direct visitors leaving events by car to exit the campus via LMU Drive.

Level of Impact After Mitigation

Construction Impacts

With implementation of mitigation measures **MM-TRAF-1** and **MM-TRAF-2**, traffic impacts during construction of the Proposed Project would be reduced to a less than significant level.

Operational Impacts

Implementation of mitigation measures **MM-TRAF-3** and **MM-TRAF-5** would reduce Proposed Project-related impacts and the Proposed Project's contribution to cumulative impacts at the intersections of Lincoln Boulevard at Jefferson Boulevard and Centinela Avenue/Campus Center Drive at Jefferson Boulevard to less than significant levels. All other traffic impacts during Proposed Project operation would be less than significant.

Implementation of mitigation measure **MM-TRAF-6** would ensure that potential parking impacts from construction of the new sports pavilion and the addition of seating at athletic facilities are reduced to less than significant, and implementation of mitigation measure **MM-TRAF-7** would ensure that parking impacts from campus events remain less than significant.

Cumulative Impacts

Construction Impacts

No projects are proposed within the residential neighborhood immediately surrounding the campus. Four related projects, Playa Vista Phases I and II, Playa Vista Plant Site (Spruce Goose), and Central Region Elementary School No. 22, are located at the base of the Westchester Bluffs. If construction of these related projects would overlap with construction of the Proposed Project a significant cumulative impact could result. However the Proposed Project would be required by **MM-TRAF-1** to implement a Construction Traffic Management Plan that includes measures to reduce construction-related traffic impacts, including consolidating and coordinating haul trucks, deliveries and pick-ups, controlling construction traffic by flagman, and prohibiting parking of construction-related vehicles on any residential street. **MM-TRAF-2** also requires LMU to provide parking for construction workers at an off-site location. Consequently, the Proposed Project's contribution to construction-related traffic is not cumulatively considerable and thus, the Proposed Project's impact is less than significant.

Operational Impacts

As discussed above, the traffic projections for the Future without Project (2030) traffic condition reflects ambient growth of the existing traffic volumes and traffic generated by the 60 related projects in the study area. Traffic resulting from the Proposed Project was added to the Future without Project (2030) traffic volumes to develop Future with Project (2030) traffic forecasts for the AM and PM peak hours. The addition of Proposed Project traffic to the Future without Project (2030) traffic condition would exceed the City's intersection threshold criteria and result in a considerable contribution to cumulatively significant impacts at the intersection of Lincoln Boulevard at Jefferson Boulevard during both peak hours and Centinela Avenue/Campus Center Drive at Jefferson Boulevard during the AM peak hour. However, implementation of mitigation measures **MM-TRAF-3** and **MM-TRAF-4**, as indicated above, would reduce the Proposed Project's contribution to cumulative impacts at the intersections of Lincoln Boulevard at Jefferson Boulevard and Centinela Avenue/Campus Center Drive at Jefferson Boulevard to less than significant levels.

As summarized above, the addition of Proposed Project traffic to unsignalized study intersections under the Future without Project (2030) traffic condition would not cause the City's signalized intersection CEQA threshold to be exceeded. As a result, the Proposed Project would not result in a considerable contribution to cumulatively significant impacts at any unsignalized intersection.

7.11 Public Utilities

7.11.1 Water Supply

Project Impacts

Construction Impacts

Throughout each phase of Proposed Project construction, water would be used during grading and earthmoving activities to reduce fugitive dust and aid in earth compaction. Construction contractors may supply specialized equipment and water supplies (i.e., water trucks) for this purpose. Although grading activities are expected to take place during each Proposed Project phase, this constitutes a temporary and short-term water demand, and therefore construction-related water use is expected to result in less than significant impacts on water supplies and distribution.

Operational Impacts

Water Demand

Implementation of the Proposed Project would result in a net increase of 54 acre-feet per year over existing conditions. Implementation of the water conservation measures to which LMU has committed, as well as the use of recycled water for irrigation and cooling towers would reduce the Proposed Project's potable water demand by 37 percent, or 309.4 acre-feet per year. The net consumption of approximately 54 acre-feet per year after conservation measures and use of recycled water represents a relatively small fraction (approximately 0.065 percent) of the projected water demand of 776,000 acre-feet per year that Los Angeles Department of Water and Power (LADWP) plans to meet by 2030 under normal weather conditions. The Proposed Project, despite its size, would use the second least net amount of water than all the projects with an LADWP Water Supply Assessment since 2005, as a result of the incorporation of water conservation measures and the use of recycled water.

LADWP has stated that the Proposed Project's net increase of 54 acre-feet per year is within the 2005 Urban Water Management Plan's projected water supplies under normal, single-dry, and multiple-dry years through 2030 and is within their 25-year growth projection. The State, Metropolitan Water District, and the City of Los Angeles have extensive plans underway to address water supply and delivery issues. Given the above, the Los Angeles Department of Water and Power has sufficient water supply to meet the demands of the Proposed Project.

Water Infrastructure

The Proposed Project-related increase in the campus residential population would constitute approximately 2 percent of the estimated 2007 Community Plan Area resident population. This estimate is likely somewhat conservative, since it is reasonable to assume that at least some of the students that would occupy on-campus housing would otherwise live in the Westchester-Playa del Rey Community Plan Area.

The Proposed Project-related population increase on campus would constitute approximately 1.6 percent of the estimated 2025 total population of the Community Plan Area, and the proposed increase in campus housing is already accounted for in the Community Plan's estimated increase in group quarters specifically, and dwelling units generally, in the Community Plan Area. LMU does not propose to increase the enrollment cap beyond the previously approved 7,800 FTE student enrollment cap or to house more than 75 percent of the undergraduate FTE students on campus under the Proposed Project. The Proposed Project's population and employment growth is also accounted for in the LADWP's Urban Water Management Plan.

Additionally, LMU would be responsible for connections to the existing municipal water lines in McConnell Avenue, 80th Street and LMU Drive. Water pressure at the four hydrants farthest from a water supply source exceeds the minimum Los Angeles Municipal Code requirement of 4,000 gallons per minute and 20 pounds per square inch of residual pressure. Therefore, adequate water flow and water pressure exists in the water supply infrastructure serving the LMU campus to accommodate the anticipated increase in demand associated with the Proposed Project, given the water conservation measures to be implemented, without the need for upgrades to the existing off-campus water system. As such, the existing water infrastructure would meet the peak water demand following Proposed Project buildout, and impacts would be less than significant.

Consistency with Regulatory Framework

LADWP has prepared the Urban Water Management Plan in accordance with the California Urban Water Management Plan Act. Los Angeles Department of Water and Power updates its Urban Water Management Plan every five years with the next update planned for 2010. As discussed above, the Proposed Project's water demand is accounted for within the 2005 Urban Water Management Plan and is therefore consistent with this policy.

As required by SB 610 and SB 221, the Proposed Project constitutes a "project" under Section 10912 of the Water Code and a Water Supply Assessment was prepared by the LADWP. The Water Supply

Assessment concluded that sufficient water supplies are available to meet the increase water demand of the Proposed Project.

The Proposed Project's design features and each new building's LEED certification (or equivalent certification) would ensure that facilities constructed under the Proposed Project exceed the water efficiency requirements of Title 20 of the California Code of Regulations. As such, the Proposed Project would be consistent with Title 20 of the California Code of Regulations.

LMU has agreed to water conservation measures more stringent than the requirements of City Ordinances. As such, the Proposed Project would be consistent with the City's Ordinances.

The Proposed Project is considered in the LADWP's 2005 Urban Water Management Plan's projected water supplies under normal, single-dry, and multiple-dry years through 2030 and is within their 25-year growth projection. The LADWP, a member agency of the Metropolitan Water District, has implemented policies for water conservation as part of the City of Los Angeles "Green LA" program. Together with the Mayor's Office, LADWP developed a Water Supply Action Plan entitled *Securing L.A.'s Water Future*, which calls for a comprehensive approach to meeting increased demand for water, combining short-term steps to conserve water with long-term investment in water-efficient technology, increase water recycling, and develop improvements in the groundwater supply. As discussed above, the Proposed Project would include numerous water conservation measures that would help to achieve LADWP's Water Supply Action. Therefore, the Proposed Project is consistent with this plan.

Therefore, the Proposed Project is consistent with the applicable regulatory framework.

Project Design Features and Mitigation Measures

PDF-WATER-1: The Proposed Project would include the following water conservation features in new development approved as part of the Proposed Project by Proposed Project buildout, unless alternative or equivalent measures are substituted with City approval. Proposed Project buildout means the addition of 508,000 net new gross square feet of academic/administrative facilities, 476,000 net new gross square feet of residential facilities, and 28,000 net new gross square feet of athletic indoor facilities on campus:

- Bathroom faucets -1.5 gallons per minute (private), 0.5 gallon per minute (public),
- Self-closing faucets in public restrooms,
- Kitchen faucets -1.5 gallons per minute,
- Pre-rinse kitchen spray head,

- Showerheads: no more than 1 showerhead per stall,
 - Low-flow showerheads – 2.0 gallons per minute,
- High efficiency clothes washers – water savings factor of 5.0 or less (residential); water savings factor of 7.5 or less (residential),
- High efficiency toilets – 1.28 gallons per flush or less, or dual flush,
- High efficiency/ultra low flow urinals – 0.125 to 0.5 gallon per flush,
- Energy Star dishwashers,
- Domestic water heating system located in close proximity to point(s) of use,
- Tankless and on-demand water heaters,
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers,
 - (Cooling towers to operate at minimum of 5.5 cycles of concentration),
- Water-saving pool filter,
- Rotating sprinkler nozzles – 0.5 gallon per minute,
- Micro-spray nozzles,
- Drip/subsurface irrigation (micro-irrigation) and bubbler irrigation,
- Weather based irrigation controller,
- Hydro-zoning plantings (grouping similar water needs plants together),
- Zoned irrigation,
- Drought-tolerant plants: 75 percent of new landscape plantings,
- Artificial turf (cost permitting),
- Landscaping contouring to minimize precipitation runoff,
- Infiltration planters (i.e., notched curb to allow runoff to flow into planted areas),
- Stormwater capture and infiltration of on campus sump,
- Campus-wide reclaimed water irrigation,
- Cooling towers using 100 percent reclaimed water use, as permitted by law,

- New buildings designed to meet the U.S. Green Building Council's Leadership in Energy and Environmental Design® (LEED®) Certified level (or higher), or an equivalent criteria.

The Proposed Project would result in a less than significant impact to water supply and infrastructure and, therefore, no mitigation is required.

Level of Impact After Mitigation

No significant impacts to water supply or infrastructure would result from implementation of the Proposed Project, and no mitigation is required. Therefore, no significant impacts related to water supply or infrastructure would occur.

Cumulative Impacts

Water Demand

Development of the Proposed Project combined with the related projects would cumulatively increase water demand in the City of Los Angeles. Using Southern California Association of Governments' growth forecasts for the City of Los Angeles, LADWP has projected that there will be an adequate supply of water to accommodate anticipated growth through 2030. Given that the Urban Water Management Plan projects water supplies to serve existing and projected needs and that approved related projects would be within Southern California Association of Governments' growth forecasts for the City of Los Angeles, it is anticipated that the LADWP will be able to supply the demands of the Proposed Project and related projects through the foreseeable future, and no significant cumulative impacts related to water demand are anticipated. LADWP maintains historical water use data separated into major billing categories: single-family residential, multi-family residential, industrial, and commercial/institutional. According to SCAG's 2004 Regional Transportation Plan, a Citywide growth of 0.4 percent annually until 2025 is expected, which will increase the overall City's population by approximately 368,000 new residents between 2004 and 2025, and lead to a 1.8 percent annual growth in housing and an employment growth of 0.7 percent annually. The LADWP Urban Water Management Plan projects a combined water consumption of 775 acre-feet per year in 2030. As the related projects are within the projected billing categories and the City would ensure each related project's water demand is within LADWP's Urban Water Management Plan, the related projects would not result in a cumulative impact. Given the above, and that LADWP has stated that adequate water supplies exist to meet the demands of the Proposed Project, as well as existing and planned future demands, the Proposed Project would not result in significant cumulative impacts on water supply.

Water Infrastructure

Development of the Proposed Project, combined with the related projects would cumulatively increase demand on the existing water infrastructure. However, as with the Proposed Project, the related projects would be subject to discretionary review to ensure that existing water infrastructure is adequate to meet each project's increased demand. If LADWP indicates that costs for new water service and improvements to the existing water system are necessary, each project applicant would be responsible for paying their fair share of any necessary improvements or new connections to the existing water infrastructure. Based on the above, each proposed project would be responsible for improvements to water infrastructure if LADWP deems it necessary. Therefore, the Proposed Project would result in a less than significant cumulative impact on water infrastructure.

7.11.2 Wastewater

Project Impacts

Construction Impacts

During construction of specific Proposed Project components, it is anticipated that construction contractors would provide portable, on-site sanitation facilities that would be regularly serviced at approved disposal facilities located off campus. Because the disposal facilities are located off campus, wastewater generated from construction activities would not be conveyed by the campus wastewater system. As such, construction impacts would be less than significant.

Operational Impacts

Wastewater Generation and Disposal System Capacity

Recent revisions to applicable building and construction codes, as well as the use of efficient flow fixtures over their standard counterparts, would affect future wastewater volumes generated by the campus population. Efficient fixtures can produce an average of 20–30 percent water savings compared to their less efficient models. Additionally, LMU plans to achieve water savings in new construction, with future improvements meeting comparable standards in savings from various LEED ratings.

According to the Wastewater Disposal Technical Memorandum prepared for the Proposed Project, additional per capita wastewater demand was conservatively valued at 90 gallons per day per additional FTE student counted under the Proposed Project, and 30 gallons per day per additional FTE faculty and staff. With the addition of FTE students and individual Proposed Project developments, and in

conjunction with an applied efficiency values, a net increase in campus wastewater flow of 128,925 gallons per day would be generated.

Assuming that increased efficiency in water usage is applied to current demands, the campus is anticipated to see, at most, a minor increase in wastewater generation, or even a net reduction, following Proposed Project buildout, even with the addition of FTE students, faculty, and staff, since the increased water efficiency per square foot of renovated or new buildings is expected to offset the increased wastewater generation from new construction from new construction associated with the Proposed Project. Accordingly, Proposed Project implementation would have a less than significant impact on the campus wastewater system and off-site existing municipal wastewater conveyance infrastructure.

The Los Angeles Regional Water Quality Control Board would enforce wastewater treatment requirements for the wastewater generated by the Proposed Project. LMU currently uses and would continue to use municipal infrastructure to convey wastewater to the Hyperion Wastewater Treatment Plant. Treatment Plants in the City of Los Angeles are subject to federal and state wastewater treatment and discharge regulations. Therefore, wastewater generated as the result of Proposed Project buildout would be treated in accordance with the wastewater requirements of the Los Angeles Water Quality Control Board. Proposed Project impacts to the wastewater requirements of the Los Angeles Regional Water Quality Control Board would be less than significant.

The majority of Proposed Project-related increases in wastewater flow would affect only the wastewater system on Burns Campus. Burns Campus is the portion of LMU's campus that contains the oldest and most constrained on campus sewer system. Additionally, Burns Campus contains the majority of older buildings that require replacement as well as the majority of LMU's academic and athletic facilities, and would accommodate the majority of future buildout. Accordingly, future new construction on Leavey and Hughes Campuses would be a minor portion of the overall Proposed Project square footage, and/or new construction would replace existing square footage on those portions of LMU's campus with more efficient fixtures and would correspondingly reduce water consumption.

LMU Campus

On Burns Campus, the majority of the wastewater collection system would continue to operate at less than 75 percent capacity in the northern portion of Burns Campus following Proposed Project Buildout. However, some segments are projected to operate between 71.4 and 77.3 percent full following Proposed Project implementation, creating a potentially significant impact. However, with the upgrade of over-capacity pipes, as required in mitigation measure **MM-WW-1**, LMU's sewer system would operate with adequate capacity and wastewater impacts would be less than significant.

At buildout of the Proposed Project, Leavey Campus wastewater system is anticipated to operate at between 3.3 percent and 10.6 percent of capacity. Therefore, Proposed Project implementation is expected to have a less than significant impact on Leavey Campus wastewater disposal system.

The existing Hughes Campus wastewater system operates at between 13.4 and 60.9 percent of capacity. At Proposed Project buildout, Hughes Campus wastewater system is anticipated to operate at between 14.2 percent and 64.4 percent of capacity with inclusion of the conference center, which is not a substantial increase from existing capacity. Thus, there is adequate capacity for additional buildout and the Proposed Project will not negatively impact the existing Hughes Campus infrastructure currently in place. Proposed Project implementation is expected to have a less than significant impact on Hughes Campus wastewater disposal system.

North Outfall Sewer

All wastewater generated on the LMU campus and within the surrounding area is collected by the North Outfall Sewer. The North Outfall Sewer is one of four major interceptor sewers that convey flows to the Hyperion Wastewater Treatment Plant. The North Outfall Sewer is undergoing rehabilitation, scheduled for completion in 2010. Future capacity following completion of the rehabilitation, and with other improvements to the City of Los Angeles major sewer network, would ensure more than adequate capacity in the North Outfall Sewer at least until the year 2020. When rehabilitation to the North Outfall Sewer is complete, the upgrades are expected to allow for adequate wastewater conveyance at depths less than 50 percent of pipe diameter. Since the average dry weather flow of the North Outfall Sewer is expected to be less than 50 percent of full capacity following rehabilitation, there is adequate capacity left within the sewer to account for future buildout along its path, including implementation of the Proposed Project. Impacts on the North Sewer Outfall capacity would be less than significant.

Hyperion Wastewater Treatment Plant

The current design capacity of the Hyperion Treatment Plant is approximately 450 million gallons per day, with peak capacity during wet weather at 1 billion gallons per day. With the approval of the 2006 Integrated Resource Plan by the Bureau of Sanitation, current design capacities of the Hyperion Wastewater Treatment Plant in conjunction with other relief wastewater treatment facilities will provide sufficient wastewater treatment capacity until 2026. Future physical expansion of the Hyperion Treatment Plant has also been approved and will improve future wastewater treatment capacity to account for the estimated growth in the greater Los Angeles area. Additional wastewater generated by the Proposed Project would represent an increase of less than 0.035 percent over the existing daily volume of wastewater treated at the Hyperion Treatment Plant.

Additionally, all projects served by Hyperion Treatment Plant are subject to the City sewer allocation program, which limits additional discharge according to a pre-established percentage rate. Under the allocation program and for the reasons described above, the Hyperion Treatment Plant has capacity to serve the Proposed Project and estimated growth in the greater Los Angeles Area, as determined by the 2006 Integrated Resource Plan. Therefore, impacts would be less than significant.

Project Design Features and Mitigation Measures

The Proposed Project would implement a number of Project Design Features that would reduce the Project's water use, thereby reducing the Proposed Project's wastewater impacts. For a complete list of these Project Design Features, see Section IV L 1, Water Supply, in the Draft EIR.

The following mitigation measure is proposed to address potential wastewater conveyance impacts and ensure that impacts would be less than significant.

MM-WW-1 If future capacity studies and calculations during the course of Project improvements determine that any sewer pipe sections on campus would operate at flow depths greater than 75 percent of pipe depth, such pipes shall be upsized as necessary at the expense of LMU.

Level of Impact After Mitigation

With incorporation of mitigation measure **MM-WW-1**, all Proposed Project-specific impacts would be less than significant; therefore, no unavoidable significant impacts with respect to wastewater conveyance and treatment are anticipated as a result of the development of the Proposed Project.

Cumulative Impacts

Development of the Proposed Project and related projects in the Westchester-Playa del Rey Community Plan Area would increase development density and, potentially, wastewater generation. Considering the average dry weather flow of 84 million gallons per day with full capacity at 194 million gallons per day, there is adequate capacity left within the North Outfall Sewer to account for future buildout along its path, including implementation of the Proposed Project. With the approval of the 2006 Integrated Resource Plan by the Bureau of Sanitation, current design capacities of 450 million gallons per day at the Hyperion Wastewater Treatment Plant in conjunction with other relief wastewater treatment facilities will provide sufficient wastewater treatment capacity for planned growth within the Hyperion service area until 2026. In addition, each new development within the City of Los Angeles is required to comply with the City's water conservation ordinances and other regulations pertaining to sewer collection and

disposal. Moreover, each project will be required to obtain confirmation from the treatment provider that sufficient capacity exists to treat flows from that project. Therefore, the Proposed Project considered together with related projects would not have a cumulatively considerable contribution to significant impacts related to wastewater conveyance or treatment.

7.11.3 Solid Waste

Project Impacts

Construction Impacts

Construction of the Proposed Project is anticipated to occur over a 20-year period. Buildout will consist of building demolition, site clearing, earthwork grading, and excavation, paving and building construction. Altogether, construction activities would result in the total generation of 981,630 tons of solid waste, assuming no reuse or recycling of construction waste. The demolition and construction process would include efforts to separate debris and recycle a minimum of 50 percent of the basic building materials, pursuant to AB 939, although the City of Los Angeles currently does not specifically enforce construction and demolition debris recycling requirements.

Exported soil and demolition debris would be hauled to one or more of the several Unclassified landfills serving Los Angeles County (unlike Class III landfills, Unclassified landfills are designated for the exclusive disposal of inert debris such as earth material and construction materials). Earth material disposed at Unclassified landfills could be used for “alternative daily cover” operations and may not count towards the maximum refuse permitted at the landfill. Alternative daily cover consists of shredded green waste and soil used to meet part of each landfill's daily cover requirements and as mulch for weed and erosion control. As of January 1, 2008, the remaining permitted combined Unclassified landfill capacity in the County was estimated at 51.05 million tons (34.03 million cubic yards). Combined, the exported soil, demolition debris, and construction debris generated by the Proposed Project would represent approximately 1.9 percent of the County's remaining capacity if no recycling is implemented. At the 2007 average rate of disposal of 440 tons per day, the County's total remaining capacity would be exhausted in 372 years. Accordingly, the County has adequate permitted inert waste disposal capacity for the foreseeable future. Therefore, solid waste impacts during construction would be less than significant.

Operational Impacts

Implementation of the Proposed Project would increase the amount of solid waste generated on the campus due to the increase in the on-campus student housing supply and increase in academic, administrative, and indoor athletic facilities. The Proposed Project would generate approximately

1,724 net new tons of solid waste per year before recycling. However, LMU would continue to conduct its campuswide recycling program that presently achieves a 58.6 percent waste diversion rate. Therefore, the campus would divert approximately 1,010 tons of solid waste from landfills (58.6 percent of the 1,724 net new tons). As a result of the Proposed Project, the campus would dispose of approximately 714 additional tons of solid waste per year in landfills after recycling, compared to existing conditions. The Proposed Project would comply with all the diversion and recycling regulations of the state, County, and City, and therefore, would assist in the overall goal of reducing the amount of waste sent to landfills.

The Sunshine Canyon Landfill is the primary landfill serving the campus; however, disposal at additional landfills may be facilitated through contractual agreements between Consolidated Disposal Service (LMU's waste hauler) and the operators of other landfills. The net annual increase of 714 tons resulting from operation of the Proposed Project represents less than 0.1 percent of the 2007 disposal rate of approximately 1.8 million tons to the Sunshine Canyon Landfill. Therefore, the increase in disposal at the Sunshine Canyon Landfill as a result of the Proposed Project would not be substantial. Although not reflected in the 2007 Annual Report calculations, in June 2008, the California Integrated Waste Management Board issued a permit to increase the capacity of the Sunshine Canyon Landfill by 67.7 million tons. This expansion will increase the landfill's lifespan by 30 years and further enhance the ability of the Sunshine Canyon Landfill to accommodate waste generated by the campus following project buildout in addition to the existing solid waste stream. Therefore, Sunshine Canyon Landfill has sufficient permitted capacity to accommodate the Proposed Project's solid waste needs.

The Los Angeles County Department of Public Works' 2007 Annual Report has determined that based on the continuation of business as usual practices, Los Angeles County solid waste disposal demand cannot be accommodated beyond the year 2014. However, this estimate does not account for a number of approved and proposed landfill expansions that would significantly expand landfill capacity, which could be made available to the City of Los Angeles, and the Proposed Project, in the future. Not reflected in the 2014 landfill capacity estimate is the June 2008 permit issued by the California Integrated Waste Management Board to increase the capacity of the Sunshine Canyon Landfill by 67.7 million tons, which is the landfill that currently serves the LMU campus and would likely serve the Proposed Project. This expansion will increase the landfill's lifespan by 30 years and further enhance the ability of the Sunshine Canyon Landfill to accommodate waste generated by the LMU campus following Proposed Project buildout. Other expansions not taken into consideration are the in-County landfill expansions currently being pursued at the Antelope Valley Landfill (adding 8.96 million tons) and the Chiquita Canyon Landfill (adding 32 million tons), or the development of out-of-County landfills such as the Eagle Mountain Landfill in Riverside County and the Mesquite Regional Landfill in Imperial County; the operation of the latter two landfills would provide enough additional capacity to accommodate Los

Angeles County's disposal need during the latter part of the present 15-year planning period (2007-2022). Despite these anticipated significant expansions, because it is not yet certain when these expansions will become operational and serve the City of Los Angeles, and since the Los Angeles County Department of Public Works, which prepared the 2007 Annual Report, does not project solid waste need and capacity beyond the existing 15-year planning period (2007-2022), it is conservatively assumed that the Proposed Project would result in a potentially significant impact with respect to solid waste at buildout in 2030.

Project Design Features and Mitigation Measures

PDF-SW-1 LMU shall continue to achieve a campuswide waste diversion rate of at least 58.6 percent through recycling activities.

No feasible mitigation is available to reduce potentially significant impacts associated with future insufficient landfill capacity.

Level of Impact After Mitigation

Impacts related to the Proposed Project's generation of construction and demolition debris would be less than significant. The increase in solid waste generation due to operation of the Proposed Project is considered an unavoidable significant impact, since the capacity of landfills serving the City of Los Angeles in 2030 (the buildout date for the Proposed Project) cannot be determined at this time.

Cumulative Impacts

Implementation of the Proposed Project and related projects in the campus vicinity would increase the quantity of solid waste requiring disposal at landfills serving Los Angeles County. Operation of the Proposed Project and related projects would require the disposal of 20,150 additional tons of solid waste into landfills; the Proposed Project accounts for less than 4 percent of this amount. While significant expansions of existing in-County landfills, and development of large out-of-County landfills, are anticipated, because it is not yet certain when these expansions will become operational and serve the City of Los Angeles, and since the Los Angeles County Department of Public Works does not project solid waste need and capacity beyond the existing 15-year planning period (2007-2022), it is conservatively assumed that the related projects plus the Proposed Project would cumulatively result in a potentially significant impact with respect to solid waste at Proposed Project buildout in 2030.

7.11.4 Energy (Electricity and Natural Gas)

Electricity

Project Impacts

Construction Impacts

Construction of the Proposed Project would consume minimal quantities of electricity (i.e., temporary use for lighting and small power tools). Therefore, electricity impacts during construction would be less than significant.

Operational Impacts

Proposed Project buildout is estimated to result in a net increase in electricity demand of approximately 6,240.28 MWh when compared to 2008 uses. This projected increase in annual electricity consumption represents 0.02 percent of LADWP's projection for 2030, and is therefore within the anticipated service capacity of LADWP. In addition, LADWP has indicated that it would be able to meet Proposed Project demand. Impacts on electricity supply facilities would be less than significant and no mitigation measures are required.

LADWP has not indicated that changes to existing off-site infrastructure would be required to meet the Proposed Project's needs. However, minor alterations to electricity transmission and distribution infrastructure on the LMU campus may be necessary to serve specific Proposed Project facilities. With implementation of mitigation measure **MM-ENG-1**, which requires LMU to consult with LADWP prior to submittal of final site plans for approval by the City's Building and Safety Department, impacts on electricity transmission and distribution infrastructure would be reduced to a less than significant level.

The Proposed Project would incorporate Proposed Project design features which would meet or exceed minimum efficiency standards for Title 24. To further ensure appropriate energy conservation measures are incorporated into specific Proposed Project facilities, mitigation measure **MM-ENG-2** requires that LMU consult with LADWP's Energy Solutions Group regarding electricity consumption prior to submitting final plans for those facilities to the City's Building and Safety Department. LADWP's Energy Solutions Group encourages customers to consider design alternatives to maximize the efficiency of building envelopes, heating, ventilation, air conditioning, lighting, water heating, and mechanical systems. Therefore, Proposed Project impacts related to energy conservation (electricity) are anticipated to be less than significant.

Natural Gas

Project Impacts

Construction Impacts

Construction of the Proposed Project is not anticipated to consume natural gas. Therefore, impacts to natural gas supply or infrastructure during construction would be less than significant.

Operational Impacts

Proposed Project buildout is estimated to result in a net increase of approximately 13,858.61 million cubic feet (mcf) in natural gas demand when compared to 2008 uses. LMU's projected increase in annual natural gas demand is 0.001 percent of the total consumption projected by the Gas Company for 2030 by 2030, and is therefore within the anticipated service capacity of the Gas Company. Minor alterations to natural gas transmission and distribution infrastructure on Campus may be necessary to serve specific Proposed Project facilities. Therefore, impacts are potentially significant. With implementation of **MM-ENG-3**, which requires LMU to consult with the Gas Company prior to submittal of final site plans for approval by the City's Building and Safety Department, impacts on natural gas infrastructure would be reduced to a less than significant level.

The Proposed Project would incorporate Proposed Project design features which would meet or exceed minimum efficiency standards for Title 24. To further ensure appropriate energy conservation measures are incorporated into specific Proposed Project facilities, mitigation measure **MM-ENG-4** requires that LMU consult with the Gas Company regarding such measures prior to submitting final plans for those designs to the City's Building and Safety Department. Therefore, Proposed Project impacts related to energy conservation (natural gas) are anticipated to be less than significant.

Project Design Features and Mitigation Measures

PDF-ENG-1 LMU shall implement the following energy conservation measures as part of the Proposed Project:

- Central Plant motors shall include variable frequency drivers to adjust electrical motor speed based on demand;
- Major building renovations and additions shall be integrated into the Campus Energy Management System, which is a set of computer-aided tools used to monitor, control, and optimize the performance of building HVAC and lighting systems;

- Future cooling loads shall be met using thermal energy storage, or an additional energy efficient chiller, or other comparable storage technologies;
- New and replacement buildings with flat roofs shall use white reflective material or comparable heat rejecting material on the building roofs;
- New appliances shall meet or exceed the minimum efficiency levels mandated in the California Code of Regulations;
- All irrigation shall use reclaimed water by Project buildout;
- All irrigation shall use automatic irrigation timers and at least 50 percent of the campus's non-turf areas shall include drought-tolerant or native plantings;
- All new and renovated buildings shall incorporate water conservation measures such as ultra-low-flush water closets and urinals, low-flow shower heads, and low-flow faucet aerators;
- All new construction shall be designed to the 2008 LEED Certified criteria (or an equivalent criteria) or better;
- Buildings shall be well sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads;
- Buildings shall incorporate thermal insulation in walls and ceilings;
- Window systems shall be designed to reduce thermal gain and loss, thus, reducing cooling loads during warm weather and heating loads during cool weather; and
- High-intensity-discharge (HID) lamps, light-emitting diode (LED), or other energy efficient lighting shall be installed for all outdoor lighting to reduce electricity consumption.

Electricity

The following mitigation measures would address potential impacts related to electricity and natural gas and reduce impacts to less than significant levels:

- MM-ENG-1 Prior to submittal of final site plans associated with specific Project facilities for approval by the City's Building and Safety Department, LMU shall consult with LADWP to determine the appropriate specifications for additional transmission or distribution facilities supplying electricity to the Project site. Upon finalization of these specifications, LMU shall fund its fair share of the cost of on campus or off campus infrastructure installation, as applicable.

MM-ENG-2 Prior to submittal of final site plans for specific Project buildings or facilities to the City's Building and Safety Department demonstrating compliance with the State's Energy Conservation Standards, LMU shall consult with LADWP's Energy Solutions Group regarding the incorporation of possible energy efficiency measures into Project design.

Natural Gas

MM-ENG-3 Prior to submittal of final site plans for specific Project buildings or facilities to the City's Building and Safety Department demonstrating compliance with the State's Energy Conservation Standards, LMU shall incorporate the appropriate specifications of necessary modifications to the natural gas conveyance system to the Project site as required by the Gas Company. Upon finalizing these specifications, LMU shall fund its fair share of the cost of on campus or off campus infrastructure installation, as applicable.

MM-ENG-4 Prior to submittal of final site plans for specific Project buildings or facilities to the City's Building and Safety Department demonstrating compliance with the State's Energy Conservation Standards, LMU shall consult with the Gas Company regarding the incorporation of feasible energy conservation measures into Project design.

Level of Impact After Mitigation

With implementation of MM-ENG-1 through MM-ENG-4, no significant effects associated with energy resources are anticipated as the result of implementation of the Proposed Project.

Cumulative Impacts

Electricity

Current known related projects together with the Proposed Project would result in a net electricity consumption of approximately 94,936.6 megawatt hours (MWh) per year. LADWP will have an energy supply sufficient to meet anticipated demand. Each related project would be required to comply with Title 24 energy efficiency standards. Implementation of the Proposed Project, considered together with related projects, is not expected to result in a cumulatively significant impact to electricity supply or conveyance systems.

Natural Gas

Current known related projects together with the Proposed Project would result in a net natural gas consumption of 706,926 mcf per year. The cumulative demand of the Proposed Project plus related

projects represents 0.05 percent of The Gas Company's projected supply by 2030. Each related project would be required to comply with Title 24 energy efficiency standards. Implementation of the Proposed Project, considered together with related projects, is not expected to result in a cumulatively significant impact on natural gas supply or conveyance systems.

8.0 SUMMARY OF ALTERNATIVES

The *State CEQA Guidelines* stipulate that alternatives addressed in an EIR should be feasible and should not be considered remote or speculative. The *State CEQA Guidelines* state that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries and whether the applicant can reasonably acquire, control or otherwise have access to the alternative site."

In response to the criteria outlining requirements for an alternatives analysis, five alternatives have been selected and evaluated in comparison to the Proposed Project.

- Alternative 1 – No Project Alternative: Buildout Under Existing Approvals
- Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is
- Alternative 3 – No New or Replacement Residential Uses
- Alternative 4 – Build New Residential Uses Off-Campus
- Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in New and Replacement Non-Residential Square Footage

8.1 Alternative 1 - No Project Alternative: Buildout Under Existing Approvals

Under CEQA Guidelines Section 15126.6(e)(3), the "No Project" Alternative for a project revising an existing land use or regulatory plan, policy or operation, like the Proposed Project, is the continuation of the existing plan, policy, or operation into the future. As discussed in the Draft EIR in Section VI, Project Alternatives, two "No Project" scenarios are analyzed in the Draft EIR.

This first "No Project" alternative (Buildout Under Existing Approvals) evaluates operation of the LMU campus under existing City of Los Angeles entitlements and approvals. No additional construction is permitted under LMU's current entitlements. Therefore, under this alternative, the Proposed Project would not be implemented and no additional development on the campus would be undertaken, other than minor improvements required for the general maintenance and upkeep of facilities that do not require further discretionary approvals. However, as permitted under current entitlements, enrollment could increase to the approved cap of 7,800 FTE students and an unlimited increase in faculty and staff

would be permitted. (If the increase in faculty and staff is roughly proportional to the increase in students, this increase would be approximately 202 FTE faculty and staff.) Currently (as of Fall 2008), there are 6,868 FTE students enrolled on campus and approximately 1,500 FTE faculty and staff working on campus. This alternative was selected for its potential to avoid or reduce all potentially significant and unavoidable impacts associated with the Proposed Project.

Implementation of this alternative would avoid the significant and unavoidable localized construction Air Quality emissions and construction Noise impacts associated with Proposed Project buildout. Additionally, implementation of this alternative would avoid many, but not all, less than significant impacts anticipated to occur during Proposed Project construction activities. However, this alternative would not avoid the significant project-level and cumulative-level Solid Waste impacts anticipated to occur beyond the year 2015. However, since Alternative 1 would involve substantially less construction, this alternative would have a smaller contribution to the cumulative Archaeological Resources impact than the Proposed Project. Further, implementation of this alternative would result in greater operational Aesthetics and Views, Air Quality (Emissions), Global Climate Change, Water Resources, Land Use, Noise, Recreation and Parks, Transportation (Access and Circulation and Parking), and Public Utilities (Water Supplies and Wastewater) impacts than those associated with the Proposed Project. However, all these impacts except, possibly, transportation impacts, would be less than significant under both development scenarios.

Because Alternative 1 would not allow the construction of any replacement or net new residential, nonresidential, or athletic square footage, the alternative would prevent attainment of two of the three Key University Objectives: Objectives U-2 and U-3. Since Alternative 1 would not allow new development of an updated, cohesive campus community, but would allow increased enrollment up to the previously approved cap of 7,800 FTE students, Key University Objective U-1 would be only incompletely attained. Alternative 1 would prevent attainment of the two Key Academic Objectives: Objectives A-1 and A-2. Alternative 1 also would prevent attainment of all six Residential Key Objectives: Objectives R-1 through R-6).

By not permitting the replacement of aging facilities on the Westchester campus or an increase in residential square footage, Alternative 1 would prevent attainment of both Key Sustainability Objectives: Objectives S-1 and S-2. Finally, because no new development or improvements of any kind would be permitted, Alternative 1 would prevent attainment of the remaining Project Objectives, including Planning and Design Objectives PD-1 and PD-2; Pedestrian and Vehicular Circulation Objective C-1; and Athletic and Open Space Objective AOS-1.

Overall, Alternative 1 would not allow full attainment of any of the 13 Key Objectives; one would be partially attained and the remaining 12 would not be attained at all. Of the remaining four Project Objectives, none would be attained. The majority of Project Objectives, therefore, would not be attained under Alternative 1.

8.2 Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is

As discussed above and in the Draft EIR in Section VI, Project Alternatives, two “No Project” scenarios are analyzed in the Draft EIR. This alternative evaluates operation of the LMU campus assuming the continuation of existing conditions. Under this alternative, the Proposed Project would not be implemented and no additional development on the campus would be undertaken, other than minor improvements required for the general maintenance and upkeep of facilities that do not require further discretionary approvals. Additionally, there would be no increase in enrollment on campus or increase in FTE faculty and staff levels. Thus, this alternative assumes a static population of 6,868 FTE students and approximately 1,500 FTE faculty and staff. This alternative was selected for its potential to avoid or reduce all potentially significant and unavoidable impacts associated with the Proposed Project.

Implementation of Alternative 2 would avoid all project-level significant and unavoidable impacts associated with the Proposed Project (construction-related Air Quality impacts related to localized significance thresholds, construction Noise, and operational Solid Waste impacts), and also would avoid many of the less than significant construction-related impacts associated with Proposed Project construction. However, implementation of this alternative would result in greater operational Aesthetics, Climate Change, and Water Resources impacts than those associated with the Proposed Project, although these impacts would be less than significant under both development scenarios. This alternative could entail some ground disturbance, such as for utility trenching, and therefore could contribute to cumulatively significant impacts on Archaeological Resource, although to a lesser degree than under the Proposed Project since Alternative 2 would involve substantially less construction.

Because Alternative 2 would not allow the construction of any replacement or net new residential, nonresidential, or athletic square footage, and furthermore would not permit an increase in enrollment beyond the Fall 2008 enrollment of 6,868 FTE students, it would prevent attainment of all three Key University Objectives: Objectives U-1, U-2 and U-3. Because Alternative 2 would not allow the construction of any replacement or net new residential, nonresidential, or athletic square footage, Alternative 2 also would prevent attainment of the two Key Academic Objectives: Objectives A-1 and A-2. Maintaining LMU’s campus as is under Alternative 2 also would prevent attainment of all six Key Residential Objectives: Objectives R-1 through R-6. By not permitting the replacement of aging facilities on the Westchester campus or an increase in residential square footage, Alternative 2 would prevent

attainment of both Key Sustainability Objectives S-1 and S-2. Finally, because no new development would be permitted, Alternative 2 would prevent attainment of the remaining Project Objectives, including Planning and Design Objectives PD-1 and PD-2; Pedestrian and Vehicular Circulation Objective C-1; and Athletic and Open Space Objective AOS-1.

Overall, Alternative 2 would not allow attainment of any of the 13 Key Objectives or remaining four Project Objectives; the majority of Project Objectives, therefore, would not be attained.

8.3 Alternative 3 – No New or Replacement Residential Uses

This alternative proposes the systematic replacement of academic, administrative, and indoor athletic facilities on campus that are functionally obsolete or substandard, as proposed in the Proposed Project. Similar to the Proposed Project, Alternative 3 would also reconfigure inadequate outdoor athletic facilities and open space areas, roadways, parking facilities, and pedestrian circulation, and would implement infrastructure upgrades as needed. This alternative would permit student enrollment to increase to the previously approved cap of 7,800 FTE students and permit the number of FTE faculty and staff to increase to 1,800, equivalent to the Proposed Project. However, no new or replacement on-campus housing, nor any off-campus housing, for undergraduate students would be developed.

Alternative 3 was selected for its potential to avoid or reduce potentially significant and unavoidable construction-related Air Quality emissions, cumulative Archaeological Resource impacts, construction Noise impacts, and project-level and cumulative Solid Waste impacts associated with the Proposed Project. However, implementation of this alternative would not change the severity of the significant and unavoidable localized air quality emissions impact and would only incrementally reduce the significant construction Noise impact associated with Proposed Project buildout, but not to a less than significant level. This alternative would also incrementally reduce the Proposed Project's less than significant impacts related to Views, Light and Glare, Shading, construction Global Climate Change, Biological Resources, Cultural Resources, Geology, Hazards during construction, Surface Water Hydrology during construction and operation, Surface Water Quality during construction, Police and Fire during construction, access and parking during construction, and Public Utilities (Wastewater, Solid Waste from construction). However, this alternative would not avoid the significant project-level Solid Waste impact anticipated to occur beyond the year 2015, and would still result in a considerable contribution to cumulatively significant Solid Waste and Archeological Resource impacts. This Alternative would result in Transportation (access and circulation during operation) impacts that are significant and unavoidable since this alternative would preclude beneficial impacts associated with the Proposed Project related to reduced trip generation resulting from the reduced number of students commuting to campus. Additionally, implementation of this alternative would result in impacts similar to or greater than those

associated with Proposed Project construction and operation (Surface Water Quality, Land Use, Noise, Police and Fire, Recreation and Parks, Parking, Water Supplies, and Energy) however, these impacts would be less than significant under both development scenarios.

Since student enrollment and FTE faculty and staff could increase under Alternative 3, but no new or replacement student housing could be constructed, Alternative 3 would prevent attainment of Key University Objective U-3. It would allow incomplete attainment of the remaining two Key University Objectives: Objectives U-1 and U-2. Because Alternative 3 precludes construction of any replacement or new residential square footage, it would allow incomplete attainment of the two Key Academic Objectives: Objectives A-1 and A-2. For the same reasons, Alternative 3 also would prevent attainment of all six Key Residential Objectives: Objectives R-1 through R-6. Alternative 3 would prevent attainment of Key Sustainability Objective S-2 and would allow incomplete attainment of Key Sustainability Objective S-1. Although no new or replacement housing could be constructed, other components of the Proposed Project could be implemented under Alternative 3; for this reason, it would attain Planning and Design Objective PD-1 and partially attain Objective PD-2. Since the number of students housed on campus would not increase, Alternative 3 would prevent attainment of Pedestrian and Vehicular Circulation Objective C-1. Proposed Project improvements related to athletic facilities could take place, and this alternative would therefore attain Athletic and Open Space Objective AOS-1.

Alternative 3 would not allow full attainment of any of the 13 Key Objectives and only two of the four remaining Project Objectives would be fully attained under Alternative 3.

8.4 Alternative 4 – Build New Residential Uses Off-Campus

This alternative would involve the implementation of a project similar to the Proposed Project, including the systematic replacement of academic/administrative, athletic, and residential facilities on campus that are functionally obsolete or substandard. Similar to the Proposed Project, Alternative 4 would also reconfigure inadequate campus athletic facilities and open space areas, roadways, parking facilities, and pedestrian circulation accommodations, and would implement infrastructure upgrades as needed. This alternative would permit student enrollment to increase to the previously approved cap of 7,800 FTE students and permit the number of FTE faculty and staff to increase to 1,800, equivalent to the Proposed Project. However, under this alternative, additional housing beyond what is being replaced on campus would be developed off campus. The additional student housing would require approximately 22 acres. However, a search of properties within 10 miles of the campus did not identify a viable site. As no single property or parcel 22 acres in size is available, student housing would need to be disaggregated within three parcels.

This alternative was selected for its potential to avoid or reduce potentially significant and unavoidable cumulative Archaeological and construction Noise impacts associated with the Proposed Project. Although Alternative 4 would incrementally reduce a number of less than significant Proposed Project impacts, implementation of this alternative would not reduce or eliminate any project-level significantly adverse impacts associated with Proposed Project buildout. The risk of significant cumulatively considerable Archaeological impacts might be incrementally reduced, but would remain nonetheless a risk and, therefore, a significant impact. This Alternative would result in Transportation (access and circulation during operation) impacts that are significant and unavoidable, even with a shuttle service that would likely be needed as a mitigation measure, since this alternative would preclude beneficial impacts associated with the Proposed Project related to reduced trip generation resulting from the reduced number of students commuting to campus. In addition, implementation of this alternative would result in impacts that are similar or greater than the Proposed Project's less than significant impacts related to Aesthetics & Views, Light & Glare, Shading, Air Quality, Global Climate Change, Paleontological, Geology, Hazards, Water Resources, Land Use, Noise, Public Services, Transportation (access, circulation, and parking), and Public Utilities. These impacts, except for Transportation, would remain less than significant.

Because Alternative 4 would not allow an increase in student housing square footage or the number of students housed on LMU's Westchester campus, it would prevent attainment of the Proposed Project's Key University Objective U-3. Alternative 4 would allow incomplete attainment of the remaining two Key University Objectives: Objectives U-1 and U-2. Because Alternative 4 precludes construction of net new on-campus residential square footage, it would allow incomplete attainment of the two Key Academic Objectives: Objectives A-1 and A-2). Since no increase in student residential facilities on the Westchester campus would be allowed, but housing would be constructed off-site, Alternative 4 would allow incomplete attainment of Key Residential Objective R-3. Alternative 4 would not attain the remaining five Residential Objectives: Objectives R-1, R-2, and R-4 through R-6). While this Alternative would permit new residential and nonresidential facilities to be constructed, these residential uses would be located off-campus, leading to more trips and associated vehicle emissions. Thus, Alternative 4 would allow incomplete attainment of Key Sustainability Objective S-1 and would not attain Key Sustainability Objective S-2. Alternative 4 would allow incomplete attainment of Planning and Design Objectives PD-1 and P-2; would prevent attainment of Pedestrian and Vehicular Circulation Objective C-1; and would fully attain Athletic and Open Space Objective AOS-1.

Alternative 4 would not allow full attainment of any of the 13 Key Objectives; five would be incompletely attained and eight would not be attained at all. Of the remaining four Project Objectives, three would be

incompletely attained; and one would not be attained at all. Overall, the majority of Project Objectives would not be attained under Alternative 4.

8.5 Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in New and Replacement Non-Residential Square Footage

This alternative would involve the implementation of a project similar to the Proposed Project, including the systematic replacement of academic/administrative, athletic, and residential facilities on campus that are functionally obsolete or substandard. Similar to the Proposed Project, this alternative would also reconfigure inadequate campus outdoor athletic facilities and open space areas, roadways, parking facilities, and pedestrian circulation accommodations, and would implement infrastructure upgrades as needed. However, under this alternative, no additional on-campus housing would be developed beyond the square footage replacing existing residential uses. Additionally, the square footage of new and replacement academic/administrative and indoor athletic facilities would be reduced by 25 percent compared with the Proposed Project.

This alternative was selected for its potential to avoid or reduce potentially significant and unavoidable Air Quality construction emissions, cumulative Archaeological, construction Noise, and project- and cumulative-level Solid Waste impacts associated with the Proposed Project. This Alternative would result in Transportation (access and circulation during operation) impacts that are significant and unavoidable since this alternative would preclude beneficial impacts associated with the Proposed Project related to reduced trip generation resulting from the reduced number of students commuting to campus. Implementation of this alternative would result in either similar (localized air quality emissions) or incrementally reduced (construction noise, project- and cumulative-level solid waste, cumulative archeological) impacts compared to the Proposed Project, but not to levels less than significant. Further, implementation of this alternative would result in impacts that are similar or greater than the Proposed Project's less than significant impacts related to Aesthetic Character, Air Quality, operational Hazards, Land Use, operational Noise, operational Public Services, operational Parking, and Energy; however, these impacts would remain less than significant.

Since Alternative 5 could construct replacement housing but no new residential housing, and could construct fewer academic, administrative, and athletic facilities than under the Proposed Project it would allow incomplete attainment of two of the three Key University Objectives: Objectives U-1 and U-2. Since no increase in housing would be permitted on the campus and LMU could not house up to 75 percent of undergraduate students as under the Proposed Project, Alternative 5 would prevent attainment of Key University Objective U-3. Because Alternative 5 precludes the construction of any net new residential facilities and reduces the square footage of nonresidential uses to be constructed, it would allow

incomplete attainment of the two Key Academic Objectives: Objectives A-1 and A-2. Since Alternative 5 would replace existing residential facilities, it would attain one of the Key Residential Objectives: Objective R-5. However, because this alternative would not allow the construction of net new residential facilities, it would prevent attainment of the remaining five Key Residential Objectives: Objectives R-1 through R-4 and R-6. Since Alternative 5 would allow existing residential facilities to be replaced, a reduced amount of nonresidential square footage to be constructed, and other Proposed Project components, such as outdoor athletic facility improvements, to be implemented, it would incompletely attain Key Sustainability Objective S-1. It would prevent attainment of Key Sustainability Objective S-2. Alternative 5 would attain Planning and Design Objective PD-1 and partially attain Objective PD-2; it would not attain Pedestrian and Vehicular Circulation Objective C-1. Finally, because it would reduce the square footage of new indoor athletic facilities by 25 percent, Alternative 5 would incompletely attain Athletic and Open Space Objective AOS-1.

Alternative 5 would not attain seven and incompletely attain five of the 13 Key Objectives. Overall, most of the Key Project Objectives, therefore, would not be attained under Alternative 5.