EXHIBIT C

ENVIRONMENTAL CLEARANCE

ENV-2008-1342-EIR-ADD1

- Loyola Marymount University Master Plan Draft EIR
  - https://planning.lacity.org/eir/LoyolaMarymountUniv/DEIR/TOC.html
- Loyola Marymount University Master Plan Final EIR
  - https://planning.lacity.org/eir/LoyolaMarymountUniv/feir/LMU_FEIR_TOC.html
- Addendum to the Environmental Impact Report for the Loyola Marymount University Master Plan Project
- LADOT Correspondence

LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

ADDENDUM

Addendum to the Environmental Impact Report for the Loyola Marymount University Master Plan Project

Environmental Case Number: ENV-2008-1342-EIR-ADD1

State Clearinghouse Number: 2008051103

Project Location: 1 LMU Drive, Los Angeles, California 90045

Community Plan Area: Westchester–Playa del Rey

Council District: 11—Bonin

Project Description: An amendment to the LMU Specific Plan to: (1) modify the previously approved floor area for Academic/Administrative, Residential, and Athletic Indoor uses; (2) allow for subsequent adjustments in the distribution of floor area; (3) permit the retention, renovation, use, and/or change the use of the existing sports arena (Gersten Pavilion); (4) update the Traffic Demand Management Plan; and (5) establish a dedicated liaison officer.

PREPARED FOR:
City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
Loyola Marymount University

September 2021

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ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE LOYOLA MARYMOUNT UNIVERSITY SPECIFIC PLAN

1.0 Introduction

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the Loyola Marymount University Master Plan Project (Case No. ENV-2008-1342-EIR, State Clearinghouse No. 2008051103), which was certified by the City of Los Angeles (City) in 2011 (Certified EIR). The Certified EIR, as referred to herein, comprises the Draft EIR, Final EIR, and an Errata to the Final EIR. In accordance with the California Environmental Quality Act (CEQA), this Addendum to the EIR analyzes proposed modifications (the Modified Project) to the Loyola Marymount University Master Plan Project approved in 2011 (the Previously Approved Project) and demonstrates that the Modified Project does not meet the standards for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines Section 15162 and 15163.

1.1. Background

The City prepared an EIR pursuant to the CEQA for the Loyola Marymount University Master Plan Project (Project) to assess potential environmental impacts of the Project, as described below. The EIR concluded that, with mitigation, all of the Project's environmental impacts would be less than significant, with the exception of a significant and unavoidable project-related environmental impacts associated with air quality and noise during construction and solid waste during operation, and cumulative impacts associated with archaeological resources and solid waste.

On February 25, 2011, the City certified the EIR and approved the Project. Subsequent to approval of the Project, the Loyola Marymount University (Project Applicant) has proposed the Modified Project. As a result of changing campus needs, the Project Applicant proposes the Modified Project to allow for adjustments in the distribution of floor area among the approved academic/administrative buildings, residential buildings, and indoor athletic buildings. This flexibility would allow LMU to continue to meet the evolving needs of a university.

Both the Previously Approved Project (as analyzed in the Certified EIR) and the Modified Project (analyzed in this Addendum) are discussed further below.

2.0 CEQA Authority for an Addendum

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

> *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

Section 15162 of the CEQA Guidelines only requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Supplemental or Subsequent EIR shall be required by the lead agency or by any responsible agency:

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

As demonstrated by the analysis herein (refer to Section 5, Comparative Analysis of Modified Project Impacts, below), the Modified Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Rather, all of the impacts associated with the Modified Project are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or substantially increased significant impact. Therefore, the modifications resulting from the Modified Project do not meet criteria for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 and CEQA Guidelines Section 15162 and 15163.

3.0 Overview of the Project

3.1. Project Location and Existing Conditions

The Loyola Marymount University (LMU) campus is located in the Westchester Community of the City of Los Angeles (City) and is within the boundaries of the Westchester–Playa del Rey Community Plan. The campus is located approximately 1.25 miles east of the Pacific Ocean and 1 mile north of Los Angeles International Airport (LAX). Regional access to LMU is provided by Lincoln Boulevard (State Highway 1) the Marina Freeway/Expressway (State Highway 90), and the San Diego Freeway (I-405).

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. 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.

3.2. Description of Previously Approved Project

In 2011, the City of Los Angeles approved a Master Plan for LMU, which included approval of the LMU Specific Plan covering the entire Westchester campus (hereafter referred to as the "campus" or "Project Site"), a Development Agreement, General Plan Amendment, Zone Change, and certification of the EIR (Previously Approved Project).

The LMU Specific Plan provides guidelines for future development on campus and is intended to provide flexibility for the university to remain competitive and meet the evolving educational needs of students, teaching and research needs of the facility, and the administrative needs of the staff. The LMU Specific Plan approved a total of 3,411,000 square feet of floor area on campus, which floor area was allocated between academic/administrative buildings, residential buildings, and indoor athletic buildings.

As shown in Table 1 on page 5, in accordance with the Specific Plan, the Previously Approved Project includes the maximum permitted development of 457,000 net new square feet of academic and administrative floor area, 428,000 net new square feet of residential floor area and 26,000 square feet of new floor area for athletics uses. In total, an additional 911,000 square feet of net new floor area is permitted under the Previously Approved Project. When accounting for approximately 1.63 million square feet of campus buildings to remain, a total of approximately 3.41 million square feet of floor area is permitted within the campus for the Previously Approved Project. The Previously Approved Project further includes 989 net new beds, a net increase of approximately 4.8 acres of outdoor facilities for athletic uses, and a net increase of approximately 5 acres of open space areas. See Specific Plan Section 2.2.C.

In accordance with the LMU Specific Plan, the number of individuals permitted to reside on the campus is limited to 4,250 students, faculty, staff, visitors, and religious affiliates. In addition, pursuant to the LMU Specific Plan, the number of students enrolled at the campus is limited to 7,800 full time equivalent (FTE) students. Total campus FTE (students, faculty, and staff) is limited to 9,600 FTE.

The LMU Specific Plan includes a list of permitted uses within the campus, noise regulations, historic preservation regulations, and operational regulations. Design regulations are also included in the LMU Specific Plan that address building heights, setbacks, open space requirements, athletic area requirements, protected trees, lighting, and landscaped buffers. Transportation and parking regulations within the LMU Specific Plan address vehicular and pedestrian circulation/access, implementation of a Transportation Demand Management (TDM) program, minimum parking requirements, and event parking. Other requirements within the LMU Specific Plan address security and signage.

Table 1
Approved LMU Specific Plan—Projected Development Plan (Floor Area)

	Existing	To Remain	New	Net New	Total at Buildout
Academic/ Administrative	1,486,000	1,022,000	921,000	457,000	1,943,000
Residential	848,000	515,000	761,000	428,000	1,276,000
Athletic Indoors	166,000	95,000	97,000	26,000	192,000
Total	*2,500,000*	*1,632,000*	*1,779,000*	*911,000*	*3,411,000*

3.3. Modifications to Previously Approved Project

The proposed Modified Project would allow for adjustments in the distribution of land uses among the approved academic/administrative buildings, residential buildings, and indoor athletic buildings. The maximum total net new construction (911,000 square feet of floor area) and maximum overall total development on Campus (3,411,000 square feet of floor area) analyzed in the EIR and approved in the Specific Plan would not increase. In addition, the maximum of 7,800 FTE students, 9,600 total FTE students, faculty and staff, and 4,250 on-Campus residents set forth by the LMU Specific Plan would not change. The number of total new beds (989) within the approved residential floor area would also not increase. This flexibility would allow LMU to continue to meet the evolving needs of a university, while ensuring that environmental impacts remain within the envelope analyzed in the EIR.

As shown in Table 2 on page 6, the Modified Project would reduce the total academic/administrative and residential floor area at buildout (while providing the same 989 residential beds) and would also increase the amount of athletic indoor floor area while maintaining the total new floor area and total floor area at existing buildout limits. The increase in athletic indoors floor area would facilitate the retention of the existing Gersten Pavilion. The Previously Approved Project contemplated replacing the Gersten Pavilion with a new sports arena. The Modified Project continues to contemplate the construction of a new sports arena, but it would allow LMU to retain, renovate, continue to use, and/or change the use of the Gersten Pavilion. Under the Modified Project, if a new sports arena is built on campus, all fixed seating in the Gersten Pavilion would be removed. Like many University spaces, a retained Gersten Pavilion may be utilized for campus events. However, temporary seating would be limited to 1,000 seats.

The Modified Project would not change the overall Project Site footprint to be developed. In addition, the depth of excavation, and peak construction activities would not increase with approval of the Modified Project. Rather, the overall amount of construction activity would likely be reduced, as Gersten Pavilion could be retained under the Modified Project.

Table 2
Proposed Redistribution of (Floor Area) with Modified Project

	Previously Approved New Floor Area	Proposed Redistribution of New Floor Area w/ Modified Project	Previously Approved Total (Existing plus New) at Buildout	Proposed Redistribution of Total (Existing plus New) at Buildout w/ Modified Project
Academic/ Administrative	921,000	869,500	1,943,000	1,847,000
Residential	761,000	709,500	1,276,000	1,198,000
Athletic Indoors	97,000	200,000*	192,000	366,000*
Total	**1,779,000**	**1,779,000**	**3,411,000**	**3,411,000**

**The Director may approve up to a 7.5-percent increase in: (1) the permitted "New Floor Area" for Athletic Indoors (up to a 15,000 square foot increase); and/or (2) the permitted "Combined (Existing + New) Floor Area" for Athletic Indoors (up to a 27,450 square foot increase) through the Administrative Clearance process detailed in Section 8.1 of the Specific Plan provided, however, in no event shall: (1) the total New Floor Area for all three land use categories exceed 1,779,000 square feet; or (2) shall the total Combined (Existing + New) Floor Area permitted for all three land use categories in exceed 3,411,000 square feet.*

Source: LMU, 2021.

The Modified Project would also update the TDM Plan to: (1) prohibit concurrent scheduling of events open to the general public at the Gersten Pavilion and the new sports arena; and (2) review other scheduling considerations for public events at the Gersten Pavilion and the new sports area. Further, to limit the potential for the overlapping of public events at the Gersten Pavilion and the new sports arena, the TDM Plan would require that a public event held at either Gersten Pavilion or the new sports arena start at least 2 hours after the scheduled end of a public event held at the other arena/pavilion. With these TDM Plan measures, the Modified Project would not increase the frequency or level of attendance at events when compared to the Previous Approved Project.

3.4. Requested Permits and Approvals

The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 11.5.7-G, a Specific Plan Amendment to the Loyola Marymount University Specific Plan.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

The proposed text amendments to the LMU Specific Plan are provided in Appendix C. These proposed modifications would provide more flexibility in the future development of the Campus. In particular, retention and repurposing of the Gersten Pavilion would provide additional indoor athletic facilities and space for student athletes. This is needed to bring the athletic experience provided at LMU to a level commensurate with peer institutions within the National College Athletic Association. To accommodate such modifications, amendment to the allocations of land uses and floor area subtotals set forth in the LMU Specific Plan is necessary.

4.0 Previous Environmental Documents Incorporated by Reference

Consistent with Section 15150 of the CEQA Guidelines, the following documents were used in preparation of this Addendum and are incorporated herein by reference:

- Loyola Marymount University Master Plan Project Draft EIR, State Clearinghouse (SCH) No. 2008051103, Case No. ENV-2008-1342-EIR, January 2010.
- Loyola Marymount University Master Plan Project Final EIR, SCH No. 2008051103, Case No. ENV-2008-1342-EIR, July 2010.
- Loyola Marymount University Master Plan Project Final Environmental Impact Report Errata, September 2010.

Pursuant to CEQA Guidelines Section 15150(b), the above documents are available for review at the following location by appointment only.

Department of City Planning
Records Management
221 N. Figueroa Street, 14th Floor
Los Angeles, California 90012
(213) 847-3753

5.0 Comparative Analysis of Modified Project Impacts

5.1 Analysis of Impacts

This section provides an impact assessment of the proposed modifications to the LMU Specific Plan regarding the land use allocations and subtotals listed above (referred to in this Addendum as the Modified Project). A Modified Environmental Checklist Form that includes the most recent changes to Appendix G of the CEQA Guidelines was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the Certified EIR and to review whether any of the conditions set forth in Public Resources Code Section 21166 or CEQA Guidelines Section 15162, requiring preparation of a Supplemental or Subsequent EIR, have been triggered. The environmental effects for each of the following impact areas were evaluated:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Transportation/Circulation
- Utilities and Service Systems

The checklist and evaluation below provides the following information for each of these environmental impact categories:

- **Impact Determination in the Certified EIR**—This section lists the impact determination made in the Certified EIR for each impact category.

- **Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**—Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this section indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.

- **Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?**—Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the Modified Project is undertaken) that have occurred subsequent to the prior environmental documents and that would result in the Modified Project having new significant environmental impacts that were not

considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

- **Any New Information Requiring New Analysis or Verification?** Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this section indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative; then the question would be answered "Yes," requiring the preparation of a Supplemental or Subsequent EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain unchanged and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or there are no additional mitigation measures or alternatives now available or feasible but declined for adoption by the project proponent, then the question would be answered 'No' and no additional environmental documentation (Supplemental or Subsequent EIR) is required. New studies completed as part of this environmental review are attached to this sixth Addendum or are on file with the Department of City Planning.

- **Mitigation Measures Addressing Impacts**—Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this section indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the previously adopted mitigation measures have already been implemented or are not applicable to the currently proposed development, in which case the measures are not listed below. If "None" is indicated, a significant impact was not identified and mitigation was not required.

- **Conclusion**—For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

5.1.1 Aesthetics

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(a) Have a substantial adverse effect on a scenic vista?	Less Than Significant	No	No	No	No
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less Than Significant	No	No	No	No
(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant With Mitigation	No	No	No	Yes
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant With Mitigation	No	No	No	Yes

Impact Determination in the Certified EIR

Aesthetic impacts are discussed in Sections IV.A.1 through IV.A.3 of the Certified EIR. The Certified EIR included mitigation measures to ensure impacts would be less than significant. A summary of the analysis from the Certified EIR is provided below.

Visual Character and Quality

Construction of the components of the Previously Approved 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. However, with implementation of 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. Since construction activity would not be substantially visible from off-site vantage points, aesthetic impacts during Previously Approved Project construction would be considered less than significant with the implementation of mitigation measure **MM-AES-1**.

The Previously Approved 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, the campus's oldest buildings with 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.

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 Project. Other existing features that contribute to the valued visual character of the campus 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 Previously Approved Project also would maintain view corridors through campus. Therefore, operation of the Previously Approved Project would not alter, damage, or remove any features that substantially contribute to the valued visual character of the campus. Impacts would be less than significant.

Visual Contrast

The Previously Approved 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. Impacts on the visual character and the aesthetic style or image of the campus and surrounding community would be generally beneficial and would be less than significant.

Views/Scenic Highways

The Previously Approved 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 Previously Approved 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 Project site. Thus, impacts to views from long-range public vantage points would be less than significant.

Short-range views of the campus entrance are available from the intersection of Lincoln Boulevard and LMU Drive and from the West Bluffs development. 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 LMU's Hughes Campus would remain in place. In addition, W. 78th Street, Fordham Road, W. 80th Street, and McConnell Avenue would continue to have views of the campus perimeter, which may be enhanced by landscaping and fencing. The LMU Specific Plan's height limitations also ensure that taller buildings are set back from these boundaries, prohibit crowding of buildings near LMU's Burns Campus edge, and contribute open airspace to the foreground of residential viewsheds. Therefore, impacts to views from nearby roadways would be less than significant.

Shade and Shadow

During the summer solstice, off-site shadow lengths and trajectory under the Previously Approved Project would be substantially similar to those under existing conditions. Therefore, between 9:00 A.M. and 5:00 P.M., no shading of off-site uses would occur. In addition, during the winter solstice, between 9:00 A.M. and 3:00 P.M., no shading of off-site uses would occur for more than 2 hours. Therefore, implementation of the Previously Approved Project would not result in new off-site shadows for more than 3 hours between 9:00 A.M. and 3:00 P.M. during the winter solstice. As such, impacts would be less than significant.

Light and Glare

Construction lighting would represent a marginal increase, if any, in existing ambient light levels. In addition, 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. 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.

With regard to operational impacts, the Approved Specific Plan includes specific provisions for lighting, including specified building setbacks and limitations on signage lighting. In addition, as required by **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. Furthermore, 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 P.M., except in the case of overtime or extra innings. With implementation of mitigation measures and compliance with the Approved Specific Plan and LAMC, the Project would not substantially alter the ambient illumination levels in the campus vicinity. Impacts would therefore be less than significant after mitigation.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) (b) and (c)—Impacts to Visual Access and Scenic Vistas, Scenic Highways and Visual Character.

The Modified Project provides for redistribution of floor area among academic/administrative, residential, and indoor athletic uses approved as part of the LMU Specific Plan. This adjusted distribution would also allow LMU to retain additional existing buildings beyond those contemplated to be retained as part of the Certified EIR including the existing Gersten Pavilion. There are no proposed changes to the existing LMU Specific Plan regulations pertaining to setbacks/buffers from off-site areas, signage, lighting and building heights.

The Modified Project would continue to comply with the provisions of the LMU Specific Plan that address building heights, setbacks, open space areas, and modification to existing historic buildings. All of the new buildings developed under the Modified Project would be developed within the planning areas designated for new buildings that are identified in the LMU Specific Plan and Certified EIR. The Modified Project would also comply with regulatory requirements related to aesthetics as well as the Project Design Features (**PDF-AES-1** through **PDF-AES-3**) and Mitigation Measure **MM-AES-1**. Impacts would continue to be less than significant with implementation of mitigation measure **MM-AES-1**. As such, the Modified Project would not result in new significant impacts associated with visual access, scenic view or visual character that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact**.**

Question (d)—Impacts Associated with Light and Glare and Shading: With regard to light and glare, the Modified Project would continue to be constructed and operated in accordance with the provisions in the LMU Specific Plan related to setbacks/buffers from off-site areas, signage, lighting and building heights. The overall intensity of development within the campus would also not change under the Modified Project when compared with

the Previously Approved Project. In addition, the Modified Project would continue to implement Mitigation Measures **MM-LIGHT-1** through **MM-LIGHT-7** that address nighttime lighting during construction, securing lighting during construction, light intensity, screening, light spillover, field lighting, and use of exterior building materials that are not highly reflective. The Modified Project would also comply with LAMC requirements with regard to lighting. As such, the Modified Project would not result in new significant impacts associated with light or glare that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.

With regard to shading, the Modified Project would not increase building heights within the planning areas or result in new development outside the planning areas designated for new buildings, consistent with Project Design Feature **PDF-SH-1**. As such, shading would not extend beyond the shading footprint evaluated in the Certified EIR. As such, the Modified Project would not result in impacts associated with shading that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to visual resources. No substantial changes in the environment affecting this analysis have occurred since certification of the Certified EIR. Finally, as determined above, the Modified Project would not result in any new or substantially more severe impacts related to aesthetic resources, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement the project design features and mitigation measures included in the MMRP adopted for the Previously Approved Project. A copy of the MMRP is included as Appendix B.

Conclusion

No new significant impacts or more severe impacts relative to aesthetic resources would occur as a result of the Modified Project. Therefore, the identified impacts to aesthetic resources under the Modified Project would not result in any of the conditions set forth in

PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.2 Agriculture and Forest Resources (Agricultural Resources)

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AGRICULTURE AND FORESTRY RESOURCES: Would the project:					
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No	No	No	No
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	Not Analyzed (New Question)	No	No	No	No
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	Not Analyzed (New Question)	No	No	No	No
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

Impacts to agricultural resources were evaluated in Section VII, Effects Found Not to be Significant of the Certified EIR and in the Initial Study for the Previously Approved Project. With regard to thresholds (a), (b), and (e), the Initial Study did not identify any impacts. With regard to thresholds (c) and (d), the Certified EIR did not analyze forest resources as these were not checklist questions at the time. However, the Project Site does not contain forest land or timberland, and thus no impacts associated with these thresholds would occur.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) through (e)—Impacts to Agricultural and Forest Resources: No agricultural or forest resources including farmland, forest land, or related operations are present on the Project Site. In addition, the Project Site is not zoned for any agriculture, forest land, or timberland. Therefore, the Modified Project would not create any new significant impacts related to agricultural or forest resources nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts to agricultural and forest resources than analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to agricultural and forest resources. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new agricultural or forest resources have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any impacts to agricultural or forest resources, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to agricultural or forest resources would occur as a result of the Modified Project. Therefore, impacts associated with agricultural or forest resources under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.3 Air Quality

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AIR QUALITY: Would the project:					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant	No	No	No	No
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less than Significant	No	No	No	Yes
(c) Expose sensitive receptors to substantial pollutant concentrations?	Significant and Unavoidable	No	No	No	Yes
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

The Previously Approved Project's air quality impacts were addressed in Section IV.E, Air Quality, of the Certified EIR.

Construction

As discussed in the Certified EIR, construction of the Previously Approved Project would generate pollutant emissions from the following activities: (1) site preparation (grading/excavation); (2) travel by construction workers to and from the site; (3) delivery and hauling of construction materials and supplies to and from the site; (4) fuel combustion by on-site construction equipment; and (5) the application of architectural coatings and other building materials that release reactive organic compounds. Based on the phases of construction and conservative assumptions, daily construction emissions associated with the Previously Approved Project would not exceed the South Coast Air Quality Management District's (SCAQMD) significance thresholds. As such, the Certified EIR concluded that the Previously Approved Project would result in less than significant regional air quality impacts during construction. In addition, Mitigation Measures **MM-AQ-1** through **MM-AQ-12** were included to reduce air quality emissions.

With regard to localized construction air quality impacts, the construction of the Previously Approved Project would not generate on-site emissions in excess of the site-specific localized significance thresholds for NO_X and CO. Construction of the

Previously Approved Project would generate on-site emissions in excess of the threshold for PM_{10} and $PM_{2.5}$ at residential receptors adjacent to the campus. The maximum impacts associated with PM_{10} and $PM_{2.5}$ emissions were demonstrated to occur at residential receptors directly to the south of the campus, when construction activity was modeled to take place at the southern end of the Burns Campus. However, Localized Significant 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 PM_{10} 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 LMU's Leavey and Hughes Campuses, respectively. Impacts related to $PM_{2.5}$ would be less than significant at the school receptors. Overall, even with implementation of the mitigation measures, the localized impacts for PM_{10} and $PM_{2.5}$ would be potentially significant during construction when construction activity is taking place near off-site sensitive receptors.

To determine the health risks from diesel particulate matter associated with construction of the Previously Approved Project, the SCREEN3 model was used to estimate the concentration of diesel particulate matter at nearby residential, workplace, and student receptors. Based on the screening health risk assessment, the cancer risk due to construction activities would not exceed the SCAQMD significance threshold.

Operation

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 Previously Approved Project buildout would not exceed SCAQMD's significance thresholds. The campus emissions after the Previously Approved 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. The California Air Resources Board (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 Previously Approved Project would not result in an increase in emissions that would exceed the significance thresholds, therefore the Previously Approved Project would result in a less than significant impact on air quality in the region. Impacts due to toxic air contaminants were also determined to be less than significant.

Regarding localized air quality impacts during operation, the Certified EIR demonstrated that sensitive receptors in the area would not be significantly affected by localized CO emissions generated by traffic attributable to the Previously Approved Project. Therefore, localized air quality impacts related to mobile source emissions were concluded to be less than significant.

Additionally, the Certified EIR concluded that the Previously Approved Project would not increase population figures over those that have been planned for the area, would be consistent with the Air Quality Management Plan 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 Certified EIR concluded that no odor impacts would result from the Previously Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Consistency with Applicable Air Quality Plans: As detailed below, construction and operation of the Modified Project would not generate emissions beyond those set forth in the Certified EIR. In addition, the Modified Project would incorporate or implement the same land uses, design features, regulatory requirements, and mitigation measures as the Previously Approved Project, which collectively would reduce air quality emissions. As such, the Modified Project also would be consistent with applicable SCAQMD and Southern California Association of Governments (SCAG) air quality policies, and impacts would be less than significant. Therefore, the Modified Project would not create any new significant impacts related to consistency with air quality plans nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (b)—Impacts Related to the Generation of Cumulatively Considerable Air Emissions:

Construction

The Modified Project would not change the types of land uses, the total floor area, or the overall development density on-site. In addition, the overall development boundary, and the maximum equipment mix and maximum numbers of pieces of equipment would not increase. Rather, in the event of the retention of Gersten Pavilion under the Modified Project, overall construction activities would be reduced. Therefore, the Modified Project would not create any new significant air quality impacts nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Operation

With regard to operation, the Modified Project would not increase the number of students, faculty or visitors when compared with the Previously Approved Project. As such, the average daily trips and associated air quality emissions would not change as a result of the Modified Project. Other aspects of operations and thus the associated air emissions

generally would be similar to the Previously Approved Project given the similar land uses and fact that the total overall floor area proposed under the Modified Project does not change. Accordingly, like the Previously Approved Project, the Modified Project would not result in significant regional operational air quality emissions. As such, the Modified Project would not involve any new significant impacts related to operational air quality or result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Based on the above, the Modified Project also would not involve any new significant impacts related to a cumulatively considerable increase in air emissions nor substantially increase a previously identified significant impact.

Question (c)—Air Quality Impacts to Sensitive Receptors:

Construction

Localized pollutant emissions during construction would be similar to the Previously Approved Project as the distance to sensitive receptors and the intensity of construction activities would not substantially change. In addition, in the event of the retention of the Gersten Pavilion, the overall amount of construction that would occur within the campus over the life of the LMU Specific Plan would likely be reduced.

Operation

With regard to operation, as discussed above, the Modified Project would not result in an increase in the number of vehicular trips when compared to the Previously Approved Project. In particular, the updated TDM Plan prohibits concurrent scheduling of events open to the general public at the Gersten Pavilion and the new sports arena. Since local CO hotspots are directly proportional to increases in vehicular traffic and the local CO impacts were well below the ambient air quality standards for the Previously Approved Project, sensitive receptors in the Project area are not anticipated to be significantly impacted by CO emissions related the Modified Project. Therefore, the Modified Project would not involve any new significant localized air quality impacts or increase the less-than-significant impacts identified in the Certified EIR.

Overall, the Modified Project would not result in any new significant localized air quality impacts or substantially increase a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (d)—Odors: With regard to construction, similar to the Previously Approved Project, the Modified Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect

a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. In addition, the proposed uses would not change under the Previously Approved Project and are not land uses associated with odor complaints, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. As no odor impacts would occur, the Modified Project would not create any new significant impacts related to odors nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe air quality impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to air quality. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new air quality issues, resources, or sensitive receptors have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, the Modified Project would not result in any new or substantially more severe air quality impacts, and a review of additional feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

Mitigation Measures **MM-AQ-1** through **MM-AQ-12** set forth in the Certified EIR and the associated MMRP will continue to be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant air quality impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to air quality resources would occur as a result of the Modified Project. Therefore, the air quality impacts under Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.4 Biological Resources

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
BIOLOGICAL RESOURCES: Would the project:					
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than Significant with Mitigation	No	No	No	Yes
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than Significant	No	No	No	No
(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant	No	No	No	No
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant with Mitigation	No	No	No	Yes
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant with Mitigation	No	No	No	Yes
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Less than Significant	No	No	No	No

Impact Determination in the Certified EIR

Impacts to Biological Resources were analyzed in the Section IV.C of the Certified EIR prepared for the Previously Approved Project. As discussed below, the Certified EIR determined that impacts would be less than significant with implementation of mitigation measures.

Construction

The Previously Approved Project has a potential for nesting habitats to occur for a variety of protected bird species within the trees, shrubs, and ground cover within the campus, in addition to the habitat associated with the bluffs. Removal or destruction of individual birds or active nests are considered a violation of the Fish and Game Code of California and the Federal Migratory Bird Act. Previously Approved Project construction could result in impacts on common nesting bird species. However, such impacts to nesting birds would be mitigated to less than significant levels with implementation of mitigation measure **MM-BIO-1**.

The Previously Approved Project also has a potential for 25 special-status plant and 30 special-status wildlife species to occur within the Project Vicinity. The only special-status plant or wildlife observed on the campus were two transient, migratory monarch butterflies. 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 implementation of the Previously Approved Project 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.

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

Operation

Since the suburban campus habitat is similar to the surrounding neighborhood and 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 Previously Approved Project.

Neither the campus or the bluff that makes up the northern border of the campus can support special-status plant or wildlife species or serve as a wildlife habitat corridor. Additionally, the Previously Approved Project does not propose any development in this area. The campus and the bluff do not contain any locally designated natural habitat or plant community, or habitat supporting any locally designated species. Additionally, LMU's campus is not a component of a wildlife migration corridor due to the topography and the setting of the campus, therefore the Previously Approved Project would not interfere with any currently existing wildlife movement along the campus bluff area.

The Previously Approved Project would have no impacts to wetland habitats during operation. A 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 Previously Approved Project, and 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 Project Site and is not expected to be impacted by any activities associated with the Previously Approved Project. No significant impacts to existing wetland habitats are expected to occur.

The Project Site is not identified as part of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other habitat conservation plan. The Project Site does not contain any habitat for a fish species and implementation of the Previously Approved Project would not substantially reduce habitat for wildlife species that have adapted to the developed urban setting of the existing campus.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) through (f)—Impacts to Biological Resources: The Modified Project would be within the same Project Site footprint as the Previously Approved Project, which is located within areas of the campus that have already been developed or graded and does not include natural habitat. The Modified Project would also be implemented in accordance with project design feature **PDF-BIO-1** that requires compliance with the land use regulations for open space areas established by the LMU Specific Plan. In addition, as discussed above, the Project Site is not identified to be a part of a Habitat Conservation Plan, Natural Community Conservation, or other habitat conservation plan. Additionally, the Project Site does not contain any habitat for a fish species, nor would it substantially reduce habitat for wildlife species adapted to the developed setting of the existing campus. The Modified Project would not threaten or eliminate a plant community or animal community within LMU's campus and would not affect the surrounding bluff or adjacent riparian corridor. Similar to the Previously Approved Project, the Modified Project would require the removal of two tree species protected by the City's Protected Tree Regulations: coast live oak and western sycamore trees. Implementation of mitigation measures **MM-BIO-1** through **MM-BIO-3** set forth in the Certified EIR would reduce the potential significant impacts to common and special-status wildlife species and protected trees to less than significant levels.

Based on the above, the Modified Project would not create any new significant impacts related to biological resources nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to biological resources. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new biological resources have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, the Modified Project would not result in any new or substantially more severe impacts related to biological resources; thus, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Project Design Feature **PDF-BIO-1** and Mitigation Measures **MM-BIO-1** through **MM-BIO-3** included in the MMRP adopted for the Previously Approved Project. A copy of the MMRP is included as Appendix B. No additional mitigation measures are required as no new significant biological impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant impacts to biological resources would occur as a result of the Modified Project. Therefore, the biological resources impacts under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.5 Cultural Resources

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
CULTURAL RESOURCES: Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Less Than Significant with Mitigation	No	No	No	Yes

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	Less Than Significant with Mitigation	No	No	No	Yes
(c) Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant with Mitigation	No	No	No	Yes

Impact Determination in the Certified EIR

Historical Resources

Impacts to historic resources were addressed in Section IV.D.3, Historical Resources, of the Certified EIR. As discussed therein, Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, and the bluff-face letter "L" are considered historic resources within LMU. As evaluated in the Certified EIR, the historic resources within the Project Site would not be substantially altered or removed. To ensure that significant groundborne vibration impacts to these historic buildings during construction would not occur, **MM-HIST-3** would be implemented. In addition, **MM-HIST-1** and **MM-HIST-2** would be implemented to provide documentation of the historic buildings and to ensure that any improvements to these buildings conform to the Secretary of the Interior's Standards. Thus, with implementation of mitigation measures, potential impacts to historical resources would be less than significant.

Archaeological Resources

Impacts to archaeological resources and human remains are addressed in Section IV.D.2, Archaeological Resources, of the Certified EIR. As stated by the Native American Heritage Commission, no sacred sites are in the immediate vicinity of the campus. However, if human remains are discovered, mitigation measure **MM-ARCH-7** would be implemented to reduce impacts to a less than significant level. Additionally, the campus contains three recorded archaeological sites. Thus, there is a potential for impacts to these sites and to areas outside of the boundaries. However, implementation of mitigation measures **MM-ARCH-1** through **MM-ARCH-12** would reduce the impacts to archaeological sites to less than significant levels.

Operations following Previously Approved Project buildout would not require any ground disturbing activities, however, routine maintenance activities such as the replacement of underground pipes requiring ground disturbing activities could have a potentially significant impact on archaeological resources or their settings. However, implementation measures

MM-ARCH-1 through **MM-ARCH-12** would reduce potential impacts to a less than significant level.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Impacts to Historic Resources: The Modified Project would be developed within areas of the campus identified for future development, which was evaluated in the Certified EIR. As described above, the historic resources within the Project Site would not substantially altered or removed. In addition, **MM-HIST-1** and **MM-HIST-2** would be implemented to provide documentation of the historic buildings and to ensure that any improvements to these buildings conform to the Secretary of the Interior's Standards. **MM-HIST-3** would also be implemented to address groundborne vibration in proximity to historic buildings. Thus, with implementation of mitigation measures, potential impacts to historical resources would be less than significant.

Questions (b) and (c)—Impacts to Archaeological Resources and Human Remains: The Modified Project would be developed within the same overall Project Site footprint as the Previously Approved Project and the depth of grading would not increase when compared with the Modified Project. In addition, in the event of the retention of the Gersten Pavilion, the overall amount of grading and excavation under the Modified Project would likely be reduced. Like the Previously Approved Project, implementation of mitigation measures **MM-ARCH-1** through **MM-ARCH-12** would reduce potential impacts to archaeological resources and human remains to less than significant levels.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to cultural resources. No substantial changes in the environment related to cultural resources have occurred since publication of the Certified EIR, and no new cultural resources have been identified in the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, since the Modified Project would not result in any new or substantially more severe impacts related to cultural resources, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Project Design Feature **PDF-ARCH-1** and Mitigation Measures **MM-ARCH-1** through **MM-ARCH-12** included in the MMRP adopted for the Previously Approved Project (see Appendix B). No additional mitigation measures are required as no new significant cultural resource impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant impacts to cultural resources would occur as a result of the Modified Project. Therefore, the cultural resources impacts under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.6 Energy

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
ENERGY: Would the project:					
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Analyzed with respect to energy conservation	No	No	No	Yes
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Not Analyzed	No	No	No	No

Impact Determination in the Certified EIR

This specific topic was not included on the Environmental Checklist Form until after the EIR was certified. However, energy was addressed in terms of any potential long-term commitment of energy resources, including electricity, and natural gas, and petroleum-based fuels, to determine whether a significant irreversible environmental change would occur as a result. Potential impacts associated with energy conservation and infrastructure are discussed in Section IV.L.4 Energy of the Certified EIR and potential impacts associated with the long-term commitment of energy resources are discussed in Section VIII. Irreversible Changes of the Certified EIR.

Energy Infrastructure and Conservation

Electricity

The Previously Approved Project is estimated to result in an increase in electricity demand of approximately 6,240.28 megawatt hours (MWh). The projected increased demand for electricity consumption would be supported by the Los Angeles Department of Water and Power (LADWP), therefore impacts on electricity supply facilities would be less than significant and no mitigation measures are required. No changes to existing off-site infrastructure would be required to meet the Previously Approved Project's needs as indicated by LADWP. However, minor alterations to electricity transmission and distribution infrastructure on the campus may be necessary to serve specific Previously Approved Project facilities. Impacts to electricity transmission and distribution infrastructure would be reduced to a less than significant level with the implementation of mitigation measure **MM-ENG-1**, which requires LMU to consult with LADWP prior to submitting final plans for the facilities to the City's Building and Safety Department and provide its fair share of the cost of campus infrastructure installation, as applicable.

The Previously Approved Project would incorporate project design feature **PDF-ENG-1** which includes numerous energy conservation measures. To further ensure appropriate energy conservation measures are incorporated into the specific 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.

Natural Gas

Previously Approved Project construction is not anticipated to consume natural gas. Therefore, impacts to natural gas supply or infrastructure during construction would be less than significant.

The Previously Approved Project would result in an estimated net increase of approximately 13,858.61 thousand cubic feet (Mcf) in natural gas demand following buildout. The increase in natural gas demand is within the anticipated service capacity of the Southern California Gas Company (Gas Company). Minor alterations to natural gas transmission and distribution infrastructure on campus may also be necessary to serve Previously Approved Project facilities, therefore impacts on natural gas are potentially significant. However, with the implementation of mitigation measure **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 would be reduced to a less than significant level.

The Previously Approved Project would incorporate project design features that would meet or exceed minimum efficiency standards for Title 24. In addition, implementation of mitigation measure **MM-ENG-4**, would require LMU to consult with the Gas Company to

ensure appropriate conservation measures are incorporated into specific Project facilities prior to submitting final plans and designs to the City's Building and Safety Department. Therefore, Previously Approved Project impacts to energy conservation are anticipated to be less than significant.

Commitment of Energy Resources

Implementation of the Previously Approved Project would necessitate the ongoing consumption of nonrenewable resources, such as electricity generated from nonrenewable resources, petroleum-based, and other fossil fuels. Energy resources would be used for heating and cooling of buildings, lighting, and transporting residents to and from the Project site. Campus operations following Previously Approved Project buildout would continue to comply with Title 24, Part 6 of the California Code of Regulations, which sets forth conservation practices that would limit the amount of energy consumed following buildout. In addition, although Previously Approved Project buildout would increase energy (i.e., electricity and natural gas) consumption over existing conditions, the energy consumption rate per square foot campuswide would decrease because of the energy conservation features in **PDF-ENG-1** to which LMU has committed. These features would meet or exceed minimum efficiency criteria for the State's most current Energy Conservation Standards for New Residential and Nonresidential Buildings (Title 24, Part 6, California Administrative Code).

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 2019 update to the CEQA Guidelines includes a new section addressing energy within Appendix G (Environmental Checklist Form) as well other modifications to the question within Appendix G. The applicable questions, detailed above, are addressed below for the Modified Project, as the City currently relies on the Appendix G questions as thresholds of significance.

Question (a)—Impacts Related to Energy Consumption: Like the Previously Approved Project, the Modified Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage and natural gas consumption.

Electricity from construction activities would be limited and would include temporary use of electricity for lighting and small power tools.

Construction activities associated with the Modified Project would not involve the consumption of natural gas. As with electricity, fuel consumption during construction would be less than significant. Accordingly, the Modified Project would not have a meaningful effect on regional energy consumption during the construction period, similar to the Previously Approved Project.

During Modified Project operations, energy consumption may increase somewhat given that additional existing building area may be retained under the Modified Project. However, in accordance with **PDF-ENG-1**, major building renovations such as renovation of the Gersten Pavilion would be integrated into the Campus Energy Management System, which is a set of computer-aided tools to monitor, control and optimize the performance of HVAC and lighting systems. Mitigation Measures **MM-ENG-1** and **MM-ENG-2** regarding coordination with Los Angeles Department of Water and Power (LADWP) to establish fair share funding of electrical systems and incorporation of energy efficiency measures would also be implemented. In addition, Mitigation Measures **MM-ENG-3** and **MM-ENG-4** regarding consultation with the Gas Company regarding fair share funding of natural gas infrastructure and incorporation of energy conservation measures would be implemented. Furthermore, the Modified Project would implement the same conservation features as the Previously Approved Project and all new buildings would comply with requirements set forth in the California Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6) as well as the California Green Building Standards Code (Title 24, Part 11), commonly referred to as the CALGreen Code. Compliance with these project design features, mitigation measures and regulatory requirements would ensure electricity and natural gas usage would not occur in a manner that is wasteful, inefficient, or unnecessary. Moreover, the Modified Project's annual electricity and natural gas consumption is anticipated to represent a small fraction of future demand within the Los LADWP and Gas Company service areas, which, in any case, would be similar to that expected under the Previously Approved Project.

Based on the above, impacts related to energy consumption would be less than significant. Like the Previously Approved Project, the Modified Project would represent a long-term commitment of non-renewable resources, but such consumption would be consistent with anticipated growth and urban changes in Los Angeles. Accordingly, such impacts would be within the envelope of impacts addressed in the Certified EIR.

Question (b)—Impacts Related to Energy Regulations: Similar to the Previously Approved Project, construction equipment for the Modified Project would comply with energy efficiency requirements. LMU is required to submit plans to the City's Building and Safety Department to demonstrate that the each of the Modified Project's buildings complies with the State's most current Energy conservation standards, including applicable Title 24 and CALGreen Code requirements. Therefore, like the Previously Approved Project, the Modified Project would implement mitigation measures and project design features which would ensure that construction and operational activities would meet or exceed minimum efficiency standards. Impacts would be less than significant and within the envelope of impacts addressed in the Certified EIR.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

As discussed above, new circumstances since certification of the Certified EIR include the incorporation of energy as an analysis topic in CEQA Guidelines Appendix G. However, as evaluated above, the Modified Project would not involve new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to energy. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new conditions or resources related to energy have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, the Modified Project would not result in any new or substantially more severe impacts related to energy, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Project Design Feature **PDF-ENG-1** and Mitigation Measures **MM-ENG-1** through **MM-ENG-4** included in the MMRP adopted for the Previously Approved Project (see Appendix B). No additional mitigation measures are required as no new significant energy impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts related to energy would occur as a result of the Modified Project. Therefore, the energy impacts under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.7 Geology and Soils

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving:					
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	Less Than Significant	No	No	No	No
(ii) Strong seismic ground shaking?	Less Than Significant With Mitigation	No	No	No	Yes
(iii) Seismic-related ground failure, including liquefaction?	Less Than Significant	No	No	No	No
(iv) Landslides?	Less Than Significant With Mitigation	No	No	No	Yes
(b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant with Mitigation	No	No	No	Yes
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant With Mitigation	No	No	No	Yes
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less Than Significant With Mitigation	No	No	No	Yes
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	No	No	No	No
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant With Mitigation	No	No	No	Yes

Impact Determination in the Certified EIR

Impacts with regard to geology and soils were addressed in Section IV.E, Geology, of the Certified EIR. The Certified EIR included mitigation measures to ensure impacts would be less than significant. A summary of the analysis from the Certified EIR is provided below.

Geological Hazards

The Previously Approved Project will require geotechnical evaluations prior to finalizing grading and construction plans for individual buildings and campus improvements. The buildings and campus improvements would be designed and constructed in accordance with applicable requirements outlined in the California Building Code, the Uniform Building Code and the Los Angeles Municipal Code. Mitigation measures **MM-GEO-1** and **MM-GEO-2** are recommended to ensure compliance with code requirements pertaining to geological hazards.

Expansive and Corrosive Soils

The campus near-surface soils are generally granular and nonexpansive. Per building code requirements, any required import fill and the upper two feet of fill beneath the floor slab and beneath other concrete slabs and walks would consist of relatively non-expansive soil. The Previously Approved Project would implement mitigation measure **MM-GEO-3** to perform expansion testing to confirm the expansion potential of any import soils. With the implementation of mitigation measure **MM-GEO-3**, the Previously Approved Project would be compliant with applicable building codes and impacts to expansive soils would be less than significant.

Some campus soils are considered mildly to moderately corrosive. Accordingly, per mitigation measure **MM-GEO-4**, corrosion testing would be performed during the geotechnical investigation required for individual buildings and structures, and proper corrosion protection would be implemented where needed. Thus, with implementation of the mitigation measure, the Previously Approved Project's impacts related to corrosive soils would be less than significant.

Groundwater

The campus has historic high groundwater levels between 43 and 56 feet below the surface in low-lying portions of the 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, excavation and below-grade construction of the Previously Approved Project would not approach or intercept groundwater beneath the campus and associated impacts would be less than significant.

Seismicity

As evaluated in the Certified EIR, the campus is not within a currently established Alquist-Priolo Earthquake Fault Zone. There are no known active or potentially active faults with the potential for surface rupture located underneath or projecting toward the campus. The Previously Approved Project would be subject to moderate ground shaking, which is

typical of the general Southern California area. With mitigation measures **MM-GEO-1** and **MM-GEO-2**, the Previously Approved Project would incorporate proper engineering design and construction in conformance with current building codes and practices. Thus, the Previously Approved Project's impacts related to seismicity would be less than significant with adherence to mitigation measures.

Slope Stability

The 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. The slopes have been determined to possess the required safety factor, however the bluff is generally considered susceptible to erosion and sloughing because of its sandy, uncemented nature. With implementation of mitigation measures **MM-GEO-1**, **MM-GEO-2**, and **MM-GEO-5**, the Previously Approved Project would be compliant with code requirements governing slope stability. Thus, with mitigation measures, the Previously Approved Project's impacts related to slope stability would be less than significant.

Liquefaction

The campus is not located within an area identified as having potential for liquefaction. Areas that may have liquefiable soils present have a groundwater depth greater than 50 feet. Therefore, the potential for liquefaction, and the associated ground deformation beneath the campus, is considered very low, and impacts related to liquefaction would be less than significant.

Other Geological Hazards

The potential for other geological 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

The bluff face along the perimeter of the LMU is susceptible to erosion and sloughing due to the sandy, uncemented nature of the Westchester Bluffs. Project level hydrology plans for Previously Approved Project buildings and campus improvements will be required prior to finalizing grading, drainage, and construction plans. Storm drain collection devices for the Previously Approved Project would be designed in conformance with applicable grading and building codes to ensure that all runoff would be collected and transferred to proper collection devices. 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 submit a Stormwater Pollution Plan, which would ensure that water quality impacts during construction from erosion would be reduced to less than significant levels. In addition, LMU would adhere to the 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. The Previously Approved Project would include mitigation measures **MM-GEO-6** and **MM-GEO-8** to ensure compliance with these requirements. With implementation of mitigation measures, the Previously Approved Project's impacts related to sedimentation and erosion would be less than significant.

Landform Alteration

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

Septic Tanks

As determined in the Initial Study, the Previously Approved Project would not necessitate the use of septic tanks or alternative wastewater disposal systems. During and following the Previously Approved Project buildout, the campus would continue to utilize existing City of Los Angeles wastewater conveyance systems to which it is currently connected and would construct new infrastructure systems and connections as needed. Therefore, no impacts related to the support for septic tanks would occur.

Paleontological Resources

Impacts to paleontological resources were analyzed in the Section IV.D.1, Paleontological Resources or the Certified EIR. The Previously Approved Project Site has a high potential for currently unrecorded fossil sites being encountered during earth moving activities in areas of the campus immediately underlain by the Palos Verdes Sand or non-marine terrace cover, or where earth moving activities would extend to a depth sufficient to encounter rock units below the Holocene dune sand elsewhere on campus. 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 impacts to a less than significant level.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) and (c)—Impacts Related to Seismic Hazards and Ground Instability: As buildings and improvements under the Modified Project would be developed within the same development areas analyzed in the Certified EIR, the geologic conditions

associated with the Modified Project would remain the same as under the Previously Approved Project. In addition, the Modified Project would not result in any increases in the depth of excavation. Rather, overall grading activities within the Project Site would likely be reduced under the Modified Project. The Modified Project would continue to comply with mitigation measures **MM-GEO-1**, **MM-GEO-2**, and **MM-GEO-5** to ensure that new buildings and campus improvements are in compliance with applicable building code requirements concerning seismic hazards and ground instability. Thus, with implementation of mitigation measures, potential impacts to seismic hazards and ground instability would be less than significant and such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (b)—Impacts Related to Soil Erosion and Topsoil: The Modified Project would be developed within the same overall Project Site footprint as the Previously Approved Project and the depth of excavation would not increase. As such, no additional impacts to soil erosion and topsoil would occur. Similar to the Previously Approved Project, the Modified Project would implement mitigation measure **MM-GEO-6**, which would require project-level hydrology plans for all project building and campus improvements, which includes designing storm drain collection devices to ensure all runoff would be collected and transferred to proper collection devices. The Modified Project would also implement mitigation measure **MM-GEO-7**, which requires LMU to submit a Stormwater Pollution Plan, which would ensure that water quality impacts during construction from erosion would be reduced to less than significant levels. Furthermore, the Modified Project would also implement mitigation measure **MM-GEO-8**, which requires LMU to adhere to the Southern California Air Quality Management District's Rule 403, Fugitive Dust, during construction to prevent impacts associated with dust generation and wind erosion. As such, the Modified Project would not generate new significant impacts related to soil erosion and topsoil. Impacts would continue to be less than significant with implementation of mitigation measures and regulatory requirements and such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (d)—Impacts Related to Expansive Soils: Development under the Modified Project would occur within the same geographic areas of the Project Site evaluated within the Certified EIR. In addition, the depth of excavation would not increase under the Modified Project. Similar to the Previously Approved Project, mitigation measure **MM-GEO-3** would be implemented to ensure compliance with applicable building code requirements governing expansive soils, and mitigation measure **MM-GEO-4** would be implemented to ensure compliance with building code and requirements governing corrosive soil issues. Therefore, the Modified Project would not create any new significant impacts related to expansive soil nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (e)—Impacts Related to Support for Septic Tanks: Similar to the Previously Approved Project, the Modified Project's wastewater demand would be

accommodated by connections to the existing wastewater system. As such, the Modified Project would not require the use of septic tanks or alternative wastewater disposal systems. As with the Previously Approved Project, no impact would occur. Therefore, the Modified Project would not create any new significant impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (f)—Impacts to Paleontological Resources or Unique Geologic Features: The Modified Project would be developed within the same overall Project Site footprint as the Previously Approved Project and the depth of grading would not increase when compared with the Modified Project. The Modified Project would continue to comply 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. Therefore, with implementation of mitigation measures, potential impacts to paleontological resources would be less than significant. The Modified Project would not create any new significant impacts related to paleontological resources or unique geologic features, nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe geology and soils impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to geology and soils. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new conditions related to geology and soils have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Mitigation Measures **MM-GEO-1** through **MM-GEO-8** included in the MMRP adopted for the Previously Approved Project (see Appendix B). The Modified Project would also continue to implement Mitigation Measures **MM-PALEO-1** through **MM-PALEO-5** with regard to paleontological resources. No additional mitigation measures are required as no new significant geological impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant impacts related to geology and soils would occur as a result of the Modified Project. Therefore, the geology and soils impacts under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.8 Greenhouse Gas Emissions

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GREENHOUSE GAS EMISSIONS: Would the project:					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant	No	No	No	No
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	No	No	No	No

Impact Determination in the Certified EIR

Impacts with regard to greenhouse gas (GHG) were addressed in Section IV.B.2, Global Climate Change, of the Certified EIR. A summary of the analysis from the Certified EIR is provided below.

As discussed in the Certified EIR, construction GHG emissions were quantified from combustion emissions associated with construction equipment, grading and demolition activities, worker trips, and on-road diesel trucks. Construction GHG emissions were estimated to emit 13,369 metric tons of carbon dioxide equivalents per year when annualized over the Previously Approved Project's lifetime of 50 years. Operation of the Previously Approved Project would result in emissions of direct GHG due to natural gas consumption and mobile source emissions. The Previously Approved Project would also result in indirect GHG emissions due to electricity demand and water demand. The Previously Approved Project would also result in an increased use of reclaimed water, primarily for outdoor landscaping. The Previously Approved Project would increase total greenhouse gas emissions on a mass-basis, but would decrease greenhouse gas intensity, which is attributed to the energy efficiencies and sustainable features associated with the Previously Approved Project (e.g., a transportation management plan as required by **MM-TRAF-3**, energy conservation features as required by **PDF-ENG-1**, and water conservation features as required by **PDF-WATER-1**). Additionally, building code standards require more energy

efficiency measures in the future. Therefore, the Previously Approved Project's impacts to GHG emissions would be less than significant.

Consistency with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases

The Previously Approved Project would be 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 Previously Approved Project would not be cumulatively significant.

Do Proposed Changes Involve New Significant Impacts?

Since publication of the Certified EIR, the regulatory environment pertaining to GHG emissions has continued to evolve. While various actions have been taken and numerous plans/policies have been adopted at the state and local levels, the following summary focuses on those regulatory changes most pertinent to an evaluation of the Modified Project's impacts related to GHG emissions:

- Building on the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), Executive Order B-30-15 was issued by California's Governor Brown in April 2015 to establish an additional statewide policy goal to reduce GHG emissions 40 percent below 1990 levels by 2030. Reducing GHG emissions by 40 percent below 1990 levels in 2030 and by 80 percent below 1990 levels by 2050 (consistent with Executive Order S-3-05) aligns with scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius.[1]

- On April 8, 2015, City of Los Angeles Mayor Eric Garcetti released the Sustainable City pLAn, which includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Specific targets include reducing vehicle miles traveled per capita by 5 percent by 2025 and increasing trips made by walking, biking or transit by at least 35 percent by 2025.

- In 2019, the first four-year update to the 2015 Sustainable City pLAn was released. While not a plan adopted solely to reduce GHG emissions, this updated document, known as the City's Green New Deal, expands upon the City's vision for a

[1] *CARB, Frequently Asked Questions about Executive Order B-30-15, 2030 Carbon Target and Adaptation FAQs, April 29, 2015.*

sustainable future and provides accelerated targets and new goals, including climate mitigation.[2] The Green New Deal established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035

- The Clean Energy and Pollution Reduction Act of 2015 was enacted on October 7, 2015 as Senate Bill (SB) 350. The objectives of SB 350 are: (1) to increase from 33 percent to 50 percent the procurement of California's electricity from renewable sources by 2030; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[3]

- The 100 Percent Clean Energy Act of 2018 was enacted on September 10, 2018, as SB 100. The Clean Energy Act accelerates the RPS Program goals as follows: (1) 50 percent renewable resources target by December 31, 2026; and (2) 60 percent renewable resources target by December 31, 2030. This Act also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. Finally, the Clean Energy Act establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

- To implement SB 375 (approved in 2008) and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) on April 7, 2016.[4,5] The 2016–2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the 2016–2040 RTP/SCS draws a close connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The 2016–2040 RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

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[2] *City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.*

[3] *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, Ch. 547.*

[4] *SCAG, Final 2016–2040 RTP/SCS.*

[5] *CARB, Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance of GHG Quantification Determination, June 2016.*

The 2016–2040 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's High Quality Transit Areas (HQTAs).[6]

- The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy 2020–2045 RTP/SCS) was approved on September 3, 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing, and using an electric vehicle will be easier thanks to an expanded regional charging network.

- The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.[7] By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. Transit Priority Areas[8] (TPAs) will account for less than 1 percent of regional total land but are projected to accommodate 30 percent of future household growth between 2016 and 2045.[9] The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. TPAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

- The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with

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[6] *HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.*

[7] *2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.*

[8] *Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours*

[9] *SCAG, Final 2020–2045 RTP/SCS, Making Connections, p. 51, May 7, 2020.*

respect to meeting the State's GHG emission reduction goals.[10] Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita. The reductions generated by fuel economy improvements are already included as part of the State's GHG emissions reduction program and are not double-counted in the SB 375 target calculation.[11]

- Senate Bill 32, signed September 8, 2016, updates AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires CARB to ensure statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. The new plan outlined in SB 32 involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

- Assembly Bill 197, also signed September 8, 2016, is linked to SB 32 and prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available and update at least annually on its website the emissions of greenhouse gases, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two Members of the Legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the State's programs, policies, and investments related to climate change.

- In March 2017, CARB voted unanimously to continue with the vehicle greenhouse gas emission standards and the Zero Emission Vehicle (ZEV) program for cars and light trucks sold in California through 2025.[12]

- Assembly Bill 398 was enacted in July 2017 to extend and clarify the role of the State's Cap-and-Trade Program through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

- In December 2017, CARB adopted the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Update). The 2017 Update builds upon the successful framework established by the 2008 Climate Change Scoping Plan and the First Update to the

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[10] *SCAG, Final 2020–2045 RTP/SCS, Making Connections, p. 5, May 7, 2020.*

[11] *California Air Resources Board. SB 375 Regional Greenhouse Gas Emissions Reduction Targets. Appendix A.*

[12] *CARB, News Release: CARB finds vehicle standards are achievable and cost-effective, ww2.arb.ca.gov/news/carb-finds-vehicle-standards-are-achievable-and-cost-effective, accessed February 2019.*

Climate Change Scoping Plan: Building on the Framework (First Update; 2014) while identifying new, technologically feasible, and cost-effective strategies to ensure California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.[13]

- Executive Order B-55-18, issued by Governor Brown on September 10, 2018, established an additional statewide policy goal to achieve carbon neutrality as soon as possible and no later than 2045 and to achieve and maintain net negative emissions thereafter. The Executive Order states that this new goal is in addition to the prior statewide targets for reduction of GHG emissions.

- In addition, the state and City building and energy codes, including Title 24 and the associated CALGreen Code as well as the Los Angeles Green Building Code, continue to be updated on a triennial basis, with continued improvements in and stricter requirements with respect to energy and water conservation and efficiency. For example, homes built with the 2019 Title 24 standards will use about seven percent less energy than those built under 2016 Title 24 standards. Once the mandated rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. Nonresidential buildings are projected to use approximately 30 percent less energy due mainly to lighting upgrades.[14]

It is noted, however, that in March 2020, the United States Environmental Protection Agency (USEPA) and the National Highway Traffic Safety Administration (NHTSA) issued the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE), which provides fuel economy and carbon dioxide standards that increase 1.5 percent in stringency each year from model year 2021 standards through model year 2026.[15] These standards apply to both passenger cars and light trucks. In addition, California's waiver under the Clean Air Act to establish more stringent standards was revoked. However, this waiver revocation is being challenged in court.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have the SCAQMD, CARB, CAPCOA, or any other state or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Modified Project. Since there is no applicable adopted or accepted

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[13] *CARB, 2017 Update, November 2017, p. 6.*

[14] *CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.*

[15] *Regulations, The Safer Affordable Fuel-Efficient Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks, www.govinfo.gov/content/pkg/FR-2020-04-30/pdf/2020-06967.pdf, accessed July 28, 2020.*

numerical threshold of significance for GHG emissions, the methodology for evaluating the Modified Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.

The Governor's Office of Planning and Research (OPR) encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. Although the City does not have a programmatic mitigation plan to tier from, such as a Greenhouse Gas Emissions Reduction Plan, the City has adopted a number of plans to help reduce GHG emissions, including the aforementioned Sustainable City pLAn and Green Building Code, both of which encourage/require applicable projects to implement energy efficiency measures, and the LA Green Plan, which outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. In addition, the California CAT Report provides recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in AB 32 and Executive Order S-3-05. On a statewide level, the *Climate Change Scoping Plan* provides measures to achieve AB 32 targets. On a regional level, the SCAG 2020-2045 RTP/SCS contains measures to achieve VMT reductions required under SB 375. Thus, if the Modified Project complies with these plans, policies, regulations, and requirements, the Modified Project would result in a less than significant impact because it would be consistent with the overarching state, regional, and local plans for GHG reduction.

Questions (a) and (b)—Impacts Related to GHG Emissions and Regulatory Consistency: As discussed in the Traffic Analysis included as Appendix A, the Modified Project would not generate additional vehicle trips or result in additional total building area when compared with the Previously Approved Project. Furthermore, as with the Previously Approved Project, the Modified Project provides for the development of additional academic/administrative buildings, residential buildings and athletics buildings on LMU's existing Westchester campus. By locating these new buildings on an existing campus, the Modified Project would serve to reduce vehicular trips and VMT and thus reduce associated GHG emissions. Moreover, much of the Project Site, is designated as an HQTA and thus targeted for higher density development such as that proposed under the Modified Project. Similar to the Previously Approved Project, the Modified Project would incorporate energy efficiencies and sustainable features (e.g., a transportation management plan as required by **MM-TRAF-3**, energy conservation features as required by **PDF-ENG-1**, and water conservation features as required by **PDF-WATER-1**). These features would reduce the demand for energy and water and would also reduce vehicles miles traveled. As such, the Modified Project would also support similar measures detailed in the Sustainable City pLAn, the LA Green Plan, and the RTP/SCS. Implementation of the project design features and mitigation measures combined with compliance with the Los Angeles Green Building Code and other relevant Title 24 requirements, would ensure the Modified Project consistency with the various plans and policies designed to reduce GHG emissions and attain the reduction targets established in AB 32 and Executive

Order S-3-05. As such, the Modified Project would not create any new significant impacts related to GHG emissions nor result in a substantial increase in a previously identified significant impact. Therefore, the Modified Project would have a less than significant impact with respect to GHG emissions. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts associated with GHG emissions.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to GHG emissions. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new conditions related to GHG emissions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, the Modified Project would not result in any new or substantially more severe GHG emission impacts, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

Although mitigation measures specific to GHG emissions were not previously adopted, implementation of many of the adopted transportation, energy, and water supply Project Design Features would serve to reduce GHG impacts. The same mitigation measures recommended to reduce construction and operational air quality impacts under the Previously Approved Project, as set forth in the Certified EIR and the associated MMRP, would also apply to the Modified Project.

Conclusion

Based on the above, no new significant impacts to GHG emissions would occur as a result of the Modified Project. Therefore, the impacts related to GHG emissions under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.9 Hazards and Hazardous Materials

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant With Mitigation	No	No	No	Yes
(b) Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	Less Than Significant With Mitigation	No	No	No	Yes
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant	No	No	No	No
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant	No	No	No	No
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Less than Significant	No	No	No	No
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No	No	No	No
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

Impacts with regard to hazards and hazardous materials were analyzed in Section IV.F, Hazardous Materials, of the Certified EIR. The Certified EIR included mitigation measures to ensure impacts would be less than significant. A summary of the analysis from the Certified EIR is provided below.

Construction

Handling of Hazardous Materials

Construction of the Previously Approved 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. However, in accordance with applicable laws and regulations and manufacturers' instructions, all hazardous materials would be used, stored, and disposed of properly. Additionally, prior to construction, all buildings planned for demolition would sample suspect asbestos-containing building materials, such as roofing, wall finishes, and non-friable floor finishes and survey lead-based paint and polychlorinated biphenyls (PCBs). Any hazardous material present 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,** impacts to hazardous materials during construction would be less than significant.

Methane

The campus is located partially within a Methane Zone and partially within a Methane Buffer Zone as designated by the Los Angeles Department of Building and Safety. Based on methane sampling results, methane gas was not detected, however precautionary measures, per mitigation measure **MM-HAZ-5**, should be taken to ensure construction worker safety. Additionally, given LMU's location in a Methane Zone and Methane Buffer Zone, new buildings are 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.** All other construction-related impacts were likewise concluded to be less than significant.

Operation

Handling of Hazardous Materials

Increased transport, use, storage, and disposal of hazardous materials during operation may result from the greater number of people on campus and higher campus square footage. However, implementation of the Previously Approved Project would not introduce new hazardous materials onto the 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 Development in compliance with federal, state, and local regulations. Additional use of hazardous materials would be documented in the annual Unified Programs Forms and would be subject to the Environmental Health and Safety Department's existing programs, policies, and procedures related to hazards and material 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. As such, impacts related to the release of

hazardous materials or exposure to health hazards during operation of the Previously Approved Project were determined to be less than significant.

Emergency Response or Evacuation Plan

Development of the Previously Approved Project would take place entirely within the existing campus, and would consider existing emergency routes, response procedures, and action plans. During both construction and operation, there is a potential 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 Previously Approved Project. All emergency response plans are adaptable to the Previously Approved Project. Therefore, implementation of the Previously Approved Project would not substantially interfere with the campus's adopted emergency preparedness recommendations and/or the emergency response procedures, and impacts would be less than significant.

Hazardous Material and Schools

As evaluated within the Certified EIR, no elementary, middle, or high schools are currently located within 0.25 mile of LMU. However, at the time the EIR was Certified, LAUSD had approved construction for 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. This school has since been constructed and constitutes a sensitive receptor within 0.25 mile of LMU's campus. LMU does use and store some hazardous materials on campus that are considered standard materials necessary to support university operations, such as chemicals handled in science laboratories, cleaning products, paints, and oil, but these materials are stored and maintained in compliance with applicable regulations. Additionally, the campus Environmental Health and Safety Department has established a set of emergency procedures that would be followed in the unlikely event that there is a hazardous materials spill or release. 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.

Safety Hazards and Airports

The campus is located approximately 1 mile north of LAX but is not located in an airport land use plan area. The campus is not located in the vicinity of a private airstrip. The Previously Approved Project is not anticipated to affect or be affected by airport operations, therefore, impacts related to safety would be less than significant.

Wildland Fires

The campus is located in a suburban setting in the midst of an urbanized part of the City and is not subject to wildland fires. No risks related to wildland fires are anticipated.

Hazardous Materials Sites

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. Therefore, the Previously Approved Project would not create a significant hazard to the public or the environment from building on a listed and impacts would be less than significant.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Impacts Related to the Routine Transport, Use, or Disposal of Hazardous Materials:

Construction

Development under the Modified Project would occur within the same overall Project Site footprint analyzed for the Previously Approved Project. In addition, the depth of excavation, and peak construction activities would not increase under the Modified Project. Rather, the overall amount of construction activity would likely be reduced as Gersten Pavilion could be retained under the Modified Project. As such, excavation and demolition activities under the Modified Project would be within the envelope of such activities originally anticipated as part of the Previously Approved Project. Therefore, the potential to release contaminants during construction would be the same or reduced when compared with the Previously Approved Project. Furthermore, all potentially hazardous materials to be used during construction of the Modified Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations. Thus, as with the Previously Approved Project, with compliance with existing regulations, as well as continued implementation of the adopted mitigation measures **MM-HAZ-1** through **MM-HAZ-6**, potentially significant impacts associated with hazardous materials would be reduced to less than significant levels. Such impacts would be within the envelope of impacts provided in the Certified EIR.

Operation

With regards to operation, the Modified Project would involve the same types of land uses as the Previously Approved Project and thus would involve the use of the same types of hazardous materials. As the Modified Project would not increase the amount of floor area permitted in the LMU Specific Plan, the magnitude of hazardous materials use during

operation also would be similar to that of the Previously Approved Project. In addition, like the Previously Approved Project, all potentially hazardous materials would be stored, handled, and disposed of properly in compliance with applicable regulations. As such, the Modified Project would not create any new impacts with respect to hazardous materials during operation, nor would the Modified Project increase the severity of any previously identified impacts. Thus, similar to the Previously Approved Project, the operational impacts of the Modified Project would be less than significant. Such impacts would be within the envelope of impacts addressed in the Certified EIR.

Question (b)—Impacts Related to Upset and Accident Conditions Due to a Hazardous Materials Release: Similar to the Previously Approved Project, the Modified Project's potential for hazardous materials releases are limited to the temporary use of hazardous substances in the form of paint, adhesives, surface coatings, and other finishing materials, and cleaning agents, fuels, and oils. However, similar to the Previously Approved Project, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturer's instructions. Therefore, the Modified Project would not create any new significant impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, nor would the Modified Project result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (c)—Impacts Related to Hazardous Emissions or Acutely Hazardous Materials Near a School: As discussed above, since certification of the EIR, LAUSD constructed Playa Vista Elementary School, which would constitute a sensitive receptor within 0.25 mile of LMU's campus. The types and amounts of hazardous materials used in connection with the Modified Project would be similar to those used in connection with the Previously Approved Project. Furthermore, like the Previously Approved Project, the Modified Project would handle, use, and store all materials in accordance with the manufacturers' instructions and in compliance with applicable standards and regulations. Therefore, the Modified Project would not result in any new significant impacts related to hazards affecting nearby schools nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (d)—Impacts Related to Hazardous Materials Sites: As discussed above, 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. Therefore, the Modified Project would not create any new significant impacts related to a hazardous materials site identified pursuant to Government Code Section 65962.5 nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (e)—Impacts Related to Safety Hazards Near an Airport: The Modified Project would be located within the same Project Site footprint as the Previously Approved Project. As such, the Modified Project would not have the potential to result in an aviation safety hazard and would not create any new significant impacts related to aviation safety hazards nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (f)—Impacts Related to Interference with an Emergency Response or Evacuation Plan: As with the Previously Approved Project, development of the Modified Project would take place entirely within the existing campus, and would take into account existing emergency routes, response procedures, and action plans. All emergency preparedness recommendations and campus emergency response and evacuation procedures would be reviewed and updated to reflect changes in campus layout through implementation of the Modified Project. The impacts related to emergency response of evacuation plans would be less than significant. Therefore, the Modified Project would not create any new significant impacts related to the implementation of the City's emergency response plans nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (g)—Impacts Related to Wildland Fires: The campus is in a suburban setting in the midst of an urbanized part of the City of Los Angeles and is not subject to wildland fires. Therefore, the Modified Project would not create any new significant impacts related to wildland fires nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to hazards and hazardous materials. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new conditions related to hazards and hazardous materials have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, the Modified Project would not result in any new or substantially more severe hazards impacts, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Project Design Feature **PDF-HAZ-1** and Mitigation Measures **MM-HAZ-1** through **MM-HAZ-6** included in the MMRP adopted for the Previously Approved Project (see Appendix B). No additional mitigation measures are required as no new significant hazards impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts related to hazards and hazardous materials would occur as a result of the Modified Project. Therefore, the impacts related to hazards and hazardous materials under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.10 Hydrology and Water Quality (Drainage and Surface Water Quality)

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less Than Significant with Mitigation	No	No	No	Yes
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than Significant	No	No	No	No
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
(i) result in substantial erosion or siltation on- or off-site;	Less Than Significant with Mitigation	No	No	No	Yes
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less Than Significant	No	No	No	No

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less Than Significant	No	No	No	No
(iv) impede or redirect flood flows?	Less Than Significant	No	No	No	No
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant	No	No	No	No
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant	No	No	No	No

Impact Determination in the Certified EIR

Hydrology and water quality impacts were evaluated in Section IV.G, Surface Water Hydrology and Water Quality, of the Certified EIR. The Certified EIR included mitigation measures to ensure impacts would be less than significant. A summary of the analysis from the Certified EIR is provided below.

Surface Water Hydrology

As discussed in detail in the Certified EIR, as part of the Previously Approved Project, a Storm Water Pollution Prevention Plan would be implemented that would include best management practices to provide temporary stormwater management for areas under construction to prevent the volume of stormwater from adversely affecting water bodies and to provide stormwater conveyance and treatment systems adjacent to the campus. As such, construction of the Previously Approved Project would not substantially reduce or increase the amount of surface water in the Ballona Channel and/or the riparian corridor. With the implementation of mitigation measure **MM-HWQ-1** and **MM-HWQ-2** which ensure compliance with regulations pertaining to surface water hydrology, impacts would be less than significant.

With regard to operation, the Previously Approved Project would include drainage system improvements designed to handle the total peak runoff rates and volumes generated by new development. The Previously Approved 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. In addition, as stated in the Certified EIR, the Previously Approved Project would be required to implement source control and treatment control BMPs as part of a Standard Urban Storm Water Mitigation Plan

(SUSMP). With the implementation of mitigation measures **MM-HWQ-1** and **MM-HWQ-2**, the Previously Approved Project would be compliant with regulations pertaining to surface hydrology. Therefore, the Previously Approved Project would not substantially reduce or increase the amount of surface water in the Ballona Channel and/or 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 and mitigation measures.

Groundwater

As discussed previously, the campus has historic high groundwater levels between 43 and 56 feet below the surface in low-lying portions of the 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, excavation and below-grade construction of the Previously Approved Project would not approach or intercept groundwater beneath the campus and associated impacts would be less than significant.

Surface Water Quality

With respect to water quality during construction, as analyzed in the Certified EIR, construction-related grading activities for buildings and facilities could temporarily increase the amount of exposed soil and the potential for erosion and sedimentation. LMU would adhere to the requirements of the National Pollutant Discharge Elimination System (NPDES), which would require the Previously Approved Project to prepare a Storm Water Pollution Prevention Plan (SWPPP). With mitigation measures **MM-HWQ-1** through **MM-HWQ-7**, the Previously Approved Project would be compliant with regulations pertaining to surface water quality. As such, with mitigation measures, the Previously Approved Project would have less than significant impacts to surface water quality during construction.

With regard to surface water quality during operation, the Previously Approved Project would include improvements to the campus that would be designed to comply with current water quality standards and regulations that address water quality and reducing the volume of rainfall runoff produced on the campus and sent to the riparian corridor. In particular, the Previously Approved Project would adhere to the requirements of the Storm Water Urban Runoff Pollution Control provisions from the LAMC, which requires the preparation of a Standard Urban Storm Water Mitigation Plan (SUSMP). Implementation of mitigation measures **MM-HWQ-1** through **MM-HWQ-7** would ensure that the Previously Approved Project would comply with regulations related to water quality. Therefore, operation of the Previously Approved Project would have less than significant impacts to surface water quality with adherence to applicable regulations and mitigation measures.

Other Flood-Related Hazards

With regard to flood-related hazards, the campus is not located within a tsunami run-up zone, therefore, tsunamis are not considered a significant hazard on the campus. The campus also is not located in a potential inundation area that could adversely affect the campus in the event of earthquake-induced dam failures or seiches. Furthermore, the campus is not located in a City-designated Landslide or Hillside Area, but the Westchester Bluffs below the campus are located in a State-designated Earthquake-Induced Landslide Hazard Zone and are considered susceptible to erosion and sloughing. However, the Previously Approved Project impacts related to slope stability would be less than significant with preparation of Project-level geotechnical evaluations, including slope stability analyses to verify the factor of safety of the buff slope, and adhere 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 would be designated as a Buffer/Open Space Planning Area by the Previously Approved Project. Therefore, impacts related to inundation by seiche, tsunami, or mudflow are considered to be less than significant.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Impacts Due to a Violation of Water Quality Standards or Waste Discharge Requirements:

With regard to construction, the Modified Project would be implemented within the same Project Site footprint as the Previously Approved Project. The total amount of floor area and overall construction activities would not increase when compared with the Previously Approved Project. The Modified Project would continue to adhere to the National Pollutant Discharge Elimination System (NPDES) requirements and local regulations to ensure construction activities would not degrade the surface water quality. Similar to the Previously Approved Project, the Modified Project would implement mitigation measure **MM-HWQ-1**, which requires preparation of a SWPPP.

With regard to operation, similar to the Previously Approved Project, all improvements to the campus would be designed to comply with current water quality standards and regulations, which would include preparation of a SUSMP. In addition, the total amount of floor area to be developed and the geographic locations of development would be within the envelope set forth in the Certified EIR. With implementation of SUSMP requirements, the Modified Project would improve water quality in the areas to be developed and would reduce the volume of rainfall runoff produced on the campus and sent to the riparian corridor and the McConnell Avenue Storm Drain. In addition, **MM-HWQ-2** through **MM-HWQ-7** would continue to be implemented to ensure compliance with regulations pertaining to surface water quality.

Based on the above, the Modified Project would not create any new significant impacts related to the violation of any water quality standards or waste discharge requirements, nor would the Modified Project result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impact analysis provided in the Certified EIR.

Question (b)—Impacts to Groundwater Supplies or Groundwater Recharge: Buildings and improvements under the Modified Project will occur within the same development area analyzed in the Certified EIR. In addition, the Modified Project would not result in increases in the depth of grading beyond 35 feet. Similar to the Previously Approved Project, groundwater is not expected to be encountered during excavation. Therefore, the Modified Project would not create any new significant impacts related to groundwater supplies nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (c)—Impacts to Existing Drainage Patterns: The Modified Project would be developed in accordance with the same regulatory requirements as the Previously Approved Project that address drainage. In addition, the Modified Project would also implement Project Design Features **PDF-HWQ-1** and **PDF-HWQ-2** that include specific improvements to direct stormwater flows and provide sufficient drainage capacity. Thus, as with the Previously Approved Project, drainage impacts under the Modified Project would be less than significant. The Modified Project would not create any new significant impacts related to drainage, including through the alteration of drainage patterns resulting in substantial erosion, siltation, or flood flow changes, nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Question (d)—Impacts Related to Inundation: The campus is not subject to seiche, tsunami, or other inundation hazards. The Modified Project would be developed under the same conditions as the Previously Approved Project and flooding as well as any related risk of pollutant release would not be expected. Therefore, the Modified Project would not create any new significant impacts related to inundation nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Question (e)—Impacts Related to Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan: Please refer to the analysis of Questions (a) and (b) above addressing water quality and groundwater impacts. As discussed therein, the Modified Project would not create any new significant impacts related to water quality and groundwater nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to hydrology or water quality. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new hydrology or water quality conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any new or substantially more severe hydrology or water quality impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Project Design Features **PDF-HWQ-1** and **PDF-HWQ-2** and Mitigation Measures **MM-HWQ-1** through **MM-HWQ-7** included in the MMRP adopted for the Previously Approved Project (see Appendix B). Mitigation Measures **MM-WR-1** through **MM-WR-7** would also be implemented to ensure compliance with regulations pertaining to surface water quality. No additional mitigation measures are required as no new significant water quality impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant hydrology or water quality impacts or a substantial increase in previously identified hydrology or water quality impacts would occur as a result of the Modified Project. Therefore, the impacts to hydrology and water quality under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.11 Land Use and Planning

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
LAND USE AND PLANNING: Would the project:					
(a) Physically divide an established community?	Less Than Significant	No	No	No	No
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No	No	No	No

Impact Determination in the Certified EIR

The analysis of land use impacts provided in Section IV.H, Land Use, of the Certified EIR considered whether the Previously Approved Project would conflict with adopted applicable land use policies, plans, or regulations and whether the Previously Approved Project would be compatible with existing land uses. A summary of the analysis from the Certified EIR is provided below.

Land Use Designation

As analyzed in the Certified EIR, LMU was designated by the Westchester–Playa del Rey Community Plan 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. To implement the Previously Approved Project, LMU proposed to change the General Plan designation of the campus from Low Density Residential to High Medium Residential, for compatibility with university uses and LMU's residential density. The High-Medium Residential land use designation more accurately reflects the use of the Project site as an academic campus with residential uses. The Previously Approved Project also changed the zoning of the campus from [Q] R4-1 to R4-1, and established a Specific Plan for the Westchester campus. The Specific Plan includes development limitations and conditions.

With the adoption of the General Plan Amendment and LMU Specific Plan, the requested Zone Change and establishment of the proposed Specific Plan would supersede the Municipal Code and land use impacts were determined to be less than significant.

Plan Consistency

As analyzed in the Certified EIR, the Previously Approved Project would be consistent with applicable SCAG policies, the Los Angeles County Airport Land Use Plan, the City of Los Angeles General Framework Element, the Westchester–Playa del Rey Community Plan following approval of the requested Zone Change and adoption of the LMU Specific Plan. Additionally, with Project Design Feature **PDF-LU-1**, the Previously Approved Project shall comply with the land use regulations established by the LMU Specific Plan. Therefore, impacts associated with plan consistency would be less than significant.

Additionally, the Previously Approved 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 Project would not conflict with an adopted conservation plan.

Land Use Compatibility

The Previously Approved Project would not expand the borders of the campus and all improvements planned under the Previously Approved Project would occur within the existing campus boundaries. Additionally, the Previously Approved Project established 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 LMU Specific Plan also establishes Planning Areas on the 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 Previously Approved 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. Thus, the Certified EIR concluded that the Previously Approved Project would be compatible with existing land uses and impacts associated with land use compatibility would be less than significant. Based on the findings of the Certified EIR, no significant impacts regarding land use compatibility would occur with the Previously Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Impacts to an Established Community: As previously described, the Modified Project would not change the campus boundaries. The Modified Project includes amendment to the Specific Plan to allow for adjustments in the distribution of floor area among academic/administrative buildings, residential buildings, and indoor athletic buildings. Furthermore, the limitations and conditions within the LMU Specific Plan would continue to apply. For this reason, the Modified Project would not result in the physical

division of an established community. As such, the Modified Project would not create any new impacts related to the division of an established community nor increase the severity of previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Question (b)—Impacts Related to a Conflict with a Land Use Plan, Policy, or Regulation:

Local and Regional Policy Plans and Regulations

As discussed above, the Previously Approved Project changed the land use designation of the Project Site to "HM" High-Medium Density Residential, which is consistent with the existing and proposed campus uses. The campus's zoning was also changed to R4-1 with a Specific Plan. The Modified Project includes amendment to the LMU Specific Plan to allow for adjustments in the distribution of floor area among academic/administrative buildings, residential buildings, and indoor athletic buildings. The Modified Project would not change any of the types of uses permitted within the campus, nor would the development boundaries or total amount of building area to be developed increase. As such, uses and development proposed under the Modified Project would continue to be consistent with the existing land use designations and zoning for the Project Site.

As previously described, the Modified Project would reduce the total allowable academic/administrative and residential floor area at buildout (while providing the same 989 residential beds) and would also increase the amount of allowable athletic indoor floor area. However, the Modified Project would not introduce new land uses or exceed the maximum total new construction (1,779,000 square feet of floor area) and maximum overall total development on campus (3,411,000 square feet of floor area) previously analyzed in the Certified EIR and Specific Plan. The increase in athletic indoor floor area would result from the potential to retain the existing Gersten Pavilion. All other aspects of the Modified Project would be consistent with the land use regulations of the LMU Specific Plan. The Modified Project would continue to achieve the Specific Plan's objectives to: (1) Guide and coordinate the future development and operation of LMU; (2) Allow improvement and modernization of the campus to enhance the educational, cultural, and recreational opportunities provided by the university; (3) Integrate LMU into the Westchester community; and (4) Address important objectives and policies and implement many programs of the City's General Plan and Westchester–Playa del Rey Community Plan that pertain to LMU.

In addition, by providing for the continued improvement and modernization of the educational and athletic facilities at LMU, the Modified Project is consistent with the following provisions of the City's General Plan Framework:

- Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

- Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.

- Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.

The Modified Project also conforms to the intent of General Plan Framework Goal 9N and Objective 9.32 below:

- GOAL 9N: Public schools that provide a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.

- Objective 9.32: Work constructively with LAUSD to promote the siting and construction of adequate school facilities phased with growth.

Although this goal and objective refer to public schools under the jurisdiction of LAUSD, their clear overall intent is to enhance the adequacy of educational facilities that serve the population of the City and the region. The amendment to the LMU Specific Plan will provide for the improvement of the campus and educational facilities at LMU to bring the university to a caliber comparable to other universities and is, therefore, consistent with the general intent of these provisions.

The Modified Project is consistent with the following residential objectives and policies of the Westchester–Playa del Rey Community Plan because it will substantially reduce construction and environmental impacts of the university on the surrounding residential neighborhood:

- Policy 1-1.1: Protect existing stable single family and low density residential neighborhoods, such as Kentwood, from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life.

- Objective 1-5: Protect established residential neighborhoods from incompatible uses, including multiple family residential uses of substantially higher density, to preserve the residential character of these neighborhoods and protect residents from adverse environmental impacts caused by such uses.

- Policy 1-5.1: Where possible, do not locate incompatible land uses, including higher density multiple residential uses, within or in close proximity to lower density

residential neighborhoods, except where there are adequate buffers, transitional land uses, etc.

- Policy 1-5.2: The location of institutional uses in residential areas shall be conditioned so as to avoid adverse impacts on the surrounding neighborhood.

Because the LMU Specific Plan will continue to guide and regulate the future development of LMU and its integration into the surrounding residential neighborhood and the Westchester community, the Modified Project is consistent with Objective 6-4 of the Community Plan, and its attendant policies, which relate specifically to the University:

- Objective 6-4: Coordinate and integrate the development and operation of the Loyola Marymount University (LMU) campus into the surrounding Westchester–Playa del Rey community.

- Policy 6-4.1: Promote land use compatibility between University facilities and adjacent land uses, with particular attention given to preventing adverse impacts to adjacent residential neighborhoods. Where feasible, mitigate impacts of university uses on adjacent properties through the use of landscaped buffers, setbacks, and/or site and building design.

- Policy 6-4.2: Protect sensitive terrain and nearby natural habitats, such as blufflines and wetland environments, from potentially adverse impacts during all phases of development and operation of the University.

- Policy 6-4.3: Minimize traffic impacts to the surrounding Westchester community by locating and maintaining the University's major vehicular access routes away from adjacent residential neighborhoods.

- Policy 6-4.4: Enhance the vitality of the Loyola Village commercial district by promoting and strengthening pedestrian linkages and land use connections between it and the University.

- Policy 6-4.5: Encourage the University to make amenities and services available to the local community, such as libraries, meeting rooms, athletic facilities, lectures, special events, or other appropriate services.

SCAG no longer evaluates projects for consistency with its Regional Comprehensive Plan and Guide. Instead, the 2020–2045 RTP/SCS is the current guidance document used to promote economic growth and livable communities. The 2020–2045 RTP/SCS emphasizes sustainability and integrated planning and identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in HQTAs; much of the campus is designated as an HQTA and thus targeted for higher density development such as that proposed under the Modified Project. The Modified Project would further support the goals and principles set forth in the 2020–2045 RTP/SCS through the construction of development within an urban, infill area

well served by transit; the introduction of new pedestrian connections designed to promote access and connectivity and enhance walkability; and the implementation of transportation demand management strategies and amenities that encourage non-automotive forms of transportation.

Based on the above, the Modified Project would be consistent with existing land use plans, policies and regulations. Thus, the Modified Project would not create any new significant impacts related to a conflict with any applicable land use plan, policy or regulation nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, the Modified Project is consistent with existing land use plans and regulations and would not disrupt or divide an established community. There are no new circumstances involving new significant impacts or substantially more severe land use impacts than what was analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to land use and planning. No substantial changes in the environment related to land use and planning beyond the construction of anticipated development have occurred since publication of the Certified EIR, and no new conditions related to land use have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe land use impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, no new significant land use impacts or a substantial increase in previously identified land use impacts would occur as a result of the Modified Project. Therefore, the impacts to land use under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.12 Mineral Resources

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
MINERAL RESOURCES: Would the project:					
(c) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	No	No	No	No
(d) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

The Initial Study included as part of the Certified EIR determined the Previously Approved Project would result in no impact to valuable mineral resources as no such resources are located within the Project Site or vicinity.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) and (b)—Impacts Related to the Loss of Availability of Mineral Resources: As discussed above, there are no valuable mineral resources within the Project Site. Therefore, the Modified Project would not create any new significant impacts related to mineral resources nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to mineral resources. No substantial changes in the environment related to mineral resources have occurred since certification of the Certified EIR, and no new mineral resources have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would

not result in any mineral resource impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, no new significant impacts to mineral resources or a substantial increase in previously identified impacts to mineral resources would occur as a result of the Modified Project. Therefore, impacts to mineral resources under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.13 Noise

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
NOISE: Would the project result in:					
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Significant and Unavoidable	No	No	No	Yes
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	No	No	No	Yes
(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

The Previously Approved Project's noise impacts were evaluated in Section IV.I, Noise, of the Certified EIR. The Certified EIR included mitigation measures to ensure impacts would be less than significant. A summary of the analysis from the Certified EIR is provided below.

Construction

On-Site Construction Equipment Noise

The Previously Approved Project related construction noise would exceed the existing ambient noise levels, which range from 56 community noise equivalent level (CNEL) to 63.5 CNEL along the campus boundary, by 5 A-weighted decibels (dB(A)) at the nearest residential land use. Specifically, the Previously Approved Project 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). Conservatively, assuming there are no intervening buildings or structure on campus that attenuate noise, construction in most areas of the campus could potentially increase existing ambient exterior noise levels at off-site residents near the campus perimeter, particularly residences closest to the campus along McConnell Avenue and potentially along Fordham Road, Altavan Avenue, the north end of Nardian Way and Belton Drive, and W. 78th and 80th Streets. Only the northwest corner of Burns Campus is sufficiently distant from residential use to entirely preclude potentially significant noise impacts on these uses. The Previously Approved Project is required to implement Project Design Feature **PDF-NOISE-1** and Mitigation Measures **MM-NOISE-1**, and **MM-NOISE-2**. However, even with implementation of mitigation, the Certified EIR concluded that the construction equipment would still create temporary noise impacts that would be significant and unavoidable.

Construction Traffic Noise

As also discussed in the Certified EIR, the movement of equipment, haul trucks and workers to and from the campus during construction would generate temporary traffic noises 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 Previously Approved Project components. For this reason, the movement of heavy-duty construction equipment would 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

The Certified EIR evaluated the generation of groundborne vibration and groundborne noise levels related to construction activities. The primary and most intensive vibration

source associated with the development of the Previously Approved 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 operation of vibratory rollers within 50 feet of residencies 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. The 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. Additionally, with the implementation of Project Design Feature, **PDF-NOISE-1**, 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

The Certified EIR evaluated potential operational noise impacts associated with the following noise sources: roadway noise; on-campus housing; parking facilities; recreational facilities and outdoor venue; and recycling and waste management areas. Roadway noise, noise associated with on-campus housing activities, and noise from the recycling and waste management areas would not cause ambient noise levels to increase by more than 3 dBA to or within the "normally unacceptable" or "clearly unacceptable" categories. In addition, noise from parking facilities would not increase ambient noise levels by more than 5 dBA. Therefore, impacts associated with these operational noise sources would be less than significant. In addition, with implementation of **MM-NOISE-3** regarding limitation of the hours of operation of audio systems, impacts associated with the use of recreational facilities and outdoor venues would be less than significant.

Impacts associated with exposure to excessive airport noise were addressed in Section VII. Effects Found Not to be Significant of the Certified EIR. As stated therein, the campus is not located within an airport land use plan area; however, LAX lies approximately 1 mile south of the campus. The airport is addressed in the Los Angeles County Airport Land Use Plan (LACALUP), a document prepared by the Airport Land Use Commission with assistance from the Department of Regional Planning and adopted on December 19, 1991. The Airport Land Use Plan delineates planning boundaries associated with Los Angeles International Airport by defining the 65 CNEL contour around the airport, within which land uses are subject to airport-related noise impacts, and by defining areas potentially subject to airport-related safety hazards. The campus is located approximately 0.50 mile north of, and therefore beyond, the airport's 65 CNEL boundary. Therefore, noise impacts associated with the airport were determined to be less than significant.

Do Proposed Changes Involve New Significant Impacts?

Question (a)—Impacts Related to Noise in Excess of Standards:

Construction

The Modified Project would not change the types of land uses, the total floor area, or the overall development density on-site. In addition, the overall development boundary, and the maximum equipment mix and maximum numbers of pieces of equipment would not increase. In addition, in the event of the retention of the Gersten Pavilion, the overall amount of construction activity under the Modified Project would likely be reduced. Like the Previously Approved Project, the Modified Project would also continue to implement Project Design Feature **PDF-NOISE-2** and Mitigation Measures **MM-NOISE-1** and **MM-NOISE-2**. Therefore, the Modified Project would not create any new significant construction noise impacts nor result in a substantial increase in a previously identified significant impact. Construction noise impacts under the Modified Project would be within the envelope of impact analysis addressed in the Certified EIR.

Operation

Operational activities under the Modified Project would be similar to those associated under the Modified Project. In addition, the Modified Project would not increase the total floor area or number of students, faculty or visitors within the Campus when compared with the Previously Approved Project. As such, the vehicular trips and associated traffic noise would not change as a result of the Modified Project. Furthermore, the permitted location of outdoor recreational facilities would not change as a result of the Modified Project and the detailed design regulations included in the LMU Specific Plan that address athletic area requirements and landscaped buffers would continue to be implemented. The Modified Project would also continue to implement Project Design Features **PDF-NOISE-3** though **PDF-NOISE-6** and mitigation measure **MM-NOISE-3** during operation. Therefore, operational noise levels would not change from those previously predicted, and impacts would be less than significant with mitigation, similar to the Previously Approved Project. As such, the Modified Project would not create any new significant impacts with respect to operational noise or substantially increase in a previously identified significant impact. As such, operational noise impacts under the Modified Project would be within the envelope of impact analysis addressed in the Certified EIR.

Question (b)—Impacts Related to Groundborne Vibration and Noise: The Modified Project would have construction activities similar to the Previously Approved Project, which could generate temporary groundborne vibration and noise consistent with levels typically associated with construction. The Modified Project would occur within the same Project Site footprint as the Previously Approved Project and would not result in an increase in building area or associated construction equipment. Additionally, like the Previously Approved Project, the Modified Project would implement Project Design Feature

PDF-NOISE-1, limiting vibration impacts. Thus, impacts related to groundborne vibration and noise would remain less than significant. The Modified Project would not create any new significant impacts related to groundborne vibration or noise nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (c)—Impacts Related to the Exposure of People to Airport Noise: LMU is located approximately 1 mile north of the Los Angeles International Airport (LAX). However, the campus is located outside the established 65 CNEL contour around the airport. As set forth in the Certified EIR, the existing ambient CNEL noise levels within the campus range from 58 dBA to 61.8 dBA. These noise levels are considered "normally acceptable" and "conditionally acceptable" for the proposed uses. Therefore, as with the Previously Approved Project, the Modified Project would not create any new significant impacts related to exposure to excessive noise levels associated with a public or private use airport nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts related to noise than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to noise impacts. No substantial changes in the environment related to noise have occurred since certification of the Certified EIR beyond those already anticipated in the Certified EIR (i.e., changes in noise levels due to the development of previously approved uses), and no new noise sources have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe noise impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Project Design Features **PDF-NOISE-1** through **PDF-NOISE-5** and Mitigation Measures **MM-NOISE-1** through **MM-NOISE-3** included in the MMRP adopted for the Previously Approved Project. A copy of the MMRP is included as Appendix B. No additional mitigation measures are required as no new significant noise impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant noise impacts or a substantial increase in previously identified impacts associated with noise would occur as a result of the Modified Project. Therefore, noise impacts associated with the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.14 Population and Housing

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
POPULATION AND HOUSING: Would the project:					
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less Than Significant	No	No	No	No
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	No	No	No	No

Impact Determination in the Certified EIR

Impacts to population and housing were evaluated in Section VII, Effects Found Not to be Significant of the Certified EIR for the Previously Approved Project. As discussed therein, the increase in on-campus housing would increase the on-campus student residential population during the academic year by approximately 989 students for a total on-Campus resident population of 4,250. The Previously Approved Project-related increase in the campus residential population would constitute an approximately 2.0 percent increase over the estimated 2007 Community Plan Area resident population. In addition, the Previously Approved Project-related population increase on campus would constitute approximately 1.6 percent of the estimated 2025 total projected population for the Community Plan Area. This 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. Therefore, the Previously Approved Project would result in a less than significant impact associated with population growth.

With regard to housing, construction of new and replacement undergraduate student housing would be phased so that new housing is developed prior to the demolition of existing housing; therefore, the demolition of student housing would not result in a need for substantial off-campus housing for students during construction. Moreover, the Previously

Approved Project would not change the present campus boundaries and no existing off-site housing would be displaced by the Previously Approved Project. Thus, no impacts related to displacement of housing would result from the Previously Approved Project.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) and (b)—Impacts Related to Population and Housing: The Modified Project continues to provide for new student housing within the campus. The Modified Project would not increase the maximum of 7,800 FTE students, 9,600 total FTE, and 4,250 on-Campus residents set forth by the Previously Approved Project. As such, the Modified Project would not result in any new impacts associated with population growth. In addition, like the Previously Approved Project, the Modified Project would not result in a net decrease in housing as any housing to be removed would be replaced by new housing units. Thus, the Modified Project would not create any new significant impacts related to Population and Housing nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts related to population or housing than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to population and housing impacts. No substantial changes in the environment related to population and housing have occurred since certification of the Certified EIR, and no new population or housing conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe population or housing impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, no new significant population and housing impacts or a substantial increase in previously identified population and housing impacts would occur as

a result of the Modified Project. Therefore, the impacts associated with population and housing under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.15 Public Services

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
PUBLIC SERVICES: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
(a) Fire protection?	Less Than Significant with Mitigation	No	No	No	Yes
(b) Police protection?	Less Than Significant with Mitigation	No	No	No	Yes
(c) Schools?	No Impact	No	No	No	No
(d) Parks?	Less than Significant	No	No	No	No
(e) Other public facilities?	Less Than Significant	No	No	No	No

[a] *As indicated in the Certified EIR, the payment of required development fees pursuant to Government Code Section 65995 would constitute full mitigation.*

Impact Determination in the Certified EIR

The Previously Approved Project's impacts to public services were evaluated in Section IV.J.1, Police; Section IV.J.2, Fire; and Section IV.J.3, Parks and Recreation, of the Certified EIR. The Previously Approved Project's impacts to public services related to schools and other public facilities were evaluated in Section VII, Effects Not Found to be Significant, of the Certified EIR.

Fire

As discussed in the Certified EIR, the risk of fire is considered minimal because the Previously Approved Project would not be constructed all at once and fire suppression equipment specific to construction would be maintained onsite. The Previously Approved Project may cause traffic disruptions during construction of the Previously Approved Project; however, the disruptions would be temporary and would not be anticipated to significantly affect emergency access or response. In addition, as part of the Previously Approved Project, construction activities would be coordinated with the Los Angeles Department of Transportation (LADOT) to implement Worksite Traffic Control Plans to ensure construction related effects are minimized, Therefore, as concluded in the Certified EIR, impacts to fire protection services during construction would be less than significant level.

With regard to emergency access during operation, the Previously Approved Project does not propose any changes to existing emergency access routes, and the vehicular circulation network at LMU would improve given the reconfiguration of buildings and recreational facilities. In addition, all new structures and structures to be modified would be located in accordance with the requirements of the Los Angeles Fire Department (LAFD). The Previously Approved Project would also implement mitigation measures **MM-FIRE-1** through **MM-FIRE-6** to ensure impacts related to emergency access would remain less than significant.

With regard to fire flows and infrastructure, sufficient fire flow and pressure would be provided on campus to accommodate the Previously Approved Project. The Previously Approved Project would also comply with applicable requirements regarding hydrant location and spacing and building design and access. The Previously Approved Project would also replace older buildings with new construction that would include modern-day fire suppressant technology, such as fire sprinklers, fire alarms, and updated fire-retardant building materials, thereby reducing potential fire risks. With the implementation of mitigation measures **MM-FIRE-1** through **MM-FIRE-7**, impacts to fire flow infrastructure would be less than significant.

Previously Approved Project impacts with respect to response distance would be less than significant. 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.

With regard to demand for services, the Previously Approved Project would result in an approximately 3.1 percent increase in emergency incidents 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.

With regard to emergency preparedness, LMU would continue to implement an Emergency Management Guide that is consistent with relevant local, state and federal policies and regulations. In addition, based on input from the LAFD, the Previously Approved Project would not require new or expanded fire protection facilities. Thus, potential impacts associated with emergency preparedness and the construction of new or expanded fire protection facilities would be less than significant.

Police

As discussed in the Certified EIR, construction of the Previously Approved Project may result in potential crime and safety issues including theft of building materials and construction equipment, malicious mischief, graffiti and general vandalism. However, these activities are not unusual and would not place undue demands on police protection. Furthermore, LMU's own 24-hour security patrol would guard against theft and vandalism, reducing the demand for Los Angeles Police Department (LAPD) services. Impacts to police services during construction is considered to be less than significant, however with the implementation of mitigation measure **MM-POL-1**, which requires security lighting within construction sites, is recommended to further increase safety and reduce potential impacts to related crime. Additionally, construction activities could increase traffic both on and adjacent to the campus during typical weekday working hours with the addition of commuting construction workers and construction vehicles. To minimize the number of construction-related trips to the Previously Approved Project Site, construction workers would be provided off-site parking within the project vicinity, and necessary construction equipment would be staged on campus to not impact local roadways. Emergency access to active construction sites would be maintained consistent with LAPD requirements. Thus, potential impacts would be less than significant.

With regard to operational impacts associated with the demand for police protection services, the Previously Approved Project could result in an increase of 87 annual incidents, representing an increase of 1.34 percent over the 6,505 incidents that occurred in 2007 in the Pacific Division. Therefore, the increased demand for police services would be minimal. In addition, the LMU Department of Public Safety provides first-response police protection services for the 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. Therefore, impacts to police services during operation would be less than significant. Nonetheless, mitigation measures **MM-POL-2** and **MM-POL-3** have been included to ensure coordination, review and input by LAPD as buildings are constructed.

Schools

The Previously Approved Project proposes to increase the existing enrollment within LMU to 7,800 FTE students and to provide on-campus housing for up to 75 percent of undergraduate FTE students. Student housing is presently provided for undergraduate students only; housing is not provided for students with spouses or children and would not

be provided under the Previously Approved Project. Therefore, the Previously Approved Project would not introduce new students in grades K–12 to the local area. Therefore, no impacts on school services would be anticipated.

Parks and Recreation

As analyzed in the Certified EIR, the Previously Approved Project's new increase in students would create additional demand for area parks and recreational facilities. The Previously Approved Project plans to add an approximate total of 9.8 new net acres of athletic facilities and landscaped open spaces, for a total of approximately 50 acres at buildout. The open space would comply with the requirements of the LMU Specific Plan, which exceeds the requirements of the Los Angeles Municipal Code and the Quimby Act. In addition, the Previously Approved Project would provide enough park and recreational facilities to exceed both the short- and long-term standards established by the Public Recreation Plan. Thus, impacts associated with the demand for parks and recreational facilities would be less than significant.

Other Public Facilities

The Previously Approved Project proposes increasing the existing enrollment from 6,868 FTE students to 7,800 FTE students and seeks to house a larger percentage of the undergraduate population in on-campus housing. The library needs of the campus community would continue to be served by existing campus libraries. As such impacts on libraries would be less than significant.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Impacts on Fire Protection: The construction activities associated with the Modified Project would be similar to the Previously Approved Project, which would occur in a variety of locations on the campus over a several year period. Like the Previously Approved Project, Modified Project construction activities would have minimal fire risk because the Modified Project would not be constructed all at once and fire suppression equipment specific to construction would be maintained on site. In addition, like the Previously Approved Project, the Modified Project would also implement Worksite Traffic Control Plans and construction site precautions to minimize construction related effects. Therefore, as with the Previously Approved Project, impacts to fire protection under the Modified Project would be less than significant during construction.

The Modified Project would not relocate or expand the boundaries of the campus or change the types of uses to be developed. In addition, the total floor area permitted on site, student population and number of housing units would not increase under the Modified Project. Thus, the Modified Project would not increase the intensity of development or population within the Project Site and would not increase the demand for fire protection

services beyond that anticipated in the Certified EIR. Like the Previously Approved Project, the Modified Project would maintain emergency access routes and locate new structures in compliance with LAFD requirements. The Modified Project would also implement mitigation measures **MM-FIRE-1** through **MM-FIRE-6** to ensure adequate emergency access and fire flows would be provided. As with the Previously Approved Project, under the Modified Project, new structures would be developed in accordance with LAFD requirements which include fire sprinklers, fire alarms, and updated fire-retardant building materials, thereby reducing potential fire risks. As such, impacts associated with emergency access, fire flow infrastructure, response distance, demand for fire services, and emergency preparedness would be within the envelope of impact established for the Previously Approved Project and would be less than significant with implementation of mitigation.

Question (b)—Impacts on Police Protection: Similar to the Previously Approved Project, under the Modified Project LMU's 24-hour security would continue to be present to patrol guard against theft and vandalism at on-campus construction sites. In addition, the Modified Project would continue to implement mitigation measure **MM-POL-1**, which requires securing construction sites and use of security lighting. Like the Previously Approved Project, construction activities would be coordinated with LADOT to implement Worksite Traffic Control Plans to ensure construction related effects on roadways are minimized. Thus, like the Previously Approved Project, the Modified Project's impacts associated with police protection and emergency access during construction would continue to be less than significant.

The Modified Project would not increase the maximum of 7,800 FTE students and 4,250 residents set forth by the LMU Specific Plan. As such, there would not be an increase in demand for police services beyond that anticipated by the Certified EIR. In addition, the LMU Department of Public Safety would continue to provide first response to incidents and mitigation measures **MM-POL-2** and **MM-POL-3** would continue to be implemented to ensure coordination, review and input by LAPD as buildings are constructed. Thus, as with the Previously Approved Project, the Modified Project's impacts on the demand for police services during operation would be less than significant and impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Question (c)—Impacts on Schools: As with the Previously Approved Project, new housing under the Modified Project would only be provided for undergraduate students. Thus, the Modified Project would not generate students in grades K–12. As such, the Modified Project would not create any new impacts with respect to schools, nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Question (d)—Impacts on Parks: As with the Previously Approved Project, the Modified Project would add an approximate total of 9.8 new net acres of athletic facilities and landscaped open spaces, for a total of approximately 50 acres at buildout. The open space

would comply with the requirements of the LMU Specific Plan, which exceeds the requirements of the Los Angeles Municipal Code and the Quimby Act. As such, the Modified Project would not create any new impacts with respect to parks and recreation, nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Question (e)—Impacts on Other Public Services: As with the Previously Approved Project, the library needs of the campus community under the Modified Project would continue to be served by existing campus libraries. In addition, no increases in FTE students or beds would occur beyond that anticipated for the Previously Approved Project. As such, impacts to libraries would be less than significant. The Modified Project would not create any new impacts with respect to libraries nor increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts related to public services than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to public services impacts. No substantial changes in the environment related to public services have occurred since certification of the Certified EIR, and no new conditions related to public services have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe impacts to public services, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Project Design Features **PDF-POL-1**, **PDF-FIRE-1**, and **PDF-REC-1**, and Mitigation Measures **MM-POL-1** through **MM-POL-3** and **MM-FIRE-1** through **MM-FIRE-7** included in the MMRP adopted for the Previously Approved Project (see Appendix B). No additional mitigation measures are required as no new significant impacts to public services would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant public services impacts or a substantial increase in previously identified impacts to public services would occur as a result of the Modified Project. Therefore, the impacts to public services under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.16 Recreation

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
RECREATION:					
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No Impact	No	No	No	No
(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less Than Significant	No	No	No	No

Impact Determination in the Certified EIR

The Previously Approved Project's impacts to recreational facilities were evaluated in Section IV.J.3, Recreation and Parks, of the Certified EIR. As discussed above, the Previously Approved Project would add an approximate total of 9.8 new net acres of athletic facilities and landscaped open spaces, for a total of approximately 50 acres at buildout. The open space would comply with the requirements of the LMU Specific Plan, which exceeds the requirements of the Los Angeles Municipal Code and the Quimby Act. In addition, the Previously Approved Project would provide enough park and recreational facilities to exceed both the short- and long-term standards established by the Public Recreation Plan. In addition, as the recreational facilities are proposed as part of the Previously Approved Project, they were evaluated in the Certified EIR. As determined therein, the proposed recreational facilities would not have an adverse physical effect on the environment. Therefore, impacts associated with parks and recreational facilities would be less than significant.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) and (b)—Impacts on Recreational Facilities: As with the Previously Approved Project, the Modified Project would add an approximate total of 9.8 new net acres of athletic facilities and landscaped open spaces, for a total of approximately 50 acres at buildout. The open space would comply with the requirements of the LMU Specific Plan, which exceeds the requirements of the Los Angeles Municipal Code and the Quimby Act. In addition, the recreational facilities were evaluated in the Certified EIR and were determined to not have an adverse physical effect on the environment. Therefore, as with the Previously Approved Project, Modified Project impacts associated with parks and recreational facilities would be less than significant. The Modified Project would not create any new impacts with respect to recreational facilities, nor would the Modified Project increase the severity of any previously identified impacts. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts associated with recreational facilities than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to recreation impacts. No substantial changes in the environment related to recreation have occurred since certification of the Certified EIR, and no new recreational facilities have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts related to recreation. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe recreation impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As previously discussed, Project Design Feature **PDF-REC-1** set forth in the Certified EIR and the associated MMRP to address park and recreation impacts would be implemented as part of the Modified Project. Refer to Section 5.1.15, Public Services, above. No additional mitigation measures are required as no new significant recreation impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant recreation impacts or a substantial increase in previously identified recreation impacts would occur as a result of the Modified Project. Therefore, the impacts to recreation under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.17 Transportation

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRANSPORTATION: Would the project:					
(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less than Significant with Mitigation	No	No	No	Yes
(b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?[a]	Less than Significant	No	No	No	No
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant	No	No	No	No
(d) Result in inadequate emergency access?	Less Than Significant	No	No	No	No

[a] *While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to the use of VMT as the methodology for evaluating traffic impact, the Certified EIR used LADOT's previously approved methodology, which used level of service (LOS) to evaluate a project's traffic impacts. As the intent of an Addendum is to provide a comparative analysis of impacts with the Certified EIR, level of service is used in this analysis. An analysis of VMT is also provided consistent with the new question in Appendix G of the CEQA Guidelines.*

Impact Determination in the Certified EIR

Transportation impacts associated with the Previously Approved Project were evaluated in Section IV.K, Transportation, of the Certified EIR. Note that subsequent to Certification of the EIR, Appendix G of the CEQA Guidelines has been updated and parking capacity is no longer included as an environmental topic to be studied as part of the CEQA process. As such, an analysis of parking capacity is not included below.

Construction

Under the Previously Approved Project most construction workers would arrive and depart during off-peak traffic hours (i.e., arriving prior to 7:00 A.M. and departing between 3:00 and 4:00 P.M.). As such, construction-related traffic impacts on peak-hour traffic would be less than significant. In addition, disruptions due to truck traffic would be minimized by implementing a Construction Traffic Control Plan in accordance with mitigation measure **MM-TRAF-1**. As such, traffic impacts associated with construction activities would be less than significant.

Operation

Traffic

As discussed in the Certified EIR, the Project is expected to generate 2,540 net new trips per day, which includes 176 net new trips during the morning peak hour and 223 net new trips during the evening peak hour. The addition of Project traffic is expected to result in potentially significant impacts at two intersections at Project buildout year in 2030: Lincoln Boulevard at Jefferson Boulevard during the morning and evening peak hours and Centinela Avenue/Campus Center Drive at Jefferson Boulevard during morning peak hour. However, with implementation of Mitigation Measures **MM-TRAF-3** and **MM-TRAF-4**, which include various Traffic Demand Management strategies, intersection impacts would be reduced to less than significant levels. In addition, regional traffic and neighborhood intrusion impacts would be less than significant.

Site Access and Safety Impacts

As discussed in the Certified EIR, the campus driveways could accommodate the increase in traffic resulting from the Previously Approved Project and impacts related to campus access would be less than significant. In addition, the existing crosswalks and intersection signal controls would remain following Previously Approved 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 Previously Approved Project is not anticipated create hazardous conditions at campus driveways and impacts would be less than significant.

Transit System Impacts

Given that the Certified EIR concluded that the Previously Approved Project transit trips were 2 percent of the hourly capacity, the capacity of the transit system serving the Previously Approved Project area would not be exceeded and impacts on the regional transit system would be less than significant.

Alternative Transportation

As discussed in the Certified EIR, the Previously Approved Project is adjacent to a major transportation corridor within an urban area of Los Angeles. The campus is also well serviced by several transit and bus lines. The Previously Approved Project also proposes designated bicycle lanes on all primary, secondary, and tertiary campus roads and bicycle parking racks at all new buildings. The Previously Approved Project would support the alternative transportation policies and programs of the SCAG Regional Transportation Plan, the Coastal Transportation Corridor Specific Plan, Metro's Congestion Management Program, the Westchester-Playa del Rey Community Plan, and the Statewide Transportation Improvement Program.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The following analysis is based in part, on the Traffic Impact Evaluation for the Addendum to the LMU Specific Plan EIR prepared by Fehr & Peers, dated June 19, 2021, and included in Appendix A of this Addendum. A copy of LADOT's Assessment Letter of the Traffic Analysis is also included in Appendix A of this Addendum.

Question (a)—Conflict with a Plan or Policy Regarding the Circulation System:

Construction

The types and amount of construction activities that would occur under the Modified Project would be generally similar to those anticipated for the Previously Approved Project. Additionally, as with the Previously Approved Project, under the Modified Project most construction workers would arrive and depart during off-peak traffic hours (i.e., arriving prior to 7:00 A.M. and departing between 3:00 and 4:00 P.M.). Additionally, the Modified Project is likely to be less impactful because the overall construction program is scaled back as more existing facilities would remain. Furthermore, like the Previously Approved Project, a Construction Traffic Control Plan would be implemented in accordance with mitigation measure **MM-TRAF-1**. Therefore, temporary construction related traffic impacts would continue to be less than significant. As such, the Modified Project would not create any new impacts to traffic nor increase the severity of previously identified construction traffic impacts. These impacts would be within the envelope of impacts set forth in the Certified EIR.

Operation

VMT

When the City adopted the Specific Plan, Level of Service (LOS) Analysis was the primary metric for the analysis of transportation impacts under CEQA. This method focused on analyzing traffic congestion and a project's potential to exacerbate congestion through an

evaluation of the changes in intersection volume to capacity (V/C) ratios associated with the addition of a project's traffic volumes to intersections and calculate the result change in V/C ratios based on the particular intersection's peak hour capacity. Thus, Previously Approved Project, transportation impacts were evaluated based on the vehicle trip increases associated with the growth of FTEs on campus.

Pursuant to California Senate Bill (SB) 743, transportation impacts from a project are now required to be evaluated under CEQA using a vehicle-miles traveled (VMT) analysis. VMT analyses quantify the amount of driving that a project would affect based on the number of trips caused by a project, which modes are utilized, and the distance these trips cover. VMT analyses are often expressed in VMT per capita, and a project's VMT performance is based on its per-capita VMT not whether a project would increase VMT in aggregate.

The Los Angeles Department of City Planning and LADOT updated the Transportation Section of the City's California Environmental Quality Act (CEQA) Thresholds Guide to comply with and implement Senate Bill (SB) 743. The City Council subsequently adopted VMT-based significance thresholds. LADOT has developed a VMT Calculator tool to estimate project-specific daily household VMT per capita and daily work VMT per employee for land use development projects. The VMT Calculator relies on the students to calculate VMT for the University land use category. The Specific Plan Amendment would not change the FTE. Therefore, VMT analysis for the growth in the campus population is not required. Notwithstanding the fact that FTE would not change, the Traffic Analysis evaluates whether the shift in allocation of floor area among campus building types would result in the potential to increase VMT. This evaluation is incorporated into the analysis of traffic included in the Transportation Analysis and summarized below.

Traffic

As discussed above, the Modified Project would not change the overall campus population, which was assumed in the Certified EIR to grow up to 9,600 campus FTE students, faculty, and staff. As campus trip generation and VMT is determined by growth of campus population, as opposed to the allocation of floor area across University buildings, with no change to the FTE cap, the Modified Project would not be expected to have any new or more severe significant transportation impacts. Further, LMU's implementation of the TDM plan has consistently kept the campus' level of trip generation below 150 per hour, the City's adopted threshold of significance. LMU has accomplished this while the campus' FTEs have grown. This indicates that trips per FTE (and therefore likely VMT per FTE) have been reduced.

The Previously Approved Project included the increase of on-campus housing as a mitigation measure, since on-campus residents were demonstrated to generate fewer vehicle trips (and likely reduced VMT) relative to commuter students. The Specific Plan Amendment Project would provide the same number of residential beds as the Previously Approved Project, which would continue to reduce trip generation and VMT from the Project.

In addition to the same increase in on-campus housing as the Previously Approved Project, the Playa Vista project, located immediately south of LMU's campus has since been completed. Playa Vista provides housing, retail and other services very close to LMU's campus. LMU implemented a shuttle to connect its campus with Playa Vista, which was not contemplated at the time of the Specific Plan's adoption. The proximity and the shuttle connection to Playa Vista would further reduce VMT compared with the context of the Previously Approved Project and Certified EIR. The Traffic Analysis also documents that LMU's proactive implementation of the TDM plan mitigation has and will continue to ensure that significant impacts identified in the Approved EIR would be mitigated to less than significant levels.

The retention and repurposing of the Gersten Pavilion permitted under the Modified Project would also not increase the frequency of public events on campus. As discussed above, the Specific Plan Amendment provides for an updated TDM Plan that prohibits concurrent events open to the general public at the Gersten Pavilion and a new sports arena. Further, the updated TDM Plan details a scheduling program such that requires a public event held at either Gersten Pavilion or the new sports arena not to be scheduled within than two hours after the scheduled end of a public event held at the other arena/pavilion.

Overall, with the implementation of the Previously Approved Project's recommended mitigation measures including **MM-TRAF-3** and **MM-TRAF-4**, impacts related to traffic during operation of the Modified Project would be reduced to less than significant levels. The Modified Project would not create any new impacts with respect to traffic during operation, nor would the Modified Project increase the severity of any previously identified significant impacts. Therefore, the Modified Project's traffic impacts would be within the envelope of impacts set forth in the Certified EIR. Further, with no increase in FTE students and implementation of the updated TDM Plan, no increase in VMT is anticipated as a result of the Modified Project.

Site Access and Safety Impacts

The Modified Project would not change the overall access patterns of the Previously Approved Project. In addition, like the Previously Approved Project, the existing crosswalks and intersection signal controls would remain following Modified 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 Modified Project is not anticipated create hazardous conditions at campus driveways and impacts would be less than significant. Therefore, the Modified Project would not create any new impacts associated with site access and safety nor increase the severity of previously identified impacts. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Transit System Impacts

The Modified Project would not result in an increase in on-site population or events. As such, impacts to the transit system under the Modified Project would be similar to those under the Previously Approved Project and such impacts would be less than significant. Therefore, the Modified Project would not create any new impacts associated with the transit system nor increase the severity of previously identified impacts. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Alternative Transportation

The Modified Project would not change location of the Campus or the overall design of the transportation system set forth for the Previously Approved Project. As such, the Modified Project would continue to be well-served by transit. The Modified Project would also continue to provide designated bicycle lanes on all primary, secondary, and tertiary campus roads and bicycle parking racks at all new buildings. Thus, like the Previously Approved Project, the Modified Project would support alternative transportation policies and programs. Therefore, the Modified Project would not create any new impacts associated with alternative transportation plans or policies, nor increase the severity of previously identified impacts. Such impacts would continue to be less than significant and within the envelope of impacts set forth in the Certified EIR.

Former Question (b)—Impacts Related to Conflicts with a Congestion Management Plan: While the CMP is no longer effect in Los Angeles County, the Modified Project would not increase the number of weekday p.m. peak-hour trips over the total number of trips estimated for the Previously Approved Project. Therefore, like the Previously Approved Project, the Modified 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. Additionally, the Modified Project would continue to provide alternative transportation options including public transit and improved bicycle facilities to further alleviate congestion. Therefore, impacts would be less than significant. The Modified Project would not create any new significant impacts related to the CMP nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

New Question (b)—Impacts Related to Conflicts with CEQA Guidelines Section 15064.3, subdivision (b): As discussed above, CEQA Guidelines Section 15064.3 is a new provision included in the 2019 update to the CEQA Guidelines which pertains to VMT-based analysis of transportation impacts. As discussed above, the Modified Project would not result in an increase in FTE students or staff within the Project Site. As such, no increase in VMT would occur as a result of the Modified Project. Furthermore, CEQA Guidelines Section 15064.3(b)(1) states that “generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.” The campus is well-served by existing

transit, including the Santa Monica Big Blue Bus, LADOT Commuter Express, and Metro). In addition, the RTP/SCS designates a majority of the campus as an HQTA, and the City's ZIMAS system confirms the Modified Project Site's location within a transit priority area, as defined in the City's ZI No. 2452. The Modified Project would support the goals and principles set forth in the RTP/SCS through the construction of development within an urban, infill area well served by transit; reconfiguring buildings and recreational facilities to improve pedestrian circulation; and the provision of bicycle parking and other amenities that encourage non-automotive forms of transportation. Accordingly, by virtue of the Project Site location, the type of development proposed, as well as consistency with relevant plans, both the Previously Approved Project and the Modified Project would support local and regional plans to reduce VMT.

Question (c)—Impacts Related to Design Hazards or Incompatible Uses: Like the Previously Approved Project, the Modified Project would not include roadway design features or physical configurations that could adversely affect the visibility of pedestrians and bicyclists to drivers, or the visibility of cars to pedestrians and bicyclists. Therefore, the Modified Project would not create any new significant impacts related to hazards or incompatible uses nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Question (d)—Impacts to Emergency Access: Similar to the Previously Approved Project, implementation of the Modified Project would not include any substantial changes to emergency access and circulation within LMU. All access routes, including fire lanes, would be maintained at all times, consistent with LAFD requirements and the Modified Project would comply with all requirements with regard to emergency access. Therefore, the Modified Project would not create any new significant impacts related to emergency access nor result in a substantial increase in a previously identified significant impact. Such impacts would be less than significant and within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts?

Based on the above analysis, there are no new circumstances involving new significant traffic, or access impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to traffic and access impacts. No substantial changes in the environment related to traffic and access beyond those anticipated as part of the Previously Approved Project have occurred since certification of the Certified EIR, and no new traffic or access conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified

Project would not result in any new or substantially more severe traffic or access impacts, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Mitigation Measures **MM-TRAF-1** through **MM-TRAF-7** included in the MMRP adopted for the Previously Approved Project (see Appendix B). No additional mitigation measures are required as no new significant transportation impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant traffic, or access impacts or a substantial increase in previously identified traffic, or access impacts would occur as a result of the Modified Project. Therefore, the impacts to traffic and access under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.18 Tribal Cultural Resources

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRIBAL CULTURAL RESOURCES:					
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Not Analyzed	No	No	No	No

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Not Analyzed	No	No	No	Yes

Impact Determination in the Certified EIR

The Certified EIR did not analyze the impact of the Previously Approved Project with respect to tribal cultural resources as that was not an environmental impact category under CEQA at the time the documents were prepared and certified. Within the Certified EIR, tribal cultural resources were generally evaluated within the context of archaeological resources and human remains, including those interred outside of formal cemeteries. As discussed above in Section 5.1.5, Cultural Resources, as stated by the Native American Heritage Commission, no sacred sites are located in the immediate vicinity of the campus. However, should archaeological resources or human remains be discovered, Mitigation Measures **MM-ARCH-1** through **MM-ARCH-12,** which include retention of a Native American monitor during construction activities, would reduce impacts to a less than significant level.

Per AB 52, tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that meet certain criteria. For projects for which a notice of preparation (NOP) of a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of the project if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation within 30 days of receipt of formal notification by the lead agency. As the NOP for the Previously Approved Project was filed in 2008, it was not subject to this requirement.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Question (a)—Impacts to Tribal Cultural Resources: The Modified Project would be developed within the same overall Project Site footprint as the Previously Approved Project and the depth of grading would not increase when compared with the Modified

Project. In addition, in the event of the retention of the Gersten Pavilion, the overall amount of grading and excavation under the Modified Project would likely be reduced. Like the Previously Approved Project, implementation of mitigation measures **MM-ARCH-1** through **MM-ARCH-12** would reduce potential impacts to archaeological resources and human remains to less than significant levels. Mitigation Measures **MM-ARCH-2**, **MM-ARCH-4**, and **MM-ARCH-7** specifically require that a Native American member of the Gabrieleño be retained as a monitor and consulted during ground disturbing activities and would ensure that impacts associated with tribal cultural resources would be less than significant. Accordingly, there would be no new potential for the discovery of tribal cultural resources.

As the Modified Project is not a new development proposal but rather represents modifications to the Previously Approved Project and given that this Addendum is tiered off the original Certified EIR, a new NOP was not required under CEQA. Therefore, the Modified Project is not subject to AB 52 requirements.

Thus, as expected under the Previously Approved Project, the Modified Project would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts would be less than significant with incorporation of mitigation measures. The Modified Project would not create any new impacts to tribal cultural resources nor increase the severity of any previously identified impacts. Such impacts would be within the envelope of cultural resource impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances with regard to tribal cultural resources involving new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to tribal cultural resources. No substantial changes in the environment relative to tribal cultural resources have occurred since certification of the Certified EIR, and no new tribal cultural resources have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, the Modified Project would not result in any new or substantially more severe impacts related to tribal cultural resources, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

Mitigation measures **MM-ARCH-1** through **MM-ARCH-12** would continue to be implemented by the Modified Project. Mitigation Measures **MM-ARCH-2**, **MM-ARCH-4**, and

MM-ARCH-7 specifically require that a Native American member of the Gabrieleño be retained as a monitor and consulted during ground disturbing activities.

Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to tribal cultural resources would occur as a result of the Modified Project. Therefore, cultural resources impacts under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.19 Utilities and Service Systems

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant With Mitigation	No	No	No	Yes
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less Than Significant	No	No	No	No
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant With Mitigation	No	No	No	Yes
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Potentially Significant	No	No	No	No
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less Than Significant	No	No	No	No

Impact Determination in the Certified EIR

The Previously Approved Project's impacts with regard to utilities and service systems were addressed in Section IV.L.1, Water Supply Section IV.L.2, Wastewater; and Section IV.L.3, Solid Waste, of the Certified EIR.

Water

As discussed in the Certified EIR, during construction of the Previously Approved Project, water would be used during grading and earthmoving activities for dust control and to aid in earth compaction. Construction contractors may supply specialized equipment and water supplies such as water trucks for this purpose. The Certified EIR concluded that water demand during construction activities associated with the Previously Approved Project would temporary and short term, therefore there would be less than significant impacts with regard to water supplies and distribution.

Implementation of the Previously Approved 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 (refer to **PDF-WATER-1**), as well as the use of recycled water for irrigation and cooling towers would reduce the Previously Approved 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. LADWP would have sufficient water supply to meet the water demands of the Previously Approved Project, and therefore, as concluded in the Certified EIR, impacts regarding water supply would be less than significant.

With regard to water infrastructure, LMU would be responsible for the connections to the existing municipal water lines in McConnell Avenue, 80th Street, and LMU Drive. Water pressure at the four hydrants furthest from a water supply source exceeds the minimum LAMC requirement of 4,000 gallons per minute and 20 pounds per square inch of residual pressure. Given the water conservation measures to be implemented, adequate water flow and water pressure exists in the water supply infrastructure serving the campus to accommodate the anticipated increase in demand associated with the Previously Approved Project without the need for upgrades to the existing off-campus water system. Therefore, the Certified EIR concluded that impacts to local water distribution or treatment facilities would be less than significant under the Previously Approved Project.

Sewer

During construction of the Previously Approved Project, 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. Thus, as concluded in the Certified EIR, no significant sewer impacts were anticipated under the Previously Approved Project.

As discussed in the Certified EIR, with the addition of FTE students and individual developments, and in conjunction with an applied efficiency values associated with recent updates to building codes, a net increase in campus wastewater flow of 128,925 gallons per day would be generated by the Previously Approved Project. Assuming that increased efficiency in water usage is applied to current demands, operation of the Previously Approved Project may have a minor increase in wastewater generation, or even a net reduction. Accordingly, the Previously Approved Project Implementation would have a less than significant impact on the campuswide wastewater system and off-site existing municipal wastewater conveyance infrastructure.

The Previously Approved Project would be required by the Los Angeles Regional Water Quality Control Board to follow wastewater treatment requirements for the wastewater generated by the Project. LMU currently uses and would continue to use municipal infrastructure to convey wastewater to the Hyperion Treatment Plant. Treatment Plants in Los Angeles are subject to federal and state wastewater treatment and discharge regulations, therefore, wastewater generated from the Previously Approved Project would be treated in accordance with the wastewater requirements of the Los Angeles Water Quality Control Board, and project impacts would be less than significant.

Additionally, as discussed in the Certified EIR, the existing wastewater and sewage systems were found to have available capacity to accommodate sewage generated by the Previously Approved Project. A majority of the increase in wastewater related to the Previously Approved Project's would only affect the wastewater system on Burns Campus. 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. Additionally, the Hyperion Treatment Plant would have sufficient capacity to serve the Previously Approved Project. Thus, less than significant impacts regarding treatment capacity at the Hyperion Treatment Plant would occur with the Previously Approved Project.

Solid Waste

As discussed in the Certified EIR, altogether, construction activities for the Previously Approved Project would result in a total generation of 981,630 tons of solid waste, assuming there no reuse or recycling of construction waste, however the construction process would include efforts to separate debris and recycle a minimum of 50 percent of the basic building materials pursuant to AB 939. As stated in the Certified EIR, the Previously Approved Project would haul exported soil and demolition debris to one or more of the several unclassified landfills serving Los Angeles County. Combined, the exported soil, demolition debris, and construction debris generated by the Previously Approved Project would represent approximately 1.9 percent of the County's remaining capacity if no recycling Is implemented. Accordingly, the County has adequate permitted inert waste disposal capacity for the foreseeable future. Therefore, as concluded in the

Certified EIR, construction activities associated with the Previously Approved Project would result in less than significant impacts with regard to solid waste disposal capacity.

As discussed in the Certified EIR, operation of the Previously Approved Project is anticipated to generate an estimated 1,724 net new tons of solid waste per day before recycling. However, LMU would continue to conduct its campuswide recycling program that achieves a 58.6-percent waste diversion rate. Therefore, the campus would divert approximately 1,010 tons of solid waste from landfills, and as a result would dispose of approximately 714 additional tons of solid waste per year after recycling. As discussed in the Certified EIR, this waste would primarily be disposed of at the Sunshine Canyon Landfill. As mentioned in the Certified EIR, the Sunshine Canyon Landfill was issued a permit by the California Integrated Waste Management Board to increase its capacity by 67.7 million tons, which would provide sufficient permitted capacity to accommodate the Previously Approved Project's solid waste needs. The Los Angeles County Department of Public Works' 2007 Annual Report determined that Los Angeles County solid waste disposal demand cannot be accommodated beyond 2014. However, this estimate does not account for a number of approved and proposed landfill expansions that would significantly expand landfill capacity, which would be made available to the City of Los Angeles, and the Previously Approved Project, in the future. Despite these anticipated significant expansions, given the uncertainty of timing of the expansions at the time the 2007 Annual Report was prepared, the Certified EIR conservatively assumed that the Previously Approved Project would result in a potentially significant impact with respect to solid waste at buildout in 2030.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) through (c)—Impacts Related to Water, Wastewater, and Other Utilities:

Water

Similar to the Previously Approved Project, the Modified Project would have a short-term demand for water during construction in association with dust control and earth compaction. Given the short-term and intermittent nature of these activities, water demand during construction of the Modified Project would result in less than significant impacts with regard to water supply and existing service, water lines, and facilities. As such, the Modified Project would not create any new significant impacts related to water supply during construction nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

With regard to water demand during operation, the Modified Project would not increase the permitted enrollment, residential units, number of permanent seats for events, or total floor area within Campus. As such, the Modified Project would not result in an incremental increase in water demand. The Modified Project would also continue to

implement LMU's water conservation measures described in project design feature **PDF-WATER-1** and would also continue to use recycled water for irrigation and cooling towers, reducing the Modified Project's potable water demand. The Modified Project would also implement water conservation features that are now required by the City per the Los Angeles Green Building Code. As such, impacts would continue to be less than significant, and the Modified Project would not create any new significant impacts related to water supply during operation nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

With regard to water infrastructure, the Modified Project would not result in an increase in water demand compared with the Previously Approved Project. In addition, LMU would continue to be responsible for the connections to the existing municipal water lines in McConnell Avenue, 80th Street, and LMU Drive and all connections and infrastructure would comply with code requirements regarding fire flow and pressure. Therefore, the water supply infrastructure serving the campus would continue to accommodate the anticipated increase in demand associated with the Modified Project. Therefore, as with the Previously Approved Project, impacts to water infrastructure would be less than significant under the Modified Project. As such, the Modified Project would not create any new significant impacts related to water infrastructure nor result in a substantial increase in a previously identified significant impact. These impacts would be within the envelope of impacts set forth in the Certified EIR.

Wastewater

Like the Previously Approved Project, construction contractors would provide portable, on-site sanitation facilities for the Modified Project that would be regularly serviced at approved disposal facilities located off campus. As such, wastewater generated from construction activities would not be conveyed by the campus wastewater system. Therefore, similar to the Previously Approved Project, wastewater impacts during construction of the Modified Project would be less than significant. As such, the Modified Project would not create any new significant impacts related to wastewater during construction nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

The Modified Project would not result in an increase in enrollment, total floor area, number of permanents seats for events, or total residential units when compared with the Previously Approved Project. As such, wastewater generation during operation of the Modified Project would be similar to the Previously Approved Project. Furthermore, as discussed above, the Modified Project would incorporate water conservation features in accordance with current Los Angeles Green Building Code requirements, which would result in a corresponding reduction in wastewater flows. In addition, like the Previously Approved Project, the Modified Project would implement **MM-WW-1**, which would ensure that LMU's sewer system would operate with adequate capacity. The Hyperion Treatment Plan would also continue to have sufficient capacity to accommodate the Modified Project. As such, potential impacts associated with wastewater infrastructure and treatment would continue to

be less than significant with mitigation. The Modified Project would not create any new significant impacts related to wastewater during operation nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Other Utilities

As discussed above in Section 5.1.10, Hydrology and Water Quality (Drainage and Surface Water Quality), question (c), the existing storm drain infrastructure would be adequate to accommodate the proposed uses. Thus, the Modified Project would not result in the relocation or construction of new or expanded storm water drainage infrastructure which could cause significant environmental effects. As with the Previously Approved Project, drainage impacts under the Modified Project would be less than significant.

As discussed above in Section 5.1.6, Energy, question (a), compliance with the California Building Energy Efficiency Standards and CALGreen Code would ensure electricity and natural gas usage would not occur in a manner that is wasteful, inefficient, or unnecessary. Moreover, the Modified Project's annual electricity and natural gas consumption is anticipated to be similar to that expected under the Previously Approved Project. Accordingly, the Modified Project's annual electricity and natural gas consumption is anticipated to represent a small fraction of future demand within the Los Angeles Department of Water and Power (LADWP) and Southern California Gas Company service areas, which, in any case, would be similar to that expected under the Previously Approved Project, and like the Previously Approved Project, impacts would be less than significant. In addition, existing telecommunications facilities in the area would be adequate to accommodate the Project.

In summary, the Modified Project would not create any new significant impacts related to other utilities nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Questions (d) and (e)—Impacts Related to Solid Waste: The Modified Project would not increase the total floor area within the Campus at buildout. In addition, as the Gersten Pavilion may be retained and repurposed, less overall construction may occur as part of the Modified Project. Thus, the Modified Project is anticipated to generate less construction and demolition waste in comparison to the Previously Approved Project. In addition, inert landfills continue to have sufficient capacity within the County. As such, similar to the Previously Approved Project, solid waste impacts during construction of the Modified Project would continue to be less than significant. The Modified Project would not create any new significant impacts related to solid waste nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Solid waste generation in the Certified EIR was determined by the number of beds and the combined net increase in academic/administrative/indoor athletic facility floor area. With regard to solid waste generated during operation of the Modified Project, the proposed modifications to the Previously Approved Project would not change the number of beds. Under the Modified Project, the total combined net amount of academic/administrative/ indoor athletic facility square footage would increase by approximately 25,000 square feet when compared with the 536,000 square feet evaluated in the Certified EIR. Using the same generation factor and waste diversion rates in the Certified EIR, the Modified Project would generate an increase in disposal of approximately 12 additional tons per year of solid waste disposed of at County landfills. This would represent a 1.7 percent increase in solid waste demand when compared with the Previously Approved Project's disposal of 714 tons per year. As such, the estimated amount of solid waste disposed of by the Campus would not substantially increase when compared with the Previously Approved Project.

Since the certification of the Previously Approved Project, the Los Angeles County Department of Public Works has issued its 2018 Countywide Waste Management Plan (CoIWMP) Annual Report which summarizes the changes in solid waste management that have taken place. Based on the 2018 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2033 will not exceed the 2018 remaining permitted Class III landfill capacity of 163.4 million tons. The 2018 Annual Report evaluated six scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with existing capacity under six scenarios using in-county and out-of-county landfills. The scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The 2018 CoIWMP Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling; expand existing landfills; study, promote, and develop alternative technologies; expand transfer and processing infrastructure; and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[16] The City of Los Angeles is currently diverting 76 percent of its waste from landfills.[17] The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030. As such, it is expected that adequate solid waste capacity would be available to accommodate operation of the Modified Project.

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[16] *City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_ sheet/SWIRPFAQS.pdf, accessed January 16, 2020.*

[17] *LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=1885068648914941 1#!, accessed January 16, 2020.*

Based on the above, the Modified Project would not create any new significant impacts related to solid waste nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to utilities and service systems. No substantial changes in the environment related to utilities and service systems have occurred since certification of the Certified EIR, and no substantial new utilities or service systems have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any new or substantially more severe impacts related to utilities and service systems, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As discussed above, the Modified Project would continue to implement Project Design Features **PDF-WATER-1** and **PDF-SW-1**, and Mitigation Measure **MM-WW-1** included in the MMRP adopted for the Previously Approved Project (see Appendix B). No additional mitigation measures are required as no new significant transportation impacts would result from implementation of the Modified Project.

Conclusion

Based on the above, no new significant utility and service system impacts or a substantial increase in previously identified utility and service system impacts would occur as a result of the Modified Project. Therefore, the impacts to utilities and service systems under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.20 Wildfire

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Not Analyzed	No	No	No	No
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Not Analyzed	No	No	No	No
(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Not Analyzed	No	No	No	No
(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Not Analyzed	No	No	No	No

Impact Determination in the Certified EIR

The Certified EIR for the Previously Approved Project did not evaluate the wildfire questions listed above as they were not included on the Environmental Checklist Form at the time of preparation. However, the Certified EIR did address risks associated with wildland fires, as discussed above in Section 5.1.9, Hazards and Hazardous Materials, question (g). As summarized therein, the Certified EIR concluded there would be no impact relative to wildland fires.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 2019 update to the CEQA Guidelines includes a new section addressing wildfires within Appendix G (Environmental Checklist Form). The applicable questions, detailed above, are addressed below for the Modified Project.

Questions (a) through (d)—Impacts Related to Wildfires: As discussed in Section 5.1.9, Hazards, above, the campus is located in a suburban setting in the midst of an

urbanized part of the City of Los Angeles and is not subject to wildland fires. As such, the Modified Project would not create any new significant impacts related to wildfires nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, there are no new circumstances involving new significant impacts or substantially more severe wildfire impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to wildfire impacts. No substantial changes in the environment have occurred since certification of the Certified EIR, and no new wildfire conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any new or substantially more severe impacts related to wildfire, a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

None.

Conclusion

Based on the above, no new significant impacts related to wildfire would occur as a result of the Modified Project. Therefore, the wildfire impacts under the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.21 Cumulative Impacts

Impact Determination in the Certified EIR

The original Certified EIR included an examination of the effects of cumulative development within the Previously Approved Project vicinity area through the year 2030, which was the original Project buildout date. The following cumulative impacts were determined to be significant and unavoidable: cultural resources (archaeological resources), and solid waste. PDFs and mitigation measures identified in the Certified EIR would reduce some of these impacts, but not to less than significant levels.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

While the specific geographic context for the cumulative impact analysis of each of the issues addressed above may vary, many types of impacts, particularly those related to construction, are typically localized and thus largely limited to the immediate vicinity. In each of the analyses provided above, impacts associated with the Modified Project would be within the envelope of impacts evaluated in the Certified EIR, and as such, the Modified Project's contribution to potential cumulative impacts would remain unchanged from those previously evaluated. Accordingly, the Modified Project would not result in any new significant cumulative impacts, nor would it substantially increase the severity of any significant cumulative impacts previously identified in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Although incremental development has occurred within and around the LMU Specific Plan area, such development has largely occurred in a manner that is consistent with the Community Plan and the cumulative development previously anticipated and analyzed within the Certified EIR. There are no substantial changes to the environmental setting which would alter the determinations of the Certified EIR with respect to buildout of the LMU Specific Plan or relative to cumulative impacts. As such, there are no new circumstances involving new significant cumulative impacts or substantially more severe cumulative impacts than previously analyzed in the Certified EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to cumulative impacts. While ongoing development throughout the general Project area has taken place, no substantial changes in the environment affecting this analysis have occurred since certification of the Certified EIR. Finally, the Modified Project would not result in any new or substantially more severe cumulative impacts, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impacts

As indicated above, the Modified Project would implement the previously adopted mitigation measures set forth in the Certified EIR, as applicable. Accordingly, Project-specific impacts would be reduced to the maximum extent possible, thus reducing the Modified Project's contribution to cumulative impacts.

Conclusion

Based on the above, no new significant cumulative impacts or a substantial increase in previously identified cumulative impacts would occur as a result of the Modified Project. Therefore, cumulative impacts with the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5.1.22 Mandatory Findings of Significance

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
MANDATORY FINDINGS OF SIGNIFICANCE:					
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Less Than Significant with Mitigation	No	No	No	No
(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	Significant and Unavoidable	No	No	No	Yes
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Significant and Unavoidable	No	No	No	Yes

Impact Determination in the Certified EIR

The environmental issues addressed in the Mandatory Findings of Significance were analyzed in a combination of the Initial Study and the Certified EIR. As summarized above, the Previously Approved Project would result in significant and unavoidable impacts in respect to air quality (construction-related), noise (construction-related), and solid waste (operation related). The Previously Approved Project would also result in significant and unavoidable cumulative impacts with respect to cultural resources (archaeological

resources) and solid waste (operation related). As such, the Previously Approved Project would cause potentially significant impacts to the quality of the environment, cumulatively considerable impacts, and environmental effects which would cause substantial adverse effects on human beings.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Questions (a) through (c)—Mandatory Findings of Significance:

(a) The Modified Project would be within the same Project Site footprint as the Previously Approved Project, which is located in a highly urbanized area and does not include habitat for fish or wildlife species. Therefore, the Modified Project would not substantially reduce habitat for fish or wildlife species or cause a fish or wildlife population to drop below self-sustaining levels. The Modified Project would not substantially alter or remove historical resources within the Project Site and would implement mitigation measures to provide documentation of historic buildings and ensure that any improvements to buildings would conform to the Secretary of Interior's Standards. Additionally, impacts to unknown cultural resources, including human remains, archaeological and paleontological resources that may be encountered during construction, would be reduced to less than significant levels with implementation of mitigation measures.[18] Overall, as analyzed above, the Modified Project would not create any new significant impacts with regard to biological or cultural resources nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

(b) and (c) Like the Previously Approved Project, and as evaluated in the analysis throughout the Addendum, the Modified Project would result in significant and unavoidable impacts with respect to air quality (construction-related), and noise (construction-related). While the Certified EIR determined that solid waste (operation-related) impacts would be significant, as discussed above, based on the most recent CoIWMP Annual Report and the City's progress in recycling, it is expected that adequate solid waste capacity would be available to accommodate operation of the Modified Project and related projects. While not anticipated due to the implementation of mitigation measures, similar to the Previously Approved Project, the Modified Project could also result in significant and unavoidable cumulative impacts with respect to cultural resources (archaeological resources). Similar to the Previously Approved Project, the Modified Project's significant impacts would have the potential to degrade the quality of the environment, cause cumulatively considerable impacts, and result in environmental effects which would cause substantial adverse effects on human beings. However, these impacts would be the same or less than those identified for the

[18] *As discussed above, the Previously Approved Project resulted in less than significant impacts with mitigation related to cultural resources (archaeological resources). However, as discussed in the Certified EIR, the Previously Approved Project would result in significant and unavoidable cumulative impacts in respect to cultural resources (archaeological resources).*

Previously Approved Project in the Certified EIR; and the Modified Project would neither create any new significant impacts nor result in a substantial increase in a previously identified significant impact. As such, the Modified Project's impacts would be within the envelope of impacts set forth in the Certified EIR.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

Based on the above analysis, no substantial changes would occur with respect to the circumstances under which the project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the environmental topics covered in the Mandatory Findings of Significance.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to the environmental topics covered in the Mandatory Findings of Significance. No substantial changes in the environment have occurred since certification of the Certified EIR beyond those contemplated therein, and no new conditions relative to the environmental topics covered in the Mandatory Findings of Significance have been identified that would result in new or more severe significant environmental impacts. Finally, as the Modified Project would not result in any new or substantially more severe impacts related to the environmental topics covered in the Mandatory Findings of Significance, a review of feasible mitigation measures is not required.

Conclusion

As demonstrated by the discussion above, impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR. No substantial changes would occur with respect to the circumstances under which the Modified Project is taken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant environmental impacts. In addition, the applicable mitigation measures included as part of the Certified EIR would continue to be implemented under the Modified Project. As all of the impacts of the Modified Project would be within the envelope of impacts analyzed in the Certified EIR, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Supplemental or Subsequent EIR would occur. Additionally, there are no known mitigation measures or Project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the Certified EIR. Therefore, the Modified Project would not create any potential

adverse impacts beyond those evaluated in the Certified EIR. As such, the preparation of an addendum that amends the Project Description in the Certified EIR to include the Modified Project is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.

Appendices

Appendix A

Traffic Memorandum

FEHR PEERS

TECHNICAL MEMORANDUM

Date: June 10, 2021

To: Eddie Guerrero, LADOT

From: Michael Kennedy & Drew Heckathorn, Fehr & Peers

Subject: Transportation Impact Evaluation for the Addendum to the LMU Specific Plan Environmental Impact Report

LA19-3126

In 2010, the City of Los Angeles adopted a Specific Plan, a Development Agreement, and certified an Environmental Impact Report (EIR) for the Loyola Marymount University (LMU) Master Plan. The Master Plan's building program was designed to accommodate a campus population of 9,600 full time equivalent (FTE) students, faculty, and staff[1].

LMU proposes to amend the Specific Plan ("Specific Plan Amendment") to allow for more flexibility regarding the distribution of floor area among the academic/administrative buildings, residential buildings, and indoor athletic buildings. While the Specific Plan Amendment will permit the redistribution in floor area under the amended Specific Plan, no other changes are proposed that could potentially change transportation impacts are proposed. The maximum amount of total new construction (1,779,000 square feet of floor area) and maximum overall total development (3,411,000 square feet or floor area) are not changed. The campus 9,600 FTE population cap is not changed. The number of total new beds (989) within the approved residential building square footage is not changed.

[1] A student FTE is a unit of measurement used to calculate enrollment for academic and master planning purposes as opposed to student headcount. One undergraduate student FTE is defined as one undergraduate student taking 12 course units, which represents a full course load. Students taking fewer course units constitute a fraction of a Student FTE, whereas students taking more than 12 units constitute more than one FTE. One graduate student FTE is defined as one graduate student taking 9 course units, which represents a full course load. To calculate Faculty/Staff FTEs the full-time 40-hour work week is used. Two part-time staff members working 20 hours per week equals one full-time equivalent staff person. For faculty, one full-time faculty member is one FTE faculty member and three part-time faculty members equals one FTE faculty member.

This memorandum evaluates the potential for new transportation impacts associated with the Specific Plan Amendment's potential reallocation of square footage among land uses as compared with the Specific Plan analyzed in the EIR.

PROPOSED SPECIFIC PLAN AMENDMENT PROJECT CHANGES

Table 1 summarizes the allowable reallocation of square feet between approved uses comparing the existing Approved Specific Plan and the proposed Specific Plan Amendment. Specifically, the Specific Plan Amendment would reduce the total allowable academic/administrative and residential floor area at buildout (while providing the same 989 residential beds). The Specific Plan Amendment could also increase the amount of athletic indoors square feet while maintaining the total new and total at buildout square feet limits. The increase in athletic indoors floor area would allow for the retention of the existing Gersten Pavilion, which was previously proposed for demolition. The total campus 9,600 FTE at buildout would remain the same.

Table 1 - Proposed Specific Plan Amendment Land Use Allocation (floor area)

	Existing Floor Area to Remain			**Proposed New Floor Area**			**Total Floor Area at Buildout (Existing + New)**		
	Approved Specific Plan	**Proposed Plan Update**	**Difference**	**Approved Specific Plan**	**Proposed Plan Update**	**Difference**	**Approved Specific Plan**	**Proposed Plan Update**	**Difference**
Academic/ Admin	1,022,000	977,500	-44,500	921,000	869,500	-51,500	1,943,000	1,847,000	-96,000
Residential	515,000	488,500	-26,500	761,000	709,500	-51,500	1,276,000	1,198,000	-78,000
Athletic Indoors	95,000	166,000	71,000	97,000	200,000	103,000	192,000	366,000	174,000
Total	1,632,000	1,632,000	0	1,779,000	1,779,000	0	3,411,000	3,411,000	0

Source: Loyola Marymount University

EIR'S ANALYSIS OF SPECIFIC PLAN TRANSPORTATION IMPACTS

The Specific Plan facilitated replacing functionally obsolete and substandard on-campus buildings to enhance the student experience and quality of life. This was accomplished in multiple ways. One, way was housing a larger share of the residential student population on campus. The Specific Plan permits a total of 989 residential beds at buildout and replacing outdated residential units with newer apartment-style units. The result was increase residential square footage allotted per bed. These proposed physical changes would not increase the amount of traffic generated per campus

FTE. Rather, the growth of traffic for the campus would come from the growth in the campus population. Therefore, the EIR assessed the potential for significant transportation-related project impacts based on the growth of the campus population up to the maximum cap of 9,600 campus FTE.

To quantify the trips per campus FTE, Fehr & Peers conducted driveway traffic counts, and empirically calculated derived trip generation rates per campus FTE (using the existing campus population at the time of the baseline driveway counts) based on the maximum AM and PM peak hours, and the maximum day across the six weekdays that were counted. Trip generation for the campus at the full buildout of 9,600 campus FTE were estimated by applying the trip rates per campus FTE to the growth in the campus population to the cap.

The EIR identified a trip impact threshold of 150 peak hour trips above the 2008 campus trip generation baseline for each peak hour, based on the required transportation impact analysis methodology and criteria of the City of Los Angeles at the time the EIR was prepared. If the campus generated more than 150 net-new peak hour trips, at least one significant impact would be triggered, with more trips triggering significant impacts at the identified locations until the campus population cap was reached.

The EIR identified mitigation measures to reduce the transportation impacts to less than significant levels, including the implementation of a Transportation Demand Management Plan (TDM), and housing more students on campus.

APPROACH TO ANALYZING TRANSPORTATION IMPACTS FOR SPECIFIC PLAN AMENDMENT

When the City adopted the Specific Plan, Level of Service (LOS) Analysis was the primary metric for the analysis of transportation impacts under CEQA. This method focused on analyzing traffic congestion and a project's potential to exacerbate congestion through an evaluation of the changes in intersection volume to capacity (V/C) ratios associated with the addition of a project's traffic volumes to intersections and calculate the result change in V/C ratios based on the particular intersection's peak hour capacity. Thus, for the Specific Plan transportation impacts were evaluated based on the vehicle trip increases associated with the growth of FTEs on campus.

Pursuant to California Senate Bill (SB) 743, transportation impacts from a project are now required to be evaluated under CEQA using a vehicle-miles traveled (VMT) analysis. VMT analyses quantify

the amount of driving that a project would affect based on the number of trips caused by a project, which modes are utilized, and the distance these trips cover. VMT analyses are often expressed in VMT per capita, and a project's VMT performance is based on its per-capita VMT not whether a project would increase VMT in aggregate.

The Los Angeles Department of City Planning and LADOT updated the Transportation Section of the City's California Environmental Quality Act (CEQA) Thresholds Guide to comply with and implement Senate Bill (SB) 743. The City Council subsequently adopted VMT-based significance thresholds and the City incorporated them into the City's CEQA Threshold Guide.

LADOT has developed a VMT Calculator tool to estimate project-specific daily household VMT per capita and daily work VMT per employee for land use development projects. The VMT Calculator relies on the students to calculate VMT for the University land use category. The Specific Plan Amendment will not change the FTE. Therefore, VMT analysis for the growth in the campus population is not required.

Notwithstanding the fact that FTE will not change, this memorandum analyzes whether the allowable shift in allocation of square footage among campus building types would result in the potential to increase VMT, either from an increase in VMT from typical campus activities, or an increase in the frequency and size of campus events, such that these activities would become more typical conditions. This evaluation is discussed below.

TRANSPORTATION DEMAND MANAGEMENT PROGRAM

LMU has implemented (TDM Plan) or is in the process of implementing (increase in residential beds) the transportation mitigation measures required for the Specific Plan to ensure that there are no significant transportation impact. LMU is required to annual monitor driveway traffic counts and parking demand to ensure the effectiveness of the mitigation measures.

The following summarizes the key TDM Plan activities/programs implemented at LMU's campus between 2012 and 2019[2]:

[2] Due to the COVID-19 pandemic, only 220 FTE students were on-campus during the 2020-2021 academic year with most students attending virtually. As a result most TDM activities were temporarily put on hold.

- Shared Vehicles – In 2012, 8 shared vehicles, operated by ZipCar, were located on campus, with a total of 295 students who were ZipCar members. In 2019, there were 9 vehicles on campus and 570 active ZipCar members on campus.
- Electric Vehicle Parking –24 Electric Vehicle charging stalls (6 at University Hall & 18 in the Life Sciences Building (Lot D) have been installed on campus
- Parking Fee Program – LMU implemented campus parking fees in 2012 for visitors, and 2013 for students and faculty/staff. The fee schedule is as follows:
    - Students – Students who park on campus may purchase a $670 annual permit for year-round parking or can pay by term ($335 per term for fall and spring terms, $200 for summer term). Students can who do not purchase a pass can pay for hourly parking, which has a daily cap of $10 per day.
    - Faculty/Staff – Faculty/Staff who park on campus may purchase a $696 annual permit for year-round parking. If they choose to purchase the permit, the fee can be paid through a payroll deduction. Faculty and staff can who do not purchase a pass can pay for hourly parking, which has a daily cap of $10 per day.
    - Visitors – Visitors are charged based on the length of time they park on campus with a $10 daily maximum. Any vehicle not registered to an LMU student, faculty, or staff is considered a visitor.
- Alternative Transportation Incentive Program – Campus members that opt out of parking on campus and use public transportation, walk, or bike to campus, are provided 5 free parking days per semester to use as needed. Since 2012, 71 campus members on average participate in this program each semester.
- Guaranteed Ride Home – Since 2012, LMU has participated in Metro's guaranteed ride home program. This program allows ridesharing employees to choose the most efficient means to get where they need to go during a qualified emergency. The program, made available to campus members, will reimburse a one-way taxi ride, one-day car rental, or transit ticket (public bus, Metro Rail, or Metrolink) to get them to their destination.
- Bicycle Parking Capacity – In 2012, LMU had the capacity for a total of 1,211 bicycles in 400 racks on campus. In 2019, there is capacity for 1,400 bicycles on campus in 500 racks.
- Shuttles – Through 2018, LMU operated a campus shuttle that connected with the Metro Green Line Aviation/LAX Station. Since June 1, 2018 through the 2019 academic year LMU has operated a Playa Vista shuttle. The service is averaging 150 riders per day. The Playa Vista shuttle is open to all students, faculty and staff members, and anyone outside the LMU community who wants to ride. The route includes stops on the Westchester campus

(University Hall flagpoles and Lawton Plaza), the LMU Playa Vista Campus, and the Runway in Playa Vista, home to a variety of restaurants and retail stores. This service is free and available to all affiliates, students, community members and employees.

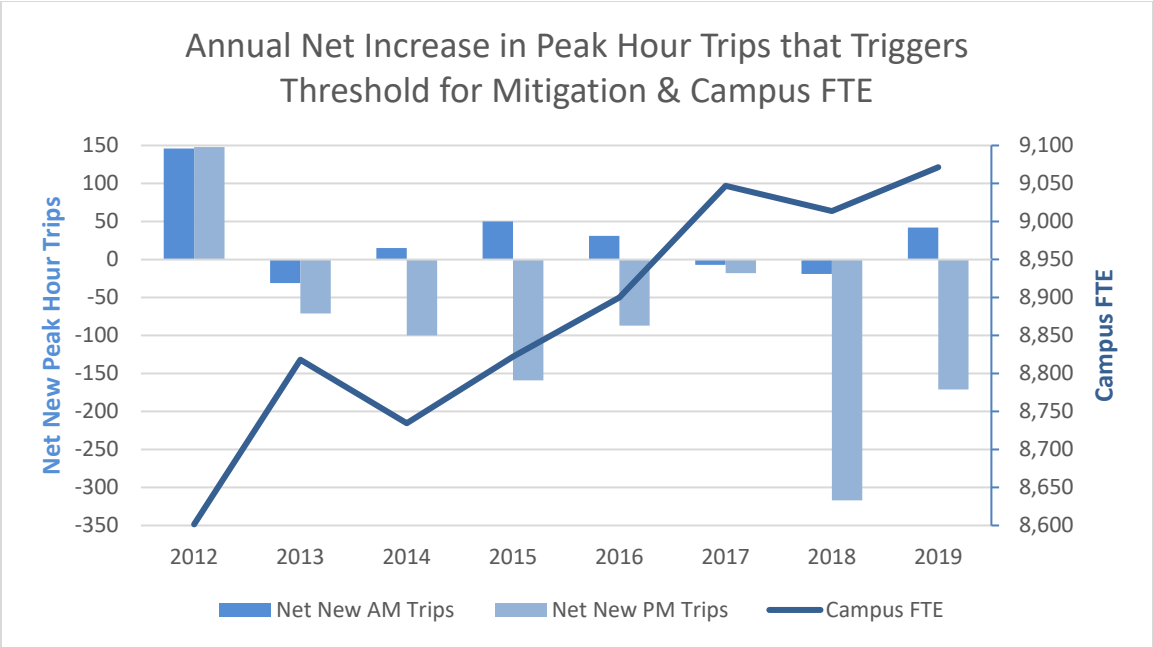
- Carpool Program – LMU's carpool program, launched in Fall 2017, provides 15 premiere parking spaces for participants in the program.

INCREASING CAMPUS HOUSING

Since 2011, LMU has constructed 633 additional residential beds for students and 15for faculty and staff. The total number of beds at buildout will be 989. The EIR identified a reduced external trip generation rate for students living on campus as compared with commuters. Thus, when the 989 beds are fully occupied, a further reduction in campus trips is anticipated.

DRIVEWAY TRAFFIC COUNT MONITORING & COMPARISON TO SPECIFIC PLAN

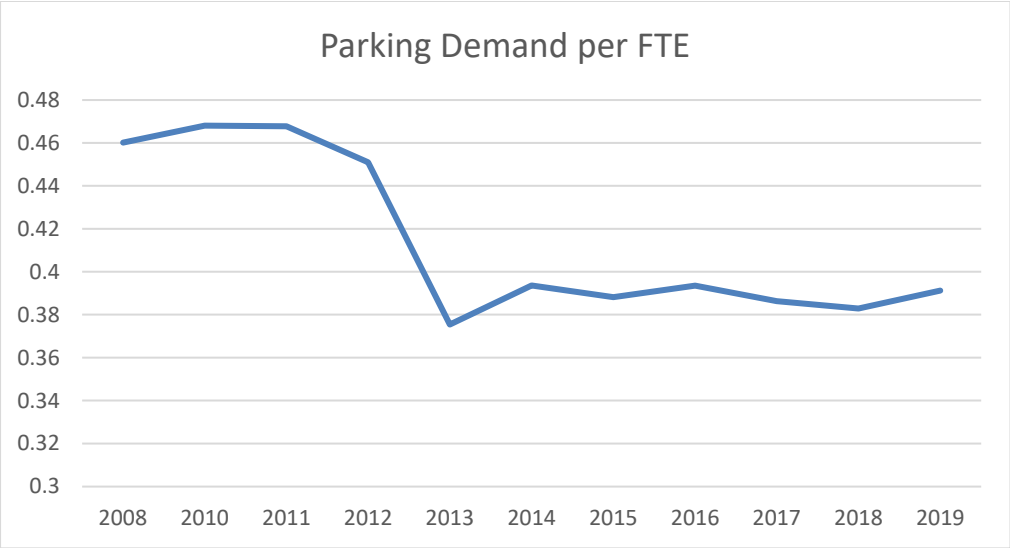
Traffic counts are collected each year over multi-day periods at the LMU Drive and Loyola Boulevard campus gates. This allows LMU evaluate the trip-reduction benefits of the TDM measures. The following chart documents how the campus is tracking against the 150 net new trip threshold for the years 2012 through 2019. While the annual campus monitoring study was conducted in 2020, because of the COVID-19 pandemic, nearly all of LMU's campus population was remote, and so the data for that year were not included as they are an outlier.



As the above chart demonstrates, the campus has been below the trip threshold since monitoring began. Moreover, the campus has successfully reduced its peak period trip generation in subsequent years due to the implementation of its TDM Plan. A significant decrease in trips is observed in 2013, the first year the campus charged for parking for all users. The TDM plan proved to be very effective. The trip generation rate for campus FTE has been reduced relative to the baseline used in the EIR, while FTE on campus has continued to increase.

PARKING DEMAND PER FTE

Parking occupancy counts are conducted hourly at all campus parking facilities to track the trend in parking demand. The following chart shows the reduction in parking demand per FTE as a result of the TDM Plan. As with the overall campus trip generation, parking demand has decreased per FTE.



RETENTION OF GERSTEN PAVILION

The Original EIR Project contemplated replacing the Gersten Pavilion with a new sports arena. The Specific Plan Amendment continues to contemplate such changes, but it would allow LMU to retain, renovate, continue to use, and/or change the use of the Gersten Pavilion. Under the Specific Plan Amendment, if a new sports arena is built on campus, all fixed seating in the Gersten Pavilion will be removed.

Like other University spaces, a retained Gersten Pavilion may be utilized for campus events. However, temporary seating will be limited to 1,000 seats, and public events at the retained Gersten Pavilion or the new sports arena would not occur simultaneously.

The Specific Plan Amendment would update the TDM Plan to (1) prohibit concurrent scheduling of events open to the general public at the Gersten Pavilion and the new sports arena, and (2) review other scheduling considerations for public events at the Gersten Pavilion and the new sports area. Further, to limit the potential for the overlapping of public events at the Gersten Pavilion and the new sports arena, the TDM Plan require that a public event held at either Gersten Pavilion or the new sports arena start not less than two hours after the scheduled end of a public event held at the other arena/pavilion. With these TDM Plan measures, the Specific Plan Amendment will not increase the frequency or level of attendance at events when compared to the Specific Plan.

POTENTIAL FOR NEW SIGNIFICANT TRANSPORTATION IMPACTS

As detailed above, the Project maintain the same amount of square footage, and there will be no change to the 9,600 campus FTE students, faculty and staff (which includes 7,800 FTE students and 1,800 FTE faculty and staff).

As campus trip generation and VMT is determined by growth of campus population, as opposed to the allocation of square footages across University buildings, with no change to the FTE, the Specific Plan Amendment would not be expected to have any new or more severe significant transportation impacts. Further, LMU's implementation of the TDM plan has consistently kept the the campus' level of trip generation below 150 per hour, the City's adopted threshold of significance. LMU has accomplished this while the campus' FTEs have grown. This indicates that trips per FTE (and therefore likely VMT per FTE) have been reduced.

The Specific Plan included the increase of on-campus housing as a mitigation measure, since on-campus residents were demonstrated to generate fewer vehicle trips (and likely reduced VMT) relative to commuter students. The Specific Plan Amendment will provide the same number of residential beds at buildout as the Specific Plan, and so will not vary both in terms of campus trip generation, and VMT. In addition to the same increase in on-campus housing as the Original EIR Project, the Playa Vista project, located immediately south of LMU's campus has since been completed. Playa Vista provides housing, retail and other services very close to LMU's campus. LMU implemented a shuttle to connect its campus with Playa Vista, which was not contemplated at the time of the Specific Plan's adoption. The proximity and the shuttle connection to Playa Vista will further reduce VMT compared with the context of the Specific Plan.

LMU's proactive implementation of the TDM plan mitigation has and will continue to ensure that the potential significant impacts the EIR identified will continued to be mitigated to less than significant levels. Additionally, the Specific Plan Amendment is likely to be even less impactful than Specific Plan because the overall construction program is substantially scaled back since more existing facilities will be retained. As a result, temporary construction related traffic will also be reduced.

The retention and repurposing of the Gersten Pavilion will also not increase the frequency of public events on campus. The Specific Plan Amendment provides for an updated TDM Plan that prohibits concurrent events open to the general public at the Gersten Pavilion and a new sports arena.

Further, the updated TDM Plan details a scheduling program such that requires a public event held at either Gersten Pavilion or the new sports arena not to be scheduled within than two hours after the scheduled end of a public event held at the other arena/pavilion. As a result, no new significant impacts are anticipated.

SUMMARY

The changes to the Specific Plan Amendment would not change the overall transportation impact analysis conclusions from the Specific Plan's EIR. No new or increased significant transportation impacts are expected with the Specific Plan Amendment. The Specific Plan Amendment may also reduce impacts during construction due to the potential for a reduction in overall demolition.

Appendix B

Adopted Mitigation Monitoring and Reporting Program

Appendix A

LOYOLA MARYMOUNT UNIVERSITY MASTER PLAN PROJECT
MITIGATION MONITORING AND REPORTING PROGRAM

A. INTRODUCTION

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the *California Environmental Quality Act (CEQA*) *Guidelines* requires that:

> *[I]n order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.*

The City of Los Angeles Department of City Planning has been designated as the Lead Agency for the Proposed Loyola Marymount University (LMU) Master Plan Project.

A Draft EIR was prepared to address the potential environmental impacts of the Proposed Project. Where appropriate, the Draft EIR identified project design features or recommended mitigation measures to avoid or to mitigate potential impacts to the environment to a level that would be less than significant. This Mitigation Monitoring and Reporting Program (MMRP) is designed to monitor implementation of the project design features and mitigation measures required for the Proposed Project.

The project design features and mitigation measures identified in the Draft EIR are categorized by environmental impact section. Following each project design features and mitigation measure is identification of the following:

- **Enforcement Agency**: The agency with the power to enforce the project design feature and mitigation measure.
- **Monitoring Agency**: The agency to which reports involving feasibility, compliance, implementation and development are made.
- **Monitoring Phase**: The phase of the project during which the project design feature and mitigation measure shall be monitored, such as: Pre-Construction, including the design phase; Construction; Prior to Issuance of a Building Permit; Prior to Issuance of a Certificate of Occupancy; Occupancy (post-construction).

- **Monitoring Frequency**: The frequency with which the project design feature and mitigation measure is to be implemented (i.e., once at a specific point during Pre-Construction, Construction, etc.) or ongoing throughout a phase of the Project.

- **Action Indicating Compliance with Mitigation Measure(s):** The performance standard indicating that compliance with the project design feature and mitigation measure has been satisfactorily achieved.

The MMRP for the LMU Master Plan Project will be in place throughout all phases of the Proposed Project. The Project applicant will be responsible for implementing all project design features and mitigation measures unless otherwise noted. The applicant shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented. The City's existing planning, engineering, review, and inspection processes will be used as the basic foundation for the MMRP procedures and will also serve to provide the documentation for the reporting program.

The substance and timing of each certification report that is submitted to Department of City Planning shall be at the discretion of City Planning. Generally, each report will be submitted to Department of City Planning in a timely manner following completion/implementation of the applicable mitigation measure and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The Department of City Planning, in conjunction with the Project applicant, shall assure that Project construction occurs in accordance with the MMRP. The South Coast Air Quality Management District (SCAQMD) shall be responsible for the implementation of corrective actions relative to violations of SCAQMD rules associated with mitigation. Departments listed below are all departments of the City of Los Angeles, unless otherwise noted.

B. PROJECT DESIGN FEATURES AND MITIGATION MEASURES FOR ENVIRONMENTAL IMPACTS

1. Aesthetics and Views

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building during Administrative Clearance

Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval

PDF-AES-2 The Proposed Project shall comply with the height and setback restrictions established by the proposed LMU Specific Plan.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building during Administrative Clearance
Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building during Administrative Clearance
Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval

Mitigation Measures

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).

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

2. Shade and Shadow

Project Design Features

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

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction

Monitoring Frequency: Once for each building during Administrative Clearance
Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval

Mitigation Measures

No mitigation measures required.

3. Light and Glare

Project Design Features

No Project Design Features proposed.

Mitigation Measures

MM-LIGHT-1 The use of nighttime lighting during Project construction shall be limited to only those features on the construction site requiring illumination.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Operation
Monitoring Frequency: Field inspection during operation
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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).

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Prior to issuance of building permit for new buildings, Operation
Monitoring Frequency: Once prior to issuance of building permits for new buildings, Periodic field inspections during operation
Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits for new buildings; field inspection sign-off

MM-LIGHT-5 All new outdoor lighting shall be equipped with louvers, shields, hoods, or other screening devices.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Prior to issuance of building permit for new buildings or electrical permit for athletic field lighting
Monitoring Frequency: Once prior to issuance of permits for new buildings or athletic field lighting
Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits for new buildings; field inspection sign-off for athletic fields

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Operation
Monitoring Frequency: Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once during building plan check
Action Indicating Compliance with Mitigation Measure(s): Plan check approval

4. Air Quality

Project Design Features

See Project Design Features for **Transportation**, **Energy**, and **Water Supply.**

Mitigation Measures

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

Enforcement Agency: South Coast Air Quality Management District
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by Project contractor

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

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by Project contractor

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

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

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation, construction during field inspection
Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

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

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-offs and quarterly compliance certification report submitted by project contractor

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

Enforcement Agency: South Coast Air Quality Management District
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-offs and quarterly compliance certification report submitted by project contractor

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Grading/Construction
Monitoring Frequency: Throughout grading and construction
Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report submitted by project contractor

MM-AQ-8 LMU shall require all on-site 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off and quarterly compliance certification report submitted by project contractor

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field-inspection sign-offs and quarterly compliance certification report submitted by project contractor

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

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field-inspection sign-off

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.

Enforcement Agency: South Coast Air Quality Management District
Monitoring Agency: Los Angeles City, Department of Building and Safety

Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-offs

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field-inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

MM-AQ-13 LMU shall require the contractor to limit construction activity over unpaved surfaces to five acres of disturbance per day or less.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field-inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field-inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field-inspections

Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

5. Global Climate Change

Project Design Features

See Project Design Features for **Section IV.K, Transportation**, **Section IV.L.4, Energy**, and **Section IV.L.1, Water Supply**.

Mitigation Measures

No mitigation measures required.

6. Biological Resources

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building during Administrative Clearance
Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval

Mitigation Measures

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 (3) 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.

Enforcement Agency: California Department of Fish & Game
Monitoring Agency: City of Los Angeles, Department of City Planning

Monitoring Phase: Construction
Monitoring Frequency: Once prior to each earthmoving activity conducted during the breeding and nesting seasons
Action Indicating Compliance with Mitigation Measure(s): Compliance report from a qualified biologist

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 effected by the 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 such construction activities will not disturb the monarch butterfly cluster.

Enforcement Agency: California Department of Fish & Game
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Once prior to removal of trees between October and February
Action Indicating Compliance with Mitigation Measure(s): Compliance report from a qualified biologist

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-construction
Monitoring Frequency: Once during building plan check
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

7. Paleontological Resources

Project Design Features

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

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building during Administrative Clearance
Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval

Mitigation Measures

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-construction
Monitoring Frequency: Once prior to ground disturbance for each building
Action Indicating Compliance with Mitigation Measure(s): Compliance report by a qualified paleontologist

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once prior to commencement of construction and subsequently for new contractor personnel as needed
Action Indicating Compliance with Mitigation Measure(s): Compliance certification report from Applicant or Representative with evidence of training provided by paleontologist or another mitigation program staff member to appropriate construction 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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Periodically as needed
Action Indicating Compliance with Mitigation Measure(s): Compliance report by a qualified paleontologist, per **MM-PALEO-5**

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Periodically as needed
Action Indicating Compliance with Mitigation Measure(s): Compliance report by a qualified paleontologist, per **MM-PALEO-5**

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Periodically as needed
Action Indicating Compliance with Mitigation Measure(s): Final technical report of results and findings by monitor/paleontologist

8. Archaeological Resources

Project Design Features

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

Enforcement Agency: City of Los Angeles, Department of City Planning

Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building during Administrative Clearance
Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval

Mitigation Measures

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).

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation for each building
Action Indicating Compliance with Mitigation Measure(s): Compliance report by archaeological monitor, per **MM-ARCH-12**

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-construction
Monitoring Frequency: Once prior to construction for each building
Action Indicating Compliance with Mitigation Measure(s): Retention of archaeologist and Native American 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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-construction
Monitoring Frequency: Once prior to ground disturbance for each building
Action Indicating Compliance with Mitigation Measure(s): Memorandum from archaeologist documenting determination whether monitoring is required or not

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**, shall be conducted.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation
Action Indicating Compliance with Mitigation Measure(s): Compliance report by archaeological monitor, per **MM-ARCH-12**

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**).

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation
Action Indicating Compliance with Mitigation Measure(s): Compliance report by archaeological monitor, per **MM-ARCH-12**

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation
Action Indicating Compliance with Mitigation Measure(s): Compliance report by archaeological monitor, per **MM-ARCH-12**

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).

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation
Action Indicating Compliance with Mitigation Measure(s): Compliance report by archaeological monitor, per **MM-ARCH-12**

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation
Action Indicating Compliance with Mitigation Measure(s): Compliance report by archaeological monitor, per **MM-ARCH-12**

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation
Action Indicating Compliance with Mitigation Measure(s): Compliance report by archaeological monitor, per **MM-ARCH-12**

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

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation
Action Indicating Compliance with Mitigation Measure(s): Compliance report by archaeological monitor, per **MM-ARCH-12**

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Construction
Monitoring Frequency: Throughout grading and excavation
Action Indicating Compliance with Mitigation Measure(s): Compliance report by archaeological monitor, per **MM-ARCH-12**

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Post-construction
Monitoring Frequency: Once at conclusion of grading and excavation
Action Indicating Compliance with Mitigation Measure(s): Submittal of reports on archaeological findings by archaeologist to City of Los Angeles, Department of City Planning, LMU, and the South Central Coastal Information Center at California State University, Fullerton

9. Historical Resources

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of City Planning (Office of Historic Resources)
Monitoring Agency: City of Los Angeles, Department of City Planning (Office of Historic Resources)
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once during building plan check for renovation of historic resource buildings
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

Mitigation Measures

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 (35mm) 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.

Enforcement Agency: City of Los Angeles, Department of City Planning (Office of Historic Resources)
Monitoring Agency: City of Los Angeles, Department of City Planning (Office of Historic Resources)
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once during building plan check for renovation of historic resource buildings
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

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

Enforcement Agency: City of Los Angeles, Department of City Planning (Office of Historic Resources)
Monitoring Agency: City of Los Angeles, Department of City Planning (Office of Historic Resources)
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once during building plan check for renovation of historic resource buildings
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

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.

Enforcement Agency: City of Los Angeles, Department of City Planning (Office of Historic Resources), Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building during building plan check
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

MM-HIST-4 Prior to the issuance of any permit for the demolition or exterior or structural modification of the Edward T. Foley Center, LMU shall undertake additional historic resources assessment in coordination with the Department of City Planning, Office of Historic Resources, of the subject building's eligibility for the National Register of Historic Places, California Register of Historic Resources, and City Historic-Cultural Monument status. If the building is identified as a historical resource, written approval shall be obtained from the Office of Historic Resources that such work conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Enforcement Agency: City of Los Angeles, Department of City Planning (Office of Historic Resources), Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once during building plan check
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

10. Geology

Project Design Features

No Project Design Features are proposed.

Mitigation Measures

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building prior to issuance of building permits
Action Indicating Compliance with Mitigation Measure(s): Submittal of geotechnical reports 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building prior to issuance of building permits
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of grading permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of grading permit

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of grading permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of grading permit

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of grading permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of grading permit

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.

Enforcement Agency: City of Los Angeles, Department of Public Works
Monitoring Agency: City of Los Angeles, Department of Public Works
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of grading permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of grading permit

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.

Enforcement Agency: City of Los Angeles, Department of Public Works
Monitoring Agency: City of Los Angeles, Department of Public Works
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of a grading permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of grading permit

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

Enforcement Agency: South Coast Air Quality Management District
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

11. Hazards

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Operation
Monitoring Frequency: Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

Mitigation Measures

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of a demolition permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of a demolition permit

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of a demolition permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of a demolition permit

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of a demolition permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of a demolition permit

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of a demolition permit
Action Indicating Compliance with Mitigation Measure(s): Report from Owner/Contractor documenting personnel training completion prior to issuance of a demolition permit

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

MM-HAZ-6 Construction of new buildings and paved areas within the portions of campus located in a Methane Zone and 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building during building plan check
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

12. Surface Water Hydrology and Water Quality

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of Public Works
Monitoring Agency: City of Los Angeles, Department of Public Works

Monitoring Phase: Pre-construction
Monitoring Frequency: Once during building plan check for each new building to be located on the southwest corner of Burns Campus
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

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.

Enforcement Agency: City of Los Angeles, Department of Public Works
Monitoring Agency: City of Los Angeles, Department of Public Works
Monitoring Phase: Pre-Construction
Monitoring Frequency: Reviewed during building plan check for each new building to be connected to the upsized storm drains
Action Indicating Compliance with Mitigation Measure(s): Building plan check approval

Mitigation Measures

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.

Enforcement Agency: City of Los Angeles, Department of Public Works
Monitoring Agency: City of Los Angeles, Department of Public Works
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of a grading permit

Action Indicating Compliance with Mitigation Measure(s): Issuance of a grading permit

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.

Enforcement Agency: City of Los Angeles, Department of Public Works
Monitoring Agency: City of Los Angeles, Department of Public Works
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of a grading permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of a grading permit

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

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspections
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

MM-HWQ-4 During Proposed Project construction and subsequent operation, project contractors and LMU, respectively, shall develop and maintain effective monitoring and cleanup programs for spills and leaks of hazardous materials.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction and Operation
Monitoring Frequency: Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

MM-HWQ-5 During Proposed Project construction and subsequent operation, 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction and Operation
Monitoring Frequency: Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

MM-HWQ-6 During Proposed Project construction and subsequent operation, project contractors and LMU, respectively, shall provide periodic and consistent removal of landscape and construction debris.

Enforcement Agency: City of Los Angeles, Department of Public Works (Bureau of Sanitation)
Monitoring Agency: City of Los Angeles, Department of Public Works (Bureau of Sanitation)
Monitoring Phase: Construction and Operation
Monitoring Frequency: Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

MM-HWQ-7 During Proposed Project construction and subsequent operation, 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction and Operation
Monitoring Frequency: Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Once prior to issuance of grading permit, Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Issuance of grading permit, Field inspection sign-off

13. Land Use and Planning

Project Design Features

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

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning and Department of Building and Safety
Monitoring Phase: Pre-construction, Operation
Monitoring Frequency: Once during Substantial Compliance Review for new buildings; periodic during operation
Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval; field inspection sign-off

Mitigation Measures

No mitigation measures required.

14. Noise

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of Transportation
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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 listed in **Exhibit 7** of the LMU Specific Plan by 5 dB(A).

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-Construction, Operation
Monitoring Frequency: Once prior to issuance of building (electrical) permit for new equipment, Periodic field inspection
Action Indicating Compliance with Mitigation Measure(s): Issuance of building (electrical) permit for new equipment; field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each parking structures during Administrative Clearance
Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Operation
Monitoring Frequency: Periodically during operation
Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by Applicant

PDF-NOISE-6 No source of outdoor amplified sound shall be installed or maintained on the LMU Campus within 150 feet of residential areas in the R1 zone zone. Outdoor amplified sound shall be prohibited in the Athletic Planning Area in the northeast corner of Campus. Emergency address systems shall be exempted from this requirement.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning and Department of Building and Safety
Monitoring Phase: Pre-construction, Operation

Monitoring Frequency: Once prior to issuance of building (electrical) permit for new equipment; periodically during operation

Action Indicating Compliance with Mitigation Measure(s): Issuance of building (electrical) permit for new equipment; field inspection sign-off

Mitigation Measures

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 or any project requiring an Administrative Clearance under the Specific Plan, 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction, Construction
Monitoring Frequency: Prior to issuance of building permit; periodic field-inspection
Action Indicating Compliance with Mitigation Measure(s): Submittal of construction contracts with BMPs included; field inspection sign-off

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 prior to issuance of a grading permit.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once prior to issuance of a grading permit
Action Indicating Compliance with Mitigation Measure(s): Issuance of a grading permit

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Operation
Monitoring Frequency: Periodically during operation
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

15. Police Protection

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Operation
Monitoring Frequency: Ongoing throughout operation
Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by Applicant

Mitigation Measures

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing throughout construction
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of building permit
Action Indicating Compliance with Mitigation Measure(s): Los Angeles Police Department correspondence to Department of City Planning documenting review.

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Police Department
Monitoring Phase: Post-construction
Monitoring Frequency: Once at completion of building/facility construction

Action Indicating Compliance with Mitigation Measure(s): Submittal of building or facility diagram to Police Department.

16. Fire Protection and Emergency Medical Services

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Operation
Monitoring Frequency: Annually
Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by Applicant

Mitigation Measures

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

Enforcement Agency: City of Los Angeles, Fire Department
Monitoring Agency: City of Los Angeles, Department Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of building permit
Action Indicating Compliance with Mitigation Measure(s): Fire Department approval

MM-FIRE-2 Prior to the issuance of any building permit, definitive plot plan and specifications including fire prevention features for the Project shall be submitted to and approved by the Fire Department.

Enforcement Agency: City of Los Angeles, Fire Department
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of building permit
Action Indicating Compliance with Mitigation Measure(s): Fire Department approval

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.

Enforcement Agency: City of Los Angeles, Fire Department

Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of building permit
Action Indicating Compliance with Mitigation Measure(s): Fire Department approval

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.

Enforcement Agency: City of Los Angeles, Fire Department
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of building permit
Action Indicating Compliance with Mitigation Measure(s): Fire Department approval

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.

Enforcement Agency: City of Los Angeles, Fire Department
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building prior to issuance of building permit
Action Indicating Compliance with Mitigation Measure(s): Fire Department approval

MM-FIRE-6 LMU shall covenant that all streets on campus shall be open to free travel of emergency vehicles.

Enforcement Agency: City of Los Angeles, Department of Transportation
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once prior to issuance of building permit for first building developed pursuant to LMU Specific Plan
Action Indicating Compliance with Mitigation Measure(s): Applicant submittal of recorded covenant

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.

Enforcement Agency: Los Angeles Department of Water and Power; City of Los Angeles, Fire Department

Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once after submittal of plans for water system improvements to meet the on-site fire flow improvements for each building prior to issuance of building permit
Action Indicating Compliance with Mitigation Measure(s): Department of Water and Power and Fire Department approval

17. Recreation and Parks

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of City Planning
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Pre-Construction
Monitoring Frequency: Once for each building during Administrative Clearance
Action Indicating Compliance with Mitigation Measure(s): Administrative Clearance approval

Mitigation Measures

No mitigation measures required.

18. Transportation

Project Design Features

No Project Design Features are proposed.

Mitigation Measures

Construction Mitigation Measures

MM-TRAF-1 Prior to the issuance of 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.

Enforcement Agency: City of Los Angeles, Department of Transportation
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once for each building prior to issuance of demolition permits
Action Indicating Compliance with Mitigation Measure(s): Approval by Department of Transportation; issuance of demolition permit

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.

Enforcement Agency: City of Los Angeles, Department of Transportation
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction
Monitoring Frequency: Ongoing throughout construction
Action Indicating Compliance with Mitigation Measure(s): Field inspection sign-off

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.

Enforcement Agency: City of Los Angeles, Department of Transportation
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Operation
Monitoring Frequency: Ongoing until Project buildout
Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by Applicant approved by Department of Transportation

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.

Enforcement Agency: City of Los Angeles, Department of Transportation
Monitoring Agency: City of Los Angeles, Department of Transportation
Monitoring Phase: Operation
Monitoring Frequency: Ongoing until Project buildout
Action Indicating Compliance with Mitigation Measure(s): Submittal of a final TDM Plan to the Department of Transportation

MM-TRAF-5 The Proposed Project shall add parking in phases with increases in the campus full-time equivalent 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Operation
Monitoring Frequency: Annually until all 4,742 parking spaces required are provided on campus
Action Indicating Compliance with Mitigation Measure(s): Annual submittal of reports to the Department of Building and Safety, due by October 1 of each year, that certifies the number of full-time equivalent students, faculty, and staff enrolled or working on Campus for the current academic year, and that includes parking plans showing that the Campus provides the number of parking spaces required by the Specific Plan

MM-TRAF-6 Prior to pulling building permits for the new sports pavilion (i.e., the replacement facility for Gerston 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 Transporation 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 sufficent 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.

Enforcement Agency: City of Los Angeles, Department of Transportation
Monitoring Agency: City of Los Angeles, Department of Transportation
Monitoring Phase: Pre-construction
Monitoring Frequency: Once during building plan check for new sports pavilion or the construction of more than 1000 additional seats (individually or cumulatively) at Page Stadium, Smith Softball Field, and/or Sullivan Field
Action Indicating Compliance with Mitigation Measure(s): Department of Transportation review and determination on additional parking space requirements, if any; building plan check approval

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.

Enforcement Agency: City of Los Angeles, Department of Transportation
Monitoring Agency: City of Los Angeles, Department of Transportation
Monitoring Phase: Operation
Monitoring Frequency: Annually
Action Indicating Compliance with Mitigation Measure(s): Compliance certification report by Applicant

19. Water Supply

Project Design Features

PDF-WATER-1 The Proposed Project would include the following water conservation features in new development approved as part of the Proposed Project through 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 (by Project buildout)
- Cooling towers using 100 percent reclaimed water use, as permitted by law (by Project buildout)
- 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction, Operation
Monitoring Frequency: Periodically during plan check for each building and operation as needed
Action Indicating Compliance with Mitigation Measure(s): Issuance of building permit; field inspection sign-off

Mitigation Measures

No mitigation measures required.

20. Wastewater

Project Design Features

See **Section IV L 1, Water Supply.**

Mitigation Measures

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.

Enforcement Agency: City of Los Angeles, Department of Public Works (Bureau of Sanitation)
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-Construction
Monitoring Frequency: As needed during plan check for new buildings
Action Indicating Compliance with Mitigation Measure(s): Sign-off by Department of Public Works (Bureau of Sanitation) on future capacity studies

21. Solid Waste

Project Design Features

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

Enforcement Agency: City of Los Angeles, Department of Public Works (Bureau of Sanitation)
Monitoring Agency: City of Los Angeles, Department of City Planning
Monitoring Phase: Operation
Monitoring Frequency: Annually until Project buildout
Action Indicating Compliance with Mitigation Measure(s): Submittal of compliance report by Applicant to the Department of Public Works

Mitigation Measures

No mitigation measures required

22. Energy (Electricity and Natural Gas)

Project Design Features

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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Construction, Operation
Monitoring Frequency: Periodically during plan check for each building and operation as needed
Action Indicating Compliance with Mitigation Measure(s): Issuance of building permit; field inspection sign-off

Mitigation Measures

Electricity

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.

Enforcement Agency: Los Angeles Department of Water and Power; City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once prior to submittal to Department of Building and Safety of final site plans for each Project facility
Action Indicating Compliance with Mitigation Measure(s): Documentation of consultation with LADWP; payment of fair share of costs, if 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.

Enforcement Agency: Los Angeles Department of Water and Power; City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once prior to submittal of final site plans for each Project facility to Department of Building and Safety
Action Indicating Compliance with Mitigation Measure(s): Documentation of consultation with LADWP's Energy Solutions Group

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 for 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once prior to submittal of final site plans for specific Project buildings or facilities to Department of Building and Safety
Action Indicating Compliance with Mitigation Measure(s): Documentation of consultation with the Southern California Gas Company; payment of fair share costs, if 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.

Enforcement Agency: City of Los Angeles, Department of Building and Safety
Monitoring Agency: City of Los Angeles, Department of Building and Safety
Monitoring Phase: Pre-construction
Monitoring Frequency: Once prior to submittal of final site plans for specific Project buildings or facilities to Department of Building and Safety
Action Indicating Compliance with Mitigation Measure(s): Documentation of consultation with the Southern California Gas Company

Appendix C
Specific Plan Amendment

The following text amendments to the LMU Specific Plan are proposed:

[Amended] Section 2.2 SPECIFIC PLAN SETTING AND DEVELOPMENT OVERVIEW

…

C. The Project Development Plan proposed with this Amended Specific Plan includes a maximum of 1,779,000 square feet of new Floor Area of facilities for Academic and Administrative Uses, Residential Uses (with approximately 989 new beds) and indoor facilities for Athletic Uses; a net increase of approximately 4.8 acres of outdoor facilities for Athletic Uses; and a net increase of approximately 5 acres of property for Open Space Uses. The total Project Development Plan proposed with this Amended Specific Plan is approximately 3.41 million square feet.[1]

[Amended] Section 3.2 PROHIBITIONS

…

B. No Administrative Clearance shall be approved for a Project that would cause overall development in the Specific Plan Area to:

1. exceed 869,500 square feet of new Floor Area of facilities for Academic and Administrative Uses, 709,500 square feet of new Floor Area of facilities for Residential Uses with approximately 989 net new beds, and 200,000 square feet of new Floor Area of indoor facilities for Athletic Uses (subject to the allowable adjustments set forth in Section 3.3); or

2. exceed a maximum total of 1,779,000 square feet of new Floor Area across all three land use categories identified in Table No. 1; or

---

[1] *The square footage of the Project Development Plan was derived by reducing the gross square footage analyzed in the LMU Master Plan Project Environmental Impact Report by ten percent.*

3. exceed a maximum total of 3,411,000 square feet of existing and new Floor Area across all three land use categories identified in Table No. 2.

[Amended] Section 3.3 LAND USE PLAN AND CAMPUS LIMITATIONS

…

B. Maximum Permitted Floor Area Development. The maximum permitted new development shall be as set forth in Table No. 1 and Table No. 2.

Table No. 1
Permitted New Floor Area by Land Use Category—Facilities

Land Use	New Floor Area (sf)
Academic/Administrative	869,500
Residential	709,500
Athletic Indoors	200,000
Total New Floor Area Permitted	**1,779,000**

Table No. 2
Permitted Combined (Existing + New) Floor Area by Land Use Category—Facilities

Land Use	Combined (Existing + New) Floor Area (sf)
Academic/Administrative	1,847,000
Residential	1,198,000
Athletic Indoors	366,000
Total Combined (Existing + New) Floor Area Permitted	**3,411,000**

*The Director may approve up to a 7.5% increase in (1) the permitted "New Floor Area" for Athletic Indoors (up to a 15,000 square foot increase) and/or (2) the permitted "Combined (Existing + New) Floor Area" for Athletic Indoors (up to a 27,450 square foot increase) through the Administrative Clearance process detailed in Section 8.1 of the Specific Plan; provided, however, in no event shall: (1) the total New Floor Area for all three land use categories in Table 1 exceed 1,779,000 square feet **or** (2) shall the total Combined (Existing + New) Floor Area permitted for all three land use categories in Table 2 exceed 3,411,000 square feet.

…

G. Retention of the Gersten Pavilion. This Amended Specific Plan expressly authorizes the right to retain, renovate, continue to use, and/or change the use of the Gersten Pavilion. Notwithstanding the foregoing, there

shall be no fixed seating in the Gersten Pavilion in the event a new sports arena is constructed and operated on Campus. Further:

1. Existing fixed seating in the Gersten Pavilion shall be removed prior to the issuance of a Certificate of Occupancy for a new sports arena.

2. Fixed seating in the Gersten Pavilion may not be reinstalled following the issuance of a Certificate of Occupancy for a new sports area unless LMU suspends or discontinues the operation of the new sports arena.

3. Temporary seating may be utilized in the Gersten Pavilion, but it shall not exceed 1,000 seats, and such seating shall be consistent with applicable Fire Department regulations.

…

[Amended] Section 5.1 VEHICULAR AND PEDESTRIAN CIRCULATION PLAN/ACCESS

…

G. Transportation Demand Management Program. LMU shall implement and monitor a Transportation Demand Management (TDM) program 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 LADOT for approval. If at any time it is determined that required trip reductions from the program are not being met, then LMU will be required to provide the action(s) necessary to bring the program into compliance, including but not limited to such measures as a reduction in the proposed Campus FTE growth level and implementing a variety of alternative TDM measures that prove to be more effective in reducing trips to Campus.

Prior to the construction of a new sports arena, LMU shall submit an updated TDM plan to LADOT for approval detailing the actions to be taken during events: (1) held in the new sports pavilion, (2) open to the general public, and (3) expected to host 3,000 or more members of the general public (a "Special Public Event"). The actions taken for Special Public Events shall include the establishment of a "Special Public Event Traffic Route" that will divert Special Public Event-traffic to LMU Drive and Lincoln Blvd. and endeavor to reduce vehicles on 80th Street and Loyola Boulevard.

The updated TDM plan shall also: (1) include a prohibition on the concurrent scheduling of events open to the general public (a "Public Event") at the Gersten Pavilion and the new sports arena and (2) review other scheduling considerations for Public Events at the Gersten Pavilion and the new sports area. To limit the potential for the overlapping of Public Events at the Gersten Pavilion and the new sports arena, Public Events should be scheduled such that a Public Event held at either Gersten Pavilion or the new sports arena is not scheduled to start less than two hours after the scheduled end of a Public Event held at the other arena/pavilion.

1. LMU shall submit a plan detailing the actions to be taken to demonstrate that the goals of the TDM effort will be met to LADOT for approval prior to the campus population exceeding 8,500 FTE students, faculty, and staff. Final approval of this plan shall be required prior to increasing the total campus population to the level of 9,000 FTE students, faculty, and staff.

2. LMU shall submit an annual report to LADOT with the campus population for the current school year to ensure these thresholds are not exceeded without submitting the required TDM Plan first.

[Amended] Section 5.2 PARKING REGULATIONS

…

J. Prior to the construction of a new sports arena, or a new conference center on the southwest side of University Hall, LMU shall submit an updated parking study to LADOT. The study shall also consider ridesharing, including access and staging, and its effects on local traffic. LMU shall provide any additional parking required by LADOT, if LADOT determines that such additional parking is needed.

Prior to the construction of a new sports arena, or a new conference center on the southwest side of University Hall, the Event Parking Management Plan shall be updated as to such facility and the retention of Gersten Pavilion. The updated Plan shall also evaluate potential temporary event signage and be provided to the Council Office representing the Campus' District for a 30 day review period prior to review by LADOT.

[New] Section 8.2 NEIGHBORHOOD COUNCIL COMMUNICATIONS

LMU shall maintain a dedicated liaison officer to facilitate communications with the Westchester/Playa Neighborhood Council. The liaison officer will, as appropriate, attend Neighborhood Advisory Committee meetings on a quarterly basis and

Westchester/Playa Neighborhood Council Planning and Land Use Committee meetings on a semi-annual basis to provide updates, if any, on the status of the University's implementation of this Specific Plan.

Connect Create Collaborate

Esther Serrato <esther.serrato@lacity.org>

Fwd: LMU Specific Plan Amendment

2 messages

Eddie Guerrero <eddie.guerrero@lacity.org> Wed, Aug 11, 2021 at 7:56 AM
To: Esther Serrato <esther.serrato@lacity.org>
Cc: Michael Kennedy <m.kennedy@fehrandpeers.com>

Good Morning Esther,

I received and reviewed the attached memorandum from Fehr & Peers, dated June 10, 2021, regarding the LMU SP Addendum and I concur with the report's finding that no new significant impacts would occur as a result of the amendment.

Let me know if this email will suffice as confirmation of this matter or if you need a separate correspondence.

Regards

---------- Forwarded message ---------
From: **Michael Kennedy** <M.Kennedy@fehrandpeers.com>
Date: Tue, Aug 3, 2021 at 9:27 AM
Subject: RE: LMU Specific Plan Amendment
To: Eddie Guerrero <eddie.guerrero@lacity.org>

Hi Eddie,

I just got the contact for planning. It is:

esther.serrato@lacity.org

Would it be possible to send over your letter or email this week? Sounds like a hearing date was just set.

Thanks!

Best,

Michael

Michael Kennedy, AICP
Principal, Long Beach Office Leader
Fehr & Peers Transportation Consultants

FEHR PEERS

TECHNICAL MEMORANDUM

Date: June 10, 2021

To: Eddie Guerrero, LADOT

From: Michael Kennedy & Drew Heckathorn, Fehr & Peers

Subject: Transportation Impact Evaluation for the Addendum to the LMU Specific Plan Environmental Impact Report

LA19-3126

In 2010, the City of Los Angeles adopted a Specific Plan, a Development Agreement, and certified an Environmental Impact Report (EIR) for the Loyola Marymount University (LMU) Master Plan. The Master Plan's building program was designed to accommodate a campus population of 9,600 full time equivalent (FTE) students, faculty, and staff[1].

LMU proposes to amend the Specific Plan ("Specific Plan Amendment") to allow for more flexibility regarding the distribution of floor area among the academic/administrative buildings, residential buildings, and indoor athletic buildings. While the Specific Plan Amendment will permit the redistribution in floor area under the amended Specific Plan, no other changes are proposed that could potentially change transportation impacts are proposed. The maximum amount of total new construction (1,779,000 square feet of floor area) and maximum overall total development (3,411,000 square feet or floor area) are not changed. The campus 9,600 FTE population cap is not changed. The number of total new beds (989) within the approved residential building square footage is not changed.

[1] A student FTE is a unit of measurement used to calculate enrollment for academic and master planning purposes as opposed to student headcount. One undergraduate student FTE is defined as one undergraduate student taking 12 course units, which represents a full course load. Students taking fewer course units constitute a fraction of a Student FTE, whereas students taking more than 12 units constitute more than one FTE. One graduate student FTE is defined as one graduate student taking 9 course units, which represents a full course load. To calculate Faculty/Staff FTEs the full-time 40-hour work week is used. Two part-time staff members working 20 hours per week equals one full-time equivalent staff person. For faculty, one full-time faculty member is one FTE faculty member and three part-time faculty members equals one FTE faculty member.

This memorandum evaluates the potential for new transportation impacts associated with the Specific Plan Amendment's potential reallocation of square footage among land uses as compared with the Specific Plan analyzed in the EIR.

PROPOSED SPECIFIC PLAN AMENDMENT PROJECT CHANGES

Table 1 summarizes the allowable reallocation of square feet between approved uses comparing the existing Approved Specific Plan and the proposed Specific Plan Amendment. Specifically, the Specific Plan Amendment would reduce the total allowable academic/administrative and residential floor area at buildout (while providing the same 989 residential beds). The Specific Plan Amendment could also increase the amount of athletic indoors square feet while maintaining the total new and total at buildout square feet limits. The increase in athletic indoors floor area would allow for the retention of the existing Gersten Pavilion, which was previously proposed for demolition. The total campus 9,600 FTE at buildout would remain the same.

Table 1 - Proposed Specific Plan Amendment Land Use Allocation (floor area)

	Existing Floor Area to Remain			**Proposed New Floor Area**			**Total Floor Area at Buildout (Existing + New)**		
	Approved Specific Plan	**Proposed Plan Update**	**Difference**	**Approved Specific Plan**	**Proposed Plan Update**	**Difference**	**Approved Specific Plan**	**Proposed Plan Update**	**Difference**
Academic/ Admin	1,022,000	977,500	-44,500	921,000	869,500	-51,500	1,943,000	1,847,000	-96,000
Residential	515,000	488,500	-26,500	761,000	709,500	-51,500	1,276,000	1,198,000	-78,000
Athletic Indoors	95,000	166,000	71,000	97,000	200,000	103,000	192,000	366,000	174,000
Total	1,632,000	1,632,000	0	1,779,000	1,779,000	0	3,411,000	3,411,000	0

Source: Loyola Marymount University

EIR'S ANALYSIS OF SPECIFIC PLAN TRANSPORTATION IMPACTS

The Specific Plan facilitated replacing functionally obsolete and substandard on-campus buildings to enhance the student experience and quality of life. This was accomplished in multiple ways. One, way was housing a larger share of the residential student population on campus. The Specific Plan permits a total of 989 residential beds at buildout and replacing outdated residential units with newer apartment-style units. The result was increase residential square footage allotted per bed. These proposed physical changes would not increase the amount of traffic generated per campus

FTE. Rather, the growth of traffic for the campus would come from the growth in the campus population. Therefore, the EIR assessed the potential for significant transportation-related project impacts based on the growth of the campus population up to the maximum cap of 9,600 campus FTE.

To quantify the trips per campus FTE, Fehr & Peers conducted driveway traffic counts, and empirically calculated derived trip generation rates per campus FTE (using the existing campus population at the time of the baseline driveway counts) based on the maximum AM and PM peak hours, and the maximum day across the six weekdays that were counted. Trip generation for the campus at the full buildout of 9,600 campus FTE were estimated by applying the trip rates per campus FTE to the growth in the campus population to the cap.

The EIR identified a trip impact threshold of 150 peak hour trips above the 2008 campus trip generation baseline for each peak hour, based on the required transportation impact analysis methodology and criteria of the City of Los Angeles at the time the EIR was prepared. If the campus generated more than 150 net-new peak hour trips, at least one significant impact would be triggered, with more trips triggering significant impacts at the identified locations until the campus population cap was reached.

The EIR identified mitigation measures to reduce the transportation impacts to less than significant levels, including the implementation of a Transportation Demand Management Plan (TDM), and housing more students on campus.

APPROACH TO ANALYZING TRANSPORTATION IMPACTS FOR SPECIFIC PLAN AMENDMENT

When the City adopted the Specific Plan, Level of Service (LOS) Analysis was the primary metric for the analysis of transportation impacts under CEQA. This method focused on analyzing traffic congestion and a project's potential to exacerbate congestion through an evaluation of the changes in intersection volume to capacity (V/C) ratios associated with the addition of a project's traffic volumes to intersections and calculate the result change in V/C ratios based on the particular intersection's peak hour capacity. Thus, for the Specific Plan transportation impacts were evaluated based on the vehicle trip increases associated with the growth of FTEs on campus.

Pursuant to California Senate Bill (SB) 743, transportation impacts from a project are now required to be evaluated under CEQA using a vehicle-miles traveled (VMT) analysis. VMT analyses quantify

the amount of driving that a project would affect based on the number of trips caused by a project, which modes are utilized, and the distance these trips cover. VMT analyses are often expressed in VMT per capita, and a project's VMT performance is based on its per-capita VMT not whether a project would increase VMT in aggregate.

The Los Angeles Department of City Planning and LADOT updated the Transportation Section of the City's California Environmental Quality Act (CEQA) Thresholds Guide to comply with and implement Senate Bill (SB) 743. The City Council subsequently adopted VMT-based significance thresholds and the City incorporated them into the City's CEQA Threshold Guide.

LADOT has developed a VMT Calculator tool to estimate project-specific daily household VMT per capita and daily work VMT per employee for land use development projects. The VMT Calculator relies on the students to calculate VMT for the University land use category. The Specific Plan Amendment will not change the FTE. Therefore, VMT analysis for the growth in the campus population is not required.

Notwithstanding the fact that FTE will not change, this memorandum analyzes whether the allowable shift in allocation of square footage among campus building types would result in the potential to increase VMT, either from an increase in VMT from typical campus activities, or an increase in the frequency and size of campus events, such that these activities would become more typical conditions. This evaluation is discussed below.

TRANSPORTATION DEMAND MANAGEMENT PROGRAM

LMU has implemented (TDM Plan) or is in the process of implementing (increase in residential beds) the transportation mitigation measures required for the Specific Plan to ensure that there are no significant transportation impact. LMU is required to annual monitor driveway traffic counts and parking demand to ensure the effectiveness of the mitigation measures.

The following summarizes the key TDM Plan activities/programs implemented at LMU's campus between 2012 and 2019[2]:

[2] Due to the COVID-19 pandemic, only 220 FTE students were on-campus during the 2020-2021 academic year with most students attending virtually. As a result most TDM activities were temporarily put on hold.

- Shared Vehicles – In 2012, 8 shared vehicles, operated by ZipCar, were located on campus, with a total of 295 students who were ZipCar members. In 2019, there were 9 vehicles on campus and 570 active ZipCar members on campus.
- Electric Vehicle Parking –24 Electric Vehicle charging stalls (6 at University Hall & 18 in the Life Sciences Building (Lot D) have been installed on campus
- Parking Fee Program – LMU implemented campus parking fees in 2012 for visitors, and 2013 for students and faculty/staff. The fee schedule is as follows:
    - Students – Students who park on campus may purchase a $670 annual permit for year-round parking or can pay by term ($335 per term for fall and spring terms, $200 for summer term). Students can who do not purchase a pass can pay for hourly parking, which has a daily cap of $10 per day.
    - Faculty/Staff – Faculty/Staff who park on campus may purchase a $696 annual permit for year-round parking. If they choose to purchase the permit, the fee can be paid through a payroll deduction. Faculty and staff can who do not purchase a pass can pay for hourly parking, which has a daily cap of $10 per day.
    - Visitors – Visitors are charged based on the length of time they park on campus with a $10 daily maximum. Any vehicle not registered to an LMU student, faculty, or staff is considered a visitor.
- Alternative Transportation Incentive Program – Campus members that opt out of parking on campus and use public transportation, walk, or bike to campus, are provided 5 free parking days per semester to use as needed. Since 2012, 71 campus members on average participate in this program each semester.
- Guaranteed Ride Home – Since 2012, LMU has participated in Metro's guaranteed ride home program. This program allows ridesharing employees to choose the most efficient means to get where they need to go during a qualified emergency. The program, made available to campus members, will reimburse a one-way taxi ride, one-day car rental, or transit ticket (public bus, Metro Rail, or Metrolink) to get them to their destination.
- Bicycle Parking Capacity – In 2012, LMU had the capacity for a total of 1,211 bicycles in 400 racks on campus. In 2019, there is capacity for 1,400 bicycles on campus in 500 racks.
- Shuttles – Through 2018, LMU operated a campus shuttle that connected with the Metro Green Line Aviation/LAX Station. Since June 1, 2018 through the 2019 academic year LMU has operated a Playa Vista shuttle. The service is averaging 150 riders per day. The Playa Vista shuttle is open to all students, faculty and staff members, and anyone outside the LMU community who wants to ride. The route includes stops on the Westchester campus

(University Hall flagpoles and Lawton Plaza), the LMU Playa Vista Campus, and the Runway in Playa Vista, home to a variety of restaurants and retail stores. This service is free and available to all affiliates, students, community members and employees.

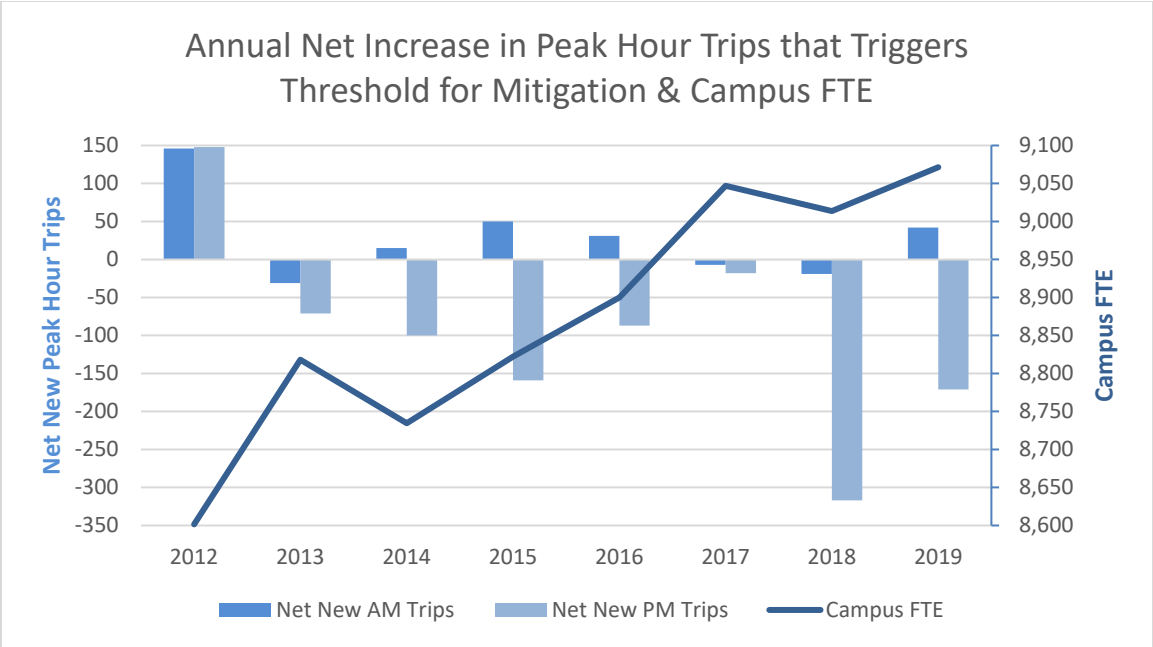
- Carpool Program – LMU's carpool program, launched in Fall 2017, provides 15 premiere parking spaces for participants in the program.

INCREASING CAMPUS HOUSING

Since 2011, LMU has constructed 633 additional residential beds for students and 15for faculty and staff. The total number of beds at buildout will be 989. The EIR identified a reduced external trip generation rate for students living on campus as compared with commuters. Thus, when the 989 beds are fully occupied, a further reduction in campus trips is anticipated.

DRIVEWAY TRAFFIC COUNT MONITORING & COMPARISON TO SPECIFIC PLAN

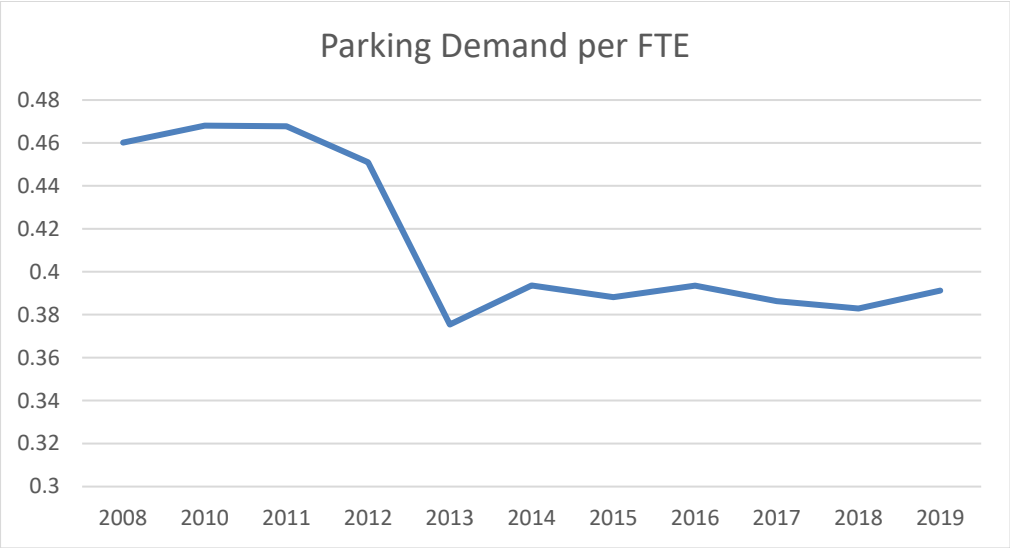
Traffic counts are collected each year over multi-day periods at the LMU Drive and Loyola Boulevard campus gates. This allows LMU evaluate the trip-reduction benefits of the TDM measures. The following chart documents how the campus is tracking against the 150 net new trip threshold for the years 2012 through 2019. While the annual campus monitoring study was conducted in 2020, because of the COVID-19 pandemic, nearly all of LMU's campus population was remote, and so the data for that year were not included as they are an outlier.



As the above chart demonstrates, the campus has been below the trip threshold since monitoring began. Moreover, the campus has successfully reduced its peak period trip generation in subsequent years due to the implementation of its TDM Plan. A significant decrease in trips is observed in 2013, the first year the campus charged for parking for all users. The TDM plan proved to be very effective. The trip generation rate for campus FTE has been reduced relative to the baseline used in the EIR, while FTE on campus has continued to increase.

PARKING DEMAND PER FTE

Parking occupancy counts are conducted hourly at all campus parking facilities to track the trend in parking demand. The following chart shows the reduction in parking demand per FTE as a result of the TDM Plan. As with the overall campus trip generation, parking demand has decreased per FTE.



RETENTION OF GERSTEN PAVILION

The Original EIR Project contemplated replacing the Gersten Pavilion with a new sports arena. The Specific Plan Amendment continues to contemplate such changes, but it would allow LMU to retain, renovate, continue to use, and/or change the use of the Gersten Pavilion. Under the Specific Plan Amendment, if a new sports arena is built on campus, all fixed seating in the Gersten Pavilion will be removed.

Like other University spaces, a retained Gersten Pavilion may be utilized for campus events. However, temporary seating will be limited to 1,000 seats, and public events at the retained Gersten Pavilion or the new sports arena would not occur simultaneously.

The Specific Plan Amendment would update the TDM Plan to (1) prohibit concurrent scheduling of events open to the general public at the Gersten Pavilion and the new sports arena, and (2) review other scheduling considerations for public events at the Gersten Pavilion and the new sports area. Further, to limit the potential for the overlapping of public events at the Gersten Pavilion and the new sports arena, the TDM Plan require that a public event held at either Gersten Pavilion or the new sports arena start not less than two hours after the scheduled end of a public event held at the other arena/pavilion. With these TDM Plan measures, the Specific Plan Amendment will not increase the frequency or level of attendance at events when compared to the Specific Plan.

POTENTIAL FOR NEW SIGNIFICANT TRANSPORTATION IMPACTS

As detailed above, the Project maintain the same amount of square footage, and there will be no change to the 9,600 campus FTE students, faculty and staff (which includes 7,800 FTE students and 1,800 FTE faculty and staff).

As campus trip generation and VMT is determined by growth of campus population, as opposed to the allocation of square footages across University buildings, with no change to the FTE, the Specific Plan Amendment would not be expected to have any new or more severe significant transportation impacts. Further, LMU's implementation of the TDM plan has consistently kept the the campus' level of trip generation below 150 per hour, the City's adopted threshold of significance. LMU has accomplished this while the campus' FTEs have grown. This indicates that trips per FTE (and therefore likely VMT per FTE) have been reduced.

The Specific Plan included the increase of on-campus housing as a mitigation measure, since on-campus residents were demonstrated to generate fewer vehicle trips (and likely reduced VMT) relative to commuter students. The Specific Plan Amendment will provide the same number of residential beds at buildout as the Specific Plan, and so will not vary both in terms of campus trip generation, and VMT. In addition to the same increase in on-campus housing as the Original EIR Project, the Playa Vista project, located immediately south of LMU's campus has since been completed. Playa Vista provides housing, retail and other services very close to LMU's campus. LMU implemented a shuttle to connect its campus with Playa Vista, which was not contemplated at the time of the Specific Plan's adoption. The proximity and the shuttle connection to Playa Vista will further reduce VMT compared with the context of the Specific Plan.

LMU's proactive implementation of the TDM plan mitigation has and will continue to ensure that the potential significant impacts the EIR identified will continued to be mitigated to less than significant levels. Additionally, the Specific Plan Amendment is likely to be even less impactful than Specific Plan because the overall construction program is substantially scaled back since more existing facilities will be retained. As a result, temporary construction related traffic will also be reduced.

The retention and repurposing of the Gersten Pavilion will also not increase the frequency of public events on campus. The Specific Plan Amendment provides for an updated TDM Plan that prohibits concurrent events open to the general public at the Gersten Pavilion and a new sports arena.

Further, the updated TDM Plan details a scheduling program such that requires a public event held at either Gersten Pavilion or the new sports arena not to be scheduled within than two hours after the scheduled end of a public event held at the other arena/pavilion. As a result, no new significant impacts are anticipated.

SUMMARY

The changes to the Specific Plan Amendment would not change the overall transportation impact analysis conclusions from the Specific Plan's EIR. No new or increased significant transportation impacts are expected with the Specific Plan Amendment. The Specific Plan Amendment may also reduce impacts during construction due to the potential for a reduction in overall demolition.