



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: October 21, 2021
Time: After 8:30 a.m.*
Place: In conformity with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over COVID-19, the CPC meeting will be conducted entirely telephonically by Zoom [<https://zoom.us/>].
The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda published at <https://planning.lacity.org/about/commissionsboards-hearings> and/or by contacting cpc@lacity.org

Case No.: CPC-1952-4072-CU-PA1
ZA-2017-928-ZAD
CEQA No.: ENV-2016-2319-EIR
Related Cases: CPC-1952-4072-CU
Council No.: 11-Bonin
Plan Area: Brentwood-Pacific Palisades
Specific Plan: N/A
Certified NC: N/A
GPLU: Minimum Low Density Residential
RE40-1-H
Zone:
Applicant: Debra Martin,
Mount Saint Mary's
University
Representative: Victor De la Cruz
Manatt, Phelps & Phillips,
LLP

Public Hearing: Required
Appeal Status: Appealable to City Council
Expiration Date: October 21, 2021
Multiple Approval: Yes

PROJECT LOCATION: 12001 Chalon Road, Los Angeles, CA 90049

PROPOSED PROJECT: Original Project

The Original Project involves the demolition of two tennis courts, an outdoor pool area, two Facilities Management buildings and the Fitness Center building, and several surface parking lots on a 3.8-acre portion of the 45-acre Mount Saint Mary's (MSMU) Chalon Campus, and the development of a 38,000 square-foot two-story Wellness Pavilion, a new outdoor pool area, landscaped open space, and a two-story parking deck providing 281 vehicle spaces (a net increase of 55 spaces). The Wellness Pavilion will provide students, faculty, and staff with a gym, multi-purpose rooms, physical therapy lab, dance and cycling studios, lockers, showers, restrooms, and an equipment storage area. The Original Project does not include a request to increase student enrollment but will require the addition of one new staff person and will introduce three new types of events which can be attended by outside guests, students, faculty, and/or staff. The Original Project's new events will include: (1) Summer Sports Camps (which will operate over a 12-week period during the summer); (2) Health and Wellness Speaker Series (a maximum of eight annual events); and (3) Other Wellness/Sports Events/Activities (a maximum of four events per month). Additionally, Athenian Day and Homecoming, two existing events currently held on the Chalon Campus will be moved to the Wellness Pavilion to allow for potential increases in attendance. Under the Original Project a total of 400 daily outside guests will be permitted to attend the three new event types stated above. The Original Project will include a maximum building height of 42 feet, require a total of 20,524 cubic yards of grading (cut and fill), and 30 retaining walls ranging in height from two feet to a maximum height of up to 36 feet.

Alternative 5

Alternative 5 is similar to the Original Project, but will result in: (1) a reduction of 11,181 cubic yards of grading and two-month shorter construction period; (2) a reduction of 18 retaining walls of which the reduced maximum height will be 17 feet; (3) a reduction of 2,500 square feet of Wellness Pavilion floor area; (4) a net reduction of 46 vehicle spaces; and (5) 36 fewer annual Other Wellness/Sport Events activities; and (5) club sports will be added as a permitted use. Additionally, Alternative 5 will implement and enforce a maximum daily vehicle trip cap for all vehicles attending Summer Sports Camps, Health and Wellness Speaker Series, Other Wellness/Sports Events/Activities, or Club Sport Event, as compared to the Original Project, which would permit a maximum of 400 daily outside guests to attend the three new event types.

**REQUESTED
ACTIONS:****ENV-2016-2319-EIR**

1. Pursuant to Section 21082.1(c)(3) of the California Public Resources Code, the consideration and certification of the **Environmental Impact Report (EIR)**, ENV-2016-2319-EIR, (SCH No. 2016081015), for the above-referenced Alternative 5, and Adoption of the **Statement of Overriding Considerations** setting forth the reason and benefits of adopting the EIR with full knowledge that significant impacts may remain;
2. Pursuant to Section 21081.6 of the California Public Resources Code, the adoption of the proposed **Mitigation Measures and Mitigation Monitoring Program**;
3. Pursuant to Section 21081 of the California Public Resources Code, the adoption of the required **Findings** for the certification of the EIR;

CPC-1952-4072-CU-PA1

4. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.24 M, a **Plan Approval** to allow for the development of Alternative 5 in conjunction with the continued use of a private school in the RE40-1-H Zone;
5. Pursuant to LAMC Section 12.24 F, a **determination** to permit a building height of 42 feet for the Wellness Pavilion, in lieu of the maximum height of 30 feet otherwise permitted by LAMC Section 12.21 C.10(d);

ZA-2017-928-ZAD

6. Pursuant to LAMC Section 12.24 X.28, a **Zoning Administrator Determination** to permit a total of 9,343 cubic yards of grading (cut and fill), in lieu of the maximum cut and fill amount of 6,600 cubic yards permitted by LAMC Section 12.21C.10(f)(1); and
7. Pursuant to LAMC Section 12.24 X.26, a **Zoning Administrator Determination** request to permit the following modification to the number and height of retaining walls at the development site:
 - a. an allowance of 12 retaining walls per lot in lieu of the maximum limit of one retaining wall per lot otherwise permitted by LAMC Section 12.21 C.8; and
 - b. a total of 12 retaining walls ranging in height from two feet to a maximum height of up to 17 feet, in lieu of the 12-foot height limit otherwise permitted by LAMC Section 12.21 C.8.

**RECOMMENDED
ACTIONS:****ENV-2016-2319-EIR**

1. **Find**, that the City Planning Commission has reviewed and considered the information contained in the Environmental Impact Report No. ENV-2016-2319-EIR (SCH No. 2016081015) dated April 2018, and

the Final EIR, dated June 2021 (collectively, Mount Saint Mary's University Chalon Campus Wellness Pavilion Project EIR), as well as the whole of the administrative record;

CERTIFY that:

- a. The Mount Saint Mary's University Chalon Campus Wellness Pavilion Project EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
- b. The Mount Saint Mary's University Chalon Campus Wellness Pavilion Project EIR was presented to the City Planning Commission as a decision-making body of the lead agency; and
- c. The Mount Saint Mary's University Chalon Campus Wellness Pavilion Project EIR reflects the independent judgment and analysis of the lead agency.

ADOPT the following:

- a. The related and prepared Mount Saint Mary's University Chalon Campus Wellness Pavilion Project Environmental Findings;
- b. The Statement of Overriding Considerations; and,
- c. The Mitigation Monitoring Program prepared for the Mount Saint Mary's University Chalon Campus Wellness Pavilion Project EIR;

CPC-1952-4072-CU-PA1

2. **Approve a Plan Approval** to allow for the development of Alternative 5 in conjunction with the continued use of a private school in the RE40-1-H Zone;
3. **Approve a determination** to permit a building height of 42 feet for the Wellness Pavilion, in lieu of the maximum height of 30 feet otherwise permitted by LAMC Section 12.21 C.10(d);

ZA-2017-928-ZAD

4. **Approve a Zoning Administrator Determination** to permit a total of 9,343 cubic yards of grading (cut and fill), in lieu of the maximum cut and fill amount of 6,600 cubic yards permitted by LAMC Section 12.21C.10(f)(1); and
5. **Approve a Zoning Administrator Determination** to permit the following modification to the number and height of retaining walls at the development site:
 - a. an allowance of 12 retaining walls per lot in lieu of the maximum limit of one retaining wall per lot otherwise permitted by LAMC Section 12.21 C.8; and
 - b. a total of 12 retaining walls ranging in height from two feet to a maximum height of up to 17 feet, in lieu of the 12-foot height limit otherwise permitted by LAMC Section 12.21 C.8.

VINCENT P. BERTONI, AICP
Director of Planning



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Environmental Impact Report (EIR) link:

<https://planning.lacity.org/development-services/eir>

PROJECT ANALYSIS

Summary

The Mount Saint Mary's University (MSMU) is a private liberal arts university offering undergraduate and graduate degrees at two campuses in the City; the 45-acre Chalon Campus (Campus), located in the Brentwood Community, and the 15-acre Doheny Campus, located north of the University of Southern California near downtown Los Angeles. MSMU's Campus operates as a private education use in a single-family residential zone under a Deemed-to-be-Approved Conditional Use Permit and subsequent Plan Approvals. In continuation with these entitlements, MSMU has requested a Plan Approval to construct and operate the Wellness Pavilion, a 38,000 square-foot facility within a 3.8-acre developed portion of its Campus.

The initial Wellness Pavilion (Original Project) proposed by MSMU involved the demolition of two tennis courts, the outdoor pool area, two Facilities Management buildings and the Fitness Center building, and several surface parking lots, and the development of a 38,000 square-foot two-story Wellness Pavilion, a new outdoor pool area, landscaped open space, Campus roadway improvements, and a two-story parking deck (resulting in a net increase of 55 vehicle spaces). The proposal also included the addition of new types of events which could be attended by outside guests, students, faculty, and/or staff, such as Summer Sports Camps, Health and Wellness Speaker Series, and Other Wellness/Sports Events/Activities. The Original Project will not increase student enrollment.

As required by the California Environmental Quality Act (CEQA), the Environmental Impact Report (EIR) analyzed a reasonable range of potentially feasible alternatives that could attain most of the basic objectives of the Original Project, while reducing or substantially lessening the significant environmental effects of the Original Project. The EIR identified Alternative 5 as the Environmentally Superior Alternative. As compared to the Original Project, Alternative 5 will reduce the size of the Wellness Pavilion, no longer construct the two-story parking deck, reduce construction and grading activities, reduce the number and height of retaining walls, reduce the number of new events, and include a Parking and Transportation Management Plan which will establish vehicle trip caps and restrict new events' start and end times to be outside of the AM/PM peak hours (as compared to the Original Project which established a maximum number of outside guests permitted at the new events). Alternative 5 will not increase student enrollment.

During the environmental review and public hearing process, the Department of City Planning received extensive oral and written testimony. Support for the Wellness Pavilion cites the need for MSMU to replace their outdated fitness facility for student use and to support their healthcare programs and curriculum; the modest size of the Wellness Pavilion as compared to surrounding schools; construction of the Wellness Pavilion will occur on a previously developed portion of the Campus and will be in compliance with fire safety requirements; and Alternative 5 reflects a compromise between MSMU and the surrounding residential community and will address traffic and parking issues by prohibiting off-Campus parking, as well as reducing the total daily average number of vehicles accessing the Campus, as compared to the 2016 baseline conditions; and will implement trip caps and start/end times for the new events.

Primary opposition to the Wellness Pavilion states concerns over MSMU operating outside of their Condition Use Permit and exceeding their permitted student enrollment; the commercialization of the Campus through the introduction of new events which will result in an increase in vehicle traffic; fire safety and the inability to safely evacuate the Campus; the Wellness Pavilion will be more suitable for the Doheny Campus; the EIR is misleading and relies on unsupported information and should be recirculated; and the proposed traffic measures are not enforceable.

Alternative 5 will address vehicle traffic associated with the Wellness Pavilion through the establishment of an extensive Parking and Transportation Management Program that will include trip caps for new events, permitted start/end event times (outside of AM/PM peak hours), prohibit off-Campus parking and pedestrian access to the Campus, and limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts taken for the Campus. Other concerns regarding environmental impacts, adequacy of the EIR, and fire safety have been addressed through the CEQA process and compliance with LAFD requirements. In addition, it should be noted that MSMU is replacing existing fitness facilities and buildings with an updated athletic/fitness facility building and is not proposing any increases to student enrollment.

Overall, Alternative 5 will support the goals, policies, and objectives of the General Plan Framework Element and the Brentwood-Pacific Palisades Community Plan. In addition, Alternative 5 will result in reduced impacts as compared to the Original Project. The Department of City Planning therefore recommends approval of the Alternative 5 project, subject to conditions of approval and the Mitigation Monitoring Program.

Project Description

Original Project

The Original Project proposed by MSMU involves the demolition of two tennis courts, the outdoor pool area, two Facilities Management buildings and the Fitness Center building, and several surface parking lots on a 3.8-acre portion of the 45-acre Campus, and the development of a 38,000 square-foot two-story Wellness Pavilion, a new outdoor pool area, landscaped open space, Campus roadway improvements, and a two-story parking deck totaling 281 vehicle spaces (a net increase of 55 vehicle spaces). The Wellness Pavilion will provide students, faculty, and staff with a gym, multi-purpose rooms, a physical therapy lab, dance and cycling studios, lockers, showers, restrooms, and an equipment storage area. The Original Project does not include a request to increase student enrollment but will require the addition of one new staff person and will introduce three new types of events which can be attended by outside guests, students, faculty, and/or staff. The Original Project's new events will include: (1) Summer Sports Camps (which will operate over a 12-week period during the summer); (2) Health and Wellness Speaker Series (a maximum of eight annual events); and (3) Other Wellness/Sports Events/Activities (a maximum of four events per month). Additionally, Homecoming and Athenian Day, two existing events with potential attendance increases, currently held at the Campus will be moved to the Wellness Pavilion. The Original Project will include a maximum building height of 42 feet and require a total of 20,524 cubic yards of grading (cut and fill), and 30 retaining walls ranging in height from two feet to a maximum height of up to 36 feet. Two on-site Protected Trees (one California Bay and one Coast Live Oak), and 46 Non-Protected Trees will be removed as part of the Original Project.

Alternative 5

Alternative 5 involves the demolition of two tennis courts, the outdoor pool area, one Facilities Management building and the Fitness Center building, and several surface parking lots on a 3.8-acre portion of the 45-acre Campus, and the development of a 35,500 square-foot two-story Wellness Pavilion, a new outdoor pool area, Campus roadway improvements, new landscaped areas, and several surface parking lots totaling 186 vehicle spaces (a net decrease of 46 spaces as compared to existing conditions). The Wellness Pavilion will provide students, faculty, and staff with a gym, multi-purpose rooms, a physical therapy lab, dance and cycling studios, lockers, showers, restrooms, and an equipment storage area. Alternative 5 does not include a request to increase student enrollment but will require the addition of one new staff person and will introduce three new types of events which can be attended by outside guests, students, faculty, and/or staff.

Alternative 5's new events will include: (1) Summer Sports Camps (which will operate over a 12-week period during the summer); (2) Health/Wellness Speaker Series (a maximum of eight annual events), and (3) Other Wellness/Sports Events/Activities (a maximum of 12 events per year). Additionally, two existing events, Athenian Day and Homecoming, with potential attendance increases, currently held at the Campus will be moved to the Wellness Pavilion, and Club Sports, but not intercollegiate sports, will be permitted. Alternative 5 will include a maximum building height of 42 feet, require a total of 9,343 cubic yards of grading (cut and fill), and a total of 12 retaining walls that will range in height from two feet to 17 feet. Two on-site Protected Trees (one California Bay and one Coast Live Oak), and 46 Non-Protected Trees will be removed as part of Alternative 5.

In a letter dated February 5, 2021, (included in this report as Exhibit G), MSMU requested that the Department of City Planning consider the recommendation of Alternative 5, which was analyzed as an Alternative in the Final EIR, in place of the Original Project. Alternative 5 is similar to the Original Project, but will result in: (1) a reduction of 11,181 cubic yards of grading and two-month shorter construction period; (2) a reduction of 18 retaining walls of which the reduced maximum height will be 17 feet; (3) a reduction of 2,500 square feet of Wellness Pavilion floor area; (4) a net reduction of 46 vehicle spaces; and (5) 36 fewer annual Other Wellness/Sport Events activities; and (5) club sports will be added as a permitted use. Additionally, Alternative 5 will implement and enforce a maximum daily vehicle trip cap for all vehicles attending Summer Sports Camps, Health and Wellness Speaker Series, Other Wellness/Sports Events/Activities, or Club Sport Events and new event start/end times outside of AM/PM peak hours, as compared to the Original Project, which did not include this event restrictions, but instead permitted a maximum of 400 daily outside guests to attend the three new event types

The Final EIR identified Alternative 5 as the Environmentally Superior Alternative as it reduces the Original Project's significant and unavoidable operational transportation impacts (to intersections and street segments) to a level of less than significant, while generally meeting the Original Project objectives to the same extent as the Original Project. Additionally, as the Original Project's construction period will be reduced by two months under Alternative 5, the Alternative will incrementally reduce the Original Project's significant and unavoidable construction transportation impacts, off-site construction noise impacts, as well as cumulative human annoyance vibration impacts. Although construction transportation, off-site construction noise, and cumulative human annoyance vibration impacts will remain significant and unavoidable, all other impacts will be less than significant, and less than or similar to those of the Original Project.

The table below highlights the differences between Alternative 5 and the Original Project.

Differences Between the Original Project and Alternative 5		
	<i>Original Project</i>	<i>Alternative 5</i>
Construction Changes		
Total Construction Period	22 months	20 months
Required Demolition	Existing tennis courts, pool, two Facilities Management buildings, and Fitness Center building, surface parking lots	Existing tennis courts, pool, one Facilities Management building (the smaller, single-story Facilities Management building), and Fitness Center building, and surface parking lots (demolition of the existing two-story Facilities Management Building would not be required)
Site Geology/Stabilization	Installation of 120 concrete soldier piles for site stabilization	Installation of 27 or fewer concrete soldier piles for site stabilization

Grading	20,524 cubic yards	9,343 cubic yards
Concrete Cubic Yards	8,155 cubic yards of concrete	1,864 cubic yards of concrete
Physical Changes		
Wellness Pavilion Floor Area	38,000 square feet	35,500 square feet
Wellness Pavilion Building Footprint	24,605 sf (not including columns)	23,598 sf (not including columns)
Parking Facilities	Replacement of 226 existing surface parking with a two-story Parking Deck with 281 spaces (a net increase of 55 vehicle spaces compared to existing conditions)	Replacement of 232 surface parking spaces with 186 new spaces (a net decrease of 46 vehicle spaces compared to existing conditions)
Wellness Pavilion Location	At the site of the existing tennis courts, pool, facilities management buildings, and fitness center	In the surface parking lot area to the north of the existing tennis courts, pool, facilities management buildings, and fitness center
Retaining Walls Number/Height	30 retaining walls with a maximum height of 36 feet	12 retaining walls with a maximum height of 17 feet.
Tree Removal	2 Protected Trees and 66 Non-Protected Trees	2 Protected Trees and 46 Non-Protected Trees
Operational Changes		
Other Wellness / Sport Event Activities	48 events per year	12 events per year
Club Sports	Not included as part of the Original Project	Permitted as part of Alternative 5 with restrictions
Maximum Daily Vehicle Trip Cap	No	Yes
Elimination of Health Wellness Speaker Series, Other Wellness/Sport Events and Club Sport Activities AM/PM Peak Hour Trips	No	Yes
Maximum Inbound/Outbound Vehicle Trips for Summer Sports Camps	No	Yes
Restricted Pedestrian Access to prohibit off-Campus Parking	No	Yes
Reduction of 2016 Average Daily Vehicle Trips inclusive of Wellness Pavilion Event Trips	No	Yes
Significant and Unavoidable Impacts	Project Level Construction Noise, Project Level Construction and Operational Traffic, and Cumulative Human Annoyance Vibration Impacts	Project Level Construction Noise, Project Level Construction Traffic, and Cumulative Human Annoyance Vibration Impacts
Increase in Student Enrollment	No	No



Alternative 5 Wellness Pavilion Rendering

Background

Mount Saint Mary's University Chalon Campus

MSMU is a private women's liberal arts university offering undergraduate and graduate degrees with two campuses in the City, the 45-acre Chalon Campus (Campus) located in the Brentwood Community and the 15-acre Doheny Campus located north of the University of Southern California. The Campus was established in January 1929 with construction of Brady Hall commencing in 1931.

Location and Setting

The Campus, including the 3.8-acre Project Site is located along the southern portion of the Santa Monica Mountains along a ridge within the Brentwood-Pacific Palisades Community Plan. The developed portion of the Campus is bounded to the north, west, and east by natural open space owned by MSMU. The Carondelet Center, a facility that serves as the provincial headquarters for the Sisters of Saint Joseph of Carondelet (a separate entity from MSMU) is located to the south and is immediately adjacent to the Campus. Two and one-story single-family residences, as well as The Getty Center, are located beyond the Carondelet Center and to the south, southeast, and southwest.

The Project Site is located on the northern portion of the Campus. Mary Chapel, Rossiter Hall, and the Circle (a landscaped and hardscaped open space area) are located immediately south of the Project Site and make up a portion of the Campus Core. The Yates, Aldworth, and Burns Houses residences hall is located immediately north of the Site and natural open space abuts the Site's west and east perimeter.

The Campus (outlined in red), Project Site (outlined in blue), adjacent natural open space, Carondelet Center, and surrounding single-family residential neighborhood are shown in the figure below.



Aerial View of the Project Site, Campus, and Surrounding Area

Project Site and Characteristics

The Campus is located on a ridge within a Special Grading Area, Hillside Area, Liquefaction Area, Landslide Area and Very High Fire Hazard Severity Zone (VHFHSZ) on the south flank of the Santa Monica Mountains. The Campus slopes to the south, with an approximately 600-foot grade change from the northern to southern edge. The central north-south axis of the Campus is developed with several buildings and landscaped areas and remains in a natural undisturbed state along its western and eastern edges. The Project Site is developed with a 1,030 square-foot single-story Fitness Center building, two Facilities Management buildings (a two-story 3,500 square-foot building and a single-story 1,470 square-foot building), two tennis courts, a swimming pool, and several surface parking lots containing a total of 226 vehicle parking spaces.

A 7.2-acre Biological Study Area (Study Area) was surveyed and includes the 3.8-acre Project Site and areas beyond the Site within the 200-foot radius fuel modification zone. Landscaping within the Study Area includes shrubs and grasses, four Protected Trees (one California Bay and three Coast Live Oak) and 169 Non-Protected trees.

Existing Land Use Designation and Zoning

The Brentwood-Pacific Palisades Community Plan designates the Project Site for Minimum Low Density Residential land use and Footnote No. 1, with a corresponding zone of RE40-1-H (Residential Estate, Hillside Area, Height District 1). The Community Plan Footnote No. 1 states that development of hillside areas may be limited due to the suitability of the area's geology,

including the steepness of the natural topography, and that areas designated for minimum density housing shall not exceed the prescribed slope density formula included in the footnote. As no residential units are proposed, the footnote does not apply. In combination with the RE40 Zone and City designated Hillside Area requirements, LAMC Section 12.21 C.10(2) allows a guaranteed minimum residential floor area of 18 percent of a lot for the RE40 Zone and Height District 1 permits a maximum building height of 30 feet for buildings with a roof slope of less than 25 percent. Additionally, parcels zoned RE40-1-H are subject to a maximum grading amount of 6,600 cubic yards and a maximum of one retaining wall per lot with the retaining wall being a maximum height of 12 feet.

The original 33.3-acre Campus was established in January 1929 with the adoption of Ordinance No. 64,642 which granted a zone variance permitting the construction of a private school use. In June 1946, the Comprehensive Zoning Plan for the City of Los Angeles under Ordinance No. 90,500 placed Educational Institutions, which are frequently located within residential zones, under the authority of the City Planning Commission as a Conditional Use. Specifically, Ordinance No. 90,500 provided that "...any of the uses enumerated in Section 12.24 that are legally existing at the time it became effective, shall be deemed to have been approved by the Commission and nothing in this Section shall be construed to prevent the enlargement of existing buildings for such uses if all other regulations of this article are complied with, including any exception or variance heretofore granted authorizing said use." Accordingly, the City Planning Commission has treated the Campus as a deemed approved conditional use in granting subsequent Plan Approvals for the Campus.

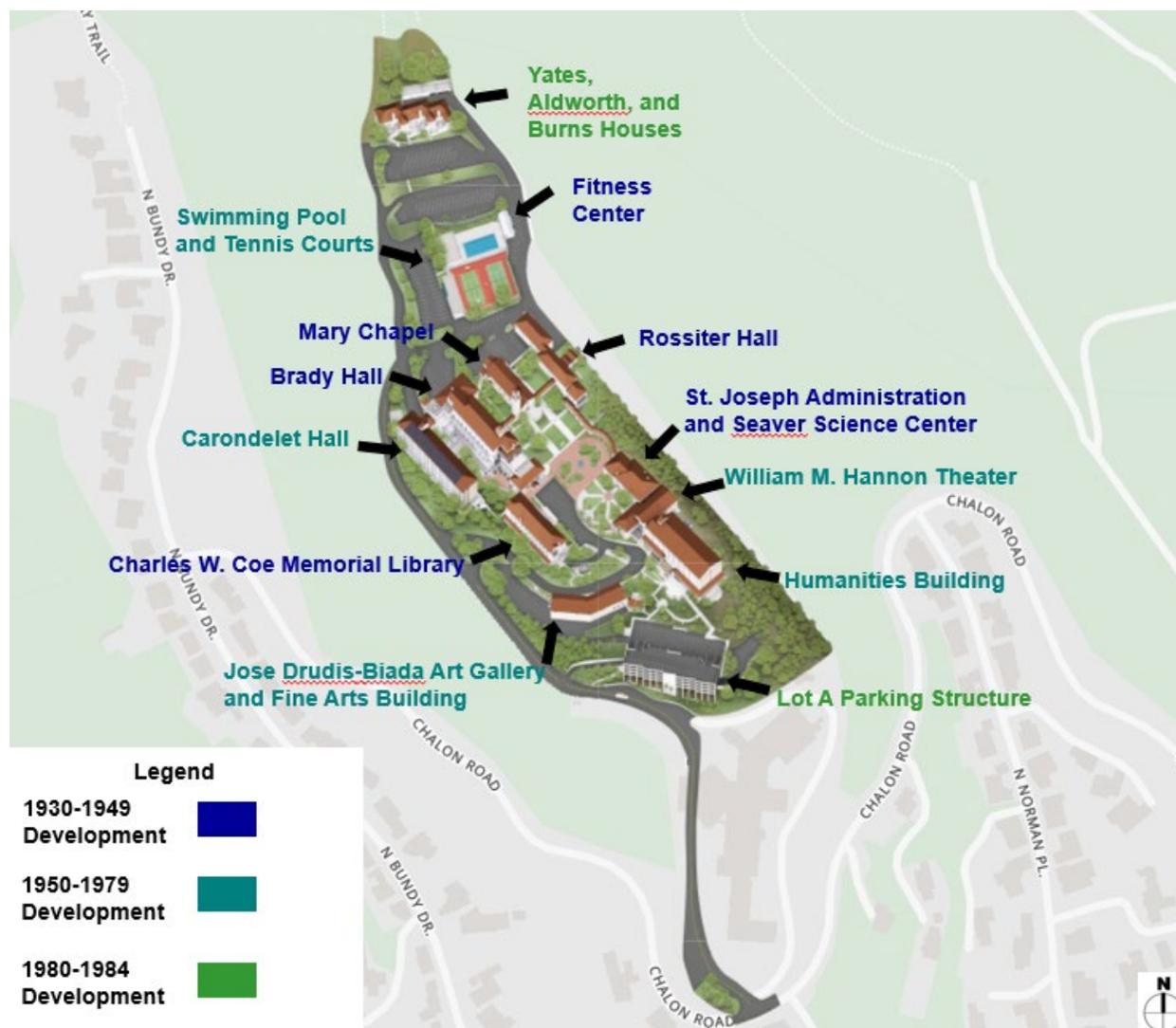
Campus Development

Development of the Campus began in 1931 with the construction of Brady Hall, a three-story student housing and services building and continued with the construction of Mary Chapel, a two-story chapel and Rossiter Hall, a three-story student housing building, both of which were constructed in 1940. The two-story St. Joseph Administration and Seaver Science Center, which provides student services, offices, and classrooms was constructed in 1945.

The four-story Charles Willard Coe Memorial Library was constructed in 1947 and the existing one-story Fitness Center building was constructed in 1949. The one and two-story Facilities Management buildings were constructed in 1952 and 1964, respectively. In 1952, the City approved a 17-acre addition to the Campus.

The Carondelet Hall, a four-story student housing building was constructed in 1958, and the existing swimming pool and tennis courts were constructed in 1962. In 1965, the Humanities Building (including the William H. Hannon Theater), a five-story addition to the existing Science Building was constructed. The three-story Jose Drudi-Bida Arts and Fine Arts Building was constructed in 1974.

In 1984, the City granted a Plan Approval pursuant to the Campus' deemed approved conditional use status for the construction of a faculty residence hall (Bates, Aldworth, and Burns Houses), consisting of a three-dwelling unit apartment building containing 33 bedrooms/guest rooms, a one-story parking garage and parking for 39 parking spaces in the north section of the Campus, north of the Project Site. Later that year, the City granted a Plan Approval for the construction of a multi-level parking structure in the south portion of the Campus. The figure below illustrates the location of the existing buildings as well as the general time period each building was built.



Existing Buildings on Campus

The Campus is eligible for the National Historic Register and is listed on the California Register of Historical Resources as a Historic District at the local level for its association with a recognized architectural style and locally known architects. The Historic District includes the following buildings within the central portion of the Campus which are identified as contributors: Brady Hall, Mary Chapel, Rossiter Hall, St. Josephs Administration and Seaver Science Center, Charles Willard Coe Memorial Library, and Carondelet Hall. No alternation of the six contributing structures is proposed as part of Alternative 5.

Student Enrollment and Staffing

MSMU grants degrees in Traditional Undergraduate, Non-Traditional Undergraduate (i.e., Nursing and Weekend Programs), and Graduate programs. Only the Traditional Undergraduate Baccalaureate Program is offered at the Campus. In addition, MSMU offers online courses for undergraduate and graduate students.

As of the fall of 2016 (when the Notice of Preparation for the Environmental Impact Report was published), total student enrollment for both the Chalton and Doheny Campuses was 3,554 students; of these, 1,498 (full and part-time) students were enrolled in the Traditional Undergraduate program held on the Campus. The remaining 2,056 students were enrolled in

Traditional Undergraduate, Non-Traditional Undergraduate and Graduate programs available online or at the Doheny Campus. Like most schools, each semester, total student enrollment at each Campus can fluctuate. The maximum number of students that can reside on the Campus is 470 students.

MSMU currently employs 176 staff members (administration, maintenance, executives, etc.) at the Campus, many of whom oversee areas at both Campuses. A total of 63 full-time faculty and 210 part-time faculty teach at the Campus.

Existing on-Campus Events

Events hosted on the Campus throughout the year draw outside guests in addition to students, staff, and faculty. The Campus hosts Internal Events with Outside Guests which are MSMU-related events that are attended by outside guests, students, faculty, and staff and External Events which are non-MSMU related events and are those events in which MSMU rents out its facilities to outside parties. In 2015 and 2016, the Campus hosted a total of 42 events each year, with 12 being External Events and 30 being Internal Events with Outside Guests. Currently, the majority of events take place in one of the following three Campus locations: Campus Center, located on the 1st floor of the Humanities Building (up to 350 attendees); Hannon Theater (350 seats); and the Circle (up to approximately 350).

The number of attendees at External Events and Internal Events varies depending on the type of event. Typically, the number of attendees ranges from approximately 50 to 450 people per event, excluding the following Internal Events:

- Student Orientation: the largest annual event (1,000 attendees) held over a weekend (two days). This is an event for newly-admitted students and their families;
- Admitted Students Day: (300 attendees) held over a weekend (two days). This is an event for newly admitted students;
- Residence Move-In Days (500 attendees) held over a weekend (two days);
- Mary's Day (500 attendees) an all-day event on the weekend (one day); and
- Open House (500 attendees) an all-day event on the weekend (one day).

Parking for all events is provided on the Campus. If events are scheduled for over 50 people during the day and could impact parking on the Campus, MSMU provides on-Campus valet parking.

Surrounding Uses

The Project Site is located in the Santa Monica Mountains and surrounded by undeveloped open space, single-family residences, and the Carondelet Center.

North: To the immediate north of the Project Site is the most northern portion of the Campus, developed with the Yates, Aldworth and Burns Houses residences Hall. Parcels to the north of the Campus are zoned RE40-1-H and are natural open space. The Mountaingate Open Space Maintenance Homeowners Association, a development of approximately 300 one and two-story single-family residences is located approximately 1.7 miles north of the Campus.

East: To the east of the Project Site is a portion of the Campus comprised of natural open space. Parcels to the east of the Campus are zoned RE40-1-H and are comprised of undeveloped open space and one and two-story single-family residences. The Getty Center is approximately 1.1 miles southeast of the Site.

South: To the immediate south of the Project Site is Rossiter Hall, Mary Chapel, Brady Hall, and the Carondelet Hall. Parcels to the south of the Campus are zoned RE40-1-H and developed with the Carondelet Center and one and two-story single-family residences.

West: To the west of the Project Site is a portion of the Campus comprised of natural open space. Parcels to the west of the Campus are zoned RE40-1-H and developed with one and two-story single-family residences and undeveloped open space.

Regional and Local Access

Primary regional access is provided by the San Diego Freeway (Interstate-405) which is 0.4 miles east of the Project Site, and accessible via Sunset Boulevard, located south of the Project Site.

Streets and Circulation

Chalon Road is designated by the Mobility Plan as a Local Street Standard travelling east-west (near the Campus) with a right-of-way width of 60 feet. Left turns are not permitted by vehicles exiting the Campus. Chalon Road provides the only ingress/egress access to the Campus and is improved with a sidewalk (along one side of the roadway), curbs, gutters and street lighting. Chalon Road is primarily accessed from Bundy Drive or Norman Place, which provide access to a limited street network connecting to Sunset Boulevard.

Public Transit

The Campus is not served directly by public transit however the Campus is located four miles north of the Metro E Line Bundy Light Rail Station (formerly the Expo Line) and MSMU provides weekday AM and PM shuttle services to and from the light rail station and the Campus. Additionally, the City of Santa Monica Big Blue Buses and Local and Rapid Metro Buses provide public transit service along Sunset Boulevard, Wilshire Boulevard, Santa Monica Boulevard, and San Vicente Boulevard. MSMU provides weekday AM and PM shuttle services to and from the Metro bus station located at Sunset Boulevard and Saltair Avenue.

MSMU Shuttles and Transportation Demand Strategies

MSMU operates several shuttles including a weekday inter-campus shuttle (between the Doheny and Chalon Campuses), a weekday Union Station shuttle (between the Doheny Campus and Union Station), a daily afternoon and evening Explore LA shuttle (providing access to the Westwood community and City of Santa Monica), a weekday E Line (formerly the Expo Line) Bundy Station shuttle and a weekly club sports team shuttle, as MSMU's club volleyball and basketball practices are currently held off-site.

In addition to the shuttle services described above, MSMU operates a rideshare program that provides faculty and staff a monthly \$50.00 transit subsidy, carpool program, TAP card, guaranteed ride home program, Enterprise Carshare Program, park and rideshare information, and ZimRide vehicles (a rideshare program).

Bicycle Facilities

Currently there are no existing bicycle lanes, paths, or routes in the Campus vicinity. Bicycle facilities are provided south of Sunset Boulevard and include designated bicycle lanes along San Vicente Boulevard west of Federal Avenue and along Arizona Avenue and Santa Monica Boulevard. Wilshire Boulevard, Yale Street, Texas Avenue, and portions of San Vicente

Boulevard are designated as roadways intended to share the road with bicyclists and that provide shared lane markings.

Pedestrian Facilities

Most residential streets within the Campus vicinity are not improved with sidewalks. Sidewalks, crosswalks, and pedestrian safety features, such as striped crosswalks and ADA ramps at intersections are provided along Sunset Boulevard, except for a segment of Sunset Boulevard between Saltair Avenue and Bundy Drive where sidewalks are not provided along the north side of the street.

Land Use Policies

Community Plan

The Brentwood-Pacific Palisades Community Plan Map designates the site for Minimum Low Density Residential land uses and allows for a corresponding zone of RE40. The Minimum Low Density Residential land use is also subject to Footnote No. 1 of the Community Plan Map. Footnote No. 1 states that development of hillside areas may be limited due to the suitability of the area's geology, including the steepness of the natural topography, and that areas designated for minimum density housing shall not exceed the prescribed slope density formula included in the footnote. As no residential units are proposed, the footnote does not apply.

The Project Site is currently zoned RE40-1-H (Residential Estate, Height District 1, City Designated Hillside). Alternative 5 is consistent with the land use designation and zoning for the site and in association with the Plan Approvals and Deemed Approved Conditional use for a private school in a residential zone.

The Brentwood-Pacific Palisades Community Plan includes policies and goals for preserving open space and hillside views, as well as the residential character of existing residential neighborhoods, locating schools in appropriate locations to serve the community while complimenting existing land uses and community character, and maximizing transportation management strategies that will reduce vehicle congestion.

Relevant Cases (1,000-foot Radius)

Subject Property

Case No. 3066 / Ordinance No. 62,642: Effective January 3, 1929, this Ordinance granted a zone variance to allow the establishment of a college on a then 33.3-acre site in the A zone (single-family residential zone). Following this approval, MSMU constructed a number of buildings on the Campus, beginning with Brady Hall.

Case No. 4487: On December 22, 1939, the Los Angeles City Council approved the plans for a faculty building.

Case No. 22654: On March 11, 1946, the Los Angeles City Council approved the plans for a library building.

CPC-1952-4072: On May 23, 1952, the Los Angeles City Council approved a 17-acre addition to the Campus, subject to conditions, including the dedication of one-half width of Bundy Drive along the westerly line of the subject property.

Tract Nos. 19719 and 20183: On October 18, 1957, Tract Nos. 19719 and 20183 were recorded indicating that one-half the width of Bundy Drive, along the westerly line of the Chalon Campus had been dedicated.

CPC-1952-4072 (March 1964): On March 5, 1964, the City Planning Commission granted a Plan Approval for a new Arts and Humanities Building, and a new 34-space surface parking lot on the Campus.

CUZ 78-262: On September 27, 1978, the Zoning Administrator approved a Conditional Use for the construction, use, and maintenance of a public service radio station transmitter, 90 feet high antenna tower, and an approximately 8 square feet and 9 square feet high transmitter building to house mechanical equipment.

CPC-1952-4072 (January 1984): On January 26, 1984, the City Planning Commission granted a Plan Approval for a faculty residence hall, one-story parking garage and the relocation of 39 vehicle parking spaces on the Campus.

CPC-1952-4072 (July 1984): On July 12, 1984, the City Planning Commission granted a Plan Approval for a multi-level parking structure for a total of up to 268 vehicle parking spaces. Construction of the parking structure resulted in a total of 237 spaces.

ZA-2003-4028-CU: On January 30, 2004, the Zoning Administrator approved a conditional use for the construction, use and maintenance of a wireless telecommunication facility on the Campus and a height determination to permit an antenna at a height of 71 feet in lieu of the permitted height of 45 feet.

AA-2012-0507-PMEX: On June 5, 2012 the Department of City Planning approved a recordation of a lot line adjustment whereby MSMU conveyed approximately 1,775 square feet of the Campus to the adjoining Carondelet Center property located at 11888 Chalon Road.

AA-2013-1581-WTM: On July 19, 2013: The Advisory Agency approved a tentative tract map waiver for approximately 300 cubic yards of balanced grading in a City designated Hillside Area having a lot in excess of 60,000 square feet of lot area, in connection with MSMU's construction of new concrete landings from the existing parking structure to a new upper terrace of the Arts and Humanities Building.

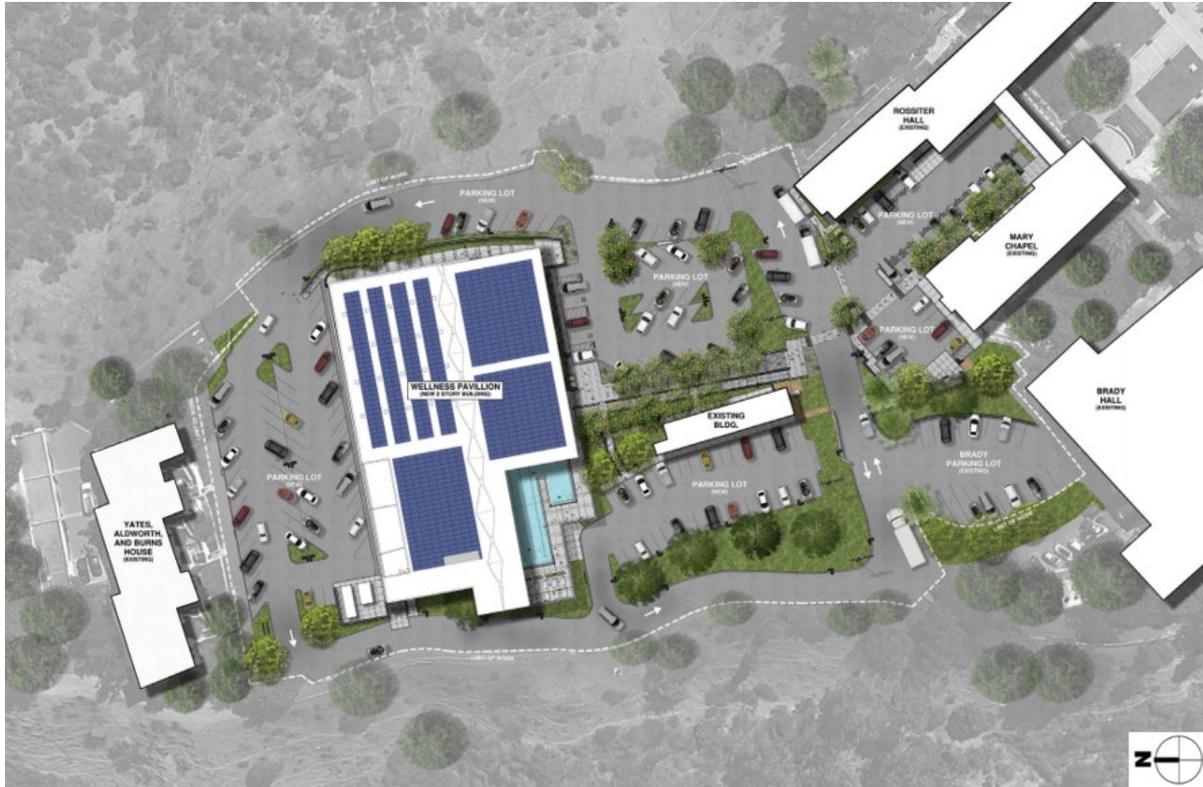
Surrounding Properties

There are no relevant cases within 1,000 feet of the Project Site.

Alternative 5 Details

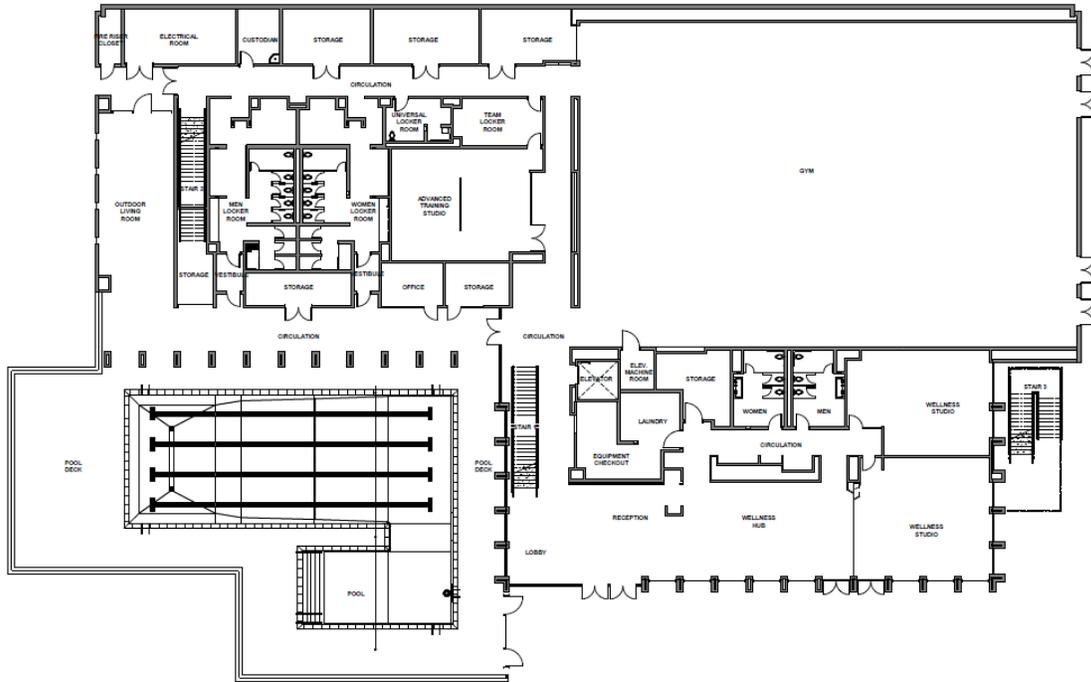
The 3.8-acre Project Site is currently improved with a 1,030 square-foot single-story Fitness building that house fitness equipment, two Facilities Management buildings (a two-story 3,500 square-foot building and a single-story 1,470 square-foot building), two tennis courts (16,473 square feet), a 8,937 square-foot swimming pool and deck, and several surface parking lots containing a total of 226 vehicle parking spaces (63,3370 square feet). All of the existing uses will be demolished, with the exception of the 3,500 square-foot Facilities Management building, to allow for the development of Alternative 5.

Alternative 5 will include the construction and operation of a two-story 35,500 square-foot Wellness Pavilion, a new outdoor pool area, landscaping, and internal roadway improvements, and three new surface parking lots (to the north, south and east of the Wellness Pavilion). The proposed improvements are illustrated in the site plan figure below.

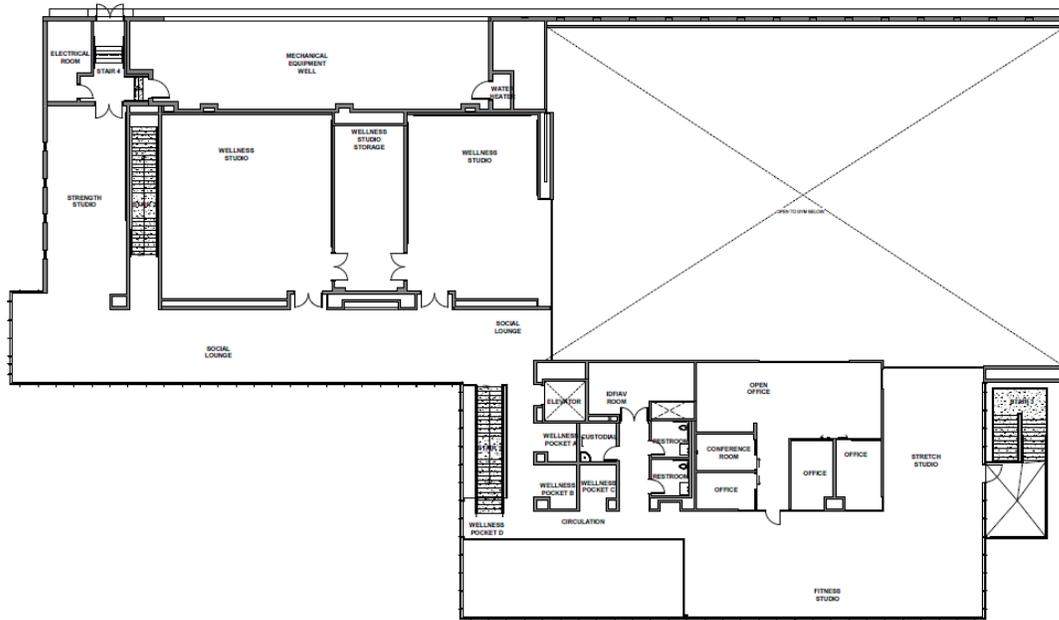


Alternative 5 Site Plan

As shown in the first and second floor figures below, the Wellness Pavilion will include an 8,600 square-foot gym, three wellness studios totaling 1,700 square feet, an 830 square-foot physical therapy lab, dancing and cycling studios (1,530 square feet and 1,250 square feet, respectively), a 1,250 square-foot cycling studio, 1,285 square feet of office space, lockers and restrooms/showers, and an equipment storage area. The first floor will be programmed with a lobby/reception area, gym, outdoor pool area, various storage areas, a training room, studio spaces, and a lifeguard office. The second floor will be programmed with studio spaces, lounge areas, offices, restrooms, a custodial storage room, and a conference room. Students, faculty, and staff will have daily access to Wellness Pavilion.



Alternative 5 Wellness Pavilion First Floor



Alternative 5 Wellness Pavilion Second Floor

Alternative 5 Events

The Wellness Pavilion will be used to host existing on-Campus events and new events. A total of seven existing events currently held elsewhere on the Campus will be moved to the Wellness Pavilion. Besides the change in location, there will be no other change to five of the seven existing

events; however, Athenian Day and Homecoming, will be permitted to increase the maximum number of students, faculty, and staff, and outside guests upon relocating these events to the Wellness Pavilion. In addition to the existing events noted above, several new events will be held at the Wellness Pavilion including Summer Sports Camps, Health and Wellness Speaker Series, Other Wellness/Sports Activities, and MSMU's existing volleyball and basketball club sports practices and games (which currently practice and play games off-site).

The Summer Sports Camps will be daily camps operating Monday through Friday from 8 AM to 5 PM during the summer months and will be made available to the students, faculty, staff, and outside guests. The Health and Wellness Speaker Series Events will occur throughout the year with a total of eight annual events. The topic of each lecture will vary by speaker, will be about three hours per event, and take place during midmorning, throughout the day, or evening hours on a weekday or weekend day. The lectures will be designed to support MSMU's Wellness curriculum with periodic lectures from experts in health and wellness. Other Wellness/Sports Activities will occur throughout the year with a maximum of 12 annual events permitted. The events can be hosted by MSMU or be external rental activities. These events will be consistent with the Wellness Pavilion goals to support health, wellness, and physical activity. The events will be permitted to take place during midmorning morning, throughout the day, or evening hours on a weekday or a weekend day. Practice and games for MSMU's existing club sports, basketball and volleyball, will be permitted throughout the school year on weekdays after 7:30 PM and anytime on weekends.

The table below provides a complete list of the existing events that will be relocated to the Wellness Pavilion (and otherwise will not change), the estimated increase in students and outside guests for Athenian Day and Homecoming (both are existing events that will be moved to the Wellness Pavilion), the type and number of new events that would be held at the Wellness Pavilion, and the estimated attendance for each of the new events.

Alternative 5 Existing and New Events to be Held at the Wellness Pavilion					
<i>Event</i>	<i>Description</i>	<i>Frequency</i>	<i>Time of Day</i>	<i>Current Location</i>	<i>Estimated Attendance</i>
Existing Events to be Relocated to the Wellness Pavilion / No Additional Changes					
Spring Convocation	Staff and faculty meeting prior to start of spring semester	Annual one-day event / January	8 am to 2 pm / Weekday	Circle / Campus Center	275 SFS 25 OG Total: 300 people
Nursing Panel	Career Services event with outside vendors and panelists	Annual one-day event / January	3 pm to 10 pm / Weekday	Campus Center	125 SFS 25 OG Total: 150 people
Women's Leadership Conference	Conference focused on women leadership	Annual one-day event / September	8 am to 5 pm / Weekend day	Circle / Campus Center/ Classrooms	175 SFS 175 OG Total: 350 people
Live at the Mount	High school students visit the Chalon Campus to learn more about MSMU ¹	Four days fall / four days spring	Morning Weekdays	Campus Center / Circle/ Theater	30 SFS 250 OG Total: 280 people
Student Orientation	Orientation for new students and family members	Annual / two days	8 am to 5 pm / Weekend days	Circle / Center Campus/ Theater / Classrooms	400 SFS 600 OG Total: 1,000 people

Existing Events to be Relocated to the Wellness Pavilion and Increase Attendance / No Additional Changes					
Athenian Day	Athletic event for students and alum	Annual one-day event / spring	8 am to 5 pm / Weekend day	Circle / Center Campus / Pool/ Fitness Facilities	200 SFS 100 OG Total: 300 people (Increase of 50 SFS and 50 OG)
Homecoming	Students, faculty, staff, and alum MSMU celebration	Annual one-day event / October	2 pm to 4 pm / Weekend day	Circle / Campus Center / Classrooms	200 SFS 150 OG Total: 350 people (Increase of 50 SFS and 50 OG)
New Events to be Located at the Wellness Pavilion					
Summer Sports Camps	Sports campus available to students, faculty, and the public	12 weeks during summer	8 am to 5 pm / Monday-Sunday /	New event, not currently held on Campus	400 OG
Health and Wellness Speaker Series	Lecture series to support MSMU's health and wellness curriculum	Maximum 8 events per year / throughout the year	If event includes OG, cannot start / end during AM or PM peak hours / weekday or weekend day	New event not currently held on Campus	200 SFS 250 OG Total: 450 people
Other Wellness / Sports Activities	External rental activities that are support health, wellness and sports	Maximum 12 events per year / throughout the year	If event includes OG, cannot start / end during AM or PM peak hours / weekday or weekend day	New event not currently held on Campus	50-400 OG ²
Club Sports	MSMU club volleyball and basketball games and practices	During the school year / no other restrictions	After 7:30 PM on weekdays / no restrictions on weekend days	Existing event not currently held on Campus	20-40 OG
<p>Notes: SFS -Students, Faculty, Staff OG – Outside Guests ¹- Students are transported to the Campus via five buses. ²- Attendance at Other Wellness/Sports Activities Events assumes all OG to be conservative. However, attendees could be a combination of SFS and OG.</p>					

Alternative 5 Transportation Project Design Features

Alternative 5 includes the implementation of Transportation Project Design Features (PDFs) that establish restrictions and requirements for the Wellness Pavilion construction and operation activities. The two construction PDFs require the implementation of a Construction Traffic Management Plan and Construction Parking Plan. The Construction Traffic Management Plan will require temporary traffic controls, coordination with Brentwood and Archer Schools to avoid the overlapping of hauling activities during the busiest construction periods, and minimization of impacts to the surrounding residential areas. The Construction Parking Plan will prohibit construction workers from parking on the surrounding residential streets, provide construction

workers with information on where they are permitted to park on Campus, and ensure all students, faculty, and staff are able to access the Campus when classes and construction activities occur simultaneously.

Alternative 5's operation Transportation PDFs establish the parameters that will govern the Wellness Pavilion operational activities and require the establishment of a Campus Event Coordination Plan that will ensure the new event restrictions are complied with. Additionally, MSMU will be required to maintain an online publicly accessible calendar, identifying all Campus events with over 50 guests. The calendar shall be updated at least once a month. A parking reservation system will be required for all outside guests arriving to Campus in a non-shuttle vehicle and attending an Other Wellness/Sports Activities event, Health and Wellness Speaker Series event, Club Sports event, and/or Summer Sports Campus with more than 50 campers.

The operational PDFs will establish maximum daily trip caps for all new events and restrict start and end times for Other Wellness/Sports Activities events, Health and Wellness Speaker Series events, and Club Sports events. These three events will not be permitted to start between 7-9:30 AM and 4-7:30 PM or end between 6:30-9 AM and 3:30-7 PM. Summer Sports Camps will be permitted to start and end during AM and PM peak hours but will be subject to the AM and PM trip caps outlined in PDF-TRAF-13.

Pedestrian access to the Campus will be restricted to ensure students, faculty, staff, and outside guests are not parking on the surrounding residential streets. Lastly, MSMU will reduce the number of average daily vehicles accessing the Campus, as compared to 2016 conditions, by limiting the average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion events, to one percent below the 2016 baseline trip counts taken for the Campus.

Alternative 5 Design and Architecture

Alternative 5 will include the construction of the Wellness Pavilion, an outdoor pool area, surface parking lots and improved landscaping and roadways. The two-story Wellness Pavilion will be a maximum height of 42 feet and sited on the northern portion of the Campus. The Wellness Pavilion will improve continuity between the Campus Core and Circle to the south and the Yates, Aldworth and Burns Houses to the north. The location of the Wellness Pavilion in relation to these buildings can be seen in the rendering below.

Overall Alternative 5 will be designed in a modern contextual style. The building will be constructed out of modern materials but will also maintain a compatible mass and scale and not overwhelm the adjacent buildings that make-up the Historic District on the Campus. Alternative 5 will achieve this by employing the same three components in the Wellness Pavilion building that are found in the older buildings on the Campus: a base, middle, and top. As discussed further below, the base will include colonnades, a common design theme found throughout the Campus, the middle will be constructed out of glass, and the top will be an inverted/butterfly roof commonly found in pavilions.

Alternative 5's landscape and hardscape design will include a dedicated walkway to the entrance plaza and will complement the existing colonnade theme of the Campus Core with an archway along the entrance plaza. The extensive use of glass will allow activities taking place at the Wellness Pavilion to be on display for individuals walking by, while offering inside panoramic views of the surrounding natural canyons, downtown Los Angeles, and the Pacific Ocean. The Wellness Pavilion will be constructed of glass, concrete, metal panels, and plaster. The architecture form seeks to use simple materials with deep overhangs to protect the glazing areas on the east, west and south facades while skylights would bring natural light into the gym.



Alternative 5 Wellness Pavilion and Campus Aerial Perspective

The building massing is conceived as an “L” shape configuration, locating the recreation and pool in the “angle” of the “L” shape for optimal solar orientation (southwest). As shown in the rendering below, at the building base, a colonnade of columns and glazing brings the scale of the building down to pedestrian level, allowing views into the Wellness Pavilion, differentiating the ground level from the second story, and providing a visually pleasing pedestrian environment. The ground floor colonnade element preserves the color, proportions and rhythm of the typical gothic arch colonnades found throughout Campus, while the second story will be constructed out of glazed glass allowing for the infiltration of natural light and reducing the demand on artificial lighting.

The typical clay tile roof forms of older buildings were reinterpreted as an expansive ceiling (an inverted roof) that brings the texture and color found on the clay roofs inside the building. The butterfly roof form is intended to express the open nature of the building, and to capture rainwater. The deep roof overhang will create a dramatic visual effect for those approaching the building from the lower elevation to the south.



Alternative 5 Wellness Pavilion Southern Facade

Citywide Design Guidelines

Pedestrian First

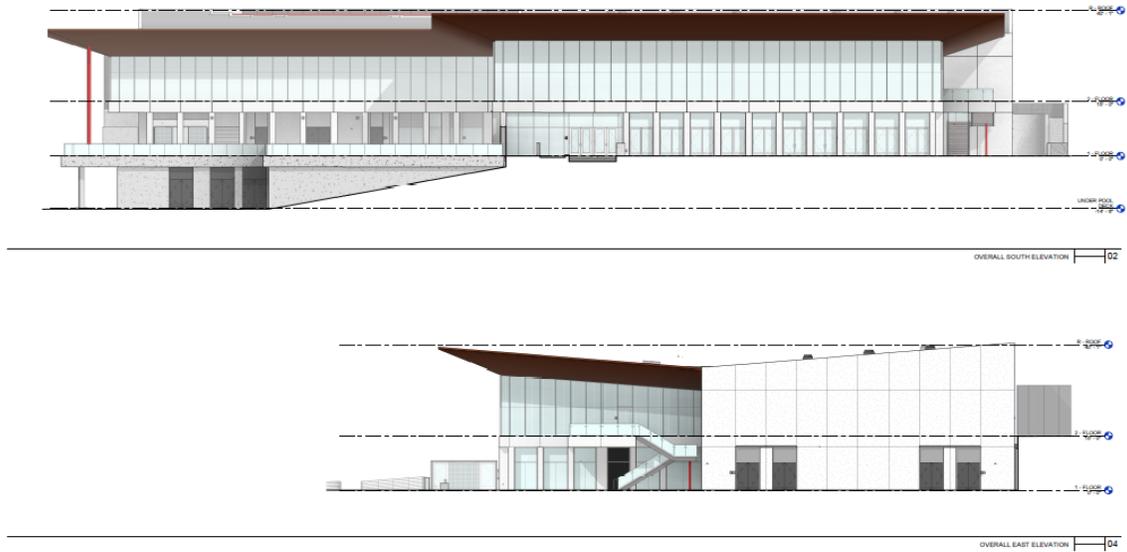
Alternative 5 will improve the pedestrian connection between the north and south portions of the Campus. Under existing conditions pedestrian walkways and passive recreation areas are located on the southern portion of the Campus, within the Campus Core and lack any meaningful pedestrian connection to the northern portion of the Campus where the existing fitness facilities are located. Currently pedestrians must walk through several surface parking lots and along internal roadways once leaving the Campus Core before arriving at the tennis courts, Fitness Center building, or pool area. As discussed below, Alternative 5 will provide up to 25,171 square feet of landscaped areas throughout the Project Site and provide a landscaped and hardscaped walkway from the surface parking lots located at the north edge of Mary Chapel to the Wellness Pavilion entrance. Thus, under Alternative 5, the proposed hardscape and landscape will improve the connection between the Campus Core and the new Wellness Pavilion.

360 Design

Alternative 5 will contribute to the visual character of the Campus and replace existing utilitarian buildings, including one of the Facilities Management buildings, Fitness Center building, pool, and tennis courts, with a building that is designed in an architectural style that complements the surrounding buildings. Alternative 5 will incorporate complementary materials that are seen throughout the Campus. For example, the Wellness Pavilion will reinterpret the typical terra cotta roof forms of the Circle through an expansive ceiling that brings the texture and color found on the clay roofs inside the building. The underside of the roof will further complement the terra-cotta color that exemplifies the Campus. The butterfly roof form and heavy use of glazing are intended to express the open nature of the proposed Wellness Pavilion and to maximize distant views. Also, the use of columns will continue the Circle's colonnade theme.

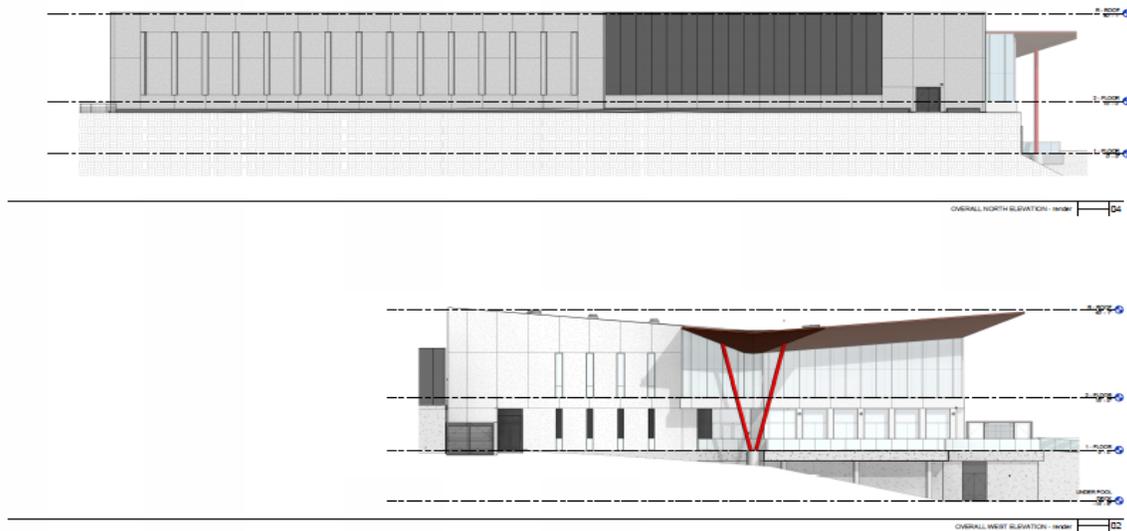
As shown in the elevations below, the extensive use of glass, cement, and plaster are carried through every building façade. The large windows will allow substantial amounts of natural light

throughout the day and will offer panoramic views of the surrounding canyons, downtown Los Angeles, and the Pacific Ocean.



Alternative 5 South and East Elevations

Alternative 5 will not encroach upon or adversely impact existing visual resources, including the surrounding undeveloped open space, the Circle, and the Campus' Historic District. Alternative 5 will result in a better visual interface between the residence hall to the north and the lower Campus while creating a visual break between the Wellness Pavilion's modernist architecture and the Spanish Colonial Revival architecture of the Campus Circle.



Alternative 5 North and West Elevations

Climate-Adaptive Design

Alternative 5 will incorporate environmentally climate adaptive design features including an underground rainwater treatment system, an irrigation system that will not result in overspray to non-irrigated areas, native and drought tolerant plants as well as low flow and sensor-activated plumbing fixtures to reduce water usage and wastewater. Additionally, water bottle filling stations will be provided, reducing waste from disposal water bottles and solar panels will be installed on 25 percent of the roof area, while the large expanses of glass and skylights will allow for the use of natural light and all rooms will include automatic dimming controls to ensure optimum energy performance. Single ply roofing will be used to reflect solar heat and reduce heat absorption into the building.

Building Height, Setbacks, and Floor Area

In combination with the RE40 zone and City designated Hillside Area, Height District 1 imposes a maximum height of 30 feet for buildings with a roof slope of less than 25 percent, setbacks ranging from 10 to 25 feet, and sets a minimum guaranteed residential floor area of 18 percent of the total lot size. Pursuant to LAMC Section 12.24 F, MSMU has requested a determination to allow a maximum building height of 42 feet, in lieu of the otherwise permitted maximum building height of 30 feet for a building located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.10(d). Alternative 5 will comply with and exceed all of the minimum setback requirements of the zone. Under Alternative 5 no residential uses will be constructed. Additionally, no single-family residences are located on the Campus. The Campus is a 1,977,156 square-foot lot. The existing development located on the Campus totals 231,343 square feet and equates to approximately 12 percent of the lot. Under Alternative 5, the Wellness Pavilion will be 35,500 square feet, thus the total square footage on the Campus will be 266,834 square feet. The additional square footage will result in approximately 13.5 percent of the lot being developed, below the guaranteed minimum residential floor area of 18 percent.

Open Space and Landscaping

Alternative 5 will not include any residential uses and thus in accordance with LAMC Section 12.21 G no residential open space is required. As shown in the figure below Alternative 5 will provide up to 25,171 square feet of landscaped areas throughout the Project Site and provide a landscaped and hardscaped walkway from the surface parking lots located at the north edge of Mary Chapel to the Wellness Pavilion entrance. Located on the upper part of Campus, the Project Site's landscaping will improve the connection between the buildings to the south which make up the Campus Core and overall, the pedestrian flow between the upper and lower Campus will be improved. The landscape design will preserve the overall established Campus character, but transition to the use of a contemporary material and plant palette to be consistent with the programmatic, functional, and sustainable requirements acting on the Project Site. Two Protected Trees, a Coast Live Oak and a California Bay are located on the Project Site and will be removed under Alternative 5. Pursuant to Ordinance 186,873 the two trees will be replaced at a 4:1 ratio with any of the protected tree varieties. Alternative 5 will also require the removal of 46 Non-Protected Trees. MSMU will be required to replace all non-protected significant trees that are eight inches or more in diameter at breast height at a 1:1 ratio.



Alternative 5 Wellness Pavilion Landscaping Plan

Parking

Vehicle Parking

There are currently 561 vehicle parking spaces on the Campus, of which 226 spaces are located on the Project Site, the general location of each existing space is shown in the figure below. As shown in the table below and in compliance with LAMC Sections 12.21 A.4(d) and 12.21 A.4(e), Alternative 5 will be required to provide a total of 95 vehicle spaces for the Wellness Pavilion. Alternative 5 will provide a total of 186 parking spaces, (more than required by the LAMC, but a net reduction of 46 spaces as compared to existing conditions), in three surface parking lots. Thus Alternative 5 will provide 91 excess vehicle spaces on the Project Site but will reduce the total number of Campus vehicle spaces from 561 spaces to 521 spaces.

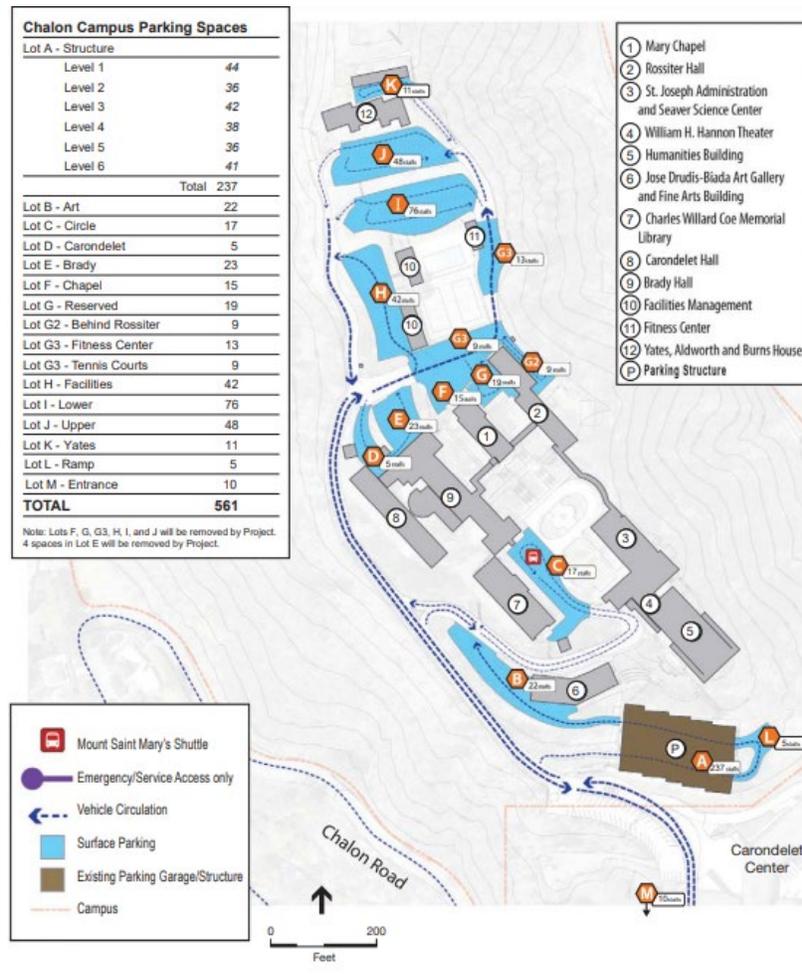
Alternative 5 Required Vehicle Parking			
<i>Wellness Pavilion</i>	<i>Parking Rate</i>	<i>Required</i>	<i>Provided</i>
26,550 sf of assembly space	1 space / 500 sf	53 spaces	186
212 fixed seats	1 space / 5 fixed seats	42 spaces	

Bicycle Parking

Pursuant to LAMC Section 12.21 A.16, Alternative 5 is required to provide 71 short-term (1 space per 500 square feet) and 35 long-term (1 space per 1,000 square feet) bicycle parking spaces. In accordance with LAMC Section 12.21 A.16(e)(2), bicycle parking shall be provided on the same lot as the use for which it is intended to serve. As the Project Site is part of the Campus, and the Campus is designated as one lot, both the short term and long term bicycle parking spaces will be located in a prominent, accessible locations on the Campus and in accordance with the provisions of Section 12.21.A.16 of the Municipal Code.

Access and Circulation

Ingress and egress access to the Campus is provided via Chalon Road. Vehicles entering/leaving the Campus must pass through a covered vehicle passageway beneath the Carondelet Center. The roadway continues along the westerly ridge, providing access to the existing parking structure and to the Circle. From this point, the driveway continues northerly and divides into two branches. The east branch is dedicated to ingress traffic and the west branch is dedicated to egress traffic. The Campus internal circulation is shown in the figure below.



Existing Campus Parking and Vehicle Circulation

Sustainability Features

Alternative 5 will incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen, which will reduce energy and water usage. Alternative 5 will also be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and stormwater reuse. Specifically, Alternative 5 will include multiple underground water storage tanks for rainwater harvesting and to ensure stormwater treatment will occur on-site prior to water being discharged to the storm drain system. Rainwater will be collected on the building roof where it will then drain to landscaped collection areas. Additionally, rainwater from parking areas will drain to the landscape areas for treatment prior to being discharged. Sustainable landscape features will include an irrigation system that will promote water conservation and avoid water runoff, and overspray to non-irrigated areas,

walks, roadways, or structures and a native, drought tolerant, low maintenance plant palette. The building will be designed to include low flow and sensor-activated plumbing fixtures which will reduce water use and wastewater in restrooms and showers. Water bottle filling stations will be provided, reducing waste from disposal of water bottles. Solar panels will be located on the roof, while the large expanses of glass and skylights will allow for the use of natural light, while all rooms would include automatic dimming controls to ensure optimum energy performance. Glazing will provide protection from direct sunlight with deep overhangs to reduce glare, solar radiation, and heat gain and single ply roofing would be used to reflect solar heat and reduce the building's heat absorption into the building. Furthermore, as proposed and conditioned, all electric vehicle charging stations (EV spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC.

Entitlement Analysis

In order to develop the Project, MSMU has requested the following land use entitlements:

- Consideration of the **Environmental Impact Report**, including the adoption of the Statement of Overriding Considerations for significant and unavoidable impacts related to Alternative 5's Project level off-site Construction Noise and Construction Transportation impacts and Cumulative Human Annoyance Construction Vibration impacts, and adoption of a Mitigation Monitoring Program to off-set any potential environmental impacts Alternative 5 may have on the environment;
- A **Plan Approval** to allow for the development of Alternative 5 in conjunction with the continued use of a private school in the RE40-1-H Zone;
- A **determination** to allow a maximum building height of 42 feet, in lieu of the otherwise permitted maximum building height of 30 feet for a building located in the RE40-1-H Zone;
- A **Zoning Administrator Determination** to permit a total of 9,343 cubic yards of grading, in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone;
- A **Zoning Administrator Determination** request to permit a total of 12 retaining walls ranging in height from two feet to a maximum height of 17 feet, in lieu of the otherwise maximum limit of one retaining wall and the maximum 12-foot height limit for a property located in the RE40-1-H Zone.

Plan Approval

The original 33.3-acre Campus was established in January 1929, with a number of building additions and expansions over the years. The Campus currently operates as a Deemed Approved Conditional Use with subsequent Plan Approvals allowing for development of the Campus.

In accordance with LAMC Section 12.24 (Conditional Use Permits and Other Similar Quasi-Jurisdictional Approvals), a CUP allows the City to consider uses that may be essential or beneficial to a particular community, but which are not allowed as a matter of right within a specific zone. A CUP is a discretionary approval issued after an environmental review process and a public hearing process. The decisionmaker may approve the conditional use in whole or in part, with or without conditions, or deny the application. In accordance with the LAMC, the City of Los Angeles permits educational uses in residential zones with the approval of a CUP. The Campus exists as a "Deemed to be Approved" conditional use because its use as an educational institution predates such CUP requirement. Per prior approvals consistent with the Campus's deemed to be approved status, the construction of new buildings on the Campus is allowed pursuant to a Plan Approval. LAMC Section 12.24 M (Development of Uses) provides that on any lot or portion of a lot that has an approved Conditional Use, new buildings or structures may be erected,

enlargements may be made to existing buildings, and existing uses may be extended on an approved site (in accordance with LAMC Section 12.24 L (Existing Uses)), provided that plans are submitted to and approved by the Zoning Administrator, the Area Planning Commission, or the City Planning Commission, whichever has jurisdiction at the time. The decisionmaker may deny the plans if the use is determined to not conform to the purpose and intent of the findings required for a conditional use.

The requested Plan Approval will allow for the development of Alternative 5 which will include a two-story, 35,500 square-foot Wellness Pavilion, new outdoor pool area, improved roadway and landscaped areas, several surface parking lots, and the introduction of three new types of events, as described above. Alternative 5 does not include a request to increase student enrollment. The development is compatible with and supports the existing private school use and has been conditioned to include construction and operational features to minimize impacts to the adjacent residential neighborhood resulting from the project.

Conditional Use Determination

Pursuant to LAMC Section 12.24 F, a decision-maker may impose conditions related to interests addressed in the required Conditional Use Permit findings (refer to LAMC Section 12.24 E), including permission to exceed the maximum permitted height. The Campus, including the Project Site, is zoned RE40-1-H which permits a maximum building height of 30 feet for a roof slope of less than 25 percent. In connection with a Plan Approval for a Deemed-Approved Conditional Use, MSMU is requesting a determination pursuant to LAMC Section 12.24 F, to allow for a maximum building height of 42 feet (a height increase of 21 percent), in lieu of the otherwise permitted maximum building height of 30 feet. This will allow the building to accommodate higher interior floor heights to support the athletic uses and facilities within the building. In addition, the height and massing of the building are compatible with the surrounding Campus buildings. As conditioned, Alternative 5 will be permitted to be a maximum height of 42 feet (see CPC-1952-4072-CU-PA 1 Condition No. 4).

Zoning Administrator Determination – Grading

Pursuant to LAMC Section 12.24 X.28, a decision-maker may permit an increase in the total amount of permitted cubic yards of grading for parcels located in a residential zone and Hillside Area. The Campus, including the Project Site, is zoned RE40-1-H. MSMU is requesting a total of 9,343 cubic yards of grading, in lieu of the otherwise permitted maximum of 6,600 cubic yards for a property located in the RE40-1-H Zone, as permitted by LAMC 12.21 C.10(f)(1). As the development standards included in LAMC Section 12.21 C.10 were adopted for Single-Family residences located in a Hillside Area and if approved Alternative 5 will result in a 35,500 square-foot gym, the additional grading is necessary due to the development type and overall design of Alternative 5 (i.e., the inclusion of pedestrian, landscaping, and internal roadway improvements in addition to the construction of the Wellness Pavilion).. As conditioned, Alternative 5 will be permitted a total of 9,343 cubic yards of grading and be required to balance the grading on-site (see ZA-2017-928-ZAD Condition No 2(a)).

Zoning Administrator Determination – Retaining Walls

Pursuant to LAMC Section 12.24 X.26, a decision-maker may permit an increase in the number of permitted retaining walls and the permitted maximum height of each individual retaining wall for parcels located in a residential zone and Hillside Area Zone. The Campus, including the Project Site, is zoned RE40-1-H. MSMU is requesting a total of 12 retaining walls ranging in height from two feet to a maximum height of 17 feet in lieu of the otherwise maximum limit of one retaining wall and the maximum 12-foot height limit per lot, for a property located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.8. Though most of the retaining walls are not retaining

walls in the sense that retaining walls are intended to support hillside earth and ensure a stable site, LAMC Section 12.21 C.8 states that, a “retaining wall” shall be defined as a freestanding continuous structure, as viewed from the top, intended to support earth, which is not attached to a building.” MSMU has requested that any wall which may technically meet the LAMC definition be considered a retaining wall. A majority of the retaining walls are largely architectural in nature, integrated into the Wellness Pavilion itself, or the surrounding parking areas, and none of the proposed retaining walls are carved into the hillside and/or supporting large amounts of earth or natural features. As conditioned, Alternative 5 will be permitted up to 12 retaining walls with a maximum height of 17 feet (see ZA-2017-928-ZAD Condition No. 2(b)).

Environmental Impact Report

The City of Los Angeles released the Final EIR, ENV-2016-2319-EIR (SCH No. 2016081015), on June 17, 2021 detailing the relevant environmental impacts resulting from Alternative 5. In regard to Alternative 5, the EIR identified Noise (Project Level Off-site Construction Noise), Vibration (Cumulative Construction Vibration Human Annoyance), and Transportation (Project Level Construction Neighborhood Street Segments) as areas where Alternative 5 will result in significant and unavoidable environmental impacts.

Public Testimony

Comments from identified state, regional and local agencies, and members of the public, on the scope of the EIR were solicited through a Notice of Preparation (NOP) process. The NOP was mailed to owners and occupants within a 500-foot radius of the Project Site and circulated for a 30-day review period starting on August 4, 2016 and ending on September 2, 2016. A public scoping meeting was held on August 16, 2016.

The Draft EIR was circulated for an initial 48-day public comment period beginning on April 12, 2018 and was scheduled to end on May 29, 2018. As requested by Council District 11, Los Angeles City Planning granted a 15-day extension period, extending the review date to June 13, 2018, for a total of 63 days. A Notice of Availability (NOA) of the Draft EIR was mailed to owners and occupants within a 500-foot radius of the Project Site, as well as to commenters and interested parties from the NOP, posted on the Department of City Planning website and published in the Los Angeles Times.

On June 17 2021, a Public Hearing Notice and Notice of Completion and Availability (NOC/NOA) of the Final EIR was distributed to all owners and occupants within a 500-foot radius of the Project Site, as well as to all commenters from the Draft EIR and interested parties and was posted on the Los Angeles City Planning website. Additionally, as required by the LAMC, Planning Staff submitted a request to the City Clerk to publish the Public Hearing Notice and NOA/NOC in the Daily Journal 24 days prior to the Hearing Office Hearing and the Public Hearing Notice and NOC/NOA was posted on-site 10 days prior to Hearing Officer Hearing.

On July 14, 2021 a Public Hearing was held by a Hearing Officer on behalf of the City Planning Commission at 9:30 a.m. using Zoom (see Public Hearing and Communications, Page P-1). In addition to the Hearing Officer, Chief Armando Hogan from the Los Angeles Fire Department (LAFD) and Senior Transportation Engineer Eddie Guerrero from LADOT were in attendance. After the Public Hearing, the City Clerk notified Planning Staff that the Public Hearing Notice and NOA/NOC had not been published in the Daily Journal, as required by the LAMC. Thus, a second Public Hearing will be held by the City Planning Commission on October 21, 2021 to satisfy this noticing requirement. It should be noted that a summary of the testimony provided during the July 14, 2021 Public Hearing, as well as comment letters received prior to and after the hearing are part of the administrative record and summarized in this staff report to ensure the City Planning Commission is aware of the issues that have been raised by members of the public.

Finally, a notice was posted at the Project Site on October 11, 2021, 10 days prior to the City Planning Commission Meeting and a Public Hearing notice for CPC-1952-4072-CU-PA1 and ZA-2017-928-ZAD was mailed out to all interested parties and owners and occupants within 500 feet of the Site, on September 27, 2021.

Issues

A variety of concerns were expressed during the NOP and Draft EIR comment periods, after the Final EIR was released (prior to the Public Hearing), at the July 14, 2021 Public Hearing, and up until the City Planning Commission Hearing. Based on public testimony and written communications received, the most prevalent issues are responded to by staff as follows, which include CEQA issues as well as concerns on the entitlement requests:

CEQA Baseline

Commenters stated that the EIR is an outdated document as the Notice of Preparation (NOP) was published in August 2016 and the Draft EIR was published in April 2018, and that the EIR used an inappropriate 2016 baseline and a future buildout year of 2020. Under CEQA, the impacts of a project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a point in time referred to as the baseline (e.g., the conditions at the time of the NOP is published). Thus, the changes in environmental conditions, between those two scenarios, represent the impacts of a project. An accurate baseline must be established to avoid an over or underestimated baseline which would cause project impacts to be inaccurate. The NOP was published on August 4, 2016. The Draft EIR properly utilized the 2016 student enrollment (1,498 students) at the Chalon Campus to establish the environmental baseline against which Alternative 5 impacts were evaluated. This approach is consistent with the CEQA Guidelines.

In addition, the EIR analysis is more conservative because it assumes a higher student enrollment number as compared to 2020-2021 conditions, which has seen decreased enrollment and a reduction of in-person events due to the unique circumstances of the pandemic. Similarly, it conservatively does not take into account efficiencies and reductions that have since occurred from programs and regulations related to more stringent emission and energy standards, as well as more efficient or restrictive building codes.

2018 CEQA Guidelines Appendix G Updates

The California Natural Resources Agency adopted revisions to the CEQA Guidelines that became effective on December 28, 2018. The revisions to the Guidelines included changes to CEQA Guidelines Appendix G- Environmental Checklist Form (Appendix G). The revisions to Appendix G are intended to reduce redundancy, provide additional clarity, and align Appendix G with recent California appellate court and Supreme Court decisions and changes to the Public Resources Code. In accordance with CEQA Guidelines Section 15007(b), the revised CEQA Guidelines, including the revised Appendix G Environmental Checklist, apply prospectively and only to steps in the CEQA process not yet undertaken by the effective date of the revisions. The revised CEQA Guidelines do not apply to the CEQA documents that were published for public review before the effective date of the revised CEQA Guidelines.

The Draft EIR was published on April 12, 2018 with a 63-day public comment period extending until June 13, 2018. While the revisions to Appendix G were not effective at the time of the Draft EIR publication, a discussion of the revised Appendix G Environmental Checklist Form, as it relates to the analysis provided in the Draft EIR for the Original Project and in the Final EIR for

Alternative 5 is provided in Appendix B of the Final EIR. Notable revisions include inclusion of a VMT threshold in the Transportation section and inclusion of Section XX Wildfire.

A commenter stated that the updated Appendix G analysis failed to include what is now Threshold g under the Hazards and Hazardous Materials section. This statement is incorrect, as this threshold that relates to wildfire was analyzed as Threshold h under Hazards and Hazardous Materials (which was consistent with the Appendix G checklist in 2018) and scoped out in the Initial Study as impacts were determined to be less than significant. As stated on Page B-3, Appendix B, in the Final EIR, the 2018 Appendix G revisions to the Hazards and Hazardous Materials section were revised to delete Checklist Question VIII.f regarding safety hazards associated with proximity to a private airstrip and to clarify that Checklist Question VIII.g (formerly Checklist Question VIII.h) addresses impacts associated with wildland fires. All of the questions in the updated Appendix G checklist have been addressed in the Initial Study, included as Appendix A-1 of the Draft EIR. All issue areas, including physical interference with an adopted emergency response plan and direct or indirect exposure to the risk of wildfire fires, were determined to be less than significant and further analysis in the Draft EIR was not required. As discussed in Section 1, Subsection d), Evaluation of Impacts, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR, issues regarding hazards and hazardous materials would be the same under Alternative 5 as compared to the Original Project.

In addition, since the time the Draft EIR was published, SB 743 required the Office of Planning and Research (OPR) to change the way public agencies evaluate project transportation impacts under CEQA. The focus of transportation analysis shifted away from driver delay, which had been historically measured by traffic level of service (LOS), to a new measurement that better addresses the state's goals of reducing GHG emissions, creation of multi-modal transportation, and promotion of mixed-use developments.

On July 1, 2020, changes to the CEQA Guidelines took effect which require local agencies to analyze traffic impacts using vehicle miles traveled (VMT) instead of LOS. The Final EIR disclosed that both the Original Project and Alternative 5 falls below LADOT's Transportation Assessment Guidelines (TAG) screening criteria for VMT and would not warrant further analysis, as it does not generate a net increase of 250 or more daily vehicle trips. To ensure a meaningful comparison between the Original Project and Alternative 5, Alternative 5's transportation analysis also provided information under the LOS methodology, as this was the approved methodology in place at the time the Draft EIR.

Alternative 5, unlike an office or residential project, will not add daily vehicle trips. Instead, Alternative 5 will add new vehicle trips only on those days on which an Other Wellness/Sports Activities event, Health and Wellness Speaker Series event, or a Summer Sports Camp will be held on Campus. Under Alternative 5 Health and Wellness Speaker series events will be permitted a maximum of eight times per year, Other Wellness/Sports Activities events will be permitted a maximum of 12 times per year, and Summer Sports Camps will be permitted during the summer months only. LADOT determined that Alternative 5 does not meet the VMT analysis threshold of 250 new daily trips because based upon the frequency of new events and the trip caps, Alternative 5 will generate approximately only 81 average daily weekday vehicle trips under a worst-case scenario.

Using the same methodology that was approved by LADOT to make this determination with respect to Alternative 5, the Original Project will generate approximately 205 average daily weekday vehicle trips under a worst-case scenario, also falling below the 250 weekday vehicle trips per day threshold and thus the Original Project would not have been required to provide a VMT study. Alternative 5 will be subject to PDF-TRAF-18, which requires an average daily trip reduction of 22 trips. New trips generated by Alternative 5 during the school year will be generated only by outside guests of new events, which generally will be the same or similar user groups as

outside guests who come to the Campus for existing events (friends and family of students and faculty, faculty of other institutions in the Los Angeles area, members of the community, etc.), and drawn from approximately the same geographic area. During the summer, Alternative 5's new trips will be generated by campers and staff of Summer Sports Camps, with many of the campers expected to be from the surrounding community and no further than the geographic area of current outside guests who visit the Campus and MSMU students, faculty, and staff.

Recirculation of the EIR

A number of comments requested that the EIR be recirculated for a variety of reasons, including the introduction of Alternative 5 in the Final EIR. Pursuant to Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5, CEQA requires recirculation of a Draft EIR only when "significant new information" is added to a Draft EIR after publication of the Notice of Availability (NOA) has occurred, but before the EIR is certified. The CEQA Guidelines define "significant new information" as changes to an EIR which "deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." The CEQA Guidelines further provide four examples of categories of "significant new information," as follows: 1. "A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented; 2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance; 3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; and 4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.*(1989) 214 Cal.App.3d 1043)." CEQA Guidelines Section 15088.5 also provides that "[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." The addition of Alternative 5 to this Final EIR does not constitute "significant new information" pursuant to CEQA Guidelines Section 15088.5 because it does not "deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement," nor does it fall into any of the four categories of "significant new information" provided in CEQA Guidelines Section 15088.5(a).

Alternative 5 does not fall into Category 1 because implementing Alternative 5 and its PDFs would not result in any new significant environmental impacts. Alternative 5 does not fall into Category 2 because it would not result in a substantial increase in the severity of any environmental impacts. Rather, as discussed in Chapter III of the Final EIR, under Alternative 5, the Original Project's significant and unavoidable construction off-site noise and transportation impacts would be incrementally reduced and the Original Project's significant and unavoidable operation traffic impacts would be reduced to a level of less than significant. As discussed in detail in Chapter III, Alternative 5 would not increase the Original Project's levels of impacts in any of the analyzed environmental factors, and would reduce the Original Project's level of impacts over a broad range of environmental issues in the categories of Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Noise, Public Services, Transportation/Traffic, Tribal Cultural Resources, and Utilities. Alternative 5 does not fall into Category 3 because Alternative 5 would be the Environmentally Superior Alternative and would reduce most of the significant environmental impacts of the Original Project, as evaluated in Chapter III. Further, similar to Alternative 5, Alternative 4, which was included in the Draft EIR, also proposed trip caps as a means to reduce the Project's significant and unavoidable operational traffic impacts. Alternative 5 is a feasible alternative that would avoid or substantially

lessen the significant environmental effects of the Original Project, in keeping with the legislative intent of CEQA. Therefore, the introduction of Alternative 5 in the Final EIR does not fall into Category 3 because while it does represent a feasible project alternative that would lessen the significant environmental impacts of the Original Project, staff has recommended Alternative 5 for approval.

Alternative 5 does not fall into Category 4 because the Draft EIR provided a comprehensive analysis of the environmental issues determined to have potentially significant impacts following completion of the Original Project's Initial Study and EIR scoping process, and that analysis is also applicable to Alternative 5. Technical analysis was provided by experts in their respective fields for those issues evaluated in the Draft EIR, where necessary. Responses to the Draft EIR comment letters were prepared in accordance with CEQA Guidelines Section 15088 and have been provided in Chapter II of this Final EIR. The responses clarify information and analysis presented in the Draft EIR, with corrections and additions provided in Chapter III. The Draft EIR also comprehensively evaluated the Original Project and Alternatives 1 through 4. As explained further in Chapter III, Alternative 5 was specifically designed to lessen or eliminate the Original Project's significant environmental impacts. As analyzed in Chapter III, Alternative 5 does not have any additional significant impacts other than those already disclosed under the Original Project in the Draft EIR, nor does Alternative 5 have any impacts of a different type or character from those studied under the Original Project in the Draft EIR. Alternative 5 would implement limitations on daily trips during the school year and the summer that are similar, but more restrictive, than those studied as part of Alternative 4 in the Draft EIR, and a complete analysis of Alternative 5's specific transportation impacts is also included in Chapter III. Therefore, the analysis of the Original Project's impacts in the Draft EIR applies to Alternative 5, providing the public with a meaningful chance to evaluate and comment on all of the potential impacts of Alternative 5. For the reasons explained above, no new significant information is introduced in the Final EIR that would warrant recirculation as set forth in CEQA Guidelines Section 15088.5. Therefore, recirculation of the Draft EIR is not required.

Introduction of Alternative 5 in the Final EIR

Commenters stated that the introduction of Alternative 5 in the Final EIR is an attempt to revise the Original Project Description without the Original Project Description appearing unstable, circumvent having to submit a new application, and avoiding recirculation of the Draft EIR. The majority of changes included as part of Alternative 5 were proposed to address concerns raised by the surrounding community and result in a more refined project with a greater number of operational restrictions.

The Original Project Description is a stable Project Description that meets the requirements of CEQA Guidelines Section 15124 including, the location and boundaries of the project site, objectives of the project, and a general description of the project's characteristics. Alternative 5 is similar to the Original Project in that it will result in the construction and operation of the Wellness Pavilion, including the introduction of three new event types, and will not increase student enrollment. However, unlike the Original Project, Alternative 5 includes PDFs which result in a far more refined operational component. These PDFs were included in response to Draft EIR comments that expressed concern over the Original Project's traffic implications.

CEQA anticipates circumstances where new information can be included in a Final EIR without the need to recirculate the Draft EIR, if the new information is intended to clarify or amplify information in the Draft EIR and does not result in significant new effects. Further, CEQA gives lead agencies the authority to adopt a project alternative particularly where the agency finds the alternative to be more environmentally beneficial than the original project.

As stated above, Alternative 5 was introduced in response to comments received during the Draft EIR comment period and feedback conveyed during MSMU community outreach events. Alternative 5 is similar to the Original Project in that both scenarios will result in the construction and operation of the Wellness Pavilion on the Campus and allow for three new types of events, Summer Sports Camps, Health and Wellness Speaker Series, and Other Wellness/Sports Events/Activities. A side-by-side comparison of the differences between Alternative 5 and the Original Project is provided in the table at the beginning of the staff report. As shown in the table, overall Alternative 5's construction, physical, and operational changes are less and/or will be more restrictive than the Original Project's.

It should also be noted that Alternative 4, the Reduced Event Alternative, which was included in the Draft EIR, Section V, Page V-64, is also similar to Alternative 5. Specifically, Alternative 4 reduced the frequency of proposed new events, implemented a maximum number of allowed outside guest vehicle trips during peak hours, and established a maximum daily vehicle trip cap for outside guests' vehicles, as compared to the Original Project, which will permit a maximum number of outside guests.

Thus, the similarities between Alternative 4 and Alternative 5 provided the public with a meaningful chance to evaluate and comment on all of the potential impacts of Alternative 4, which is similar to Alternative 5. For these reasons, the introduction of Alternative 5 in the Final EIR is not an attempt to revise the Original Project and no new significant information has been introduced in the Final EIR that would warrant recirculation as set forth in CEQA Guidelines Section 15088.5.

Related Projects

Comments were received stating that the related projects list was incomplete. CEQA requires that an analysis of cumulative impacts be included in a Draft EIR. For an adequate discussion of significant cumulative impacts, a list of past, present, and probable future projects producing related or cumulative impacts can be relied upon or a summary of projections contained in an adopted general plan, related planning document, or prior environmental document which has been adopted or certified, and which described or evaluated regional or area-wide conditions contributing to a cumulative impact may be used. A list of 67 related projects known at the time the NOP was published and within a five-mile radius of the Project Site was used to determine potential cumulative impacts. It should be noted that due to the location of the Project Site, the related project radius was increased from the then standard of one and a half to two miles to five miles to ensure a conservative number of related projects were captured. Additionally, since publication of the EIR, LADOT has updated the related project radius to now only be half a mile from a project site. Comments were received claiming that the related projects list was incomplete and should have included additional projects, including the Berggruen Institute, the Benedict Canyon Project, the Curtis School Project and the Miriam School Project. All of the referenced projects are located greater five miles from the Project Site and thus were not required to be included.

Enforceability of Project Design Features, Mitigation Measures, and Conditions of Approval

Comments were received that questioned the validity and enforceability of Alternative 5's mitigation measures, PDFs, and conditions of approval. With respect to the enforceability of PDFs, PDFs, like mitigation measures, are included in a project's Mitigation Monitoring Program (see Section IV, Mitigation Monitoring Program, of the Final EIR). MSMU will be required to provide documentation to demonstrate compliance with Alternative 5's mitigation measures,

PDFs, and Conditions of Approval prior to permits being issued by Planning staff. As such, as with mitigation measures, PDFs are fully enforceable.

Additionally, in regard to the Transportation PDFs introduced in the Final EIR as part of Alternative 5, prior to publication of the Final EIR, Planning and LADOT staff reviewed and vetted the Transportation PDFs. Further, several operational PDFs include enforcement components. For example, PDF-TRAF-10, which requires that MSMU provide a parking reservation/ticketing system to track the number of outside vehicles; the parking system can be audited by LADOT at any time. PDF-TRAF-18, which requires MSMU to reduce the number of average daily trips to one percent below the 2016 baselines conditions will also require biannual monitoring reports be submitted to LADOT for the first five years and thereafter every five years. Finally, separate from the CEQA requirement of enforceability of a Mitigation Monitoring Program, the City's standard project conditions include the enforcement of the entirety of the Mitigation Monitoring Program.

Commenters have questioned how the Department of City Planning and LADOT will monitor the operational Transportation PDFs and noted that staff has acknowledged that the Department does not conduct mitigation monitoring. The Los Angeles Department of Building and Safety is responsible for enforcement of the Code, however Planning staff will be responsible for verifying compliance with the MMP prior to issuing permits for Alternative 5. Thus, prior to the issuance of permits, staff will require documentation and agreements demonstrating that MSMU must comply with the operational Transportation PDFs which require MSMU to provide biannual monitoring reports.

Regarding conditions of approval, in accordance with LAMC Section 12.24 F (which Alternative 5 will be subject to), "The Department shall have the authority to conduct inspections to verify compliance with any and all conditions imposed on any conditional use or other similar quasi-judicial approval granted pursuant to this section...If upon inspection, the Department finds that the applicant has failed to comply with conditions of any conditional use or other similar quasi-judicial approval granted pursuant to this section, the Department shall give notice to the business operator or property owner to correct the specific deficiencies and the time in which to complete the correction. Evidence of compliance shall be submitted to the Department within the specified correction period. If the deficiencies are not corrected with the time prescribed by the Department, revocation proceedings pursuant to Subsection Z of this section may commence."

Further LAMC Section 12.24 Z states, "If the applicant fails to comply with the conditions of any conditional use or other similar quasi-judicial approvals granted pursuant to this section, the Director or the appropriate Area or City Planning Commission (if the approval or conditional use was granted by an Area or City Planning Commission), upon knowledge of the fact of non-compliance, may give notice to the record owner or lessee of the real property affected to appear at a time and place fixed by the Area or City Planning Commission or Director and show cause why the decision granting the approval of conditional use should not be repealed or rescinded."

Project Design Features

Several commenters have stated that the Alternative 5 Transportation PDFs introduced in the Final EIR should be mitigation measures, and all PDFs included in the Draft EIR as part of the Original Project and Alternative 5 should have been mitigation measures and not PDFs. All PDFs included in the Draft EIR, as part of the Original Project, will be implemented under Alternative 5, with the exception of PDF-TRAF-3 through PDF-TRAF-6 which have been incorporated into Alternative 5's modified PDF-TRAF-1 and PDF-TRAF-2. In addition, PDF-TRAF-8, which limited outside guest attendance under the Original Project and is no longer necessary under Alternative 5 as the event limitation program has shifted from limiting outside guests to limiting vehicle trip counts. The table below provides a synopsis of Alternative 5's PDFs as well as an explanation as to why it is appropriate to include the component as a PDF.

Alternative 5 Project Design Features		
<i>Project Design Features</i>	<i>Summary</i>	<i>Justification</i>
Aesthetics		
PDF AES-1 and 2	The PDFs will require Alternative 5 to shield all outdoor light sources to ensure on-site lighting will not be seen off-site, that glass used to construct the building façade shall comply with existing building and energy code requirements, and that LADBS shall review the exterior building materials to ensure they do not exceed the reflectivity of current building materials.	Both PDFs are design features of Alternative 5. Alternative 5 will be required to comply with LAMC lighting requirements and LADBS requirements in regard to glass coating.
Air Quality		
PDF AQ-1 through PDF AQ-8	PDF AQ-1 will require Alternative 5 to comply with the Californian Green Building Code requirements in regard to EV ready and EV installed parking spaces.	Alternative 5 will be required to comply with the current Green Building Code regulations. This is a regulatory measure and not a mitigation.
	PDF-AQ-2 through PDF-AQ-7 ensure specific design features, including the inclusion of large expanses of insulated glass and skylights, and interior lighting system that will adjust accordingly based on the amount of natural light, a single-ply roof to reduce the building's heat absorption, water bottle filling stations to reduce the use of disposable water bottles, and solar panels.	These PDFs restate the certain architectural elements and building features will be included as part of Alternative 5.
	PDF-AQ-8 requires MSMU to use electricity from power poles and solar generators, in place of diesel generators, when available.	This PDF requires that options other than diesel be used, when available, but if there is no other option, then MSMU is permitted to use diesel generators for construction activities.
Biological Resources		
PDF-BIO-1	PDF-BIO-1 requires MSMU to replace all non-protected significant trees that are 8 inches or more dbh that are removed during construction at a 1:1 ratio.	Alternative 5 will be required to comply with this LAMC requirement. This is a regulatory measure and not a mitigation.
Geology and Soils		
PDF-GS-1	PDF-GS-1 requires a qualified geotechnical engineer to be present on-site during grading/excavation activities to ensure the Final Geotechnical Report recommendations are implemented.	This was not a requirement of the Final Geotechnical Report but is a feature of Alternative 5 to ensure all of the geotechnical regulatory measures recommendations are monitored and complied with.

Hydrology and Water Quality		
PDF-H/WQ-1	PDF-H/WQ-1 will require the installation of an underground storm drain system to control sheet flow along the Campus' east and west facing slopes.	This feature is part of Alternative 5's design to ensure stormwater does not infiltrate the Site and instead is captured and directed to the local storm drain. This is a regulatory measure and not a mitigation
Transportation		
<ul style="list-style-type: none"> PDF-TRAF-1, PDF-TRAF-2, PDF-TRAF-7, PDF-TRAF-9 through PDF-TRAF-18. 	<p>The two construction PDFs (PDF-TRAF-1 and PDF-TRAF-2) require the implementation of a Construction Traffic Management Plan and Construction Parking Plan.</p> <p>Alternative 5's operational PDFs require the implementation of a Campus Event Coordination Plan (to be reviewed and approved by LADOT), a parking reservation system establishing maximum daily trips for the three new events, hours of operation for certain events, restrict pedestrian access to ensure visitors are not parking off-Campus, and an average daily reduction of 22 trips, inclusive of trips generated by the Wellness Pavilion.</p>	<p>PDF-TRAF-1 and PDF-TRAF-2 are design features that are commonly included for most discretionary development projects.</p> <p>Alternative 5's operational PDFs form the thresholds that will govern the Alternative's operational component. These operational components are part of Alternative 5's design similar to how a building's maximum capacity is part of a building's design and establish restrictions that the Alternative's operational activities must comply with. Further, the design features speak to reducing impacts related to LOS which are no longer the adopted transportation metric under CEQA and has been replaced with the VMT metric.</p>

Thus, the PDFs primarily serve to reinforce regulatory measures or to identify features that are integral to the project's design or capacity assumptions, and which do not serve as mitigations needed to reduce impacts. In regard to Alternative 5's Transportation PDFs, a commenter noted that an analysis without the PDFs should have been provided in addition to the Alternative 5 analysis provided in Section III, Revisions, Clarifications, and Corrections, in the Final EIR (which included implementation of all PDFs, including the Transportation PDFs). Two things should be noted here: First, as explained in greater detail below, the Level of Service (LOS) metric which was applied to both the Original Project and Alternative 5 is no longer an adopted metric and has been replaced by the Vehicle Miles Travelled metric as of July 1, 2020. Thus, the transportation "impacts" for which the commenter claims the Transportation PDFs are mitigating are no longer impacts under CEQA. Second, in regard to the commenter's request that an analysis without the Transportation PDFs should have been provided to disclose Alternative 5's transportation "impacts," this analysis was provided in the Transportation Section of the Draft EIR as part of the Original Project. As the Original Project did not include any of Alternative 5's operational PDFs that will restrict event hours of operation and number of vehicle trips, it is clear what the impacts without Alternative 5's PDFs will be.

Wellness Pavilion Programming

Comments were received requesting that all programming open to outside guests be removed as part of the proposal. As stated above the Wellness Pavilion will introduce three new event types to the Campus, Summer Sports Camps, Health and Wellness Speaker Series, and Other

Wellness/Sports Activities. Both the Original Project and Alternative 5 included the three event types as part of their applicable project descriptions. Alternative 5 will also allow for Club Sport practices and events to take place in the Wellness Pavilion, which currently are held off Campus. It should be noted that in response to comments received regarding the number of events and operational transportation impacts caused by trips associated with the events, Alternative 5 will reduce the number of events proposed, implement start and end times to avoid additional vehicle trips on the surrounding roadways during AM/PM peak hours, and establish maximum trip thresholds for different event types.

In addition to the operational restrictions that will be implemented under Alternative 5, but not the Original Project, Alternative 5 will also require that MSMU maintain on its website a publicly accessible calendar, updated at least once per month, identifying *all* Campus events with over 50 outside guests, restrict pedestrian access to the Campus, to ensure outside guests do not park in the surrounding area and walk onto the Campus, and require MSMU to institute a parking reservation/ticketing system for outside guests arriving to Campus in non-shuttle vehicles for any Other Wellness/Sports Activities or Health and Wellness Speaker Series event, Summer Sports Camps with up to 50 campers, and for Club Sports activities. Lastly, Alternative 5 will be required reduce average daily trips, inclusive of those trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts (an average daily reduction of 22 trips).

Enforcement of Trip Cap Thresholds

As a number of Alternative 5's PDFs require compliance with maximum trip counts, commenters stated that the City should require annual monitoring of these PDFs by a third party and require annual reports to be generated by the parking reservation system similar to what has been required by the City for other schools in the area.

As required by PDF-TRAF-17, the Campus Event Coordination Plan which will define the parameters of the Wellness Pavilion's parking reservation system, shuttling, valet parking program, monitoring of on-Campus parking and parking at designated off-Campus parking locations, shall be submitted to LADOT for review and approval prior to issuance of a certification of occupancy. In regards to MSMU's parking reservation/ticketing system, which will be required for outside guests arriving to Campus in non-shuttle vehicles for any Other Wellness/Sports Activities or Health and Wellness Speaker Series event, Summer Sports Camps with up to 50 campers, and for Club Sports activities, the reservation system shall include a reporting capability such that logs detailing issued reservations can be generated and reviewed and LADOT may audit the parking reservation system at any time. Finally, in regard to the requirement of reducing the average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trips (an average of 22 daily trips), overall trip reductions will be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Bi-annual monitoring reports documenting the trip counts will be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years.

Transportation Construction Impacts

Comments raised concerns over construction truck impacts on local neighborhood streets. It is important to clarify that the Draft EIR took a conservative approach and analyzed the Original Project and Alternative 5's construction traffic impacts against the operative threshold. Prior to adopting the VMT methodology, when applying the LOS methodology, LADOT did not consider construction traffic impacts to intersections and/or street segments when determining the threshold of significance for construction traffic and has not required such an analysis. Thus, the Original Project and Alternative 5's conclusion that construction of the Wellness Pavilion will result

in significant and unavoidable impacts to the study area's neighborhood street segments is a conservative approach.

Further, as the Original Project and Alternative 5's construction traffic impacts will be created during the concrete pour phase, Alternative 5 will result in a 77 percent reduction in total concrete needed for construction of the Wellness Pavilion, as Alternative 5 does not include construction of the two-story parking deck. This will be an overall reduction of 6,219 cubic yards of concrete and ultimately will substantially reduce the overall time period that the significant and unavoidable construction traffic impact will occur.

Impacts to Wildlife

Several comments stated that construction and operation of the Wellness Pavilion will result in impacts to the surrounding wildlife including mountain lions, deer, and bats. Section IV.C Biological Resources, in the Draft EIR noted that the Project Site is currently developed, and construction of the Wellness Pavilion will not extend beyond the developed area of the Campus into open space or wildlands. As stated on Page IV.C-9, Section IV.C Biological Resources, of the Draft EIR, a biological survey was completed for a 7.2-acre Biological Study Area to document the existing biological conditions on the 3.8-acre Project Site and surrounding area.

Alternative 5 will require operational fuel modification activities where periodic thinning and/or removal of vegetation will occur. Pursuant to LAFD's brush clearance requirements, MSMU will be required to maintain a 200-foot fuel modification buffer around the Wellness Pavilion. A total of up to 3.4-acres to the east, west, and south of the Project Site are within the 200-foot fuel modification buffer around the Wellness Pavilion. As shown in the figure below, the fuel modification area includes 0.6-acres of developed land to the south of the Project Site, which is currently subject to fuel modification requirements, as well as 2.8-acres of vegetated, undeveloped slopes to the east and west of the Project Site. Of these 2.8-acres, 1.9-acres are disturbed vegetation (currently subject to fuel modification activities), 0.5-acres are laurel sumac scrub and 0.4-acres are greenbark ceanothus chaparral. Because of the existing adjacent fuel modification activities, the 0.5-acres of laurel sumac scrub and 0.4-acres of greenbark ceanothus chaparral habitat is of marginal quality to support any wildlife. While no special status species were observed during the biological study, the analysis in the Draft EIR noted that a number of wildlife species have been observed in the area including several types of bats. However, analysis of indirect (including noise and lighting) and direct impacts to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the state or federal Fish and Wildlife Services, associated with construction and operation of the Wellness Pavilion were determined to be less than significant.



Disturbed and Undisturbed Areas Adjacent to the Project Site

Wildfire/Wildlands Impacts

Several commenters raised concern over the Campus and Project Site being located in a VHFHSZ and questioned if the Wellness Pavilion should be constructed and operated on the Campus. Further, commenters stated that the Draft EIR failed to include any discussion of wildfire-related impacts and staff disregarded repeated comments that noted the area, including the Campus, is in a VHFHSZ.

Potential impacts related to wildfire were initially analyzed in the Initial Study. As noted on Page B-22, Section VIII, Hazards and Hazardous Materials, of the Original Project's Initial Study, the Campus and surrounding area are in a VHFHSV. Further, at the time of publication of the Initial Study, Appendix G Hazards and Hazardous Materials Threshold h was the only threshold regarding wildland fires. Specifically, Threshold h asked, will the project "expose people or structures to significant risk of loss, injury or death involving wildland fires, including where wildland fires are adjacent to an urbanized areas or where residences are intermixed with wildlands?" The analysis provided in response to Threshold h noted that the Original Project will replace the older, existing on-site building/structures with a modern facility constructed to current Fire Code building standards and safety requirements, including smoke/fire alarms, fully sprinklered indoor spaces, and irrigated landscaped areas, which would serve to reduce potential hazards related to structure fires. Further, MSMU will continue to comply with brush clearance requirements as required by the Fire Code under project operations and based on the developed nature of the Project Site and the brush clearing requirements to be implemented on the adjacent

hillsides, as well as the building standards and fire safety features to be included as part of the Original Project, impacts will be less than significant and further analysis of this issue was not required in the EIR.

In addition, the CEQA Guidelines and the Appendix G Thresholds were revised in December 2018 after the publication of the Draft EIR in April 2018. Section XX, Wildfire was added to Appendix G and includes thresholds related to impairment of an adopted emergency plan, exacerbation of wildfire risks and consequently exposure to wildfire pollutants and/or uncontrolled spread of wildfire, whether a project will require the installation or maintenance of infrastructure that would exacerbate fire risk, and whether a project will expose people or structures to risks such as downstream flooding/landslides due to post-fire instability. While the revised CEQA Guidelines only apply to steps in the CEQA process not yet completed by the December 28, 2018 date, Appendix B, in the Final EIR, includes analyses for the Wildfire Thresholds for both the Original Project and Alternative 5. As shown in Appendix B, of the Final EIR, impacts related to Wildfire were found to be less than significant.

As stated on Page B-12, Appendix B, of the Final EIR, the Project Site is located on a ridge on the south flank of the Santa Monica Mountains, surrounded on three sides by natural open space and wildlands, within a VHFHSZ. The Project Site is developed and does not directly interface with open space or any wildland area to the north or south but is immediately adjacent to open space and wildlands to the east and west. Alternative 5 will not require the physical extension of the Campus into open space or wildlands. Further, because the Campus is located in a VHFHSZ, specific building materials would be used to construct the Wellness Pavilion, during construction smoking would be prohibited except in areas approved by the City of Los Angeles Fire Department, refueling of equipment would only be allowed in certain locations, preparation of a fire prevention program would be required, and fire watch personnel would be required to be onsite during hazardous construction activities. Additionally, the Campus is required to comply year-round with Fire Code requirements related to Brush Clearance (See Fire Code Section 57.322). This includes maintaining a 200-foot buffer, clear of any brush from all buildings.

Fire Protection

A number of comments focused around LAFD's ability to protect the Campus, and surrounding area, evacuation of the Campus during an emergency, emergency access to the Campus, and increase fire risk during construction of the Wellness Pavilion.

Section IV.J.1, Fire Projection, of the Draft EIR analyzed impacts to fire protection and emergency services, specifically whether the Wellness Pavilion would result in substantial impacts that would require the construction of fire facilities, the construction which could cause significant environmental effects. Analysis of construction and operational impacts which considered factors such as existing facilities and equipment, response distance and emergency access, fire flow, and the location of the Project Site in a VHFHSZ, determined that Alternative 5 will not result in substantial adverse physical impacts that would require new or expanded fire facilities at both the project and cumulative level. Specific responses to the issues stated in the paragraph above are responded to in detail below.

LAFD Protection of the Campus

One commenter claimed that fire protection at the Project Site will be considered inadequate without the implementation of mitigation measures. This statement is incorrect. LAFD issued three Inter-Departmental Correspondence letters dated October 17, 2017, March 15, 2018, and April 3, 2018, all of which are included as part of Appendix H, in the Draft EIR. All three letters state that based on a fire flow of 4,000 gallons per minute (gpm) the first due Engine Company should be one and half miles from a Project Site and the Truck Company should be a maximum of two miles

from the Project Site. The closest Fire Station to the Project Site is Fire Station No. 19 located 2.6 miles from the Site. Fire Station No. 16 houses an Engine, Brush Patrol, and a Paramedic Rescue Ambulance, however none of the surrounding fire stations house a Truck Company. In the event that a project site exceeds the 1.5-mile emergency response distance, Fire Code Section 57.512, "Response Distances that if Exceeded Require the Installation of an Automatic Fire Sprinkler System," requires the installation of automatic fire sprinkler systems for buildings. Accordingly, because the Project Site's response distance will exceed the Fire Code response distance standard, the Original Project or Alternative 5 is required to provide an automatic sprinkler system. The Inter-Departmental Correspondence letter does note that based on the response distance from the Project Site to the surrounding fire stations, fire protection will initially be considered inadequate. The Inter-Departmental Correspondence letters also requires that a number of measures and features be included as part of the Wellness Pavilion, including but not limited to noncombustible roofs, non-wood siding, fire resistant plants and materials, and boxed eaves. As noted in all three letters, "The inclusion of the above recommendations, along with any additional recommendations made during later review of the proposed project. [sic] Will reduce the impacts to an acceptable level." The measures included in the Inter-Department Correspondence will be enforced by LAFD during plan check and review of MSMU's plans and LAFD will continue to be able to provide protection to the Campus, including the Project Site.

Further, as stated above, the Inter-Departmental Correspondence letters confirmed that the required fire flow needed is 4,000 gpm. A comment was received noting that the Draft EIR failed to demonstrate that the 4,000 gpm threshold can be met. This statement is incorrect. As stated in Section IV.J.1, Fire Protection, of the Draft EIR, the hydrant system (four hydrants flowing simultaneously) serving the Project Site would have a total of 4,452 gpm, which would exceed the Fire Code's minimum requirement of 4,000 gpm, and residual psi's ranging from 88 to 163, which would exceed the Code's minimum requirement of 20 psi.

Evacuation of the Campus

Commenters expressed concern as to how the Campus will be evacuated, especially with new events being hosted at the Campus, during an emergency, including a wildfire. Wildfires have occurred historically and recently in the area, including the recent 2019 Getty Wildfire and the 2017 Skirball Fire in Bel Air. Additionally, commenters noted that during the 2019 Getty Wildfire, some students evacuated on foot towards Sunset Boulevard. Further, because of the surrounding roadway characteristics (Chalon Road, Noman Place, and Bundy Drive are all designated as a Local Street Standard with a right-of-way of 60 feet) community members express concern as to whether LAFD will be able to access the Campus if the surrounding residences, students, faculty, staff, and outside guests are trying to evacuate. A detailed discussion regarding evacuation of the Campus is provided in Section II. Response to Comments, Topical Response No. 4, of the Final EIR. A summary of that discussion is provided below.

Planning staff met with LAFD Inspector Miller, Chief Hogan and Chief Zimmerman in August 2020 to discuss how best to evacuate the Campus. During the meeting LAFD confirmed that after the 2019 Getty Wildfire, MSMU submitted an Emergency Response Plan as well as met with LAFD to ensure moving forward better practices are implemented.

A component of the Emergency Response Plan is the existing Campus Command Center, consisting of a Watch Commander, MSMU Incident Commander, Patrol Officer, Main Gate Officer, and Community Relations Officer who provide security and emergency management to ensure personal safety of students, fire prevention, evacuation management, and other duties. Watch Commanders are responsible for conducting vehicle patrols both on Campus and in the immediate surrounding area and responding to Campus emergencies as well as regular nonemergency calls for service. The 24-hour Command Center monitors MSMU's automatic fire/life/safety systems and receives emergency calls from within the Campus. In addition to its

Emergency Response Plan, MSMU also maintains a Chalon Wildfire Emergency Plan that was developed in consultation with LAFD to ensure appropriate action during wildfires.

If a future emergency arose, school officials will first communicate with the City's Emergency Operation Center (EOC) Team, which is comprised of LAFD, LADOT, and other agencies. The EOC Team will confirm if the Campus has time to evacuate and the best evacuation route available. Additionally, MSMU University Incident Commanders may call for evacuation preparation, in which all individuals will evacuate from the separate buildings to a central Campus location, or MSMU may choose to evacuate prior to receiving evacuation orders from the LAFD, as they did for the Skirball Fire.

Nevertheless, if LAFD issues an evacuation order, they will provide a certain amount of time that the Campus has to safely evacuate. Those who choose not to evacuate will be required to shelter in place. It should be noted that LAFD has confirmed that the Campus is a defensible space and safe space, and may be used as a staging area. MSMU's shelter in place policy is consistent with that of other institutions of higher education near wildlands such as Pepperdine University in Malibu, which has successfully employed a shelter in place policy for wildfires since 1993. The Carondelet Center successfully sheltered in place during the 2019 Getty Fire.

LAFD's goal in issuing an evacuation order is to ensure everyone can evacuate safely.

Emergency Access to the Campus

Comments received expressed concern that emergency access on local streets is substandard. In the preparation of the Draft EIR, a list of questions was sent to the LAFD regarding fire safety in the Project area and any history of bottlenecks or street blockages during fire or wildfire emergencies (see LAFD Correspondence, November 7, 2016, in Appendix H, Public Services, pages IV.K-93 through IV.K.93 of the Draft EIR). The request for information contained maps of the Project Site and Project area, as well as ingress and egress routes within the Campus and surrounding area. In addition, LAFD is familiar with the Campus from their many visits to the Campus for emergency response planning and coordination, as well as the November 2019 Getty Fire. In response to the request for information, LAFD responded that, with the implementation of recommended on-site improvements listed in the letter, along with any additional recommendations to be made during later reviews of the Project, all of which involved improvements within the Project Site, impacts to fire protection services would be reduced to an acceptable level. With respect to mountain roads, Fire Station 19 Engine Company is equipped to manage mountain roads and the types of fires that occur in wildland areas.

Increase Fire Risk During Construction of the Wellness Pavilion

Commenters stated that the Wellness Pavilion's construction activities will result in an increased fire risk to the Campus and surrounding community. As discussed in Section IV.J.1, Fire Projection, of the Draft EIR, construction activities have the potential to expose combustible materials to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. Specifically, construction activities associated with the demolition of the existing on-site structures and the construction of the Wellness Pavilion could temporarily increase the demand for fire protection and emergency medical services.

Construction of the Wellness Pavilion will comply with Occupational Safety and Health Administration (OSHA) and Fire and Building Code regulations. Construction managers would be trained in fire suppression and emergency response. Fire suppression equipment that meets OSHA standards, including portable extinguishers, water supply sources, and hoses, will be maintained on-site. Additionally, construction activities would be required to comply with

applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Therefore, the temporary use of construction equipment on the Project Site will not increase demand for fire protection and emergency medical services.

As the Project Site is located in a VHFHSZ, materials used during construction will comply with California Fire Code (CFC) Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure. CFC Section 701A.3 requires certification from the local building official that building plans comply with applicable state and local building standards, including construction methods for wildfire exposure. Thus, with compliance with regulations pertinent to the VHFHSZ, construction activities would not increase demand for fire protection and emergency medical services in excess of LAFD existing service capabilities.

Construction related traffic on adjacent streets could temporarily interfere with local and on-site emergency response. Construction activities would generate traffic associated with the movement of construction equipment, hauling of demolition materials, and construction worker trips. Implementation of PDF TRAF-1 and PDF TRAF-2 will reduce the potential impacts to fire and emergency services associated with construction related traffic. Implementation of PDF TRAF-1, the Project's Construction Traffic Management Plan, requires the preparation and enforcement of a Construction Traffic Management Program. The Construction Traffic Management Program requires the contractor to maintain access for land uses in proximity to the Project Site during construction, to minimize obstruction of through traffic lanes on surrounding public streets, to coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences at all times, and other measures to reduce congestion in the area. Coordination with the LAFD will include apprising the LAFD of haul truck activity, including the days, times, and routing of trucks. In addition, MSMU would be required to meet with the Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities. MSMU shall also provide advance notification to LADOT, the Archer School for Girls, and the Brentwood School of its upcoming construction activities, including durations and daily hours of construction.

Regarding LAFD capabilities, upgrades on LAFD fire apparatus include automated vehicle locating systems that facilitate the selection of alternative routes. Furthermore, communication between the LAFD and MSMU will allow MSMU to notify the contractor and request that the contractor cease sending any vehicles along a particular route in order to not interfere with the passage of an emergency vehicle. Emergency response is also routinely facilitated, particularly for high priority calls, through driving in opposing traffic lanes. In addition, Alternative 5's high levels of truck traffic would not be continuous over a long period of time and will be limited to specific hours on a particular day.

MSMU Fire Road

Comments were received regarding the MSMU fire road located north of the Campus. Specifically, commenters noted that the MSMU fire road is not an adequate fire road or secondary emergency access for fire personnel or equipment. As discussed Section IV.J.1, Fire Protection, of the Draft EIR, emergency access for fire personnel and equipment would be available via the MSMU fire road, a physical continuation of MSMU's driveway off-Campus to the north, or via the Getty Fire Road, which is a continuation of Chalon Road to the east. With regard to the MSMU fire road, this road is maintained by the Getty on the portion located on Getty property and by MSMU on that portion located on MSMU property, in accordance with LAFD requirements. The LAFD inspects the fire roads on a regular basis and reports any issues to MSMU or the Getty regarding road conditions that need to be addressed. LAFD, MSMU, and the Getty have keys to MSMU's fire road entrance. Having been recently used by the LAFD during the November, 2019

Getty Fire, there is no indication that the MSMU fire road is not suitable for LAFD emergency access.

Further, a commenter stated that the Draft EIR analysis is misleading in that the MSMU fire road does not connect to a public street through the Mountaingate Subdivision (a residential development north of the Campus) and Stoney Hill Road, the roadway that the MSMU fire road terminates at, is a private road. The commenter is correct that Stoney Hill Road is a private roadway, however the Draft EIR did not state or imply that the MSMU fire road provided public access to the Mountaingate Subdivision. Additionally, as stated in Section II, Response to Comments, in the Final EIR, "Contrary to the commenter's statement, the Draft EIR emergency access analysis does not state that Stoney Hill Road is publicly accessible and/or provides public access to the Campus. Further, the Mt. Saint Mary's Fire Road is accessible via Stoney Hill Road and Mountain Gate Drive. While all designated fire roads, including the Mt. Saint Mary's Fire Road, are gated and locked, keys are held by the LAFD and the property owner, with use and access to be determined by the LAFD. In the event of an emergency, LAFD would decide how the road would be used. The LAFD also has right of access to private, gated roads through the Mountaingate Subdivision that connect to the Mt. Saint Mary's Fire Road. The purposes of the fire roads (Mt. Saint Mary's Fire Road and the Getty Fire Road) in the Project area are to provide secondary access for the LAFD for the movement of engine units and other fire-fighting equipment, as needed. It would be atypical and highly unlikely that the road would be used for the evacuation of non-fire-fighting personnel."

Alternative Location

Several comments were received that the Wellness Pavilion would be more appropriate if it were located on the Doheny Campus. The Project included a total of four alternatives: (1) No Project/No Build Alternative; (2) Reduced Intensity Alternative – 50 Percent Floor Area Reduction; (3) Alternate Construction Route (which was withdrawn from consideration, see Section II, Response to Comments, Topical Response No. 5: Alternative 3, of the Final EIR for further explanation); and (4) Reduced Events Alternative. MSMU operates two campuses, the Chalon Campus and the Doheny Campus and, thus, would have access to an alternate location. However, even if space for the proposed Wellness Pavilion were available on the Doheny Campus, the relocation of the Wellness Pavilion to the Doheny Campus would defeat the primary purpose of Alternative 5 to develop a new on-Campus facility that provides MSMU's Chalon students with comprehensive health and wellness services including modern amenities needed for physical and health education. Nearly all of the Project objectives are specific to the Chalon Campus, most notably, the need to replace the Campus' inadequate fitness and recreational facilities, while also addressing student health and well-being, improving pedestrian safety, circulation and parking, design, and enhancing Campus programming. In addition to updating the outdated facilities, the events with potential to change and/or that may have increased attendance with development of the Wellness Pavilion are currently held on the Chalon Campus. Finally, if the Wellness Pavilion was constructed on the Doheny Campus, this could result in a greater number of trips to and from the Chalon Campus, as students who live and/or attend classes on the Chalon Campus, will now be driving back and forth from the Doheny Campus to access the Wellness Pavilion activities.

Sunset Standard

Several comments were submitted requesting that the Original Project be required to comply with the Sunset Standard. The Sunset Standard was introduced by Councilmember Bonin as a recommended and voluntary standard for institutions along Sunset Boulevard, undergoing construction to improve their facilities, to reduce associated operational traffic impacts. While not a formally adopted City policy or regulation, projects such as the Brentwood School have agreed to reduce operational traffic by 12.5 percent, compared to existing conditions. Although the Campus is not situated along Sunset Boulevard, Alternative 5 will be required to comply with PDF-

TRAF-18 which will require MSMU to limit average daily vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2,160 average baseline trip counts taken for the Campus in 2016. This will be an average reduction of 22 daily trips. In compliance with PDF-TRAF-18, trip counts will be conducted over the course of two weeks in the fall and spring, with bi-annual reports provided to LADOT. The bi-annual reports will be required to be submitted to LADOT until five years of compliance is completed, at which time compliance reports will be required to be submitted to LADOT every five years.

Student Enrollment

Numerous comments were received regarding the Chalon Campus' permitted student enrollment. While the Draft and Final EIR analysis noted that the Original Project and/or Alternative 5 will not increase student enrollment, commenters expressed concern over the following language included in the Draft EIR.

“Per MSMU’s current land use entitlement as a deemed approved conditional use, the Campus’ maximum student enrollment is tied to the number of parking spaces on Campus. Specifically, condition number three of City Plan Case No. 4072 CU dated July 27, 1984 provides as follows: ‘That the ratio of parking to students shall not be less than 1/4 parking spaces for each student enrolled at Mount St. Mary’s College.’ The Campus currently provides 561 spaces, which results in a maximum enrollment of 2,244 students (561 x 4 = 2,244). The Project’s parking component would provide an additional 55 parking spaces over existing conditions. The Project would not increase permitted student enrollment. Further as a condition of approval for the Project the 55 net new spaces will be excluded from being used to increase permitted student enrollment. Accordingly, the maximum permitted student enrollment on Campus shall remain 2,244 students.”

As stated and shown in Chapter III, Revisions, Clarification, and Corrections, of the Final EIR (see Page III-104), this language has been deleted from the Draft EIR as neither the Original Project nor Alternative 5 will increase student enrollment but will require the addition of one new staff person. The EIR does not take any position on student enrollment and the Draft EIR correctly utilized the existing 2016 student enrollment of 1,498 students to form the baseline conditions.

While neither the Original Project nor Alternative 5 will increase student enrollment, numerous commenters have stated that MSMU operates above their permitted student enrollment. The City Planning Commission granted two Plan Approvals in 1984 which discussed/referenced student enrollment. The following is a summary of those approvals as well as an explanation of the various interpretations in regard to the Campus' permitted maximum student enrollment.

On January 31, 1984, under Case No. CPC 1952-4072 MSMU the City Planning Commission granted a Plan Approval for a faculty residence hall, a one-story parking structure, and the relocation of 39 parking spaces (Exhibit C4). Condition No. 1 of the approval states, “There shall be no increase in student enrollment beyond 750 students, until a parking structure is constructed at the southern end of the campus. In lieu of this, when an increase in enrollment beyond 750 students is contemplated, the college may apply to the City Planning Commission for a review of the adequacy of existing and any proposed on-campus surface parking.” Thus, the language in this condition implies that the maximum enrollment permitted at the Chalon Campus in January 1984 was 750 students. As discussed further below, the parking structure referenced in Condition No. 1 was later approved and constructed on the southern portion of the Campus. Lot A, as the parking structure is now referred to by MSMU, includes a total of 237 vehicle parking spaces. The January 26, 1984 staff report concludes, “The staff has recommended that any future expansions of enrollment be predicted upon the construction of the future parking structure at the southern end of the campus. While it is true, as the applicant has noted, that the proposed faculty residence

hall contemplates a net addition of 10 parking spaces on-campus with no increase in student enrollment, there would be no inherent control in this approval to insure the enrollment would not grow in an ad hoc fashion, apart from the condition relating future increases to the proposed parking structure.”

On July 27, 1984 under Case No. CPC-1952-4072 the City Planning Commission granted a Plan Approval to replace a surface parking lot comprised of 56 vehicle parking spaces with a 268 space multi-level parking structure (Exhibit C5). Although the July 12, 1984 staff report states that the request is for a 244-space parking structure, Condition No. 4 states, “That not more than 268 automobile parking spaces be constructed on the subject site.” While the approved Plan Approval allowed for a maximum of 268 vehicle parking spaces, the constructed parking structure, referred to by MSMU as Lot A, includes a total of 237 vehicle parking spaces. Additionally, 56 vehicle parking spaces were replaced, thus the total of new spaces resulting from the construction of Lot A was 181 vehicle parking spaces (237-56).

Page 4 of the July 1984 staff report references the January 1984 approval and underscores that MSMU could not increase student enrollment until approval and construction of the parking structure. Specifically, the staff report notes, “The most recent grant was on January 26, 1984 to permit the construction of a faculty residence hall in anticipation of enlargement of student enrollment. The Planning Commission stipulated in the grant that the college enrollment could not be expanded until adequate parking facilities had been constructed.” The conclusion of the staff report states, “The project will enable the college to increase its enrollment consistent with the Commission’s actions of January 21, 1984 relative to its approval of a faculty residence hall. The Commission required that no increase in enrollment would be permitted until parking facilities had been provided.”

The July 1984 approval also includes Condition No. 3 which states, “That the ratio of parking to students shall not be less than $\frac{1}{4}$ parking spaces for each student enrolled at Mount Saint Mary’s College.” Thus, applying Condition No. 3 to the total net number of vehicle parking spaces in Lot A would afford a total of 724 additional students (i.e., $((237-56=181)*4)$), for a total of 1,474 students (750 existing students + 724 additional students). However, Page 3 of the staff report reads, “If the current ratio of students to parking available is used, the enrollment on campus could increase to 1,037 from 750 with the additional 188 spaces (244-56).” While it is not clear how staff reached a total of 1,037 students, as stated above, the total number of vehicle parking spaces provided was 237 spaces and a net total of 181 spaces.

Comments were received noting that the approved July 1984 plan approval only permitted a parking structure and did not allow for any increase in student enrollment, and thus MSMU is limited to a student enrollment of 750 students per the Plan Approval dated January 31, 1984. While both the January and July 1984 staff reports include references to an increase in student enrollment, and the July 1984 Plan Approval includes Condition No. 3 which states that $\frac{1}{4}$ parking space shall be provided for each student, the Mitigated Negative Declaration (MND) prepared for the July 1984 Lot A parking structure project did not consider an increase in student enrollment as noted by LADOT’s Initial Study Traffic Analysis which is the final page of the MND (Exhibit C6).

Other commenters stated that the July 1984 conditions, which permitted the enrollment of four students per every one parking space, applied only to the 268 approved spaces for the parking structure, effectively capping student enrollment at 1,072 ($268*4$) students for the approved parking structure spaces. Lastly, MSMU has proposed that the permitted student enrollment for the Chalon Campus is 2,244 students. This total is derived by applying Condition No. 3 from the July 1984 approval for Lot A and multiplying the total campus parking spaces by 4 ($561*4=2,244$).

The table below includes conditions of approval and relevant information taken from the January 31, 1984 Plan Approval July 27, 1984 Plan Approval, and MND completed for the July 1984 approval approvals in regard to student enrollment and parking at the Chalon Campus.

Approval	Student Enrollment/Applicable Condition
January 31, 1984: Approval for a faculty residence hall, one story-parking garage and relocation of 39 parking spaces (Staff Report Exhibit C4)	<p>Page 1, Condition No. 1: "There shall be no increase in student enrollment beyond 750 students, until a parking structure is constructed at the southern end of the campus. In lieu of this, when an increase in enrollment beyond 750 students is contemplated, the college may apply to the City Planning Commission for a review of the adequacy of existing and any proposed on-campus surface parking."</p> <p>Page 2, Comments Section: "It should also be noted that, at the southern end of the campus, there is a proposed future parking structure. While no new parking is needed at the present time, future changes in enrollment could create a demand for more parking. The future parking structure will be constructed if and when the need for it becomes apparent."</p> <p>Page 3, Conclusion Section: "The staff has recommended that any future expansions of enrollment be predicated up the construction of the future parking structure at the southern end of the campus."</p>
July 27, 1984: Approval for a multi-level parking structure (Staff Report Exhibit C5)	<p>Page 2, Condition No. 3: "That the ratio of parking to students shall not be less than ¼ parking spaces for each student enrolled at Mount St. Mary's College."</p> <p>Page 2, Condition No. 4: That not more than 268 automobile parking spaces be constructed on the subject site."</p> <p>Page 3, Proposed Project Section: "If the current ratio of students to parking available is used, the enrollment on campus could increase to 1037 from 750 with the additional 188 spaces (244-56)."</p> <p>Page 4, Prior Relevant Cases: "The most recent grant was on January 26, 1984 to permit the construction of a faculty residence hall in anticipation of enlargement of the student enrollment. The Planning Commission stipulated in the grant that the college enrollment could not be expanded until adequate parking facilities had been constructed."</p> <p>Page 4, Conclusion Section No. 1. "The project will enable the college to increase its enrollment consistent with the Commission's action of January 21, 1984 relative to its approval of a faculty residence hall. The Commission required that no increase in enrollment would be permitted until parking facilities had been provided."</p> <p>Page 4, Conclusion Section No. 4: "The proposed parking facility will result in a student -parking ratio of approximately .23 spaces per student."</p>
MND-113-84-CUC: MND for multi-level parking structure (Staff Report Exhibit C6)	PDF Page 9, Comments from LADOT, "Impact of traffic generation: Not Significant, provided that no enrollment increase is allowed."

The table below provides a breakdown of the three interpretations.

Approval	Number of Students	Reasoning
January 31, 1984/July 27, 1984 approvals	750 students (maximum number of students permitted on the Chalon Campus as stated in the January 31, 1984 approval).	The July 27, 1984 approval did not permit an increase in student enrollment. An increase in student enrollment was not accounted for in the MND

		prepared for the July 27, 1984 approval.
July 27, 1984 approval	1,037 ¹ or 1,072 students	The July 27, 1984 approval permitted the enrollment of four students per one parking space. The approval was for a 268 space parking garage but the parking garage included a total of 237 spaces and 56 existing spaces were removed for a net total of 181 spaces (237-56). It should be noted that $181 \times 4 = 724$ students.
July 27, 1984 approval	2,244 students	This student enrollment number assumes that Condition No. 4, "the ratio of parking to student shall not be less than $\frac{1}{4}$ parking spaces for each student enrolled at Mount St. Mary's College" included in the July 27, 1984 approval applies to the 561 spaces located on the Campus parking ($561 \times 4 = 2,244$)
Note: The parking garage was approved for a total of 268 spaces ($268 \times 4 = 1,072$). It is not clear how the 1984 staff report arrived at 1,037 students. If the net total number of parking spaces was used, a total of 724 students would be permitted ($181 \times 4 = 724$).		

Given the various interpretations of the 1980s Plan Approvals associated with Case No. CPC-1952-4072, the past conditions of approval do not clearly outline what the permitted student enrollment for the Chalon Campus is. CPC-1952-4072-CU-PA1 Condition No. 6(c), included in this staff report prohibits any future vehicle parking spaces, including those proposed as part of the Wellness Pavilion, to be used as a mechanism to calculate student enrollment on the Chalon Campus. Additionally, as explained above, while the Wellness Pavilion will not increase student enrollment, and require the addition of one new staff member, the Draft EIR properly utilized the 2016 student enrollment (1,498 students) at the Chalon Campus to establish the environmental baseline against which Alternative 5 impacts were evaluated. This approach is consistent with the CEQA Guidelines.

Conditional Use Permit/Master Plan Request

A number of community members have suggested that MSMU be required to submit a new Conditional Use Permit (CUP) or Master Plan and have included recommended parameters and restrictions that the MSMU CUP be required to comply with. As described above the Campus operates as a deemed approved conditional use with subsequent plan approvals granting the addition of building and modifications to the Campus. The Campus does operate under a CUP.

In accordance with the current LAMC, if a new school were to apply for approval today, the City of Los Angeles would require the approval of a CUP, as the City permits educational uses in residential zones with the approval of a CUP. The Campus exists as a "Deemed to be Approved" conditional use because its use as an educational institution predates such CUP requirement. Per prior approvals consistent with the Campus's Deemed to be Approved status, the construction of new buildings on the Campus is allowed pursuant to a Plan Approval. LAMC Section 12.24 M provides that on any lot or portion of a lot that has an approved Conditional Use, new buildings or structures may be erected, enlargements may be made to existing buildings, and existing uses may be extended on an approved site (in accordance with LAMC Section 12.24 L), provided that plans are submitted to and approved by the Zoning Administrator, the Area Planning Commission,

or the City Planning Commission, whichever has jurisdiction at the time. The decisionmaker may deny the plans if the use is determined to not conform to the purpose and intent of the findings required for a conditional use.

Regarding the request for the submission of a master plan, the filing of a master plan is at the discretion of a particular school. If approved, a master plan can serve as a useful tool if a school is expecting to expand, develop, or redevelop significant portions of their campus in the near future or as part of a phased long-term plan. However, a school also has the legal ability to request a Plan Approval for additions and changes to its campus, in accordance with LAMC 12.24.M.

1952 Approval

Commenters have questioned whether the entire Campus can operate as a deemed approved conditional use. On May 23, 1952 under Case No. CPC-1952-4072-CU the City Planning Commission approved the addition of 17 acres to the existing MSMU 33-acre Campus. As stated in the letter of determination, "As required by Section 12.24 of the Municipal Code, and without a public hearing, the City Planning Commission on Thursday May 22, 1952, considered a conditional use application to add to the existing college site at 12001 Chalon Road... Since it will be in harmony with the objectives of the Master Plan, the addition was approved..." Commenters have questioned whether the 1952 approval can be considered under the same deemed approved conditional use for the original 33 acres approved in 1929.

As shown on ZIMAS, the entire 45-acre Campus is one lot. A review of the previous approvals suggests that the City has always treated the entire Chalon Campus as a deemed approved conditional use and buildings constructed after the 1952 decision have been approved through a Plan Approval process and not as a new conditional use. It should be noted that there are two primary cases associated with the Campus; the 1929 Case No. 3066 in which the Los Angeles City Council granted a zone variance allowing for the establishment of the Chalon Campus and Case No. CPC-1952-4072-CU to add 17 acres to the existing Campus and allow for the construction of buildings and athletic facilities. Because the 1929 case was approved prior to the LAMC's establishment of the CUP entitlement, the 1952 case number, which established the deemed to be approved conditional use and plan approval process, all subsequent plan approvals have been associated with the 1952 case number and approved by the City Planning Commission. This approach was followed for the March 1964 approval for a new Arts and Humanities Building, the January 1984 for the construction of a faculty residence hall and one story parking garage, and the July 1984 approval for Parking Lot A (the most recent Plan Approval) and as noted on Page 4 of the July 1984 letter of determination, under the Prior Relevant Cases subheader, "The college has existed since 1929 under a zone variance (Zoning Administration Case No. 3066) grant by the City Council. It is considered a "deemed to be approved" conditional use. Subsequent plan approvals permitted expansion of the campus facilities beginning in 1952. The most recent grant was on January 26, 1984 to permit the construction of a faculty residence hall in anticipation of enlargement of the student enrollment."

Both the 1964 and 1984 approvals reference Case No. CPC-1952-4072. Further, it is worth noting that Condition No. 4 of the 1952 approval reads, "That a precise plot plan showing the location of all buildings on the property involved, parking areas, walls, fences, hedges, driveways, and paved parking areas, [shall] be submitted to the City Planning Department for approval prior to the issuance of any and all subsequent building permits or certificates of occupancy." The 1952 approval does not include any conditions which set forth a requirement for a conditional use permit for any building constructed on the 17-acre addition, but instead clarifies through Condition No. 4 that new buildings shall be approved through an approval of plans process.

2018 Revocation Request Letter

A revocation letter dated May 29, 2018 was received by the Department on behalf of Sunset Coalition and Brentwood Residents Coalition. The 2018 revocation letter claims that the new events which will be held at the Wellness Pavilion are not permitted under the conditions included in the approved 1952 approval (Case No. CPC-1952-4072), nor will these new events be a Deemed Approved Use. As explained above, the Chalon Campus operates as a Deemed Approved Conditional Use and subsequent development on the Campus is subject to the Plan Approval process. The revocation letter goes on to note that the Draft EIR fails to recognize that the Wellness Pavilion will increase enrollment, noting the enrollment language originally included in the Draft EIR, but which has now been deleted from the EIR (see Student Enrollment discussion above). Additional issues raised in the letter include an increase in unpermitted commercial activities, adverse impacts associated with MSMU's student enrollment increase, significant traffic impacts, and a shortage of on-Campus parking.

Surrounding Roadways

Commenters have noted the characteristics of the surrounding roadways, specifically that a majority of the streets are narrow and lack sidewalks, have led to vehicle accidents between students and residents' vehicles and created challenges for residents walking in the area. Further, commenters have submitted photos illustrating the vehicle congestion that can occur along these hillside roadways as well as photos of MSMU shuttles driving along the roadways. The characteristics of the surrounding roadways are discussed in Section IV.K Transportation, of the Draft EIR. A majority of the surrounding streets in the hillside area are designated as Collector or Local Street-Standard and are not improved with sidewalks. Alternative 5 will not introduce any features that will change the physical dimensions of the surrounding roadways. Further, Alternative 5 includes PDFs that will restrict Wellness Pavilion events' start/end times, to limit the number of vehicle trips during AM/PM peak hours, establish a maximum number of daily vehicle trips permitted for each new event, and reduce the overall number of Campus average daily vehicle trips, as compared to 2106 vehicle trips.

Additionally, one commenter claimed that the Draft EIR did not include a discussion of Norman Place. Section IV.K Transportation, of the Draft EIR (Page IV.K-9) includes a discussion of Norman Place. Norman Place is classified as a Local Street-Standard with two nine-foot wide lanes and on-street parking provided intermittently along the roadway. No parking is permitted along the narrowest portion of Norman Place.

Commercial Activities

Commenters have stated that a substantial number of commercial events occur on the Campus and the events proposed under the Wellness Pavilion will lead to a further commercialization of the Campus which conflicts with 1952 approval Condition of Approval No.3 which reads, "That this grant shall only apply to a school use involving educational subjects which are in conformance with the State Educational Code, religious services, or religious educational activities. This grant does not apply to any such activities conducted in tents or temporary structures."

The California State Educational Code is a compilation of regulations for California Kindergarten through 12th grade public schools. Further, the condition does not indicate that MSMU cannot rent its facilities. Many, if not most, educational institutions rent their facilities for temporary events and/or uses such as filming. Further, a similar concern was raised in the 1995 Revocation Request letter submitted on behalf of the Brentwood Homeowners Association and the Bundy/Norman Place Committee. At that time, the Department did not find any merit in the claim and stated, "The educational content of classes at universities and colleges has historically and consistently been broadly defined to not limit educational curiosity and inquiry. The fact that a few classes cited

obviously would not have been intended for undergraduates of the school is not contrary to the fact that such classes are routinely offered at other colleges in the area.” The new events that will be held at the Wellness Pavilion are consistent with event types held on other university and college campuses.

Under Alternative 5, three new event types will be permitted at the Wellness Pavilion: Summer Sport Camps, Health and Wellness Speaker Series and Other Wellness/Sports Activities. Club Sports, which is an existing activity offered by MSMU, will also be permitted. With respect to Summer Sports Camps, these are in alignment with the concept of health and wellness. The Health and Wellness Speaker Series and Other Wellness/Sports Activities are educational in nature. Pursuant to CPC-1952-4072-CU-PA1 Condition No. 12(a) Other Wellness/Sports Activities are the only new event in which MSMU will be able to rent the Wellness Pavilion to an outside party.

Traffic/Vehicle Congestion

A substantial number of comments expressed concern with regard to the traffic along Sunset Boulevard and along the hillside roadways which provide ingress and egress to the Campus. MSMU is located approximately two and half miles north of the intersection of Sunset Boulevard and Barrington Avenue, about one-half mile west of the I-405 freeway. The Original Project's Traffic Study, public comments, and staff field visits, all attest to the heavily congested traffic conditions along this stretch of Sunset Boulevard. The Traffic Study measured the Level of Service (LOS) as Level F (the worst possible rating) during every afternoon or evening study period for three of the 14 study intersections along Sunset Boulevard, including: (1) Bundy Drive and Sunset Boulevard; (2) Saltair Avenue and Sunset Boulevard; and (3) Barrington Avenue and Sunset Boulevard during the school year. During the summer, both intersections of Saltair Avenue and Sunset Boulevard and Barrington and Sunset Boulevard during the afternoon measured as Level F.

As one of the few through east-west routes through Brentwood, this stretch of Sunset Boulevard collects traffic from the various educational and religious institutions, as well as the largely single and multi-family residential areas both north and south of this major scenic highway, including a substantial amount of territory in the Santa Monica Mountains, Pacific Palisades, Malibu, and portions of the City of Santa Monica, a significant employment destination. The confluence of mostly single occupancy vehicles along Sunset Boulevard results in significant delays inciting motorists to venture into residential streets in search of less congested routes.

MSMU has been successful in its implementation of various shuttles including weekday AM and PM shuttle services to and from the Metro bus station located at Sunset Boulevard and Saltair Avenue, a weekday inter-campus shuttle (between the Doheny and Chalon Campuses), a weekday Union Station shuttle (between the Doheny Campus and Union Station), a daily afternoon and evening Explore LA shuttle (providing access to the Westwood community and City of Santa Monica), a weekday E Line (formerly the Expo Line) Bundy Station shuttle and a weekly club sports team shuttle, as MSMU's club volleyball and basketball practices are currently held off-site.

In addition to the shuttle services described above, MSMU operates a rideshare program that provides faculty and staff a monthly \$50.00 transit subsidy, carpool program, TAP card, guaranteed ride home program, Enterprise Carshare Program, park and rideshare information, and ZimRide vehicles (a rideshare program).

As part of its Construction Traffic Management Plan, MSMU shall attend bi-monthly (or at a frequency determined appropriate by City Staff) construction management meetings conducted

by City Staff and the operators or contractors for the Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities. Coordination shall ensure that construction activities associated with these concurrent related projects and hauling activities are managed in collaboration with one another. Additionally, MSMU shall provide advance notification to LADOT, the Archer School for Girls, the Brentwood School, and St. Martin of Tours School of its upcoming construction activities, including durations and daily hours of construction, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.

During operation, Alternative 5 will require that campers attending Summer Sports Camps with more than 50 campers travel via shuttles and/or carpools, establish maximum vehicle trip thresholds for each of the new events which will be held at the Wellness Pavilion, and restrict start and end times for new events to limit the number of vehicle trips during AM/PM peak hours. Further, as required by PDF-TRAF-18, MSMU will be required to reduce the average number of daily trips, inclusive of trips generated by Wellness Pavilion events, to one percent below the 2016 conditions. Thus, vehicle congestion will be reduced as compared to the 2016 conditions.

It is important to note the relationship of six institutions located along Sunset Boulevard within three miles of MSMU, including Archer School, Brentwood School–West, Brentwood Sunshine Preschool, University Synagogue, St. Martin of Tours Catholic School, and Brentwood School–East. Many of these educational institutions are subject to stringent traffic management measures.

Pursuant to Footnote 10 in the Brentwood–Pacific Palisades Community Plan, Sunset Boulevard cannot be widened in this area to increase capacity. In order to alleviate any additional traffic burden, the Campus has been conditioned to limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts taken for the Campus (an average daily reduction of 22 trips).

Conclusion

Based on the analysis of the MSMU Chalon Campus Wellness Pavilion Project EIR, project design features, mitigation measures, and in conjunction with conditions of approval included herein, significant unavoidable impacts will remain in Noise (construction), Transportation (construction), and a cumulative human annoyance impact (construction) for Alternative 5.

However, based on the analysis, findings, and Statement of Overriding Considerations presented in this report, staff recommends that the City Planning Commission conditionally approve the requested entitlements, including use, operational, environmental, and administrative conditions, and that the continued private school use is appropriate for the Campus. Improving the School's functionality will result in benefits to the students and surrounding neighbors as project design features will establish restrictions for new events, club sport practices and games will be held on Campus, reducing the need for students to travel off-site for such events, and MSMU will be required to reduce the Campus' average daily trips. MSMU's current fitness facilities are outdated and do not serve the health, fitness, and wellness needs of the students. The Wellness Pavilion will provide the students with a fitness facility on Campus, eliminating the need to travel off Campus to access such facilities.

The Wellness Pavilion design will represent a modern contextual style. The building will be constructed out of modern materials but would also maintain a compatible mass and scale and not overwhelm the adjacent buildings that make-up the historic district on the Campus. Alternative 5 will also improve the pedestrian connectivity on the Campus, providing a pedestrian walkway from the Campus Core to the Wellness Pavilion.

Lastly, in regard to exacerbation of wildfire, Alternative 5 will result in the demolition of buildings constructed in the 1940s and 1960s, slightly increase the existing fuel modification area, and develop the Site with a new building (the Wellness Pavilion) which will be required to comply with all applicable City of Los Angeles Fire Code requirements.

The issue of traffic congestion is an existing condition within the West Los Angeles area and consequently, no one entity can be held responsible for the current gridlock conditions. Nevertheless, the Alternative 5 includes project design features which will mitigate any level of service related impacts of Alternative 5. Therefore, the Department of City Planning recommends that the City Planning Commission approve the requested entitlements in furtherance of the improved functionality of a well-established educational institution.

CONDITIONS OF APPROVAL for CPC-1952-4072-CU-PA1

Pursuant to LAMC Sections 12.24 M and 12.24 F the following conditions are hereby imposed upon the use of the Wellness Pavilion.

1. **Site Development.** The use and development of the Wellness Pavilion portion of the property shall be in substantial conformance with the attached plans labeled as Exhibit A1, dated May 17, 2021. No change to the plans will be made without prior review by the Department of City Planning, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the project conditions.

Plan Approval Conditions

2. **Use.** Operation of the Wellness Pavilion shall be limited to athletic and recreation facility uses and activities or events that complement the purpose of the Wellness Pavilion (i.e., promote health, fitness, and/or wellness).
3. **Building.** The Wellness Pavilion shall be a maximum of 35,500 square feet in floor area.
4. **Height.** The height of the Wellness Pavilion shall not exceed 42 feet from hillside area grade, with a roof slope of less than 25 percent, in lieu of the maximum height limit of 30 feet otherwise permitted by Section 12.21.1 of the LAMC. The maximum building height can be exceeded by certain roof structures and equipment in accordance with LAMC Section 12.21.1 B.3.
5. **Lighting.** All lighting shall be directed onto the site. Floodlighting shall be designed and installed to preclude glare to adjoining and adjacent properties. Outdoor lighting shall be designed and installed with shielding such that the light source cannot be seen from adjacent properties, nor seen from above.
6. **Parking.**
 - a. **Vehicle Parking.** A minimum of 95 permanent, striped vehicular parking spaces shall be provided in accordance with the provisions of Section 12.21.A.5 of the Municipal Code.
 - b. **Electric Vehicle Parking.** All electric vehicle charging stations (EV spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC.
 - c. **New and Future Parking.** Any new parking provided in association with the Wellness Pavilion and/or a future use shall not be used as a mechanism to increase student enrollment for the Chalon Campus.
 - d. **Bicycle Parking.** At least 71 short term and 35 long term bicycle parking spaces shall be located in a prominent, accessible location on the Campus and in accordance with the provisions of Section 12.21.A.16 of the Municipal Code.
7. **Access.** Primary ingress and egress shall be limited to the Chalon Road entrance. The Mount Saint Mary's Fire Road shall not be used for public access to the site, including access by construction vehicles. The Mount Saint Mary's Fire Road shall only be used for emergency access.
8. **Landscaping.** Prior to the issuance of a building permit, a landscape and irrigation plan shall be submitted to the Planning Department for approval. The landscape plan shall be in substantial conformance with the landscape plan stamped Exhibit A1 dated May 17,

2021. Minor deviations from the requirements provided below may be permitted by the Planning Department to permit the existing landscaping conditions provided that the plantings are well established and in good condition.

9. **Trees.** The Landscape Plan shall include a minimum of eight Protected Trees and 46 Non-Protected Trees to the satisfaction of Urban Forestry Division of the Bureau of Street Services.
 - a. Tree Wells.
 - i. The minimum depth of tree wells shall be as follows:
 1. Minimum depth for trees shall be 42 inches.
 2. Minimum depth for shrubs shall be 30 inches.
 3. Minimum depth for herbaceous plantings and ground cover shall be 18 inches.
 4. Minimum depth for an extensive green roof shall be three inches.
 - ii. The minimum amount of soil volume for tree wells shall be based on the size of the tree at maturity as follows:
 1. 220 cubic feet for a tree 15 - 19 feet tall at maturity.
 2. 400 cubic feet for a tree 20 - 24 feet tall at maturity.
 3. 620 cubic feet for a medium tree or 25 - 29 feet tall at maturity.
 4. 900 cubic feet for a large tree or 30 - 34 feet tall at maturity.
 - b. Any trees that are required pursuant to LAMC Section 12.21 G and are planted on any podium or deck shall be planted in a minimum three-foot planter.
 - c. The eight Protected Trees and 46 Non-Protected Trees shall be planted within the boundaries of the Campus.
10. **Solar Power.** Solar panels will be installed on at least 25 percent of the total roof area. Solar panels may be installed on all rooftop areas with the exception of areas occupied by rooftop mechanical equipment.
11. **Utilities.** All utilities shall be fully screened from view of any abutting properties and the public right-of-way.
12. **Event Restrictions.**
 - a. Renting/Leasing. Rental or lease of the Wellness Pavilion is not permitted, with the exception of Other Wellness/Sports Activities Events. The term "rental of facilities" is dependent upon the payment of a fee; for example, the use by homeowner or civic groups is permitted if MSMU does not charge a fee to use the Wellness Pavilion.
 - b. Other Wellness/Sports Activities. A total of 12 Other Wellness/Sports Activities Events are permitted annually.
 - c. Wellness Speaker Series Events. A total of 8 Wellness Speaker Series Events are permitted annually.
 - d. Summer Sports Camps. Summer Sports Campus located at the Wellness Pavilion are only permitted Monday through Friday over a 12-week period during the summer.
 - e. Club Sport Events. Club Sport Events located at the Wellness Pavilion are only permitted during the school year.
 - f. Intercollegiate Sport Events. No intercollegiate sport events (including practices) are permitted at the Wellness Pavilion.

- g. Homecoming and Athenian Day. Both events shall be held on a weekend day and are not permitted to be held on a weekday.
- h. Total Daily Outside Guest Vehicle Trips.
 - i. The maximum number of total daily outside guest vehicle trips for Other Wellness/Sports Activities, Health and Wellness Speaker Series Events and Club Sports shall be limited to 310 outside guest vehicle trips (155 inbound and 155 outbound) and shall be applicable to all vehicles, including shuttles.
 - ii. Shuttles/carpools shall be required for all Summer Sports Campus with more than 50 campers. The maximum number of total daily outside guest vehicles trips for Summer Sports Campus shall be limited to 236 outside guest vehicle trips and shall be applicable to all vehicles, including shuttles. The specific number of trips permitted during the AM and PM peak hours shall comply with the applicable restrictions outlined in PDF-TRAF-13.
- i. New Event Start/End Times.
 - i. Other Wellness/Sports Activities, Health and Wellness Speaker Series Events and Club Sports shall not be permitted to start between the hours of 7:00 AM to 9:30 AM and 4:00 PM to 7:30 PM and/or end between the hours of 6:30 AM to 9:30 AM and 3:30 PM to 7:00 PM.
 - ii. If MSMU permits Summer Sports Camps to begin or end during AM and PM peak hours, a Campus entry reservation system demonstrating that the maximum AM and PM peak hour trips (as outlined in PDF-TRAF-13) are not exceeded, shall be provided to LADOT

13. Neighborhood Outreach and Notice

- a. MSMU shall maintain on its website a publicly accessible calendar, updated at least once per month, identifying all Campus events with over 50 outside guests.
- b. A Community Relations representative shall be designated and contact information of that person posted online on the school's website, and prominently at the school, 10 days prior to the beginning of each school year.
- c. A complaint log shall be kept and include the complainant's name, date and time of complaint, phone number, the nature of the complaint, the date and time of the response of the complaint, and a description of how the issue was responded to or resolved. Record of all complaints must be maintained on the premise. Information on how the public can report concerns or complaints shall be posted online on the school's website, and prominently at the school visible from the public right of way, 10 days prior to the beginning of each school year for public reference.

14. Noise

- a. No outdoor public address system shall be installed or maintained for an event being held at the Wellness Pavilion. A paging system shall be permitted inside the Wellness Pavilion building. An emergency alert system shall be permitted to be used only in the event of an emergency.
- b. No amplified music or loud non-amplified music is permitted outside for any event being held at the Wellness Pavilion.
- c. Compressors and other equipment that may introduce noise impacts beyond the Campus property line would incorporate noise attenuation features as required by the LAMC.
- d. No exterior bells are permitted.

- e. Motorized cleaning and landscaping (taking place outside) shall not be permitted before 8 a.m. or after 6 p.m.

15. Construction

- a. Construction Relations Liaison. Prior to commencement of construction, a Construction Relations Liaison shall be designated by MSMU to serve as a liaison with neighbors concerning construction activity. Contact details for the liaison, together with dates for the construction schedule, shall be provided to the Council Office and all residents immediately abutting and adjacent to MSMU prior to commencement of construction. The construction schedule shall be the general contractor's construction manager's best estimate for construction activities.
- b. Construction Access. During construction, vehicles shall access and leave the Campus via the Chalon Road ingress/egress driveway.
- c. Catering Trucks. A maximum of three catering truck visits daily is permitted and such trucks shall be accommodated within the Campus. Catering truck operators shall be instructed in writing not to use their horn or other loud signal. A copy of such letter shall be submitted to the City of Los Angeles Planning Department.
- d. Portable Toilets. Any portable toilets shall be on the Campus and screened from single family residences and the public right-of-way.

Conditional Use Determination Conditions

16. **Grant.** The use and development of the Wellness Pavilion may be permitted the following variations of the LAMC regulations, and shall be in substantial conformance with Exhibit A1, dated May 17, 2021:

The Wellness Pavilion shall be permitted to have a maximum height of 42 feet from hillside area grade, with a roof slope of less than 25 percent, in lieu of the maximum height limit of 30 feet otherwise permitted by Section 12.21.1 of the LAMC. The maximum building height can be exceeded by certain roof structures and equipment in accordance with LAMC Section 12.21.1 B.3.

CONDITIONS OF APPROVAL for ZA-2017-928-ZAD

Pursuant to LAMC 12.24 X.28 and 12.24 X.26, the following conditions are hereby imposed upon the use of the Wellness Pavilion.

Determination Conditions

1. **Site Development.** The use and development of the grading and retaining walls for the Wellness Pavilion portion of the property shall be in substantial conformance with the attached plans labeled as Exhibits D1 (dated August 17, 2021), D2 (dated May 17, 2021), and D3 (dated August 4, 2021). No change to the plans will be made without prior review by the Department of City Planning, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the project conditions.
2. **Grading and Retaining Walls.** Approved are the following grading activities and the construction of retaining walls, in association with the Wellness Pavilion, as follows:
 - a. **Grading.** The total permitted on-site grading (cut and fill) shall be up to 9,343 cubic yards as shown in Exhibit D1, dated August 17, 2021. All grading shall be balanced on-site. No grading permit shall be issued until the building permit is approved for the Wellness Pavilion.
 - b. **Retaining Walls.** A total of 12 retaining walls ranging in height from two feet to 17 feet shall be permitted as shown in Exhibit D2, dated May 17, 2021. The retaining walls are permitted as follows:
 - i. Retaining Wall No. 1 with a height ranging from 2' to 12';
 - ii. Retaining Wall No. 2 with a height ranging from 9' to 12';
 - iii. Retaining Wall No. 3 with a height ranging from 3' to 5';
 - iv. Retaining Wall No. 4 with a height ranging from 2' to 8';
 - v. Retaining Wall No. 5 with a height ranging from 2' to 10';
 - vi. Retaining Wall No. 6 with a height ranging from 2' to 8';
 - vii. Retaining Wall No. 7 with a height ranging from 2' to 9';
 - viii. Retaining Wall No. 8 with a height ranging from 7' to 17';
 - ix. Retaining Wall No. 9 with a height ranging from 5' to 17';
 - x. Retaining Wall No. 10 with a height ranging from 2' to 17';
 - xi. Retaining Wall No. 11 with a height ranging from 2' to 16'; and
 - xii. Retaining Wall No. 12 with a height ranging from 2' to 8'.
3. **Retaining Walls in Hillside Areas.** In accordance with LAMC 12.21 C.8(b), all retaining walls eight feet or greater in height must be landscaped to completely hide the retaining wall from view within a reasonable amount of time. The retaining wall landscaping shall be in substantial conformance with Exhibit D3, dated August 4, 2021.

Environmental Conditions

Applicable to both CPC-1952-4072-CU-PA1 and ZA-2017-928-ZAD

1. **Implementation.** The Mitigation Monitoring Program (MMP), attached as Exhibit E and part of the case file, shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each Project Design Features (PDF) and Mitigation Measure (MM) and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.
2. **Construction Monitor.** During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

3. **Substantial Conformance and Modification.** After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the nonenvironmental conditions of approval.

4. **Tribal Cultural Resource Inadvertent Discovery.** In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:
- a. Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning.
 - b. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
 - c. The Applicant shall implement the tribe's recommendations if a qualified archaeologist and a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably conclude that the tribe's recommendations are reasonable and feasible.
 - d. The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any affected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
 - e. If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
 - f. The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
 - g. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Administrative Conditions of Approval**Applicable to both CPC-1952-4072-CU-PA1 and ZA-2017-928-ZAD**

1. **Approval, Verification and Submittals.** Copies of any approvals guarantees or verification of consultations, review or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Planning Department for placement in the subject file.
2. **Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except where herein conditions are more restrictive.
3. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Planning Department for attachment to the file.
4. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public officials, legislation or their successors, designees or amendment to any legislation.
5. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Planning Department and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
6. **Building Plans.** Page 1 of the grants and all the conditions of approval shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety.
7. **Project Plan Modifications.** Any corrections and/or modifications to the project plans made subsequent to this grant that are deemed necessary by the Department of Building and Safety, Housing Department, or other Agency for Code compliance, and which involve a change in Site Plan, floor area, parking, building height, yards or setbacks, building separations, or lot coverage, shall require a referral of the revised plans back to the Department of City Planning for additional review and final sign-off prior to the issuance of any building permit in connection with said plans. This process may require additional review and/or action by the appropriate decision-making authority including the Director of Planning, City Planning Commission, Area Planning Commission, or Board.
8. **Indemnification.** The Applicant shall do all of the following:
 - a. Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

- b. Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
 - c. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
 - d. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
 - e. If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.
9. The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

10. For purposes of this condition, the following definitions apply: "City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers. "Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law. Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

A. Plan Approval Findings in Accordance with LAMC Section 12.24 M and 12.24 F (School Use in a Residential Zone, Height Modification). Findings in Accordance with LAMC Section 12.24 X.28 (Grading) (Zoning Administrator Determination), and Findings in Accordance with LAMC Section 12.24 X.26 (Retaining Walls) (Zoning Administrator Determination).

The following is a delineation of the findings as related to the request for a Plan Approval in accordance with LAMC Section 12.24 M for the construction and operation of the Wellness Pavilion, a determination, in accordance with LAMC Section 12.24 F, to allow a maximum building height of 42 feet, in lieu of the otherwise permitted maximum building height of 30 feet for a building located in the RE40-1-H Zone with a roof slope of less than 25 percent, a Determination in accordance with LAMC Section 12.24 X.28, for a total of 9,343 cubic yards of grading in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone, and a Determination in accordance with LAMC Section 12.24 X.24, for 12 retaining walls ranging in height from two feet to a maximum height of 17 feet, in lieu of the otherwise maximum limit of one retaining wall and the maximum 12-foot height limit for a property located in the RE40-1-H Zone. All of these requests require that the following findings identified in LAMC 12.24 E be made.

- 1. The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.**

a. Plan Approval

Mount Saint Mary's University (MSMU) is requesting a Plan Approval to allow for the construction and operation of Alternative 5. Alternative 5 will improve MSMU's fitness/educational facilities on the Chalon Campus (Campus) providing a greater and enhanced educational and wellness experience for MSMU students, faculty, staff, and outside guests, thereby providing a service that enriches and benefits the students, community, City, and region as a whole.

Alternative 5 will replace the Campus' inadequate and outdated existing fitness and recreation facilities and include the construction and operation of a two-story 35,500 square-foot Wellness Pavilion, a new outdoor pool area, improvements to an internal roadway, new landscaping and three new surface parking lots. MSMU's current fitness and recreation facilities are not properly sized or proportioned to accommodate the physical education needs of the Campus. The Campus' existing fitness facilities include a pool area, two tennis courts, a 1,030 square-foot Fitness Center building that was constructed in 1949 and a 1,470 Facilities Management building that was constructed in 1964. The Wellness Pavilion will provide students, faculty, staff, with a modernized fitness/educational facility and wellness programming to encourage physical activity and to educate students on nutrition and health.

The Wellness Pavilion will host existing on-Campus events and new events. A total of seven existing events currently held elsewhere on the Campus will be moved to the Wellness Pavilion. Besides the change in location, there will be no other change to five of the seven existing events; Athenian Day and Homecoming, will be permitted to increase the maximum number of outside guests, students, faculty, and staff upon relocating these events to the Wellness Pavilion. In addition, a number of new events will be held at the Wellness Pavilion including Summer Sports Camps, Health and Wellness Speaker Series, Other Wellness / Sports Activities, and MSMU's existing volleyball and basketball club sports practices and games (which currently practice and play games off-site). Alternative 5 will not increase student enrollment but will permit an increase in the number of outside guests, students, faculty, and staff that can attend Athenian Day and

Homecoming, as well as introduce the three new event types described above, which can be attended by outside guests, students, faculty, and staff. The table below provides the existing and new events which will be relocated to the Wellness Pavilion, the permitted increase in the number of students, faculty, staff, and outside guests for Athenian Day and Homecoming, and the estimated number of students, faculty, staff, and outside guests which will be permitted at the three new event types.

Alternative 5 Existing and New Events to be Held at the Wellness Pavilion					
<i>Event</i>	<i>Description</i>	<i>Frequency</i>	<i>Time of Day</i>	<i>Current Location</i>	<i>Estimated Attendance</i>
Existing Events to be Relocated to the Wellness Pavilion / No Additional Changes					
Spring Convocation	Staff and faculty meeting prior to start of spring semester	Annual one-day event / January	8 am to 2 pm / Weekday	Circle / Campus Center	275 SFS 25 OG Total: 300 people
Nursing Panel	Career Services event with outside vendors and panelists	Annual one-day event / January	3 pm to 10 pm / Weekday	Campus Center	125 SFS 25 OG Total: 150 people
Women's Leadership Conference	Conference focused on women leadership	Annual one-day event / September	8 am to 5 pm / Weekend day	Circle / Campus Center/ Classrooms	175 SFS 175 OG Total: 350 people
Live at the Mount	High school students visit the Chalon Campus to learn more about MSMU ¹	Four days fall / four days spring	Morning Weekdays	Campus Center / Circle/ Theater	30 SFS 250 OG Total: 280 people
Student Orientation	Orientation for new students and family members	Annually / two days	8 am to 5 pm / Weekend days	Circle / Center Campus/ Theater / Classrooms	400 SFS 600 OG Total: 1,000 people
Existing Events to be Relocated to the Wellness Pavilion and Increase Attendance / No Additional Changes					
Athenian Day	Athletic event for students and alum	Annual one-day event / spring	8 am to 5 pm / Weekend day	Circle / Center Campus / Pool/ Fitness Facilities	200 SFS 100 OG Total: 300 people (Increase of 50 SFS and 50 OG)
Homecoming	Students, faculty, staff, and alum MSMU celebration	Annual one-day event / October	2 pm to 4 pm / Weekend day	Circle / Campus Center / Classrooms	200 SFS 150 OG Total: 350 people (Increase of 50 SFS and 50 OG)
New Events to be Located at the Wellness Pavilion					
Summer Sports Camps	Sports campus available to students, faculty, and the public	12 weeks during summer	8 am to 5 pm / Monday-Sunday /	New event, not currently held on Campus	400 OG
Health and Wellness Speaker Series	Lecture series to support MSMU's health and wellness curriculum	Maximum 8 events per year / throughout the year	If event includes OG, cannot start / end during AM or PM	New event not currently held on Campus	200 SFS 250 OG Total: 450 people

			peak hours / weekday or weekend day		
Other Wellness / Sports Activities	External rental activities that are support health, wellness and sports	Maximum 12 events per year / throughout the year	If event includes OG, cannot start / end during AM or PM peak hours / weekday or weekend day	New event not currently held on Campus	50-400 OG ²
Club Sports	MSMU club volleyball and basketball games and practices	During the school year / no other restrictions	After 7:30 PM on weekdays / no restrictions on weekend days	Existing event not currently held on Campus	20-40 OG
<p>Notes: SFS -Students, Faculty, Staff OG – Outside Guests ¹ - Students are transported to the Campus via five buses. ² - Attendance at Other Wellness/Sports Activities Events assumes all OG to be conservative. However, attendees could be a combination of SFS and OG.</p>					

The Wellness Pavilion will provide a practice facility to accommodate MSMU's club sport practices and games, fostering an improved educational experience and eliminating operational challenges by removing the necessity of locating club sport practices and games off-site. Accordingly, Alternative 5 will allow MSMU to continue providing the essential and beneficial service of a private educational institution in the Brentwood Community.

In addition to the educational value that MSMU provides, Alternative 5 will implement traffic operational restrictions, including maximum daily vehicle trip caps for Health and Wellness Speaker Series, Other Wellness/Sports Activities, Summer Sports Camps, and Club Sports activities. Under Alternative 5, the maximum daily outside guest vehicle trips for Health and Wellness Speakers Series, Other Wellness/Sports Activities, and Club Sports activities will be restricted to a total of 310 (155 inbound and 155 outbound) (Project Design Feature (PDF) PDF-TRAF-12). The daily trip maximum will be applicable to all types of vehicles, including shuttles, as further specified in PDF-TRAF-12. PDF-TRAF-11 will restrict the start and end times of these events such that no trips will be generated during peak periods. Summer Sports Camps will be limited to 236 daily trips (118 inbound and 118 outbound), with the requirement of shuttles or carpools when attendance would exceed 50 campers per day during peak periods (PDF-TRAF-14). Other vehicle trip limitations will apply to certain peak hours as included in PDF-TRAF-13. Finally, concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts taken for the Campus (a reduction of 22 average daily trips). Overall trip reductions shall be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Biannual monitoring reports documenting the trip counts shall be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years. Thus, as part of the operation of the Wellness Pavilion, MSMU will be required to implement the operational components summarized above and included in Alternative 5's Mitigation Monitoring Program (Exhibit E).

Alternative 5 will also enhance the built environment in the surrounding neighborhood by creating a visually unified Campus with buildings and landscaping that respect the scale and character of

the surrounding area. The Wellness Pavilion as proposed under Alternative 5 will demolish outdated fitness facilities and construct a building that includes a colonnade of columns and glazing, differentiating the ground level from the second level, and creating a pleasing pedestrian environment. The ground floor colonnade element will preserve the color, proportions and rhythm of the typical gothic arch colonnades found throughout Campus, while the second story will be constructed out of glazed glass allowing for the infiltration of natural light and reducing the demand on artificial lighting. The typical clay tile roof forms of older on Campus buildings will be reinterpreted as an expansive ceiling (an inverted roof) bringing the texture and color found on the clay roofs inside the building.

The Campus is eligible for the National Historic Register and is listed on the California Register of Historical Resources as a Historic District at the local level for its association with a recognized architectural style and locally known architects. The Historic District includes the following buildings which are identified as contributors: Brady Hall, Mary Chapel, Rossiter Hall, St. Josephs Administration and Seaver Science Center, Charles Willard Coe Memorial Library, and Carondelet Hall. While construction of Alternative 5 will not result in the alternation of the six contributing structures and the existing structures located on the Project Site are not contributors to the Historic District, the Wellness Pavilion will be proportioned to be similar in height (a maximum of 42 feet tall) to the adjacent Campus buildings, including Mary Chapel (which is 54 feet tall, 113 feet tall at the top of the bell tower), Rossiter Hall (which is 35 feet tall), and Yates, Aldworth, and Burns Residences (43 feet tall). Thus Alternative 5 will enhance the built environment existing on the Campus and not negatively impact the structures which make-up the Historic District.

With the exception of the Campus and Carondelet Center, the land uses along Chalon Road and Bundy Drive, north of Sunset Boulevard, consist of low-density residential neighborhoods. The nearest residences to the Project Site, are located along Bundy Drive, to the north of the Bundy Drive/Chalon Road intersection. These residences are sited approximately 300 feet below the Project Site and do not have views of the developed portion of the Campus, including the Project Site. Single-family residences are also located along Chalon Road south and east of the Campus and along Grace Lane directly south of the Carondelet Center. Similar to the single-family homes located to the north of the Bundy Drive/Chalon Road intersection, the residences along Chalon Road and Grace Lane are substantially lower in elevation than the Campus (including the Project Site), ranging from 200 to 400 feet below the Campus setting. The difference in elevation between the surrounding land uses and the Campus reduces the visual interaction between the surrounding land uses and Campus.

Because of the varying topography within the Campus and surrounding areas, public views of the Project Site from the surrounding areas are limited. While Sunset Boulevard, located approximately two miles (driving distance) south of the Project Site, is a City designated Scenic Highway in the Brentwood-Pacific Palisades Community Plan and City of Los Angeles Mobility Plan 2035, the Project Site is not visible from Sunset Boulevard. The Project Site, however, is visible from two residential streets, including North Tigertail Road and Sky Lane at Canna Road, located approximately 0.3 mile to the west and southwest of the Project Site. While there are rises in topography at the north edge of the Campus and beyond, the varying intervening landforms or hills, along with intervening vegetation (trees, shrubs, etc.) obstruct some views of Campus buildings, while still encompassing vistas of the west Los Angeles Basin and cityscape across the Project Site. Views of the Project Site are also available from trails to the north of the MSMU Campus and north of the Tigertail Road north terminus. Views of the Project Site are available from the Getty Museum, which is located to the southeast of the Campus, although partly obscured by existing on-Campus buildings.

Because of the topography of the area, together with dense vegetation along nearby roadways, the Campus and the Project Site are minimally visible from the surrounding area. Thus, views

across the Campus would not be interrupted or blocked by the proposed Wellness Pavilion and the nearest residences along Bundy Drive will not be able to see the Wellness Pavilion.

While the Project Site is located in the RE40-1-H Zone and subject to the LAMC single-family zone hillside development standards, MSMU has operated on the site since 1929. The continued use of the Campus and the proposed physical and operational components that will occur under Alternative 5 will be consistent with the intent of the Land Use Element of the General Plan which permits schools in residential zones including the nearby Archer School for Girls which has a land use of Very Low II Residential and Medium Residential and R3-1 and RE1-1 zones and Brentwood School which has a land use of Very Low II Residential and RE11-1 and RE15-1 zones.

Accordingly, for the reasons discussed above, Alternative 5 will enhance the built environment on the Campus and will not impact the built environment of the surrounding neighborhood. Further, Alternative 5 will provide students, faculty, staff, with a modernized fitness/educational facility and wellness programming to encourage physical activity, to educate students on nutrition and health, and result in an upgraded and regionally competitive university campus.

b. Height Modification

In connection with the Plan Approval, the Wellness Pavilion will require a determination by the decision-maker (in this case the City Planning Commission) to allow a maximum building height of 42 feet, in lieu of the otherwise permitted maximum building height of 30 feet for a building located in the RE40-1-H Zone with a roof slope of less than 25 percent, as permitted by LAMC Section 12.21 C.10(d). Additional height is required due to the nature of the use (e.g., a gym with a tall ceiling) and the sloping topography of the Site. Improving the School's functionality, by allowing for the construction and operation of the Wellness Pavilion will result in benefits to the students and surrounding neighbors as club sport practices and games can now be held on Campus in the Wellness Pavilion, reducing the need for students to travel off-site for such events.

Further, while the Wellness Pavilion will be proportioned to be similar in height (a maximum of 42 feet tall) to the adjacent Campus buildings, including Mary Chapel (which is 54 feet tall, 113 feet tall at the top of the bell tower), Rossiter Hall (which is 35 feet tall), and Yates, Aldworth, and Burns Residences (43 feet tall); the nearest residences are located along Bundy Drive, to the north of the Bundy Drive/Chalon Road intersection, approximately 300 feet below the Project Site and do not have views of the developed portion of the Campus, including the Project Site.

c. Grading

Alternative 5 will require a total of 9,343 cubic yards of grading in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone, as permitted by LAMC 12.21 C.10(f)(1). Alternative 5's construction period will be a total of 20 months and be comprised of seven phases: (1) Site Preparation; (2) Demolition; (3) Grading; (4) Concrete Pour; (5) Building Construction-Structural Steel; (6) Building Construction-Framing/Walls/Finishes; and (7) Paving. Grading activities will occur over a one and half month period and in accordance with ZA-2017-928-ZAD Condition No. 2(a) MSMU has proposed to balance all grading activities on-site, thereby eliminating the need for any import or export of fill. Therefore, unlike a majority of development projects which require haul trucks to remove earthwork from a site, haul trucks will not be needed for import/export grading activities and thus will not impact the surrounding neighborhood streets. Allowing for the grading amount to exceed the LAMC maximum will permit the development of a Wellness Pavilion to serve the Campus and community. The Wellness Pavilion has been designed to position the building in an area of the Campus to minimize grading. The Wellness Pavilion design necessitates a flat and level building pad to be able to properly accommodate indoor and outdoor contiguous athletic facilities, thereby

necessitating additional grading than what would normally be allowed for a single-family development in the hillside area, for which the LAMC Hillside Development Standards were adopted. As Alternative 5 will require typical grading activities needed for the proposed development type (a gym) and eliminate earthwork hauling activities, while developing a new facility in furtherance of the use of an educational institution which serves students and the community, therefore, Alternative 5 will enhance the built environment in the surrounding neighborhood and will perform a function or provide a service that is essential or beneficial to the community, city, or region.

d. Retaining Walls (Number and Height)

The Campus is located on the south flank of the Santa Monica Mountains and slopes to the south, with an approximately 600-foot grade change from the northern to southern edge. In addition to the request to exceed the permitted maximum by-right cut and fill amount, Alternative 5 will require a total of 12 retaining walls ranging in height from two feet to a maximum height of 17 feet, in lieu of the otherwise maximum limit of one retaining wall per lot and the maximum 12-foot height limit for a property located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.8. Though most of the retaining walls are not retaining walls in the sense that retaining walls are intended to support hillside earth and ensure a stable site, LAMC Section 12.21 C.8 states that, a “retaining wall” shall be defined as a freestanding continuous structure, as viewed from the top, intended to support earth, which is not attached to a building.” MSMU has requested that any wall which may technically meet the LAMC definition be considered a retaining wall. A majority of the retaining walls are largely architectural in nature, integrated into the Wellness Pavilion itself, or the surrounding parking areas, and none of the proposed retaining walls are carved into the hillside and/or supporting large amounts of earth or natural features.

As shown in Exhibit D2, the 12 proposed retaining walls are located throughout the Site and will enhance the Site’s overall design, pedestrian experience and vehicle safety. Further, it should be noted that several of the proposed retaining walls are located around trash or electrical equipment enclosures and will screen these uses from view. Others are located along new surface parking areas and will aid in pedestrian safety. Finally, several retaining walls are located along the pedestrian walkway, increasing pedestrian connectivity throughout the Campus, as well as opportunities for landscaping and contributing to the overall Site design. .

Pursuant to LAMC Section 12.21 C.8(b), ZA-2017-928-ZAD Condition No. 3 requires any Alternative 5 retaining wall eight feet or greater in height to be landscaped and hidden from view. MSMU’s retaining wall landscape plan is included as Exhibit D3. Thus, the Project Site characteristics and existing improvements make strict adherence to the retaining wall regulations impractical due to the Project Site topography, which creates practical difficulties when siting new construction.

The number and height of retaining walls needed to allow for the construction and operation of Alternative 5 are included in ZA-2017-928-ZAD Condition No. 2(b). As discussed above, the Project Site will not be visible to the nearest residences along Bundy Drive and all retaining walls eight feet and greater in height will be required to be landscaped to completely hide the retaining wall from view. Similar to the request to exceed the permitted amount of grading, the LAMC Hillside Development Standards were adopted to regulate single-family residences which make-up most of the development in hillside areas. The retaining walls will not expand the existing Campus’ development pad nor will they result in visual impacts to the surrounding community. The Wellness Pavilion will provide a service that is beneficial to both students, faculty, staff, and the surrounding community with a modernized fitness facility and wellness programming to encourage physical activity and to educate students on nutrition and health.

- 2. The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety;**

- a. Plan Approval**

Mount Saint Mary's University (MSMU) is requesting a Plan Approval to allow for the construction and operation of Alternative 5. Alternative 5 will replace the Chalon Campus' (Campus) inadequate and outdated existing fitness and recreation facilities and include the construction and operation of a two-story 35,500 square-foot Wellness Pavilion, a new outdoor pool area, improvements to an internal roadway new landscaping, and three new surface parking lots. MSMU's current fitness and recreation facilities are not properly sized or proportioned to accommodate the physical education needs of its Campus. The Campus' existing fitness facilities include a pool area, two tennis courts, a Facilities Management building (a single-story 1,470 square-foot building) constructed in 1952, and a 1,030 square-foot Fitness Center building that was constructed in 1949. The Wellness Pavilion will provide students, faculty, staff, with a modernized fitness/educational facility and wellness programming to encourage physical activity and to educate students on nutrition and health and allow MSMU to continue providing the essential and beneficial service of a university.

Schools are permitted and frequently do use residentially-zone properties for school purposes. Many private schools throughout the City are located in single-family residential neighborhoods. Recognizing that schools are in residential neighborhoods, the LAMC allows private schools to use residential zoned parcels for school purposes through a Conditional Use Permit (CUP) and subsequent Plan Approval process.

In connection with the 1929 zone variance and subsequent construction of various Campus buildings granted under Case No. 3066, the deemed-to-be approved Conditional Use status, as well as previous plan approvals granted under Case No. CPC-1952-4072, the City has determined that the Campus and previously approved structures are compatible with and will not adversely affect or degrade adjacent properties, the neighborhood, or the public health, welfare, and safety. Further, the location, size, height, and operations of Alternative 5 will not adversely affect or degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety. The Wellness Pavilion and Project Site is located entirely within a developed area of the Campus, and will be replacing older facilities. Alternative 5 will result in the expansion of the Project Site's 200-foot fuel modification zone into 0.9-acres of native plant communities, however due to the proximity of the 200-foot fuel medication zone to developed areas of the Campus, the new fuel modification area is already subject to indirect biological resource effects associated with Campus activities, and would therefore not adversely affect or degrade the portion of the Campus site or adjacent properties. The nearest residences to the Project Site are located along Bundy Drive, to the north of the Bundy Drive/Chalon Road intersection. These residences are sited approximately 300 feet below the Project Site. Under Alternative 5 a two-story, 42-foot tall, 35,500 square-foot Wellness Pavilion, a new outdoor pool area, improvements to an internal roadway, new landscaping, and three new surface parking lots will be constructed. The requested height modification as well as the adjustments needed for the grading amount and number and height of retaining walls are discussed in greater detail below. In accordance with the requirements included under LAMC Section 12.21 C.10, no portion of Alternative 5 will be constructed in any of the required setback areas. In combination with the RE40 Zone and City designated Hillside Area, the LAMC sets a minimum guaranteed residential floor area of 18 percent of the total lot size. The Wellness Pavilion's additional square footage will result in approximately 13.5 percent of the Campus (which is a single lot) being developed, below the guaranteed minimum residential floor area of 18 percent.

Due to the topography and vegetation, the Project Site is shielded from the view of the surrounding residences, however Alternative 5 will create a visually unified Campus with buildings and landscaping that respect the scale and character of the surrounding area. The building will include a colonnade of columns and glazing, differentiating the ground level from the second level, and create a pedestrian-oriented environment. The ground floor colonnade element will preserve the color, proportions and rhythm of the typical gothic arch colonnades found throughout Campus, while the second story would be constructed out of glazed glass allowing for the infiltration of natural light and reducing the demand on artificial lighting. The typical clay tile roof forms of older on Campus buildings will be reinterpreted as an expansive ceiling (an inverted roof) bringing the texture and color found on the clay roofs inside the building. Thus, the new Wellness Pavilion will not encroach upon or adversely impact existing visual resources, including the surrounding undeveloped open space, the Circle, and the Campus's historic buildings but will result in a compatible visual interface between the residence hall to the north and the lower Campus while creating a visual break between the Wellness Pavilion's modernist architecture and the Spanish Colonial Revival architecture of the Campus Circle.

Regarding construction of the Wellness Pavilion, Alternative 5's temporary construction period will be a total of 20 months and be comprised of seven phases: (1) Site Preparation; (2) Demolition; (3) Grading; (4) Concrete Pour; (5) Building Construction-Structural Steel; (6) Building Construction-Framing/Walls/Finishes; and (7) Paving. To ensure minimal disturbance to the surrounding neighborhood, in accordance with PDF-TRAF-1, MSMU will be required to prepare and submit a Construction Traffic Management Plan to the City of Los Angeles Department of Transportation (LADOT) for approval. The Construction Traffic Management Plan will disclose street closure information, detour plans, haul routes, staging plans, require that access be maintained for surrounding residences, prohibit haul truck staging on surrounding roadways and truck loading and unloading, schedule construction related deliveries (excluding concrete related deliveries) between the hours of 7 AM and 3 PM to avoid PM peak hours, coordination with emergency service providers to ensure adequate access to the Campus and surrounding neighborhood is provided at all times, require MSMU to attend bi-monthly construction management meetings with City staff, Archer School for Girls and Brentwood School to avoid overlapping hauling activities, provide advance notice to LADOT and the surrounding schools of upcoming construction activities and post a hotline on Campus, including at the entrance to the Campus, to provide the public with a number to call to report non-compliance with the Construction Traffic Management Plan. Additionally, PDF-TRAF-2 will require MSMU to prepare a Construction Parking Plan prior to issuance of a building permit. The Construction Parking Plan shall identify temporary on Campus parking areas for students, faculty, staff and construction workers and requires that all construction workers park on Campus. Thus Alternative 5's construction activities will not adversely affect or degrade adjacent properties, the surrounding neighborhood, or public health, welfare and safety.

Regarding operation of the Wellness Pavilion, while Alternative 5 will not increase student enrollment, the Wellness Pavilion will host existing on-Campus events and new events. A total of seven existing events currently held elsewhere on the Campus will be moved to the Wellness Pavilion. Besides the change in location, there would be no other change to five of the seven existing events; Athenian Day and Homecoming, would be permitted to increase the maximum number of outside guests, students, faculty, and staff upon relocating these events to the Wellness Pavilion. In addition, a number of new events will be held at the Wellness Pavilion including Summer Sports Camps, Health and Wellness Speaker Series, Other Wellness / Sports Activities, and MSMU's existing volleyball and basketball club sports practices and games (which currently practice and play games off-site). Alternative 5 will permit an increase in the number of outside guests, students, faculty, and staff that could attend Athenian Day and Homecoming, as well as introduce the three new event types described above, which can be attended by outside guests, students, faculty, and staff. The table below provides the existing and new events which will be relocated to the Wellness Pavilion, the permitted increase in the number of students,

faculty, staff, and outside guests for Athenian Day and Homecoming, and the estimated number of students, faculty, staff, and outside guests which will be permitted at the three new event types.

Alternative 5 Existing and New Events to be Held at the Wellness Pavilion					
<i>Event</i>	<i>Description</i>	<i>Frequency</i>	<i>Time of Day</i>	<i>Current Location</i>	<i>Estimated Attendance</i>
Existing Events to be Relocated to the Wellness Pavilion / No Additional Changes					
Spring Convocation	Staff and faculty meeting prior to start of spring semester	Annual one-day event / January	8 am to 2 pm / Weekday	Circle / Campus Center	275 SFS 25 OG Total: 300 people
Nursing Panel	Career Services event with outside vendors and panelists	Annual one-day event / January	3 pm to 10 pm / Weekday	Campus Center	125 SFS 25 OG Total: 150 people
Women's Leadership Conference	Conference focused on women leadership	Annual one-day event / September	8 am to 5 pm / Weekend day	Circle / Campus Center/ Classrooms	175 SFS 175 OG Total: 350 people
Live at the Mount	High school students visit the Chalon Campus to learn more about MSMU ¹	Four days fall / four days spring	Morning Weekdays	Campus Center / Circle/ Theater	30 SFS 250 OG Total: 280 people
Student Orientation	Orientation for new students and family members	Annually / two days	8 am to 5 pm / Weekend days	Circle / Center Campus/ Theater / Classrooms	400 SFS 600 OG Total: 1,000 people
Existing Events to be Relocated to the Wellness Pavilion and Increase Attendance / No Additional Changes					
Athenian Day	Athletic event for students and alum	Annual one-day event / spring	8 am to 5 pm / Weekend day	Circle / Center Campus / Pool/ Fitness Facilities	200 SFS 100 OG Total: 300 people (Increase of 50 SFS and 50 OG)
Homecoming	Students, faculty, staff, and alum MSMU celebration	Annual one-day event / October	2 pm to 4 pm / Weekend day	Circle / Campus Center / Classrooms	200 SFS 150 OG Total: 350 people (Increase of 50 SFS and 50 OG)
New Events to be Located at the Wellness Pavilion					
Summer Sports Camps	Sports campus available to students, faculty, and the public	12 weeks during summer	8 am to 5 pm / Monday-Sunday /	New event, not currently held on Campus	400 OG
Health and Wellness Speaker Series	Lecture series to support MSMU's health and wellness curriculum	Maximum 8 events per year / throughout the year	If event includes OG, cannot start / end during AM or PM peak hours / weekday or weekend day	New event not currently held on Campus	200 SFS 250 OG Total: 450 people

Other Wellness / Sports Activities	External rental activities that are support health, wellness and sports	Maximum 12 events per year / throughout the year	If event includes OG, cannot start / end during AM or PM peak hours / weekday or weekend day	New event not currently held on Campus	50-400 OG ²
Club Sports	MSMU club volleyball and basketball games and practices	During the school year / no other restrictions	After 7:30 PM on weekdays / no restrictions on weekend days	Existing event not currently held on Campus	20-40 OG
<p>Notes: SFS -Students, Faculty, Staff OG – Outside Guests ¹- Students are transported to the Campus via five buses. ²- Attendance at Other Wellness/Sports Activities Events assumes all OG to be conservative. However, attendees could be a combination of SFS and OG.</p>					

The Wellness Pavilion will provide a practice facility to accommodate MSMU's club sport practices and games, fostering an improved educational experience and eliminating the club sports operational challenges by removing the necessity of locating club sport practices and games off-site.

Alternative 5 will implement traffic operational restrictions relative to the Wellness Pavilion events start and end times and permitted number of vehicle trips to ensure the Wellness Pavilion events are compatible with the surrounding community. Alternative 5 will implement maximum daily vehicle trip caps for Health and Wellness Speaker Series, Other Wellness/Sports Activities, Summer Sports Camps, and Club Sports activities. Under Alternative 5, the maximum daily outside guest vehicle trips for Health and Wellness Speakers Series, Other Wellness/Sports Activities, and Club Sports activities will be restricted to a total of 310 (155 inbound and 155 outbound) (PDF-TRAF-12). The daily total will be applicable to all types of vehicles, including shuttles, as further specified in PDF-TRAF-12. PDF-TRAF-11 will restrict the start and end times of these events such that no trips will be generated during peak periods. Summer Sports Camps will be limited to 236 daily trips (118 inbound and 118 outbound), with the requirement of shuttles or carpools when attendance would exceed 50 campers per day during peak periods (PDF-TRAF-14). Other vehicle trip limitations will apply to certain peak hours as included in PDF-TRAF-13. Finally, concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts taken for the Campus (a reduction of 22 average daily trips). Overall trip reductions shall be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Biannual monitoring reports documenting the trip counts shall be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years. Thus, as part of the operation of the Wellness Pavilion, MSMU will be required to implement the operational components summarized above and included in Alternative 5's Mitigation Monitoring Program (Exhibit E). Thus Alternative 5's operational activities will not adversely affect or degrade adjacent properties, the surrounding neighborhood, or public health, welfare and safety.

b. Height Modification

The Wellness Pavilion will require a determination to allow a maximum building height of 42 feet, in lieu of the otherwise permitted maximum building height of 30 feet for a building located in the RE40-1-H Zone with a roof slope of less than 25 percent, as permitted by LAMC Section 12.21 C.10(d). Additional height is required due to the nature of the use (e.g., a gym with a tall ceiling) and the sloping topography of the Site.

The Campus is located on a ridge on the south flank of the Santa Monica Mountains and slopes to the south. The Project Site is currently developed and located on the northern portion of the Campus. As stated above, the nearest residences to the Project Site, are located along Bundy Drive, to the north of the Bundy Drive/Chalon Road intersection. These residences are sited approximately 300 feet below the Project Site and do not have views of the developed portion of the Campus, including the Project Site. The existing buildings on Campus range in height from 12 feet tall to 70 feet tall, with the Mary Chapel bell tower being 113 feet tall. While the Wellness Pavilion, will be relatively higher than Rossiter Hall to the south (35 feet tall), the Yates, Aldworth and Burns Houses, located to the immediate north (43 feet tall), as well as the Mary Chapel (which is located immediately south of the Project Site and 54 feet tall), will have a greater height than the Wellness Pavilion.

The Campus and Project Site are minimally visible from the surrounding properties due to the varying topography and dense vegetation along nearby roadways. The Campus is visible from hiking trails to the north and west and at a higher elevation than the Project Site. Views of Alternative 5 from the northern hiking trail will be largely obscured by intervening land forms, vegetation, and buildings (the tops of the Yates, Aldworth and Burns Houses). The Mary Chapel bell tower will be taller than the Wellness Pavilion and will remain visible. Alternative 5 will not break the skyline and will not block existing views of the skyline, nearby hills, and/or the horizon as viewed from trails along the Santa Monica Mountains foothills to the north.

The closest public access to the Campus from the west is the hiking trail on the first major ridge to the west, which is located more than 0.32 miles west of the Project Site. The trail is located approximately 0.24 mile to the north of the North Tigertail Road terminus at an elevation of approximately 1,300 feet above mean sea level (amsl) (approximately 200 feet higher than the Project Site). Under Alternative 5, the Wellness Pavilion will be located on the northern portion of the Project Site and the Campus will be visible in the foreground/mid-ground of existing panoramic views of the Santa Monica/Hollywood Hills and the horizon currently across the Campus. Alternative 5 will not block any existing horizon views or existing views of natural hillsides.

The Project Site will also be visible from two local residential streets to the southwest, including Canna Road at Sky Lane and North Tigertail Road. The Sky Lane/Canna Road view location is located approximately 0.32 miles southwest of the Site. Alternative 5 will be a small background feature and will not block views of the surrounding and/or background open space, including the view of the fire road/trail in the center left of the photograph, or views of the horizon.

The North Tigertail Road view location is located approximately 0.58 miles southwest of the Project Site. The Wellness Pavilion will be located on the northern portion of the Site and will be largely obscured by landform and vegetation, and will not encroach into the existing views of the ridgeline or affect horizon views. No existing open space will be infringed upon and no views of open space, including views of the surrounding Santa Monica Mountains will be affected. It is further noted that public views from these public streets are limited to a few openings between residences and are not considered to be valued key views that would be generally available to or valued by the public. No other view fields across the Project Site are available from neighborhood streets that are closer to the Campus. Views across the Campus will be available from the Getty Center, approximately 0.58 mile to the southwest. Views of the Wellness Pavilion will be obscured

by the existing Humanities Building, landform, and vegetation. Alternative 5 will not block any open space vistas, including ridgelines or open space as viewed from this location.

Thus, Alternative 5's height will be compatible with and will not adversely affect or degrade adjacent properties (both on and off-Campus), the surrounding neighborhood, or the public health, welfare and safety.

c. Grading

Alternative 5 will require a total of 9,343 cubic yards of grading in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone, as permitted by LAMC 12.21 C.10(f)(1). Alternative 5's construction period will be a total of 20 months and comprised of seven phases: (1) Site Preparation; (2) Demolition; (3) Grading; (4) Concrete Pour; (5) Building Construction-Structural Steel; (6) Building Construction-Framing/Walls/Finishes; and (7) Paving. Grading activities will occur over a one and half month period and in accordance with ZA-2017-928-ZAD Condition No. 2(a), MSMU has proposed to balance all grading activities on-site, thereby eliminating the need for any import or export of fill. Therefore, haul trucks will not be needed for import/export grading activities and thus will not impact the surrounding neighborhood streets. Further, in accordance with PDF-TRAF-1 and PDF-TRAF-2, MSMU will be required to prepare and submit a Construction Traffic Management Plan and Construction Parking Plan. In addition, grading activities will comply with South Coast Air Quality Management District (SCAQMD) Rule 403 which requires the implementation of best available dust control measures during operations capable of creating fugitive dust. Compliance with the Transportation PDFs and Rule 403 in addition to the distance between the Project Site and nearest residence (300 feet) will ensure that grading activities related to the construction of Alternative 5 will not adversely affect or degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety.

d. Retaining Walls (Number and Height)

The Campus is located on the south flank of the Santa Monica Mountains and slopes to the south, with an approximately 600-foot grade change from the northern to southern edge. In addition to the request to exceed the permitted maximum by-right cut and fill amount, Alternative 5 will require a total of 12 retaining walls ranging in height from two feet to a maximum height of 17 feet, in lieu of the otherwise maximum limit of one retaining wall per lot and the maximum 12-foot height limit for a property located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.8.

As shown in Exhibit D2, the 12 proposed retaining walls are located throughout the Site and will enhance the Site's overall design, pedestrian experience and vehicle safety. Further, it should be noted that several of the proposed retaining walls are located around trash or electrical equipment enclosures and will screen these uses from view. Others are located along new surface parking areas and will aid in pedestrian safety. Finally, several retaining walls are located along the pedestrian walkway, increasing pedestrian connectivity throughout the Campus, as well as opportunities for landscaping and contributing to the overall Site design. .

The number and height of retaining walls needed to allow for the construction and operation of Alternative 5 are included in ZA-2017-928-ZAD Condition No. 2(b). The Project Site will not be visible to the nearest residences along Bundy Drive and all retaining walls eight feet and greater in height will be required to be landscaped to completely hide the retaining wall from view. Similar to the request to exceed the permitted amount of grading, the LAMC Hillside Development Standards were adopted to regulate single-family residences which make-up most of the development in hillside areas. The retaining walls will not expand the existing Campus' development pad nor will they result in visual impacts to the surrounding community. Pursuant to LAMC Section 12.21 C.8(b), ZA-2017-928-ZAD Condition No. 3 requires any Alternative 5

retaining wall eight feet or greater in height to be landscaped and hidden from view. MSMU's retaining wall landscape plan is included as Exhibit D3.

The Wellness Pavilion will provide a service that is beneficial to both students, faculty, staff, and the surrounding community with a modernized fitness facility and wellness programming to encourage physical activity and to educate students on nutrition and health. The request to exceed the maximum limit of one retaining wall per lot and the maximum 12-foot height limit for a property located in the RE40-1-H Zone will not adversely affect or degrade adjacent properties, including the surrounding neighborhood.

3. The project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

a. Plan Approval

The original 33.3-acre Campus was established in January 1929 with the adoption of Ordinance No. 62,642 which granted a zone variance permitting the construction of the Chalon Campus (Campus) in a residential zone. In 1952, the City granted a 17-acre expansion of the Campus.

The Campus exists as a “deemed to be approved” conditional use because its use as an educational institution predates such CUP requirement, and development of the Campus has been permitted through a series of Plan Approvals. The continued operation and development of the Campus substantially conforms with the purpose, intent and provisions of the General Plan, Framework Element, and the Brentwood Pacific-Palisades Community Plan. The residential neighborhood has grown around the Campus over time. Alternative 5 does not involve a material change from the previously authorized deemed approved conditional use. The proposed addition of the Wellness Pavilion will allow the continued school use and will replace previous outdated athletic and wellness facilities within the same area of the Campus. Student enrollment will not be increased however the Wellness Pavilion will be used to host existing on-Campus events and new events that will be attended by students, faculty, staff, and outside guests.

The following findings include applicable goals, objectives, and policies from both the General Plan Framework Element and Brentwood-Pacific Palisades Community Plan and all relevant approval(s) (e.g., Plan Approval, Height Modification, Grading, and/or Retaining Walls (height and number), that substantially conforms with the purpose, intent and provisions of the referenced goal, objective, and policy.

General Plan Framework Element

The Framework Element of the General Plan was adopted the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the Project Site. It also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following goals, objectives, and policies relevant to the current request:

Chapter 3 – Land Use

Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air

quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.

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

a. Plan Approval

The Chalon Campus (Campus) was established in 1929 and the construction of Brady Hall, a three-story building that currently provides student services was constructed shortly thereafter in 1931. Alternative 5 will replace the Campus' inadequate and outdated existing fitness and recreation facilities and include the construction and operation of a two-story 35,500 square-foot Wellness Pavilion, a new outdoor pool area, improvements to an internal roadway, new landscaping, and three new surface parking lots. MSMU's current fitness and recreation facilities are not properly sized or proportioned to accommodate the physical education needs of the Campus. The Campus' existing fitness facilities include a pool area, two tennis courts, a 1,030 square-foot Fitness Center building that was constructed in 1949 and a 1,470 Facilities Management building that was constructed in 1964. The Fitness Center building encompasses the Campus' entire weight training and cardio facilities which includes free weights, three treadmills, one stair machine, two elliptical machines, and several strength training machines, while the Facilities Management building includes a 600 square-foot maintenance area and 870 square-foot shower/locker room area. The Wellness Pavilion will provide students, faculty, and staff with a modernized fitness/educational facility and wellness programming to encourage physical activity and to educate students on nutrition and health and allow MSMU to continue support the needs of the City's existing and future residents, businesses, and visitors.

MSMU is a university that contributes towards and facilitates the City's long-term fiscal and economic viability. As stated above, the current fitness facilities are outdated; construction and operation of the Wellness Pavilion will support the viability of an established educational institution that plays a vital role in educating women from diverse backgrounds. Further, higher education institutions play an essential role in the health and wellness of their students. The Wellness Pavilion will address the lack of adequate fitness and wellness facilities on the Campus.

The existing fitness and recreation facilities located on the Campus must be updated to ensure MSMU can provide their students with similar fitness facilities offered at other universities, located in the City. Operation of the Wellness Pavilion will not increase student enrollment however the Wellness Pavilion will be used to host existing on-Campus events and new events. A total of seven existing events currently held elsewhere on the Campus would be moved to the Wellness Pavilion. Besides the change in location, there would be no other change to five of the seven existing events; Athenian Day and Homecoming, would be permitted to increase the maximum number of outside guests, students, faculty, and staff upon relocating these events to the Wellness Pavilion. In addition, a number of new events will be held at the Wellness Pavilion including Summer Sports Camps, Health and Wellness Speaker Series, Other Wellness / Sports Activities, and MSMU's existing volleyball and basketball club sports practices and games (which currently practice and play games off-site). Alternative 5 will permit an increase in the number of outside guests, students, faculty, and staff that could attend Athenian Day and Homecoming, as well as introduce the three new event types described above, which could be attended by outside guests, students, faculty, and staff. The introduction of new events open to outside guests will further contribute to the City's diversity of uses and will provide new extracurricular events/activities for the City's existing and future residents, businesses, and visitors.

The Wellness Pavilion will be located on a developed portion of the Campus and preserve the adjacent natural open space to the east and west of the Campus, as well as the residential

neighborhood to the south. Alternative 5 will result in the expansion of the Project Site's 200-foot fuel modification zone into 0.9-acres of native plant communities, however the expansion of the fuel modification is necessary to comply with fire safety requirements. Thus, construction of the Wellness Pavilion will not result in the development of natural open space. Further due to the topography and surrounding vegetation, the Project Site is not visible from the nearest residences, located along Bundy Drive. Thus, Alternative 5 will not change the atmosphere of the residential community to the south.

Alternative 5 will contribute to the Campus' physically balanced distribution of uses that contributes towards and facilitates the City's long-term fiscal and economic viability, while also supporting the needs of the City's existing and future residents, businesses, and visitors, and conserving the natural open space and residential community that is adjacent to the Campus and Project Site.

Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram.

a. Plan Approval

The Campus land use designation is Minimum Residential and is zoned as RE40-H-1. As set forth in Table 3-1, Land Use Standards and Typical Development Characteristics, in the General Plan Framework, typical development characteristics of the Single-Family Residential category, which includes uses designated for Minimum Residential, include the development of single-family dwelling units, as well as supporting uses such as parks, schools, and community centers. Alternative 5 involves the construction of a new fitness and recreation building (Wellness Pavilion), a pool, surface parking lots, improvements to an internal roadway, and new landscaped areas. Alternative 5 will be consistent with the Single-Family Residential category from the Framework Element, as this category allows for the development of schools. Overall, Alternative 5 will be generally be consistent with the General Plan Framework's guidelines.

Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.

a. Plan Approval

Alternative 5 includes components to restrict the interim vehicle trips that will be generated by Wellness Pavilion events, provides a variety of shuttle options, as well as last mile connections to the surrounding public transit options. MSMU's various shuttles provide transportation options for arrivals to the Campus and serves to reduce the number of trips to and from the Campus. The Campus is not served directly by public transit however the Campus is located four miles north of the Metro E Line Bundy Light Rail Station (formerly the Expo Line) and MSMU provides weekday AM and PM shuttle services to and from the light rail station and the Campus. Additionally, the City of Santa Monica Big Blue Buses and Local and Rapid Metro Buses provide public transit service along Sunset Boulevard, Wilshire Boulevard, Santa Monica Boulevard, and San Vicente Boulevard. MSMU provides weekday AM and PM shuttle services to and from the Metro bus station located at Sunset Boulevard and Saltair Avenue. MSMU operates several shuttles including a weekday inter-campus shuttle (between the Doheny and Chalon Campuses), a weekday Union station shuttle (between the Doheny Campus and Union Station), a daily afternoon and evening Explore LA shuttle (providing access to the Westwood community and City of Santa Monica), a weekday E Line (formerly the Expo Line) Bundy Station shuttle and a weekly club sports team shuttle, as MSMU's club volleyball and basketball practices are held off-site. In addition to the shuttle services described above, MSMU operates a rideshare program that provides faculty and staff a monthly \$50.00 transit subsidy, carpool program, TAP card,

guaranteed ride home program, Enterprise Carshare Program, park and rideshare information, and ZimRide vehicles (a rideshare program).

Alternative 5 will implement maximum daily vehicle trip caps for the Health and Wellness Speaker Series, Other Wellness/Sports Activities, Summer Sports Camps, and Club Sports activities. Under Alternative 5, the maximum daily outside guest vehicle trips for the Health and Wellness Speakers Series, Other Wellness/Sports Activities, and Club Sports activities will be restricted to a total of 310 (155 inbound and 155 outbound) (PDF-TRAF-12). The daily total will be applicable to all types of vehicles, including shuttles, as further specified in PDF-TRAF-12. PDF-TRAF-11 will restrict the start and end times of these events such that no trips will be generated during peak periods. Summer Sports Camps will be limited to 236 daily trips (118 inbound and 118 outbound), with the requirement of shuttles or carpools when attendance would exceed 50 campers per day during peak periods (PDF-TRAF-14). Other vehicle trip limitations will apply to certain peak hours as included in PDF-TRAF-13. Finally, concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts taken for the Campus (a reduction of 22 average daily trips). Overall trip reductions shall be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Biannual monitoring reports documenting the trip counts shall be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years. Thus, as part of the operation of the Wellness Pavilion, MSMU will implement the operational components summarized above and included in Alternative 5's Mitigation Monitoring Program (Exhibit E). Alternative 5 will promote an improved quality of life by reducing the number of vehicle trips associated with operation of the Wellness Pavilion.

Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.

Goal 3B: Preservation of the City's stable single-family residential neighborhoods.

Objective 3.5: Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.

Policy 3.5.2: Require that new development in single-family neighborhoods maintains the predominant and distinguishing characteristics, such as property setbacks and building scale.

a. Plan Approval

Alternative 5 will replace the Campus' inadequate and outdated existing fitness and recreation facilities and include the construction and operation of a two-story 35,500 square-foot Wellness Pavilion, a new outdoor pool area, improvements to an internal roadway, new landscaping, and three new surface parking lots, while maintaining the overall spatial relationships with the surrounding environment.

The 3.8-acre Project Site is located on the northern portion of the 45-acre Campus and currently developed. Surrounding uses include open space to the east, west, and north, and single-family residential uses to the south. The closest single-family residence, located along Bundy Drive is approximately 300 feet from the Campus. The Campus, including the Project Site is Zoned RE40-H-1 and subject to the LAMC's Single-Family Zone Hillside Area Development Standards. Pursuant to LAMC Section 12.21 C.10-1, parcels located in a City designated Hillside Area and

zoned RE40 must maintain a front yard setback that is not less than 20 percent of the lot depth and not greater than 25 feet; a 10-foot side yard setback and for buildings with a height greater than 18 feet, one additional foot shall be added to each required side yard for each increment of 10 feet or fraction thereof above the first 18 feet; and a rear yard setback that is not less than 25 percent of the lot depth and not greater than 25 feet. Alternative 5 will comply with all required setbacks.

In combination with the RE40 Zone and City designated Hillside Area, Height District 1 imposes a maximum height of 30 feet for buildings with a roof slope of less than 25 percent. In combination with the RE40 Zone and City designated Hillside Area, the LAMC sets a minimum guaranteed residential floor area of 18 percent of the total lot size. The Wellness Pavilion's additional square footage will result in approximately 13.5 percent of the entire Campus (which is a single lot) being developed, below the guaranteed minimum residential floor area of 18 percent. MSMU is requesting a determination to allow a maximum building height of 42 feet, in lieu of the otherwise permitted maximum building height of 30 feet as discussed further below. Additionally, MSMU is requesting a Zoning Administrators Determination to exceed the maximum by-right cut and fill amount of 6,600 cubic yards and the maximum number and height of retaining walls permitted on a parcel zoned RE40. Both of these requests are discussed in greater detail below.

With the exception of the Campus and Carondelet Center, the land uses along Chalon Road and Bundy Drive, north of Sunset Boulevard, consist of low-density residential neighborhoods. The nearest residences to the Project Site, are located along Bundy Drive, to the north of the Bundy Drive/Chalon Road intersection. These residences are sited approximately 300 feet below the Project Site and do not have views of the developed portion of the Campus, including the Project Site. Single-family residences are also located along Chalon Road south and east of the Campus and along Grace Lane directly south of the Carondelet Center. Similar to the single-family homes located to the north of the Bundy Drive/Chalon Road intersection, the residences along Chalon Road and Grace Lane are substantially lower in elevation than the Campus (including the Project Site), ranging from 200 to 400 feet below the Campus setting. The difference in elevation between the surrounding land uses and the Campus reduces the visual interaction between the surrounding land uses and Campus and will ensure that the character and scale of the single-family residential neighborhood is maintained.

b. Height Modification

The Wellness Pavilion will require a determination to allow a maximum building height of 42 feet, in lieu of the otherwise permitted maximum building height of 30 feet for a building located in the RE40-1-H Zone with a roof slope of less than 25 percent, as permitted by LAMC Section 12.21 C.10(d). Additional height is required due to the nature of the use (e.g., a gym with a tall ceiling) and the sloping topography of the Site.

The Campus is located on a ridge on the south flank of the Santa Monica Mountains and slopes to the south. The Project Site is currently developed and located on the northern portion of the Campus. As stated above, the nearest residences to the Project Site, are located along Bundy Drive, to the north of the Bundy Drive/Chalon Road intersection. These residences are sited approximately 300 feet below the Project Site and do not have views of the developed portion of the Campus, including the Project Site. The existing buildings on Campus range in height from 12 feet tall to 70 feet tall, with the Mary Chapel bell tower being 113 feet tall. While the Wellness Pavilion will be relatively higher than Rossiter Hall to the south (35 feet tall), the Yates, Aldworth and Burns Houses, located to the immediate north (43 feet tall), as well as the Mary Chapel (which is located immediately south of the Project Site and 54 feet tall), will have a greater height than the Wellness Pavilion, creating a visually interesting tiering effect.

The Campus and Project Site are minimally visible from the surrounding properties due to the varying topography and dense vegetation along nearby roadways. Thus, the character and scale of stable single-family residential neighborhoods will be maintained; Alternative 5 is compatible with the surrounding on-Campus development and the requested height increase will not conflict with the scale and character of existing single-family residential development.

c. Grading

Alternative 5 will require a total of 9,343 cubic yards of grading in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone, as permitted by LAMC 12.21 C.10(f)(1). Alternative 5's construction period will be a total of 20 months and be comprised of seven phases: (1) Site Preparation; (2) Demolition; (3) Grading; (4) Concrete Pour; (5) Building Construction-Structural Steel; (6) Building Construction-Framing/Walls/Finishes; and (7) Paving. Grading activities will occur over a one and half month period and in accordance with ZA-9017-928-ZAD Condition No. 2(a), MSMU has proposed to balance all grading activities on-site, thereby eliminating the need for any import or export of fill. Therefore, haul trucks will not be needed for import/export grading activities and thus will not impact the surrounding neighborhood streets.

Allowing for the grading amount to exceed the LAMC maximum will allow the Wellness Pavilion to be located on an area of the Campus that will not be visible from the surrounding residential community and thus not impact the character and/or scale of the single-family neighborhood. Additionally, the Wellness Pavilion has been designed to position the building in an area of the Campus to minimize grading. The Wellness Pavilion design necessitates a flat and level building pad to be able to properly accommodate indoor and outdoor contiguous athletic facilities, thereby necessitating additional grading than what would normally be allowed for a single-family development in the hillside area. In accordance with PDF-TRAF-1 and PDF-TRAF-2, MSMU will be required to prepare and submit a Construction Traffic Management Plan and Construction Parking Plan which would ensure that construction activities, including grading activities, related to the construction of Alternative 5 will have minimal impacts to the surrounding residential neighborhood's character. In addition, grading activities will comply with South Coast Air Quality Management District (SCAQMD) Rule 403 which requires the implementation of best available dust control measures during operations capable of creating fugitive dust. Compliance with the Transportation PDFs and Rule 403 in addition to the distance between the Project Site and nearest residence (300 feet) will ensure that grading activities related to the construction of Alternative 5 do not impact the character of the surrounding residential neighborhood.

d. Retaining Walls (Number and Height)

In addition to the request to exceed the permitted maximum by-right cut and fill amount, Alternative 5 will require a total of 12 retaining walls ranging in height from two feet to a maximum height of 17 feet, in lieu of the otherwise maximum limit of one retaining wall and the maximum 12-foot height limit for a property located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.8. Pursuant to LAMC Section 12.21 C.8(b), ZA-2017-928-ZAD Condition No. 3 requires any Alternative 5 retaining walls eight feet or greater in height to be landscaped and hidden from view. As shown in MSMU's retaining wall landscape plan which is included as Exhibit D3, the retaining walls eight feet or greater in height will be landscaped and not visible.

As shown in Exhibit D2, the 12 proposed retaining walls are located throughout the Site and will enhance the Site's overall design, pedestrian experience and vehicle safety. Further, it should be noted that several of the proposed retaining walls are located around trash or electrical equipment enclosures and will screen these uses from view. Others are located along new surface parking areas and will aid in pedestrian safety. Finally, several retaining walls are located along the

pedestrian walkway, increasing pedestrian connectivity throughout the Campus, as well as opportunities for landscaping and contributing to the overall Site design.

The nearest single-family residence is approximately 300 feet from the Campus, and the Campus and Project Site are minimally visible from the surrounding properties due to the varying topography and dense vegetation along nearby roadways. Thus, the 12 retaining walls which will range in height from two to 17 feet, will not impact the character of the surrounding single-family residential neighborhood.

Chapter 6 – Open Space and Conservation

Policy 6.1.6: *Consider preservation of private land open space to the maximum extent feasible. In areas where open space values determine the character of the community, development should occur with special consideration of these characteristics.*

a. Plan Approval

The Campus is surrounded by open space to the east, west, and north. Alternative 5 will be constructed on a developed portion of the Campus. The Project Site is currently developed with a 1,030 square-foot single-story Fitness Center building, two Facilities Management buildings (a two-story 3,500 square-foot building and a single-story 1,470 square-foot building), two tennis courts, a swimming pool, and several surface parking lots. Alternative 5 will result in the expansion of the Project Site's 200-foot fuel modification zone into 0.9-acres of native plant communities, however due to the proximity of the 200-foot fuel medication zone to developed areas of the Campus, the new fuel modification area is required per regulations designed to enhance fire safety. Thus, Alternative 5 will preserve the surrounding open space to the maximum extent feasible.

Brentwood-Pacific Palisades Community Plan

The Brentwood-Pacific Palisades Community Plan was adopted by the Los Angeles City Council on June 17, 1998. The Community Plan's purpose is to, "to promote an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live and work in the community." Alternative 5 will be in conformance with the following goals, objectives, and policies as described below.

Objective 1-3: *To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.*

Policy 1-3.2: *Preserve existing views in hillside areas.*

a. Plan Approval

As discussed above the Campus has existed in its current location since 1929. Since 1931, with the construction of Brady Hall, MSMU has made Campus improvements, including new buildings which require discretionary approvals. Coinciding with the Campus improvements, the surrounding neighborhood comprised of single-family residences has developed around the Campus.

The Campus is located on a ridge on the south flank of the Santa Monica Mountains and slopes to the south. Open space surrounds the Campus to the east, west, and north, and single-family residences are located to the south. The Project Site is currently developed and located on the northern portion of the Campus. As stated above, the nearest residences to the Project Site, are

located along Bundy Drive, to the north of the Bundy Drive/Chalon Road intersection. These residences are sited approximately 300 feet below the Project Site and do not have views of the developed portion of the Campus, including the Project Site. Due to the Campus and surrounding area's topography and the location of the Project Site within the Campus, the Wellness Pavilion will not impact the residential character and integrity of the single-family residential neighborhood to the south.

As discussed in detail below under "Height Modification", the existing views in hillside areas will be preserved under Alternative 5.

Operation of the Wellness Pavilion will not increase student enrollment however the Wellness Pavilion will be used to host existing on-Campus events and new events. A total of seven existing events currently held elsewhere on the Campus will be moved to the Wellness Pavilion. Besides the change in location, there will be no other change to five of the seven existing events; Athenian Day and Homecoming, will be permitted to increase the maximum number of outside guests, students, faculty, and staff upon relocating these events to the Wellness Pavilion. In addition, a number of new events will be held at the Wellness Pavilion including Summer Sports Camps, Health and Wellness Speaker Series, Other Wellness / Sports Activities, and MSMU's existing volleyball and basketball club sports practices and games (which currently practice and play games off-site). Alternative 5 will permit an increase in the number of outside guests, students, faculty, and staff that could attend Athenian Day and Homecoming, as well as introduce the three new event types described above, which could be attended by outside guests, students, faculty, and staff. While the introduction of new events open to outside guests will result in new vehicle trips, the Wellness Pavilion will provide a practice facility to accommodate MSMU's club sport practices and games, fostering an improved educational experience and eliminating operational challenges by removing the necessity of locating club sport practices and games off-site.

To ensure the new interim vehicle trips do not impact the residential character of the community, Alternative 5 will include traffic operational restrictions, applicable to events hosted at the Wellness Pavilion, in regards to maximum daily vehicle trip caps for Health and Wellness Speaker Series, Other Wellness/Sports Activities, Summer Sports Camps, and Club Sports activities. Under Alternative 5, the maximum daily outside guest vehicle trips for the Health and Wellness Speakers Series, Other Wellness/Sports Activities, and Club Sports activities will be restricted to a total of 310 (155 inbound and 155 outbound) (PDF-TRAF-12). The daily total will be applicable to all types of vehicles, including shuttles, as further specified in PDF-TRAF-12. PDF-TRAF-11 will restrict the start and end times of these events such that no trips will be generated during peak periods. Summer Sports Camps will be limited to 236 daily trips (118 inbound and 118 outbound), with the requirement of shuttles or carpools when attendance will exceed 50 campers per day during peak periods (PDF-TRAF-14). Other vehicle trip limitations will apply to certain peak hours as included in PDF-TRAF-13. Finally, concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts taken for the Campus (a reduction of 22 average daily trips). Overall trip reductions shall be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Biannual monitoring reports documenting the trip counts shall be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years. Thus, as part of the operation of the Wellness Pavilion, MSMU will implement the operational components summarized above and included in Alternative 5's Mitigation Monitoring Program (Exhibit E). Thus Alternative 5's operational activities will not impact the residential character and integrity of the surrounding residential neighborhood.

b. Height Modification

The Wellness Pavilion will require a building height of 42 feet, in lieu of the otherwise permitted maximum building height of 30 feet for a building located in the RE40-1-H Zone with a roof slope of less than 25 percent, as permitted by LAMC Section 12.21 C.10(d). Additional height is required due to the nature of the use (e.g., a gym with a tall ceiling) and the sloping topography of the Site.

The Campus is located on a ridge on the south flank of the Santa Monica Mountains and slopes to the south. The Project Site is currently developed and located on the northern portion of the Campus. As stated above, the nearest residences to the Project Site, are located along Bundy Drive, to the north of the Bundy Drive/Chalon intersection. These residences are sited approximately 300 feet below the Project Site and do not have views of the developed portion of the Campus, including the Project Site. The existing buildings on Campus range in height from 12 feet tall to 70 feet tall, with the Mary Chapel bell tower being 113 feet tall. While the Wellness Pavilion, would be relatively higher than Rossiter Hall to the south (35 feet tall), the Yates, Aldworth and Burns Houses, located to the immediate north (43 feet tall), as well as the Mary Chapel (which is located immediately south of the Project Site and 54 feet tall), will have a greater height than the Wellness Pavilion.

The Campus and Project Site are minimally visible from the surrounding properties due to the varying topography and dense vegetation along nearby roadways. The Campus is visible from hiking trails to the north and west and at a higher elevation than the Project Site. Views of Alternative 5 from the northern hiking trail will be largely obscured by intervening land forms, vegetation, and buildings (the tops of the Yates, Aldworth and Burns Houses). The Mary Chapel bell tower will be taller than the Wellness Pavilion and will remain visible. Alternative 5 will not break the skyline and will not block existing views of the skyline, nearby hills, and/or the horizon as viewed from trails along the Santa Monica Mountains foothills to the north.

The closest public access to the Campus from the west is the hiking trail on the first major ridge to the west, which is located more than 0.32 miles west of the Project Site. The trail is located approximately 0.24 mile to the north of the North Tigertail Road terminus at an elevation of approximately 1,300 feet above mean sea level (amsl) (approximately 200 feet higher than the Project Site). Under Alternative 5, the Wellness Pavilion will be located on the northern portion of the Project Site and the Campus would be visible in the foreground/mid-ground of existing panoramic views of the Santa Monica/Hollywood Hills and the horizon currently across the Campus. Alternative 5 will not block any existing horizon views or existing views of natural hillsides.

The Project Site will also be visible from two local residential streets to the southwest, including Canna Road at Sky Lane and North Tigertail Road. The Sky Lane/Canna Road view location is located approximately 0.32 miles southwest of the Site. Alternative 5 will be a small background feature and will not block views of the surrounding and/or background open space, including the view of the fire road/trail in the center left of the photograph, or views of the horizon.

The North Tigertail Road view location is located approximately 0.58 miles southwest of the Project Site. The Wellness Pavilion will be located on the northern portion of the Site and would be largely obscured by landform and vegetation, and would not encroach into the existing views of the ridgeline or affect horizon views. No existing open space would be infringed upon and no views of open space, including views of the surrounding Santa Monica Mountains would be affected. It is further noted that public views from these public streets are limited to a few openings between residences and are not considered to be valued key views that would be generally available to or valued by the public. No other view fields across the Project Site are available from neighborhood streets that are closer to the Campus. Views across the Campus will be available from the Getty Center, approximately 0.58 mile to the southwest. Views of the Wellness Pavilion

will be obscured by the existing Humanities Building, landform, and vegetation. Alternative 5 will not block any open space vistas, including ridgelines or open space as viewed from this location.

Thus, Alternative 5's height will not interfere with existing hillside views and Alternative 5 will be compatible with and will not impact the residential character and integrity of the surrounding residential neighborhood.

c. Grading

Alternative 5 will require a total of 9,343 cubic yards of grading in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone, as permitted by LAMC 12.21 C.10(f)(1). Alternative 5's construction period will be a total of 20 months and be comprised of seven phases: (1) Site Preparation; (2) Demolition; (3) Grading; (4) Concrete Pour; (5) Building Construction-Structural Steel; (6) Building Construction-Framing/Walls/Finishes; and (7) Paving. Grading activities will occur over a one and half month period and be contained entirely within the Project Site. Further, in accordance with ZA-2017-928-ZAD Condition No. 2(a), MSMU has proposed to balance all grading activities on-site, thereby eliminating the need for any import or export of fill. Therefore, haul trucks will not be needed for import/export grading activities and thus will not impact the surrounding neighborhood streets. Additionally, in accordance with PDF-TRAF-1 and PDF-TRAF-2, MSMU will be required to prepare and submit a Construction Traffic Management Plan and Construction Parking Plan which will ensure that grading activities related to the construction of Alternative 5 will not impact the residential character and integrity of the surrounding residential neighborhood, including hillside views.

d. Retaining Walls (Number and Height)

The Campus is located on the south flank of the Santa Monica Mountains and slopes to the south, with an approximately 600-foot grade change from the northern to southern edge. In addition to the request to exceed the permitted maximum by-right cut and fill amount, Alternative 5 will require a total of 12 retaining walls ranging in height from two feet to a maximum height of 17 feet, in lieu of the otherwise maximum limit of one retaining wall per lot and the maximum 12-foot height limit for a property located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.8.

As shown in Exhibit D2, the 12 proposed retaining walls are located throughout the Site and will enhance the Site's overall design, pedestrian experience and vehicle safety. Further, it should be noted that several of the proposed retaining walls are located around trash or electrical equipment enclosures and will screen these uses from view. Others are located along new surface parking areas and will aid in pedestrian safety. Finally, several retaining walls are located along the pedestrian walkway, increasing pedestrian connectivity throughout the Campus, as well as opportunities for landscaping and contributing to the overall Site design.

Pursuant to LAMC Section 12.21 C.8(b), ZA-2017-928-ZAD Condition No.3 requires any Alternative 5 retaining walls eight feet or greater in height to be landscaped and hidden from view. MSMU's retaining wall landscape plan is included as Exhibit D3. As discussed in detail above, the Campus and Project Site are minimally visible from the surrounding properties due to the varying topography and dense vegetation along nearby roadways. As MSMU will be required to comply with ZA-2017-928-ZAD Condition No. 3 that requires any retaining wall eight feet or greater in height to be landscaped and hidden from view the additional retaining walls, the request to exceed the maximum limit of one retaining wall and the maximum 12-foot height limit for a property located in the RE40-1-H Zone will not interfere with existing hillside views and Alternative 5 will be compatible with and will not impact the residential character and integrity of the surrounding residential neighborhood.

Goal 4: A Community with sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the community and to protect environmental and aesthetic resources.

Objective 4-1: To protect the resources of the Plan area for the benefit of the residents and of the region by preserving existing open space and, where possible, acquiring new open space.

Policy4-1.1: Natural resources should be conserved on privately-owned land of open space quality and preserved on state parkland. City parks should be further developed as appropriate.

a. Plan Approval

The Campus is located on a ridge on the south flank of the Santa Monica Mountains and slopes to the south. As discussed above, the Campus is surrounded by open space to the east, west, and north. Alternative 5 will be constructed on a developed portion of the Campus. The Project Site is currently developed with a 1,030 square-foot single-story Fitness Center building, two Facilities Management buildings (a two-story 3,500 square-foot building and a single-story 1,470 square-foot building), two tennis courts, a swimming pool, and several surface parking lots. Alternative 5 will result in the expansion of the Project Site's 200-foot fuel modification zone into 0.9-acres of native plant communities, however due to the proximity of the 200-foot fuel modification zone to developed areas of the Campus, the new fuel modification area is already subject to indirect effects to biological resources associated with Campus activities. Thus, Alternative 5 will preserve the surrounding open space to the maximum extent feasible.

b. Height Modification

The Wellness Pavilion will require a building height of 42 feet, in lieu of the otherwise permitted maximum building height of 30 feet for a building located in the RE40-1-H Zone with a roof slope of less than 25 percent, as permitted by LAMC Section 12.21 C.10(d). Additional height is required due to the nature of the use (e.g., a gym with a tall ceiling) and the sloping topography of the Site. The Campus is located on a ridge on the south flank of the Santa Monica Mountains and slopes to the south. The Project Site is currently developed and located on the northern portion of the Campus. The requested increase in height will not impact any of the surrounding open space.

c. Grading

Alternative 5 will require a total of 9,343 cubic yards of grading in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone, as permitted by LAMC 12.21 C.10(f)(1). Alternative 5's construction period will be a total of 20 months and be comprised of seven phases: (1) Site Preparation; (2) Demolition; (3) Grading; (4) Concrete Pour; (5) Building Construction-Structural Steel; (6) Building Construction-Framing/Walls/Finishes; and (7) Paving. Grading activities will occur over a one and half month period and be contained entirely within the Project Site. Further, in accordance with ZA-2017-928-ZAD Condition No. 2(a), MSMU has proposed to balance all grading activities on-site, thereby eliminating the need for any import or export of fill. As discussed above, in accordance with PDF-TRAF-1 and PDF-TRAF-2, MSMU will be required to prepare and submit a Construction Traffic

Management Plan and Construction Parking Plan which will ensure that grading activities related to the construction of Alternative 5 will not impact any of the surrounding open space.

d. Retaining Walls (Number and Height)

The Campus is located on the south flank of the Santa Monica Mountains and slopes to the south, with an approximately 600-foot grade change from the northern to southern edge. In addition to the request to exceed the permitted maximum by-right cut and fill amount, Alternative 5 will require a total of 12 retaining walls ranging in height from two feet to a maximum height of 17 feet, in lieu of the otherwise maximum limit of one retaining wall per lot and the maximum 12-foot height limit for a property located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.8.

Pursuant to LAMC Section 12.21 C.8(b), ZA-2017-928-ZAD Condition No. 3 requires any Alternative 5 retaining walls eight feet or greater in height to be landscaped and hidden from view. MSMU's retaining wall landscape plan is included as Exhibit D3. As discussed in detail above, the Project Site is located entirely within the Campus, thus none of the retaining walls will be located in open space. Further, as any retaining walls eight feet or greater in height are required to be landscaped, none of the retaining walls will be visible from the surrounding trails. Thus, the number and height of retaining walls will not impact any of the surrounding open space.

Goal 6: Appropriate locations and adequate facilities for schools to serve the needs of existing and future population.

Objective 6-1: To site schools in locations complementary to existing land uses and community character.

6-1.1: Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character.

a. Plan Approval

As discussed above the Campus has existed in its current location since granted in 1929. The Campus is located on the south flank of the Santa Monica Mountains and slopes to the south, with an approximately 600-foot grade change from the northern to southern edge. The nearest residential uses are located approximately 300 feet from the Project Site. Since 1931, with the construction of Brady Hall, MSMU has made Campus improvements, including the construction of new buildings which require discretionary approvals. Coinciding with the Campus improvements, the surrounding single-family residential neighborhood has developed around the Campus.

The Campus land use designation is Minimal Residential and is zoned as RE40-H-1. As set forth in Table 3-1, Land Use Standards and Typical Development Characteristics, in the General Plan Framework, typical development characteristics of the Single-Family Residential category, which includes uses designated for Minimum Residential, include the development of single-family dwelling units, as well as supporting uses such as parks, schools, and community centers. Alternative 5 involves the construction of a new fitness and recreation building (Wellness Pavilion), a pool, surface parking lots, improvements to an internal roadway, and new landscaped areas. Alternative 5 will be consistent with the Single-Family Residential category from the Framework Element, as this category allows for the development of schools.

The Project Site is currently developed with the Campus' existing fitness facilities that include with a 1,030 square-foot single-story Fitness Center building, two Facilities Management buildings (a two-story 3,500 square-foot building and a single-story 1,470 square-foot building), two tennis courts, a swimming pool, and several surface parking lots. Alternative 5 will replace the Campus'

inadequate and outdated existing fitness and recreation facilities and include the construction and operation of a two-story 35,500 square-foot Wellness Pavilion, a new outdoor pool area, improvements to an internal roadway, new landscaping, and three new surface parking lots.

The Wellness Pavilion design and layout reflect a consideration of the Campus' relationship to adjacent residential uses. Alternative 5 will create a visually unified Campus with buildings and landscaping that respect the scale and character of the surrounding area. The Wellness Pavilion as proposed under Alternative 5 will demolish outdated fitness facilities and construct a building that includes a colonnade of columns and glazing, differentiating the ground level from the second level, and creating a pleasing pedestrian environment. The ground floor colonnade element will preserve the color, proportions and rhythm of the typical gothic arch colonnades found throughout Campus, while the second story will be constructed out of glazed glass allowing for the infiltration of natural light and reducing the demand on artificial lighting. The typical clay tile roof forms of older on Campus buildings will be reinterpreted as an expansive ceiling (an inverted roof) bringing the texture and color found on the clay roofs inside the building.

The Wellness Pavilion will be proportioned to be similar in height (a maximum of 42 feet tall) to the adjacent Campus buildings, including Mary Chapel (which is 54 feet tall, 113 feet tall at the top of the bell tower), Rossiter Hall (which is 35 feet tall), and Yates, Aldworth, and Burns Residences (43 feet tall). With the exception of the Campus and Carondelet Center, the land uses along Chalon Road and Bundy Drive, north of Sunset Boulevard, consist of low-density residential neighborhoods. The nearest residences to the Project Site, are located along Bundy Drive, to the north of the Bundy Drive/Chalon Road intersection. These residences are sited approximately 300 feet below the Project Site and do not have views of the developed portion of the Campus, including the Project Site. Single-family residences are also located along Chalon Road south and east of the Campus and along Grace Lane directly south of the Carondelet Center. Similar to the single-family homes located to the north of the Bundy Drive/Chalon Road intersection, the residences along Chalon Road and Grace Lane are substantially lower in elevation than the Campus (including the Project Site), ranging from 200 to 400 feet below the Campus setting. The difference in elevation between the surrounding land uses and the Campus reduces the visual interaction between the residences and Campus. Residential neighborhoods with views of the Campus are located along Tigertail Road, Canna Road, and Sky Lane, but are located approximately 0.3 or more miles to the west.

As such, approval of Alternative 5's site layout and architectural design will be compatible with the existing Campus buildings and the surrounding community character.

Goal 11: Encourage alternative modes of transportation to the use of single occupancy vehicles (SOV) in order to reduce vehicle trips.

Objective 11-1: To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length and reduce the number of vehicle trips.

Policy 11-1.1: Encourage public schools, private schools and non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e. car pools, vanpools, buses, flex time, telecommuting, bicycles and walking, etc.).

a. Plan Approval

Alternative 5 will include transportation operation components that restrict vehicle trips associated with the Wellness Pavilion events and MSMU will continue to provide various shuttles to and from the Campus, as well as provide last mile connections with the surrounding public transit options. MSMU's various shuttles provide transportation options for arrivals to the Campus and serves to reduce the number of trips to and from the Campus. The Campus is not served directly by public

transit however the Campus is located four miles north of the Metro E Line Bundy Light Rail Station (formerly the Expo Line) and MSMU provides weekday AM and PM shuttle services to and from the light rail station and the Campus. Additionally, the City of Santa Monica Big Blue Buses and Local and Rapid Metro Buses provide public transit service along Sunset Boulevard, Wilshire Boulevard, Santa Monica Boulevard, and San Vicente Boulevard. MSMU provides weekday AM and PM shuttle services to and from the Metro bus station located at Sunset Boulevard and Saltair Avenue. MSMU operates several shuttles including a weekday inter-campus shuttle (between the Doheny and Chalon Campuses), a weekday Union station shuttle (between the Doheny Campus and Union Station), a daily afternoon and evening Explore LA shuttle (providing access to the Westwood community and City of Santa Monica), a weekday E Line (formerly the Expo Line) Bundy Station shuttle and a weekly club sports team shuttle, as MSMU's club volleyball and basketball practices are held off-site. In addition to the shuttle services described above, MSMU operates a rideshare program that provides faculty and staff a monthly \$50.00 transit subsidy, carpool program, TAP card, guaranteed ride home program, Enterprise Carshare Program, park and rideshare information, and ZimRide vehicles (a rideshare program).

Alternative 5 will include traffic operational restrictions, applicable to events hosted at the Wellness Pavilion, in regards to maximum daily vehicle trip caps for the Health and Wellness Speaker Series, Other Wellness/Sports Activities, Summer Sports Camps, and Club Sports activities. Under Alternative 5, the maximum daily outside guest vehicle trips for Health and Wellness Speakers Series, Other Wellness/Sports Activities, and Club Sports activities will be restricted to a total of 310 (155 inbound and 155 outbound) (PDF-TRAF-12). The daily total will be applicable to all types of vehicles, including shuttles, as further specified in PDF-TRAF-12. PDF-TRAF-11 will restrict the start and end times of these events such that no trips will be generated during peak periods. Summer Sports Camps will be limited to 236 daily trips (118 inbound and 118 outbound), with the requirement of shuttles or carpools when attendance would exceed 50 campers per day during peak periods (PDF-TRAF-14). Other vehicle trip limitations will apply to certain peak hours as included in PDF-TRAF-13. Finally, concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts taken for the Campus (a reduction of 22 average daily trips). Overall trip reductions shall be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Biannual monitoring reports documenting the trip counts shall be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years. Thus, as part of the operation of the Wellness Pavilion, MSMU will implement the operational components summarized above and included in Alternative 5's Mitigation Monitoring Program (Exhibit E).

Alternative 5, unlike an office or residential project, will not add daily vehicle trips. Instead, Alternative 5 will add new vehicle trips only on those days on which an Other Wellness/Sports Activities event, Health and Wellness Speaker Series event, or a Summer Sports Camp will be held on Campus. Under Alternative 5 Health and Wellness Speaker series events will be permitted a maximum of eight times per year, Other Wellness/Sports Activities events will be permitted a maximum of 12 times per year, and Summer Sports Camps will be permitted during the summer months only. LADOT determined that Alternative 5 does not meet the VMT analysis threshold of 250 new daily trips because based upon the frequency of new events and the trip caps, Alternative 5 will generate approximately only 81 average daily weekday vehicle trips under a worst-case scenario.

Thus, the design features associated with Alternative 5, specifically the TDM measures and vehicle trip restrictions, such as requiring that shuttles be used to transport outside guests to certain events, will encourage alternative modes of transportation, and reduce trips to the extent feasible.

Policy 13-1.2: *New development projects shall be designed to minimize disturbance to existing traffic flow with proper ingress and egress to parking.*

Policy 13-1.2: *Discourage non-residential traffic flow for streets designed to serve residential areas only by the use of traffic control measures.*

a. Plan Approval

Alternative 5 will include construction and operational components to minimize disturbance to the existing traffic flow. Regarding construction of the Wellness Pavilion, Alternative 5's temporary construction period will be a total of 20 months and be comprised of seven phases: (1) Site Preparation; (2) Demolition; (3) Grading; (4) Concrete Pour; (5) Building Construction-Structural Steel; (6) Building Construction-Framing/Walls/Finishes; and (7) Paving. In accordance with PDF-TRAF-1, MSMU will be required to prepare and submit a Construction Traffic Management Plan to the City of Los Angeles Department of Transportation (LADOT) for approval. The Construction Traffic Management Plan will disclose street closure information, detour plans, haul routes, staging plans, require that access be maintained for surrounding residences, prohibit haul truck staging on surrounding roadways and truck loading and unloading, schedule construction related deliveries (excluding concrete related deliveries) between the hours of 7 AM and 3 PM to avoid PM peak hours, coordination with emergency service providers to ensure adequate access to the Campus and surrounding neighborhood is provided at all times, require MSMU to attend bi-monthly construction management meetings with City staff, Archer School for Girls and Brentwood School to avoid overlapping hauling activities, provide advance notice to LADOT and the surrounding schools of upcoming construction activities and post a hotline on Campus, including at the entrance to the Campus, to provide the public with a number to call to report non-compliance with the Construction Traffic Management Plan. Additionally, PDF-TRAF-2 will require MSMU to prepare a Construction Parking Plan prior to issuance of a building permit. The Construction Parking Plan shall identify temporary on Campus parking areas for students, faculty, staff and construction workers and requires that all construction workers park on Campus. Thus Alternative 5 includes features to minimize its construction activities disturbance to existing traffic flow and will provide on-site parking for all construction workers.

In regard to operational activities, Alternative 5 will implement maximum daily vehicle trip caps for the Health and Wellness Speaker Series, Other Wellness/Sports Activities, Summer Sports Camps, and Club Sports activities. Under Alternative 5, the maximum daily outside guest vehicle trips for Health and Wellness Speakers Series, Other Wellness/Sports Activities, and Club Sports activities will be restricted to a total of 310 (155 inbound and 155 outbound) (PDF-TRAF-12). The daily total will be applicable to all types of vehicles, including shuttles, as further specified in PDF-TRAF-12. PDF-TRAF-11 will restrict the start and end times of these events such that no trips will be generated during peak periods. Summer Sports Camps will be limited to 236 daily trips (118 inbound and 118 outbound), with the requirement of shuttles or carpools when attendance would exceed 50 campers per day during peak periods (PDF-TRAF-14). Other vehicle trip limitations will apply to certain peak hours as included in PDF-TRAF-13. Finally, concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts taken for the Campus (a reduction of 22 average daily trips). Overall trip reductions shall be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Biannual monitoring reports documenting the trip counts shall be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years. Thus, as part of the operation of the Wellness Pavilion, MSMU will implement the operational components summarized above and included in Alternative 5's Mitigation Monitoring Program (Exhibit E).

Thus, the implementation of Alternative 5's PDFs will minimize disturbance to the area's existing traffic flow and include features to require the use of shuttles and carpools if specified trip thresholds are met.

Policy 15-1.1: *Consolidate parking where appropriate, to minimize the number of ingress and egress points onto arterials.*

Policy 15-1.2: *New parking lots and new parking garages shall be developed in accordance with the design standards.*

a. Plan Approval

There are currently 561 vehicle parking spaces on the Campus, of which 226 spaces are located on the Project Site. As shown in the table below and in compliance with LAMC Sections 12.21 A.4(d) and 12.21 A.4(e), Alternative 5 will be required to provide a total of 95 vehicle spaces. Alternative 5 will provide a total of 186 parking spaces, a net reduction of 46 spaces, in three surface parking lots. Thus Alternative 5 will provide 91 excess vehicle spaces on the Project Site, but will reduce the total number of Campus vehicle spaces from 561 spaces to 521 spaces.

Alternative 5 Required Vehicle Parking			
<i>Wellness Pavilion</i>	<i>Parking Rate</i>	<i>Required</i>	<i>Provided</i>
26,550 sf of assembly space	1 space / 500 sf	53 spaces	186
212 fixed seats	1 space / 5 fixed seats	42 spaces	

The three new surface parking lots that will be constructed as part of Alternative 5 will be required to comply with LADOT design standards. Ingress and egress to the Campus from Chalon Road is through the Carondelet property. Alternative 5 will not result in any change to the existing Campus ingress/egress.

B. Additional Required Findings for LAMC Section 12.24 X.28 (Grading) (Zoning Administrator Determination)

In connection with Alternative 5, MSMU is requesting a Determination, pursuant to LAMC Section 12.24 X.28 (a)(5), to allow up to 9,343 cubic yards of grading in lieu of the maximum 6,600 cubic yards of grading for a lot in a Hillside Area in the RE40-1 Zone. The following additional findings are required by LAMC Section 12.24 X.28(b)(5)

1. The project is in conformity with the public necessity, convenience, general welfare and good zoning practice.

Alternative 5 will replace the Campus' inadequate and outdated existing fitness and recreation facilities and include the construction and operation of a two-story 35,500 square-foot Wellness Pavilion, a new outdoor pool area, improvements to an internal roadway, new landscaping, and three new surface parking lots. MSMU's current fitness and recreation facilities are not properly sized or proportioned to accommodate the physical education needs of the Campus. The Campus' existing fitness facilities include a 1,030 square-foot single-story Fitness Center building, two Facilities Management buildings (a two-story 3,500 square-foot building and a single-story 1,470 square-foot building), two tennis courts, a swimming pool, and several surface parking lots. The Fitness Center building encompasses the Campus' entire weight training and cardio facilities which includes free weights, three treadmills, one stair machine, two elliptical machines, and several strength training machines, while the Facilities Management building includes a 600 square-foot maintenance area and 870 square-foot shower/locker room area. The Wellness Pavilion is a public necessity as it will provide students, faculty, staff, with a modernized

fitness/educational facility and wellness programming to encourage physical activity and to educate students on nutrition and health.

The Campus has operated in its current location since 1929. The Project Site will be entirely contained within the Campus and is currently developed. Construction of Alternative 5 will not require the development of any of the surrounding open space; Alternative 5 will require the expansion of the Project Site's 200-foot fuel modification zone into 0.9-acres of native plant communities, however due to the proximity of the 200-foot fuel modification zone to developed areas of the Campus, the new fuel modification area is already subject to indirect affects associated with Campus activities. Operation of the Wellness Pavilion will provide students, faculty, and staff with convenient access to a modernized fitness/educational facility on the Campus. As a number of students currently drive off-Campus to access fitness facilities, the students will be better served by having access to an on-Campus facility. Additionally, the Wellness Pavilion will be used by MSMU's club sport teams for both practice and intercollegiate competitions, further reducing the need for students to travel off Campus. Currently the club teams are required to rent off-Campus facilities for practice and competitions.

The Campus is located on a ridge, with open space to the east, west, and north, and a single-family residential community to the south. Operation of Alternative 5 will permit new events to be held on Campus, which can be attended to by student, faculty, staff, and outside guests. Ingress/egress to the Campus is provided via the residential neighborhood to the south. Alternative 5 will implement maximum daily vehicle trip caps for the Health and Wellness Speaker Series, Other Wellness/Sports Activities, Summer Sports Camps, and Club Sports activities. Under Alternative 5, the maximum daily outside guest vehicle trips for Health and Wellness Speakers Series, Other Wellness/Sports Activities, and Club Sports activities will be restricted to a total of 310 (155 inbound and 155 outbound) (PDF-TRAF-12). The daily total will be applicable to all types of vehicles, including shuttles, as further specified in PDF-TRAF-12. PDF-TRAF-11 will restrict the start and end times of these events such that no trips will be generated during peak periods. Summer Sports Camps will be limited to 236 daily trips (118 inbound and 118 outbound), with the requirement of shuttles or carpools when attendance would exceed 50 campers per day during peak periods (PDF-TRAF-14). Other vehicle trip limitations will apply to certain peak hours as included in PDF-TRAF-13. Finally, concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to one percent below the 2016 baseline trip counts taken for the Campus (a reduction of 22 average daily trips). Overall trip reductions shall be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Biannual monitoring reports documenting the trip counts shall be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years. Thus, as part of the operation of the Wellness Pavilion, MSMU will implement the operational components summarized above and included in Alternative 5's Mitigation Monitoring Program (Exhibit E). Thus Alternative 5's operational restrictions will ensure that the general welfare of the surrounding community is not impacted with the interim outside guest vehicle trips associated with events held at the Wellness Pavilion.

The Campus exists as a "deemed to be approved" conditional use with subsequent plan approvals, allowing for an educational use in the residential zone. Continuation of the school use and improvement of the site with upgraded athletic and wellness activities is consistent with good zoning practice. As such, the project is in conformity with the public necessity, convenience, general welfare and good zoning practice.

Alternative 5 will require a total of 9,343 cubic yards of grading in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone, as permitted by LAMC 12.21 C.10(f)(1), in order to implement Alternative 5. Alternative 5's

construction period will be a total of 20 months and be comprised of seven phases: (1) Site Preparation; (2) Demolition; (3) Grading; (4) Concrete Pour; (5) Building Construction-Structural Steel; (6) Building Construction-Framing/Walls/Finishes; and (7) Paving. Grading activities will occur over a one and half month period and in accordance with ZA-2017-928-ZAD Condition No. 2(a), MSMU has proposed to balance all grading activities on-site, thereby eliminating the need for any import or export of fill. Therefore, haul trucks will not be needed for import/export grading activities and thus will not impact the surrounding neighborhood streets. Further, in accordance with PDF-TRAF-1 and PDF-TRAF-2, MSMU would be required to prepare and submit a Construction Traffic Management Plan and Construction Parking Plan which would ensure that grading activities related to the construction of Alternative 5 will be in conformity with public welfare and be consistent with good zoning practices, and will support the continued school use, which provides a operates in conformity with public necessity and convenience.

2. The action will be in substantial conformance with the various elements and objectives of the General Plan.

Pursuant to LAMC Section 12.36-D, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same project. This finding is substantially identical to the finding found earlier in this document as Finding No. 3 in the Conditional Use Permit Findings in accordance with Section 12.24 E of the LAMC and is hereby incorporated by reference.

3. That the grading in excess of the absolute maximum Grading quantities is done in accordance with the DCP Planning Guidelines Landform Grading Manual and is used to reflect the original landform and result in minimum disturbance to natural terrain. Notching into hillside is encouraged so that projects are built into natural terrain as much as possible.

The Chalon Campus (Campus) is located in a designated Hillside Area. In 2011, the City Council adopted the Baseline Hillside Ordinance (Ordinance No. 181,624) ("BHO"), which is codified in LAMC Section 12.21-C.10. The BHO was adopted to regulate the scale and massing of single-family homes in single-family zones in Hillside Areas. In 2017, the City Council amended the BHO (Ordinance No. 184,802) to update and fine-tune the existing rules relating to the size and bulk of new homes, as well as grading of hillside lots. The BHO regulates grading and although the BHO was intended primarily to address out-of-scale single-family homes, the Planning Department has determined that the requirements of the BHO that are not expressly limited to single-family homes or residential uses apply to private schools and other non-residential uses in the Hillside Area. Therefore, the Campus is subject to the grading and export regulations of the BHO.

Alternative 5 will require a total of 9,343 cubic yards of grading in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.10(f)(1). The BHO limits grading quantities to five percent of the site area plus 500 cubic yards, not to exceed the maximum "by right" grading quantity set forth for the zone. The BHO permits a maximum of 6,600 cubic yards for the RE40 Zone. As noted, construction of Alternative 5 requires approximately 9,343 cubic yards of grading. Under the authority of Section 12.24-X.28, the Zoning Administrator may issue a determination to allow grading to exceed the limitations in the BHO to allow grading quantities up to five percent of the total Lot size plus 500 cubic yards. The 45-acre Campus is one lot. For the Campus, this calculation would allow up to approximately 98,510 cubic yards of grading $(.05 * 1,960,200 = 98,010 + 500 = 98,510)$.

The Project Site is relatively flat with modest sloping to the south (the grade change from the northern to southern end of the Campus is approximately 600 feet) and is already improved with existing fitness facilities and areas with level pads, as well as sloped grades. The Wellness

Pavilion design necessitates a flat and level building pad to be able to properly accommodate indoor and outdoor contiguous athletic facilities, thereby necessitating additional grading than what would normally be allowed for a single-family development in the hillside area. However, there will be minimal disturbance of the natural terrain and the original landform. Alternative 5 will require typical grading activities needed for the proposed development type (a gym) and eliminate earthwork hauling activities, while developing a new facility in furtherance of the use of an educational institution which serves students and the community. In addition, the Landform Grading Manual includes Specific Techniques for varying slope ratios, drainage devices, streets and sidewalks, and Hillside maintenance plans. The Project will comply with the guidelines contained in the Landform Grading Manual as appropriate.

- 4. That the increase in the maximum quantity of earth import or export will not lead to the significant alteration of the existing natural terrain, that the hauling of earth is being done in a manner that does not significantly affect the existing conditions of the Street improvements and traffic of the streets along the haul route; and that potentially significant impacts to the public health, safety and welfare of the surrounding community are being mitigated to the fullest extent feasible.**

Alternative 5 will require grading require a total of 9,343 cubic yards of grading in lieu of the otherwise permitted maximum by-right cut and fill amount of 6,600 cubic yards for a property located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.10(f)(1). All grading activities will be balanced on-site, thereby eliminating the need for any import or export of fill. Thus, Alternative 5's grading activities would not result in import or export leading to significant alteration of the existing natural terrain and will not significantly affect the existing conditions of the surrounding roadways and/or impact traffic.

As stated in the Final EIR, Alternative 5 will result in significant and unavoidable construction noise and construction traffic impacts as well as a cumulative human annoyance vibration impact, although as also explained in the Final EIR, the analysis and conclusion of the Original Project's construction traffic impacts for intersection level of service and neighborhood street segments was a conservative approach as the Los Angeles Department of Transportation never adopted construction traffic thresholds. In addition, Alternative 5 will require mitigation for impacts to reduce impacts to less than significant levels for the following: air quality, specifically impacts from regional construction NOX emissions, migratory bird species, existing trees that will remain on-site, the potential discovery of archaeological resources, noise, specifically impacts from on-site construction equipment and off-site construction traffic, and traffic, specifically construction truck trip impacts to intersections and street segments.

Truck trips associated with maximum pour days would have significant and unavoidable construction traffic impacts. Alternative 5's traffic impacts at study area intersections during construction would be potentially significant, but these would be reduced to a level of less than significant through the implementation of MM-TRAF-1. However, Alternative 5 would also result in significant and unavoidable traffic impacts during periods of peak construction at three street segments: Bundy Drive north of Norman Place, with a projected increase of 11.7 percent, exceeding the applicable impact criteria of 10 percent, Chalon Road east of Bundy Drive with an increase of 18.3 percent, exceeding the applicable impact criteria of 12 percent, and Bundy Drive north of Sunset Boulevard with an increase of 8.6 percent, exceeding the applicable impact criteria of 8 percent. As these temporary impacts to neighborhood street segments are based on daily trips and not only peak hour trips, due to the surrounding roadways existing conditions (i.e., minimal number of daily trips), only a low number of daily trips are needed to exceed the neighborhood street segment threshold. The EIR concluded that no additional feasible mitigation measures could be implemented to reduce these impacts.

Off-site construction traffic under Alternative 5 will increase noise levels at noise-sensitive receptors (residential uses) in the Project Site vicinity in excess of applicable threshold standards. Alternative 5 will implement a modified PDF-TRAF-1 requiring that no haul truck trips occur between 3:00 P.M. and 7:00 A.M. Monday through Saturday, except for concrete pour truck trips that cannot feasibly be finished prior to 3:00 P.M. MM-NOISE-2 requires that all off-site heavy duty trucks accessing the Project Site during the demolition, concrete pouring, and asphalt paving phase shall install noise dampening mufflers that achieve a minimum 10 dBA noise level reduction, based on the manufacturer specifications for noise reduction performance. With implementation of MM-NOISE-2, under Alternative 5, off-road construction noise impacts will be reduced to less than significant levels during the demolition and asphalt paving phases of construction. However, impacts from concrete trucks will remain significant and unavoidable along Chalon Road. With implementation of MM NOISE-1 and MM NOISE-2, some off-site noise impacts associated with haul trucks will be reduced to less than significant levels during Alternative 5's peak high-noise phases, which include hauling of demolition debris and concrete deliveries. No feasible mitigation will reduce the significant and unavoidable noise impacts associated with concrete trucks under Alternative 5 and, as such, noise impacts related to truck activity would be significant and unavoidable. CEQA requires that all feasible mitigation measures or alternatives be considered that can reduce significant impacts to a level of less than significant. With respect to construction traffic and noise impacts, as well as cumulative human annoyance impacts, the EIR fully analyzed all feasible mitigation measure for Alternative 5. Therefore, all of Alternative 5's significant impacts are being mitigated to the fullest extent feasible.

C. Additional Findings in Accordance with LAMC Section 12.24 X.26 (Retaining Walls)
(Zoning Administrator Determination)

In connection with Alternative 5, MSMU is requesting a Determination, pursuant to LAMC Section 12.24 X.26 to allow up to 12 retaining walls and to exceed the allowable height otherwise permitted on a lot in a Hillside Area in the RE40-1 Zone. The following additional findings are required by LAMC Section 12.28 C.4.

- 1. That while site characteristics or existing improvements make strict adherence to the zoning regulations impractical or infeasible, the project nonetheless conforms with the intent of those regulations.**

Alternative 5 will require a total of 12 retaining walls ranging in height from two feet to a maximum height of 17 feet, in lieu of the otherwise maximum limit of one retaining wall per lot and the maximum 12-foot height limit for a property located in the RE40-1-H Zone, as permitted by LAMC Section 12.21 C.8. LAMC Section 12.21 C.8 states that a retaining wall is, "...defined as a freestanding continuous structure, as viewed from the top, intended to support earth, which is not attached to a building." The retaining wall standards were adopted principally to regulate the development of walls for new single-family residential uses, which constitute the vast majority of development in hillside areas, so as to minimize visual impacts on adjoining and nearby residential properties that are typically located in close proximity.

The Chalon Campus (Campus) is located on the south flank of the Santa Monica Mountains and slopes to the south, with an approximately 600-foot grade change from the northern to southern edge. The Campus has been fully improved for several decades with dormitories, classroom buildings, a chapel, and existing recreational facilities. As shown in Exhibit D2, the 12 proposed retaining walls are located throughout the Site and will enhance the Site's overall design, pedestrian experience and vehicle safety. Further, it should be noted that several of the proposed retaining walls are located around trash or electrical equipment enclosures and will screen these uses from view. Others are located along new surface parking areas and will aid in pedestrian safety. Finally, several retaining walls are located along the pedestrian walkway, increasing

pedestrian connectivity throughout the Campus, as well as opportunities for landscaping and contributing to the overall Site design.

The retaining walls will not expand the existing Campus' development pad nor will they result in visual impacts to the surrounding community. Pursuant to LAMC Section 12.21 C.8(b), ZA-2017-928-ZAD Condition No. 3 requires any Alternative 5 retaining wall eight feet or greater in height to be landscaped and hidden from view. MSMU's retaining wall landscape plan is included as Exhibit D3. The Wellness Pavilion will require more than one retaining wall per lot, as permitted by the LAMC, and several requested retaining walls will also exceed the LAMC permitted maximum height. The request is needed to be able to properly accommodate indoor and outdoor contiguous athletic facilities, thereby necessitating a greater number of retaining walls with an increased height, than what would normally be allowed for a single-family development in the hillside area. However, as discussed above the retaining walls that are greater than eight feet in height will be landscaped and not visible from the surrounding residences, the Wellness Pavilion will be located in a developed area of the Campus and the retaining walls will not be needed due to the grading of an extreme slope and/or undisturbed hillside. Thus, the Project Site characteristics and existing improvements make strict adherence to the retaining wall regulations impractical due to the Project Site topography, which creates practical difficulties when siting new construction. Accordingly, the granting of the Zoning Administrator Determination will nevertheless conform to the intent of the Zoning Code and while the Project Site characteristics and existing improvements make strict adherence to the retaining wall regulations impractical, Alternative 5 nevertheless conforms with the intent of the regulations.

- 2. That in light of the project as a whole, including any mitigation measures imposed, the project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety; and**

Pursuant to LAMC Section 12.36.D, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same project. This finding is substantially identical to the finding found earlier in this document as Finding No. 2 in the Conditional Use Findings and in accordance with LAMC Section 12.24.E of the LAMC, is hereby incorporated by reference.

- 3. That the project is in substantial conformance with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.**

Pursuant to LAMC Section 12.36-D, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same project. This finding is substantially identical to the finding found earlier in this document as Finding No. 3 in the Conditional Use Permit Findings and in accordance with Section 12.24 E of the LAMC, is hereby incorporated by reference.

CEQA Findings

An Environmental Impact Report (ENV-2016-2319-EIR) was prepared for Alternative 5. On the basis of the whole of the record before the lead agency including any comments received, the lead agency finds that, with imposition of the mitigation measures described in the EIR, there is no substantial evidence that Alternative 5 will have a significant effect on the environment. The EIR reflects the lead agency's independent judgment and analysis. The records upon which this decision is based are with the Major Projects Section of the Planning Department in Suite 1350, 221 N. Figueroa Street.

I. INTRODUCTION

This Environmental Impact Report (EIR), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of the Mount Saint Mary's (MSMU) Wellness Pavilion (Project), located within a 3.8-acre portion of MSMU's Chalon Campus (Campus) at 12001 Chalon Road, Los Angeles, CA 90049 (Site or Project Site).

The Project involves the construction of a new 38,000-square-foot, 2-story Wellness Pavilion that would provide students, faculty, and staff with comprehensive health and wellness services including modern amenities needed for physical and health education. The proposed Wellness Pavilion would include a recreation and practice gym, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space, and a new outdoor pool area. The Project would not increase enrollment at the Campus.

The EIR analyzed the project originally proposed by the applicant (referred to as the "Original Project"), as well as multiple alternatives, including Alternative 4, *Reduced Event Alternative*. In response to comments from the public made on the Draft EIR, and pursuant to guidance offered by the City of Los Angeles (the "City"), the Final EIR also analyzed an alternative not included in the Draft EIR, Alternative 5. Alternative 5 incorporates event reductions that are similar to those of Alternative 4, as well as further operational restrictions designed to reduce significant environmental impacts. Alternative 5 eliminates the parking deck component of the Original Project and shifts the location of the Wellness Pavilion to the north, into the former parking deck space. Compared to the Original Project, Alternative 5 would result in a net reduction of 46 parking spaces. Alternative 5 would allow for the preservation of the existing two-story Facilities Management building, which would be demolished under the Original Project, reduce overall construction length by approximately two months, and incrementally reduce the Wellness Pavilion's floor area from 38,000 square feet to 35,500 square feet. Other than the physical and operational differences between Alternative 5 and the Original Project explained in the Final EIR, Alternative 5 is identical to the Original Project and will include the implementation of all of the Original Project's PDFs and mitigation measures.

For purposes of these Findings, the term "Project" is used for statements that are equally attributable to the Original Project and Alternative 5. Where a statement applies specifically only to the Original Project or Alternative 5, the more specific terminology is used.

The City, as Lead Agency, has evaluated the environmental impacts of the implementation of the Original Project by preparing an EIR (Case Number ENV-2016-2319-EIR/State Clearinghouse No. 2016081015). The EIR was prepared in compliance with the California Environmental Quality Act of 1970, Public Resources Code Section 21000 et seq. (CEQA) and the California Code of Regulations Title 15, Chapter 6 (the "CEQA Guidelines"). The findings discussed in this document are made relative to the conclusions of the EIR.

CEQA Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The

procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” CEQA Section 21002 goes on to state that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

The mandate and principles announced in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081[a]; CEQA Guidelines Section 15091[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

- 1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.
- 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.
- 3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final EIR for Alternative 5 as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely “potentially significant”, these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects - A description of the environmental effects identified in the EIR.
- Project Design Features - A list of the project design features or actions that are included as part of Alternative 5.
- Mitigation Measures - A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.
- Finding - One or more of the three possible findings set forth above for each of the significant impacts.

- Rationale for Finding - A summary of the rationale for the finding(s).
- Reference - A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines §15093, 15043[b]; see also CEQA § 21081[b].)

II. ENVIRONMENTAL REVIEW PROCESS AND RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Initial Study. The Project was reviewed by the Los Angeles Department of City Planning (serving as Lead Agency) in accordance with the requirements of CEQA (Pub. Resources Code § 21000 et seq.). The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines (14 Cal. Code Regs. §§ 15000 et seq.).

Notice of Preparation. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 31-day period commencing on August 4, 2016 and ending on September 4, 2016. The NOP also provided notice of a Public Scoping Meeting held on August 16, 2016. The purpose of the NOP and Public Scoping Meeting was to formally inform the public that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. Written comment letters responding to the NOP and the Scoping Meeting were submitted to the City by various public agencies, interested organizations and individuals. The NOP, Initial Study, and NOP comment letters are included in Appendix A of the Draft EIR.

Draft EIR. The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of alternatives to the Project, including a "No Project/No Build" alternative (Alternative 1), a "Reduced Intensity Alternative – 50 Percent Floor Area Reduction" (Alternative 2), an "Alternative Construction Route" (Alternative 3, and a "Reduced Event Alternative" (Alternative 4). The Draft EIR for the Project (State Clearing House No. 2016081015) incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (City of Los Angeles California Environmental Quality Act Guidelines). The Draft EIR was circulated for an initial 48-day public comment period beginning on April 12, 2018, and a 15-day extension was added, for a total public comment period of 63 days ending on June 13, 2018. A Notice of Completion and Availability (NOC/NOA) was distributed on April 12, 2018 to all property owners within 500 feet of the Project Site and interested parties, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at the City of Los Angeles, Department of City Planning, and could

be accessed and reviewed by members of the public by appointment with the Planning Department, and digital copies were made available to the Los Angeles Central Library at 630 W. 5th Street, Los Angeles, CA 90071, the West Los Angeles Regional Library at 11360 Santa Monica Boulevard, Los Angeles, CA 90025, the Westwood Branch Library at 1246 Glendon Avenue, Los Angeles, CA 90024, and the Donald Bruce Kaufman – Brentwood Branch Library at 11820 San Vicente Boulevard, Los Angeles CA 90049. A copy of the document was also posted online at <https://planning.lacity.org>. Notices were filed with the County Clerk on April 12, 2018.

Notice of Completion. A Notice of Completion was sent with the Draft EIR to the Governor’s Office of Planning and Research State Clearinghouse for distribution to State Agencies on April 12, 2018, and notice was provided in newspapers of general and/or regional circulation.

Final EIR. The City released a Final EIR for the Project on June 17, 2021, which is hereby incorporated by reference in full. The Final EIR constitutes the second part of the EIR and is intended to be a companion to the Draft EIR. The Final EIR also incorporates the Draft EIR by reference. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Chapter II, Responses to Comments, of the Final EIR. In Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, the City made revisions, clarifications and corrections to the Draft EIR regarding the Project and in addition, analyzed the environmental effects of Alternative 5, focusing particularly on the differences in its environmental impacts as compared to those of the Original Project analyzed in the Draft EIR. Notices regarding the availability of the Final EIR were also sent to property owners and occupants within a 500-foot radius of the Project Site, as well as anyone who commented on the Draft EIR, and interested parties.

Public Hearing. A noticed public hearing for the Project was held by the Deputy Advisory Agency/Hearing Officer on behalf of the City Planning Commission on July 14, 2021. Notices were mailed and posted to the Department’s website on June 17, 2021. After the Public Hearing, the City Clerk notified Planning Staff that the Public Hearing Notice and NOA/NOC had not been published in the Daily Journal, as required by the LAMC. Thus a second Public Hearing will be held by the City Planning Commission on October 21, 2021 to satisfy this noticing requirement.

RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the Original Project and Alternative 5 includes (but is not limited to) the following documents and other materials that constitute the administrative record upon which the City determined to approve Alternative 5. The following information is incorporated by reference and made part of the record supporting these Findings of Fact:

- All Original Project plans and application materials including supportive technical reports;
- All Alternative 5 plans and application materials including supportive technical reports;
- The Draft EIR and Appendices, the Final EIR and Appendices, and all documents cited, relied upon or incorporated therein by reference;

- The Mitigation Monitoring Program (MMP) prepared for the Original Project and Alternative 5;
- The City of Los Angeles General Plan and related EIR;
- The Southern California Association of Governments (SCAG)'s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and related EIR (SCH No. 2015031035);
- The Southern California Association of Governments (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and related EIR (SCH No. SCH#2019011061));
- The Los Angeles Municipal Code, including but not limited to the Zoning Ordinance and Subdivision Ordinance;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits, letters, minutes of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- Any documents expressly cited in these Findings of Fact, in addition to those cited above; and
- Any and all other materials required for the record of proceedings by Public Resources Code Section 21167.6(e).

Pursuant to CEQA Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision and these CEQA Findings are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record of proceedings, located at the City of Los Angeles, Figueroa Plaza, 221 North Figueroa Street, Room 1350, Los Angeles, CA 90012.

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at <https://planning.lacity.org/development-services/eir> and click on the Project title, where the Draft and Final EIR are made available. Due to government facility closures as a result of the COVID-19 crisis, the Final EIR documents could not be made available at a public library. However, consistent with state emergency orders, the public was notified of an ability to call or email the City and schedule an appointment to review the documents at the City of Los Angeles, Department of City Planning, 221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012, during office hours Monday - Friday, 9:00 a.m. - 4:00 p.m.

III. DESCRIPTION OF ALTERNATIVE 5

Alternative 5 involves the demolition of two tennis courts, the outdoor pool area, one Facilities Management building and the Fitness Center building, and several surface parking lots on a 3.8-acre portion of the Campus, and the development of a 35,500 square-foot two-story Wellness Pavilion, a new outdoor pool area, landscaped open space, and several surface parking lots totaling 186 vehicle spaces (a net decrease of 46 spaces). The Wellness Pavilion would provide students, faculty, and staff with a gym, multi-purpose rooms, a physical therapy lab, dance and cycling studios, lockers, showers, restrooms, and an equipment storage area. Alternative 5 does not include a request to increase student enrollment but would introduce three new types of events which could be attended by outside guests, students, faculty, and/or staff. Alternative 5's new

events would include: 1. Summer Sports Camps (which would operate over a 12-week period during the summer), 2. Health/Wellness Speaker Series (a maximum of eight annual events), and 3. Other Wellness/Sports Events/Activities (a maximum of 12 events per year). Additionally, two existing events, Athenian Day and Homecoming, with potential attendance increases currently held elsewhere on Campus would be moved to the Wellness Pavilion, and Club Sports activities, both practices and games, but not intercollegiate sports, would be permitted. Alternative 5 would include a maximum building height of 42 feet, require a total of 9,343 cubic yards of grading (cut and fill), and 12 retaining walls with a maximum height of 17 feet. A complete description of Alternative 5 is provided in Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR.

As explained on Page B-1 of Appendix B of the Final EIR, revisions to the CEQA Guidelines Appendix G—Environmental Checklist Form became effective on December 28, 2018, but do not apply to CEQA documents that were sent out for public review before the effective date. The Draft EIR's initial 48-day public review period commenced on April 12, 2018 and was scheduled to end on May 29, 2018. A 15-day extension was added to the public review period extending the review date until June 13, 2018 for a total of 63 days. Therefore, the revisions to Appendix G do not apply to the Project's Draft EIR or Final EIR. However, for informational purposes only, a discussion of the revised Appendix G checklist was included in the Final EIR for both the Project and Alternative 5. That analysis and the substantial evidence included and referenced therein forms the basis for the City's findings with respect to less than significant impacts in the impact categories discussed below which were added to the Environmental Checklist Form following the release of the Draft EIR.

IV. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT WITHOUT MITIGATION OR LESS THAN SIGNIFICANT IN THE EIR

Impacts of Alternative 5 that were determined to have no impact or to be a less than significant impact in the EIR (including having a less than significant impact with the incorporation of PDFs and compliance with regulatory compliance measures, where applicable) and that require no mitigation are identified below.

The City has reviewed the record and agrees with the conclusion that the following environmental issues would not be significantly affected by Alternative 5 and, therefore, no additional findings are needed. The following information does not repeat the full discussion of environmental impacts contained in the EIR or the Initial Study (Appendix A to the Draft EIR). The City ratifies, adopts, and incorporates the analyses, explanations, findings, responses to comments, and conclusions of the EIR and of the Initial Study.

A. Aesthetics:

1. Scenic Vista

As discussed on pages IV.A-1 through IV.A-43 of Chapter IV of the Draft EIR and pages III-29 through III-34 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would not have a substantial adverse effect on a scenic vista, and impacts would therefore be less than significant. Alternative 5 would not block any scenic vistas or views of open space, ridgelines, horizons, or other hillside and urban views, and would be minimally visible from public view locations. Impacts related to views and scenic vistas would be similar during construction and operation and less than significant under Alternative 5.

2. Visual Character and Quality

As noted on page B-1 of Appendix B of the Final EIR, revisions to the CEQA Guidelines have clarified that in urbanized areas such as the Project Site, visual character and quality of public views are not considered, apart from a determination of a project's consistency with regulations that govern scenic quality. As discussed on pages III-41 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's visual quality impacts would be less than significant because it would not encroach upon or adversely impact existing visual resources, including surrounding undeveloped open spaces, the Campus Circle, and the Campus's historic buildings, would incorporate complementary building materials that are seen throughout the Campus, and would replace existing utilitarian buildings with a new building designed in an architectural style that complements the surrounding buildings.

3. Light and Glare

As discussed on pages IV.A-1 through IV.A-43 of Chapter IV of the Draft EIR and pages III-42 through III-43 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and light and glare impacts would therefore be less than significant. Adjacent undeveloped open space would not be illuminated under Alternative 5. The Project Site's distance from the closest off-site residential viewers (0.3-mile), combined with the shielding of source light required by PDF-AES-1 and relevant LAMC provisions, would limit impacts with respect to lighting to a level of less than significant. Alternative 5 would also implement PDF-AES-2, requiring that glass used in building facades minimize glare, and applicable energy and building code requirements would further require the reduction of glare.

B. Agriculture and Forestry Resources:

1. Farmland

As explained on page B-4 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Original Project's Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown in the General Plan Land Use Map for the Brentwood-Pacific Palisades Community Plan or maps prepared pursuant to the Farmland Mapping and Monitoring Program, no agricultural or other related activities occur on the Project Site or within the Project vicinity, and the Original Project would therefore not result in any impacts to farmland. Alternative 5 would be constructed on the same Project Site as the Original Project. Therefore, Alternative 5 would not result in any impacts to farmland.

2. Agricultural Zoning

As explained on page B-4 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, no agricultural uses are permitted within the land use or zoning designation applicable to the Campus, no agricultural zoning is present in the immediate surrounding area, and no nearby lands are enrolled under the Williamson Act, and the Original Project would therefore not conflict with existing zoning for agricultural use or a Williamson Act contract. Alternative 5 would use the same Project Site as the Original Project, and Alternative 5 would therefore similarly result in no impacts with respect to agricultural zoning.

3. Forestland Zoning

As explained on page B-4 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, no portion of the Campus is designated for forest land or timberland production and

the Original Project would therefore not conflict with existing zoning or cause the rezoning of forest land, timberland, or timberland production land. Alternative 5 would have the same Project Site as the Original Project and would similarly result in no impacts with respect to forestland zoning.

4. Loss of Forest Land

As explained on page B-4 through B-5 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is currently developed and no forest lands exist within the Campus, and development of the Original Project would therefore not cause a loss of forest land. Because Alternative 5 will occur on the same Project Site as the Original Project, this conclusion follows for Alternative 5 as well.

5. Conversion of Farmland or Forest Land

As explained on page B-5 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, no agricultural resources or operations currently exist on or near the Project Site or Campus, and the Original Project would therefore result in no impacts with respect to the conversion of Farmland. Because Alternative 5 will occur on the same Project Site as the Original Project, this conclusion follows for Alternative 5 as well.

C. Air Quality:

1. Criteria Air Pollutants

As discussed on page IV.B-37 of Chapter IV the Draft EIR, operational emissions from the Original Project would not introduce any substantial stationary sources of emissions, anticipated CO emissions would not violate state and/or federal standards, nor would operational emissions exceed the SCAQMD regional or local thresholds or result in ground level concentrations that exceed the NAAQS or CAAQS and would therefore be less than significant. As discussed on page III-44 through III-45 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would also incorporate PDF-AQ-1 through PDF-AQ-8, and emissions during operation would be similar to those of the Original Project and would therefore also be less than significant. With respect to Alternative 5's criteria air pollutant impacts during construction, see Section V B below.

2. Sensitive Receptors

As discussed on pages IV.B-41 through IV.B-48 of Chapter IV of the Draft EIR and pages III-45 through III-46 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's impacts with respect to sensitive receptors would be less than significant. Alternative 5 would not expose sensitive receptors to substantial pollutant concentrations from localized construction emissions, and localized emissions during operation would not exceed the SCAQMD's localized thresholds, as shown on Table IV.B-7 of the Draft EIR. Further, Alternative 5's overall Toxic Air Contaminants (TAC) emissions from construction would result in a less than significant incremental increase in lifetime carcinogenic health risks to off-site receptors, and Alternative 5 would not contain substantial TAC sources and would be consistent with CARB and SCAQMD guidelines.

3. Other Emissions

As explained on page B-7 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Original Project would not introduce any major odor-producing uses that would

have the potential to affect a substantial number of people, and odors generated during construction are anticipated to be localized and temporary in nature, and impacts with regard to odors and other emissions would be less than significant. Because Alternative 5 would involve the same type of uses as the Original Project and use the same construction methods with a slightly reduced construction schedule, impacts with respect to Alternative 5 would also be less than significant.

D. Biological Resources:

1. Special Status, Sensitive or Candidate Species

As discussed on pages IV.C-1 through IV.C-39 of Chapter IV of the Draft EIR and page III-46 through III-47 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's impacts to special status, sensitive or candidate species would be less than significant. Direct and indirect impacts to plant communities and special status plant species would be less than significant under Alternative 5, and impacts to four special-status wildlife species not observed on the Project Site but with the potential to occur are expected to be less than significant. Alternative 5 would not disturb wildlife in a way that would meaningfully diminish the chances for long-term survival of a special-status species.

2. Riparian and Sensitive Natural Communities Habitat

As discussed on pages IV.C-1 through IV.C-39 of Chapter IV of the Draft EIR and page III-47 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would have no impacts to riparian and sensitive natural communities habitat because the Project Site does not contain any Waters of the U.S., Waters of the State, or wetlands under the jurisdiction of the US Army Corp of Engineers (USACE)/Regional Water Quality Control Board (RWQCB), or any streambed and associated sensitive riparian habitat.

3. Wetlands

As explained on page B-7 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is currently developed and the open space areas along the slopes adjacent to the Project Site do not contain wetlands, and the Original Project would therefore have no impact on wetlands. Because Alternative 5 would use the same Project Site as the Original Project, Alternative 5 would also result in no impacts to wetlands.

6. Adopted Habitat Conservation Plans

As explained on page B-9 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan and will therefore not conflict with the provisions of any conservation plan. Alternative 5 would use the same Project Site as the Original Project and would similarly have no impacts in this category.

E. Cultural Resources:

1. Historic Resources

As discussed on pages IV.D.1-1 through IV.D.1-2 of Chapter IV of the Draft EIR and page III-49 through III-50 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's direct and indirect impacts to historic resources would be similar to those of the Original Project and less than significant.

2. Human Remains

As discussed on page III-51 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's impacts to human remains would be less than significant, because in the unlikely event that previously unknown human remains are encountered during construction excavations, compliance with existing regulations would ensure that no human remains are disturbed.

F. Energy:

1. Wasteful, Inefficient, or Unnecessary Consumption

The Original Project's estimated net operational electricity demand is provided in Chapter VII, Appendix F – Energy Analysis, and in Appendix L, Energy Worksheets, of the Draft EIR. As shown therein, the Original Project would result in a projected consumption of electricity totaling approximately 0.68 million kWh per year. The existing facility uses approximately 0.10 million kWh per year. As such, the Original Project would result in a net new consumption of electricity within the Site of 0.57 million kWh per year. The Original Project is projected to generate an annual demand for natural gas totaling approximately 0.62 million kBtu. The Project Site currently consumes approximately 0.06 million kBtu of natural gas. As such, the Original Project would result in a net new consumption of natural gas within the Site of 0.56 million kBtu. As stated on pages III-87 through III-89 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would also implement PDF-AQ-1 through PDF-AQ-8 to reduce demand on energy supplies, and would incorporate numerous energy saving and waste reduction features to minimize energy demand. Further, as a result of Alternative 5's incrementally reduced floor area and implementation of on-site solar collectors, impacts on energy consumption would be less than the Original Project. Alternative 5 would not result in the inefficient, wasteful, and unnecessary consumption of energy during construction or operation, and impacts would therefore be less than significant.

2. Renewable Energy and Energy Efficiency Plans

Draft EIR Chapter VII, page VII-25, Chapter IV, pages IV.F-28 through IV.F-58 and pages III-53 through III-54 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR discuss the Original Project and Alternative 5's consistency with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, including through the incorporation of PDF-AQ-1 through PDF-AQ-8. This same analysis provides substantial evidence that Alternative 5 does not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would therefore be less than significant.

G. Geology and Soils:

1. Substantial Adverse Effects

As discussed on pages IV.E-1 through IV.E-32 of Chapter IV of the Draft EIR and on pages III-50 through III-52 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's impacts with respect to fault rupture, seismic ground shaking, liquefaction, and landslides would be less than significant. No active faults with the potential for surface rupture are known to pass directly beneath the Project Site, nor would Alternative 5 involve any activities that would exacerbate ground shaking. The Project Site would not be susceptible to liquefaction, and the implementation of PDF-GS-1 and recommended measures in the EIR's Geotechnical Report would ensure that Alternative 5 would not exacerbate, cause, or accelerate geological hazards related to landslides.

2. Loss of Topsoil

The Original Project's soil erosion impacts are analyzed on page IV.E-22 through IV.E-23 of the Draft EIR, which determined that compliance with existing regulations, including implementation of BMPs and collection of surface water runoff, the Original Project would not result in substantial soil erosion and/or loss of topsoil. As stated on page III-52 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would not result in substantial soil erosion or the loss of topsoil because existing erosion conditions that occur along the edges of the Project Site would be addressed through the construction of Alternative 5, improving existing conditions with respect to soil erosion. Impacts from Alternative 5 would therefore be less than significant.

3. Unstable Soils

As stated on pages IV.E-23 through IV.E-30 of Chapter IV of the Draft EIR and page III-52 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would implement temporary and permanent slope stability measures and correction of fill soils and other measures as recommended by the Geotechnical Report. Alternative 5's soil erosion impacts would be less than significant because existing erosion conditions that occur along the edges of the Project Site would be addressed through the construction of Alternative 5, improving existing conditions with respect to soil erosion.

4. Expansive Soils

As stated on pages IV.E-23 through IV.E-30 of Chapter IV of the Draft EIR, with the incorporation of site-specific geotechnical recommendations contained in the Geotechnical Report, the Original Project's impacts related to expansive soils would be less than significant. Alternative 5 would be constructed on the same Project Site as the Original Project, and would also incorporate all of the recommendations of the Geotechnical Report, and impacts would therefore also be less than significant for Alternative 5.

5. Septic Tanks

As explained on page B-13 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is located within the currently developed Campus, the Wellness Pavilion would connect to existing wastewater infrastructure, would not use septic tanks or alternative wastewater disposal systems, and would therefore have no impacts. Alternative 5 would be constructed on the same Project Site and would similarly connect to existing wastewater infrastructure and not use septic tanks or alternative wastewater disposal systems, and would therefore also have no impacts.

6. Paleontological Resources

As discussed on pages IV.E-1 through IV.E-32 of Chapter IV of the Draft EIR and pages III-51 and III-52 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's impacts to paleontological resources and unique geologic features would be less than significant. Given that the Project Site's underlying fill soils and the existence of a metamorphic rock, the potential to encounter paleontological resources during ground disturbing activities is considered negligible, and Alternative 5 would therefore not directly or indirectly destroy a unique paleontological resource or site. Alternative 5 would generally maintain the same ground levels as compared to existing conditions, and no mass grading is anticipated across the Project Site. The Project Site is currently entirely developed, and no natural landforms or other geologic features occur within the site or would be affected by grading activities. Impacts with respect to unique geologic features would be less than significant under Alternative 5.

H. Greenhouse Gas Emissions:

1. Consistency with GHG Reduction Plans, Policies, Regulations

As discussed on pages IV.F-1 through IV.F-58 of Chapter IV of the Draft EIR and on pages III-53 through III-54 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's impacts with respect to consistency with GHG reduction plans, policies, and regulations would be less than significant. Alternative 5 would include sustainability features, such as solar collectors, storm water collection and treatment, high efficiency, low-e insulated glass, and other measures, and would implement PDF-AQ-1, requiring the provision of EV Ready and EV Capable parking spaces in compliance with applicable CalGreen requirements. Further, Alternative 5 is not anticipated to add new vehicle trips on a daily basis, and overall vehicle trips would be reduced through the implementation of PDF-TRAF-18, requiring that total daily vehicle trips generated by the Campus, inclusive of trips generated by the Wellness Pavilion, be maintained to one percent below the 2016 trip counts.

2. GHG Generation

As discussed on pages IV.F-1 through IV.F-58 of Chapter IV of the Draft EIR and on page III-54 through III-55 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would incrementally increase GHG emissions over existing conditions, but not to an extent to significantly influence global climate change. Further, Alternative 5's consistency with various GHG reduction plans would ensure that GHG emissions would be less than significant.

I. Hazards and Hazardous Materials:

1. Routine Transport, Use, and Disposal

As explained on page B-14 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, activities involving hazardous materials during construction of the Wellness Pavilion would be short-term and cease with completion of the Original Project, and would be less than significant. Operation of the Wellness Pavilion would involve the use and storage of only small quantities of potentially hazardous materials, and therefore would not result in significant impacts. Alternative 5 would be consistent with the Original Project with respect to hazardous materials used during construction and compliance with existing regulations, with a slightly reduced construction schedule, and would result in operation of the Wellness Pavilion consistent with the Original Project in terms of hazardous materials, and impacts would therefore be similar to the Original Project and less than significant.

2. Accident or Upset

As explained on page B-14 through B-19 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, impacts to the public or the environment resulting from the release of hazardous materials would be less than significant with the implementation of applicable regulatory requirements. Alternative 5 would also be subject to the same regulatory requirements as the Original Project, and take place on the same Project Site, and impacts would therefore be less than significant for Alternative 5.

3. Hazards Near Schools

As explained on page B-19 through B-20 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is located on the Campus but no other existing or proposed schools are located within one-quarter mile of the Project Site. However, compliance with existing applicable regulations during construction would reduce risks associated with

hazardous or acutely hazardous materials, substances, or waste to acceptable levels and impacts would be less than significant. With respect to operation, the Wellness Pavilion would only involve limited quantities of hazardous materials and would comply with prescribed handling procedures of hazardous materials and would not pose a risk to the Campus and its students, staff, faculty, and visitors, and impacts would therefore be less than significant. Alternative 5 would be constructed on the same Project Site, would comply with the same regulations and handling procedures, and impacts would therefore be less than significant for Alternative 5.

4. Hazardous Materials Sites

As explained on page B-20 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, based upon a review of all lists of hazardous materials sites compiled pursuant to Government Code 65962.5, the Project Site is not identified as a hazardous materials site, nor would any off-site facilities identified which would present an environmental concern related to the Project Site. Alternative 5 would be constructed on the same Project Site and impacts would therefore be less than significant.

5. Airports

As explained on page B-21 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is not located within an airport land use plan or designated airport hazard area, is not within two miles of a public use airport, and there are no private airstrips in the vicinity of the Project Site. Alternative 5 would be constructed on the same Project Site and would therefore cause no impacts with respect to hazards related to airports.

6. Emergency Plans

As explained on page B-21 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, as a result of the implementation of the Original Project's Construction Traffic Management Plan (PDF-TRAF-2), which includes the designation of a construction vehicle route, adequate emergency access would be maintained during construction. Alternative 5 would implement a modified and expanded PDF-TRAF-2 and would therefore also maintain emergency access during construction, and impacts would be less than significant during construction for Alternative 5. None of the roadways in the vicinity of the Project Site are designated as emergency or disaster routes, and operation of Alternative 5 would not result in modifications to any public streets or otherwise impede any designated emergency or disaster routes, and impacts during operation would therefore be less than significant.

7. Wildland Fires

As explained on page B-22 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is located within the existing developed Campus. During operation, the Wellness Pavilion would be required to comply with applicable brush clearance requirements in the City's Fire Code. Alternative 5 would use the same Project Site and would also be required to comply with these requirements, and impacts would therefore be less than significant for Alternative 5. Alternative 5's wildfire impacts are further discussed in below in Subsection S.

J. Hydrology and Water Quality:

1. Water Quality Standards

As explained on pages IV.G-1 through IV.G-33 of Chapter IV of the Draft EIR and pages III-55 through III-57 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5, like the Original Project, would implement a site-specific Stormwater Pollution Prevention Plan

and a stormwater control system designed in compliance with the City's Low Impact Development program. Further, Alternative 5 would implement stormwater capture and reuse best management practices. Therefore, Alternative 5 would comply with applicable regulations and impacts would be less than significant.

2. Groundwater Supplies

As explained on page B-23 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is currently developed, with pervious areas limited to ornamental landscaped areas, and therefore does not currently support a substantial opportunity for recharge of groundwater. Following construction of the Wellness Pavilion, the extent of potential groundwater recharge would be roughly similar as compared to existing conditions. Further, the relatively small size of the Project Site limits its potential to substantially contribute to recharge of groundwater. Alternative 5 would use the same Project Site as the Original Project and would result in roughly similar conditions with respect to potential groundwater recharge on the Project Site following construction. Therefore, impacts with respect to groundwater supplies would be less than significant under Alternative 5.

3. Existing Drainage Patterns, Runoff, and Flood Flows

As explained on pages IV.G-1 through IV.G-33 of Chapter IV the Draft EIR and page III-56 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, neither the Original Project or Alternative 5 would significantly alter drainage patterns during construction. Both the Original Project and Alternative 5 would increase runoff by approximately 0.06 cubic feet per second (cfs) during a 50-year storm event, which would not be sufficient to produce a substantial or observable change in the existing amount and direction of water flow in the receiving storm drain system. Further, Alternative 5, like the Original Project, would implement PDF HWQ-1 to correct existing uncontrolled sheet flow onto adjacent hillsides. Therefore, impacts with respect to surface runoff during operation of Alternative 5 would be less than significant.

4. Inundation

As explained on page B-25 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is not located within a 100-year or 500-year flood zone designated by either FEMA or the City. As explained on page B-26, the Project site is not located within a potential inundation area and is located approximately 4.5 miles from the Pacific Ocean. Alternative 5 would be constructed on the same Project Site, and Alternative 5 therefore would not have any impacts with respect to the release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone.

5. Water Quality Control Plan

As explained on pages IV.G-1 through IV.G-33 of Chapter IV of the Draft EIR and pages III-55 through III-56 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would comply with all applicable provisions of water quality control plans and sustainable groundwater management plans, and impacts would therefore be less than significant.

K. Land Use and Planning:

1. Divide a Community

As explained on page B-26 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is located within a previously developed area of the Campus and would therefore not physically divide an established community and impacts would be less than

significant. Alternative 5 would be developed on the same Project Site and impacts would therefore also be less than significant for Alternative 5.

2. Conflict with Plans

As explained on pages IV.H-1 through IV.H-49 of Chapter IV of the Draft EIR and pages III-57 and III-58 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would require the same discretionary actions as the Original Project and would be similarly consistent with applicable policies of the General Plan Framework, Brentwood-Pacific Palisades Community Plan, and SCAG's 2016 RTP-SCS and SCAG's 2020-2045 RTP/SCS. Alternative 5 would more strictly require the use of multimodal access and reduce VMT as compared to the Original Project, and would therefore more closely align with the GHG emissions reduction goals of the 2020-2045 RTP/SCS, reducing impacts compared to the Original Project. Alternative 5's impacts with respect to consistency with adopted plans and policies would be less than significant.

3. Mineral Resources

As explained on page B-27 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is not designated by the City as an area containing significant mineral deposits, nor is the Project Site designated as an existing mineral resource extraction area by the State of California. Therefore, the Original Project was not anticipated to result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. Alternative 5 would use the same Project Site as the Original Project, and the conclusion of a less than significant mineral resource impact would therefore apply to Alternative 5 as well.

L. Noise:

1. Groundborne Vibration (Project Level)

As explained on from page IV.I-1 through IV.I-60 of Chapter IV of the Draft EIR and on pages III-59 through III-61 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's groundborne noise and vibration impacts would be less than significant on a project level. Alternative 5 would reduce the scope and duration of on-site construction activities and would reduce off-site construction truck activity, and therefore incrementally reduce the Original Project's groundborne noise and vibration impacts. The Original Project and Alternative 5's potentially significant cumulative human annoyance vibration impacts are discussed below in Section VI A.

2. Public Airports

As explained on page B-29 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Project Site is not located within an airport land use plan or within two miles of an airport or a private airstrip, and the Project would therefore have no impacts. Alternative 5 would use the same Project Site as the Original Project, and would therefore also have no impacts.

M. Population and Housing:

1. Population Growth

As explained on page B-29 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Original Project would have a less than significant impact because construction workers would not be anticipated to relocate as a result of working on the construction of the Wellness Pavilion. Further the Wellness Pavilion would not extend or modify any public roads or

infrastructure, would not include the development of residential units, and would not result in any changes to enrollment on the Campus. Further, the Original Project would only add one new permanent employee. Alternative 5 would be constructed at a similar, although slightly reduced scale, by the same population of construction workers, and would similarly not result in any changes to public roads or infrastructure or development of residential units. Like the Original Project, Alternative 5 would not change student enrollment on the Campus and only require one new permanent employee. Therefore, impacts with respect to population growth for Alternative 5 would be less than significant.

2. Displace Housing and People

As explained on page B-30 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, one of the two existing Facilities Management buildings that would be demolished under the Original Project contains two apartment units previously used by Campus facilities management staff, but these would be relocated under the Original Project to the existing Brady Building located elsewhere on the Campus. Therefore, the Original Project would have no impact with respect to displacement of housing or people because no people would be displaced and no construction of new housing would be required as a result of the Original Project. Alternative 5 would preserve the Facilities Management building that contains the two apartment units (currently vacant), and would therefore also have no impact.

N. Public Services

1. Fire Protection

As explained on pages IV.J.1-1 through IV.J.1-40 of Chapter IV of the Draft EIR and pages III-61 through III-63 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would incrementally reduce the scale of the Original Project's construction activities, resulting in reduced overall construction truck traffic and a shorter duration of construction activity, and compliance with the Fire Code and other applicable regulations would ensure that LAFD maintains access for fire apparatus to the Project Site via the Mount Saint Mary's and Getty Fire Roads, and impacts during construction would therefore be less than significant. Alternative 5 would also include a completely hydraulically calculated automatic sprinkler system and would comply with all applicable Fire Code requirements, and as a result, would not place an undue burden on existing facilities. Alternative 5 would not result in the need for new or physically altered fire facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or objectives during construction or operation. Therefore, impacts during operation would be less than significant.

2. Police Services:

As explained on pages IV.J.2-1 through IV.J.2-21 of the Draft EIR and pages III-63 through III-65 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would not result in the need for new or physically altered police facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or objectives during construction or operation. Therefore, Alternative 5's impacts related to police protection services are less than significant. Further, because Alternative 5 would reduce the Original Project's traffic during operation through the reduced size of some events and summer camps, it would have less impact than the Project relative to demand on LAPD services and the capacity of LAPD facilities.

3. Education

As explained on page B-31 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Original Project would have no impact with respect to educational public services, because it does not involve the development of residential units and would not increase the student population, and would therefore not place any direct demands for classroom space within the Los Angeles Unified School District or surrounding school districts. Alternative 5 would similarly not involve the development of residential units and would similarly not result in any increases to student population, and Alternative 5 would therefore also have no impact. Further, Alternative 5, like the Original Project, would itself provide for permanent, upgraded, and expanded school wellness and recreation facilities.

4. Parks

As explained on page B-31 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Original Project would not develop any residential uses or increase student enrollment, and therefore would not generate a direct demand for parks, and would therefore have no impact. Alternative 5 would similarly not develop residential uses and similarly not increase student enrollment, and therefore also result in no impact. Further, Alternative 5, like the Original Project, would itself create new recreation and exercise space, increasing the recreational opportunities available to students, faculty, and staff, and reducing existing demand for off-Campus recreational facilities, including parks.

5. Other Public Facilities

As explained on pages B-31 and B-32 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, because the Original Project would not develop any residential uses or increase student enrollment, it would not increase demand on existing library resources, the existing road network, or any other public services. Alternative 5 would similarly not develop any residential uses or increase student enrollment, and would therefore similarly not increase demands on these public services and facilities, and would therefore have no impact.

O. Recreation:

1. Existing Facilities

As explained on page B-32 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Original Project would itself create new and expanded recreation facilities, and reduce existing demand for off-Campus facilities. Alternative 5 would also create new and expanded recreation facilities and reduce existing demand for off-Campus facilities, and therefore have no impact.

2. New Recreational Facilities

As explained on page B-32 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, because the Original Project consists of the development of new and expanded recreational facilities, the physical impacts resulting from that development are not individually evaluated in the EIR but are instead analyzed in each of the other relevant impact categories. Alternative 5 would also consist of the development of new and expanded recreational facilities, the physical impacts of which were evaluated in the other categories analyzed throughout the EIR.

P. Transportation:

1. Conflicts with Plans (Operation)

As explained on pages III-65 through III-84 and shown on Table III-5 and Table III-6 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 incorporates modified and new traffic PDFs that would reduce operational traffic impacts at both study area intersections and neighborhood street segments to a level of less than significant. Alternative 5 would incorporate a modified PDF-TRAF-1, PDF-TRAF-2, PDF-TRAF-3, and PDF-TRAF-7, and new PDF-TRAF-9 through PDF-TRAF-18, incorporating a variety of traffic control measures and limitations on vehicle trips and Wellness Pavilion activities potentially generating trips. As a result of the implementation of the modified and new traffic PDFs, Alternative 5's operational traffic impacts would be less than significant. A complete level of service analysis for Alternative 5 is included as Appendix C to the Final EIR.

2. Vehicle Miles Traveled

Changes to the CEQA Guidelines requiring local agencies to analyze traffic impacts using vehicle miles traveled (VMT) instead of level of service (LOS), the metric used in the Draft EIR's Traffic Study, took effect on July 1, 2020. To implement the use of VMT, the Los Angeles Department of Transportation (LADOT) has developed Transportation Assessment Guidelines (TAG) screening criteria that apply to any project that did not receive approval of requested entitlements prior to July 1, 2020. LADOT's TAG screening criteria provide that a project is not required to analyze VMT if it does not generate a net increase of 250 or more daily vehicle trips. As explained on pages B-5 and B-6 of Appendix B to the Final EIR, Alternative 5 would generate approximately 81 average daily weekday vehicle trips, and would therefore have no impacts with respect to VMT. Further, because Alternative 5 would incorporate PDF-TRAF-18, reducing total trips generated by the Campus, and overall trip lengths would not be increased as a result of Alternative 5, Alternative 5 would result in a reduction in total VMT generated by the Campus to below 2016 levels. Therefore, Alternative 5's VMT impacts would be less than significant.

3. Design Feature Hazards

As explained on page B-34 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Original Project would not change the roadway network off the Campus, and would improve safety conditions compared to existing conditions as a result of improved circulation and access on the Project Site, and would therefore have no impacts with respect to hazardous design features or incompatible uses. Alternative 5 would similarly not result in any changes to the off-Campus roadway network, and would also improve circulation on the Project Site relative to existing conditions, and would therefore similarly have no impacts.

4. Emergency Access

As explained on page B-35 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Original Project would be developed on the Campus, which is served by the existing roadway network, and would not result in modification to streets or street access. Emergency access to the Project Site, Campus, and surrounding area would not change as a result of the construction of the Original Project, and the Original Project would be required to provide adequate emergency access and comply with all applicable LAFD and LAPD access requirements. Alternative 5 would be developed on the same Project Site, and would similarly not result in any changes to streets or street access, and would also comply with all relevant regulations regarding emergency access, and would therefore have a less than significant impact on emergency access during construction or operation.

Q. Tribal Cultural Resources:

As explained on pages IV.L-1 through IV.L-10 of Chapter IV of the Draft EIR and on page III-85 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, no known Tribal cultural resources have been identified within the Project Site or vicinity, and in the unlikely event that buried Tribal cultural resources are encountered during construction, MSMU would be required to comply with the City's standard Condition of Approval relating to the treatment of inadvertent Tribal cultural resource discoveries. Further, because the scale of grading and construction would be incrementally reduced under Alternative 5 as compared to the Original Project, the changes of any Tribal cultural resources being affected would be reduced. Therefore, impacts from Alternative 5 to cultural resources would be less than significant.

R. Utilities and Service Systems—Water, Watershed, Telecommunications, and Solid Waste:**1. Relocation or Expanded Services**

The Original Project's impacts with respect to the relocation or construction of new or expanded wastewater facilities are analyzed on pages B-37 through B-39 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR. As discussed therein, wastewater generated on non-event days at the Wellness Pavilion is anticipated to be relatively similar to existing conditions on the Campus, and the Hyperion Water Reclamation Plant (HWRP) has sufficient capacity to process projected increased wastewater flows on days when an event is held in the Wellness Pavilion, and impacts would therefore be less than significant. Because Alternative 5 would generate similar wastewater as compared to the Original Project, impacts from Alternative 5 would also be less than significant. With respect to telecommunications, Alternative 5's impacts are discussed on page B-7 of Appendix B to the Final EIR. As discussed therein, physical impacts from the installation of new or relocated telecommunications infrastructure resulting from Alternative 5 would primarily involve trenching in order to place lines below the surface, would be of a relatively short duration, and would cease to occur once installation was complete. Impacts would therefore be less than significant with respect to telecommunications infrastructure. With respect to water infrastructure, as explained on pages III-85 and III-86 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would not result in the need for new or expanded water facilities. Therefore, Alternative 5's impacts with respect to the relocation or expansion of utility services would be less than significant.

2. Water Supplies

As stated on pages III-85 and III-86 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's construction activities, which would be incrementally reduced as compared to the Original Project, would result in water demand that would be largely off-set by the demolition of existing uses on the Project Site and would be less than significant. With respect to water supply impacts during operation, the total water demand of Alternative 5 during an average year, single-dry year, and multiple dry-year in each year from 2015 to 2040 would not exceed available LADWP water supplies,

3. Wastewater Capacity

As explained on pages B-35 through B-37 of Attachment B to the Initial Study, included as Appendix A-2 to the Draft EIR, the Original Project would not exceed the wastewater treatment requirements of the applicable Regional Water Quality Control Board, as the HWRP has sufficient capacity to accommodate wastewater generated by the new events and activities that would be held in the Wellness Pavilion. Further, construction of the Wellness Pavilion would include all necessary on and off-site sewer pipe improvements to adequately convey flows through the City's

sewer system. Alternative 5 would hold fewer new events, but with a similar maximum attendance as compared to the Original Project, and would involve the same sewer pipe improvements, and impacts from Alternative 5 would therefore be less than significant.

4. Solid Waste Standards

As stated on pages III-85 and III-86 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would result in approximately 281 less tons of construction debris compared to the Original Project, and would comply with all applicable State and local statutes and regulations related to solid waste, and impacts during construction would therefore be less than significant. With respect to operation, Alternative 5 would generate approximately 10.4 tons of solid waste per year, less than the 14 tons projected to be generated by the Original Project, although this estimate does not take into consideration the amount of solid waste (65 percent) that would be diverted via source reduction and recycling programs within the City. Alternative 5's solid waste generation would not exceed State or local standards, exceed the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts from Alternative 5 would therefore be less than significant.

5. Solid Waste Statutes and Regulations

As stated on pages III-85 and III-86 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste, and impacts would therefore be less than significant.

S. Wildfire:

As explained above the 2018 revisions to Appendix G do not apply to the Project's Draft EIR or Final EIR. However, for informational purposes only, findings for revised Appendix G Wildfire Thresholds are included below.

1. Emergency Response and Evacuation

As explained on pages B-8 through B-12 of Appendix B of the Final EIR, during both construction and operation the Wellness Pavilion would not impair any adopted emergency response plan or emergency evacuation plan. Both the Original Project and Alternative 5 would comply with all applicable Los Angeles Fire Code standards, as explained in Section IV.J.1, *Fire Protection*, of the Draft EIR, and pages III-61 through III-63 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR. Alternative 5 would not disrupt access to primary or secondary designated Disaster Routes during either construction or operation. Alternative 5 would not add visitors to the Campus on a daily basis, but would instead add visitors only on those occasional days on which outside guests attend an event, and all students, faculty, staff, and outside guests would comply with MSMU's emergency plans developed in consultation with the LAFD. Alternative 5 would provide fire truck access around the perimeter of the Project Site. Alternative 5's impacts would therefore be less than significant.

2. Wildfire Exacerbation

As explained on pages B-12 through B-14 of Appendix B of the Final EIR, during both construction and operation the Wellness Pavilion would not impair any adopted emergency response plan or emergency evacuation plan. Alternative 5 would involve the physical extension of the Campus or related development into existing wildlands, or change existing use patterns within the Project Site, or otherwise result in physical changes that would be anticipated to change the behavior of

any wildfires in the area. Compliance with the City's Fire Code would ensure that during both construction and operation, Alternative 5 would not exacerbate wildfire risks. Alternative 5's impacts would therefore be less than significant.

3. Associated Infrastructure

As explained on page B-15 of Appendix B of the Final EIR, Alternative 5 would be constructed within an existing developed portion of the Campus and would not require incursions into wildland or effect wildland by the permanent or temporary installation of new roads, fuel breaks, power lines, water sources, or other utilities to serve the Wellness Pavilion. Impacts would therefore be less than significant for Alternative 5.

4. Exposure to Risks

As explained on pages B-15 through B-16 of Appendix B of the Final EIR, because of the geography of the Project Site and Campus post-wildfire flooding and landslides are not anticipated to adversely impact the Campus, including the Project Site. Existing conditions with respect to runoff onto the adjacent slopes are expected to improve during construction due to the implementation of storm water pollution prevention practices during construction. During operation, drainage changes on the Project Site would be implemented by Alternative 5 that would divert runoff away from nearby slopes and into the Campus storm drainage system. Therefore, impacts would be less than significant for Alternative 5.

V. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The EIR determined that Alternative 5 has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, Alternative 5 would not have any significant environmental impacts in these areas, with the incorporation of mitigation measures. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

A. Aesthetics

1. Impact Summary - Scenic Resources

As discussed on pages III-34 through III-40 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, the Project Site is entirely developed and does not include natural open space resources, and does not contain any historic buildings or other historic resources. Alternative 5 would not directly or indirectly impact any adjacent historic resources located on the Campus. The Project Site does contain trees, including trees protected under the LAMC, and both the Original Project and Alternative 5 would therefore have potential impacts to trees as a scenic resource. Alternative 5 would result in 20 fewer removed non-protected trees as compared to the Original Project. Impacted protected trees would be replaced pursuant to LAMC Section 17.02. To ensure that impacts to trees as a scenic resource are less than significant, Alternative 5 incorporates mitigation measures to mitigate the potential impacts of construction on trees on the Project Site. With implementation of existing City regulations, PDF-BIO-1, and MM-BIO-2 through 4, impacts to trees as a scenic resource would be less than significant under Alternative 5.

2. Project Design Features

The following PDF addresses scenic resource impacts to trees and is considered in the analysis of this impact.

PDF-BIO-1 Prior to issuance of a grading permit, the Project Applicant shall coordinate with the City and replace any non-protected significant trees that are 8 inches or more in diameter at breast height (DBH), or cumulative trunk diameter if multi-trunked, that were removed during the Project construction period, at a 1:1 ratio with a minimum 24-inch box tree. Replacement trees should be planted on-site; however, if there is insufficient space, replacement trees can also be planted elsewhere on the Mount St. Mary's University Chalon Campus.

3. Mitigation Measures

The following mitigation measures are identified in the EIR to reduce potentially significant scenic resource impacts to trees to a less than significant level.

MM BIO-2: For preserved trees (e.g., trees to be avoided or that may potentially be encroached upon), the following protection measures shall be implemented during the construction of the Project:

Protective Fencing:

- Protective fencing not less than four feet in height shall be placed at the limits of the protective zone of a preserved tree located within 50 feet of the grading limits. Protective fencing shall be inspected by a qualified biologist prior to grading or ground disturbing activities, and shall be maintained in place until construction is completed.
- Fencing shall remain intact until a Tree Expert (as defined in LAMC Section 17.02) and/or the City's arborist verifies that it can be removed.

Grading Restrictions Near Trees:

- The grade shall not be lowered or raised within the protective zone of a preserved tree without the approval from the City's Department of Urban Forestry. A Tree Expert (as defined in LAMC Section 17.02) shall supervise all excavation or grading approved within the protective zone.

Trenching and Excavation:

- Trenching, excavation, or clearance of vegetation within the protective zone of a preserved tree shall be accomplished by the use of hand tools or small hand-held power tools, and shall be monitored by a Tree Expert (as defined in Section 17.02). If major roots are encountered during grading activities (including trenching, excavation, and other related ground disturbance activities), a qualified arborist (i.e., ISA certified arborist) shall be notified to provide recommendations for pruning or avoidance measures. Any major roots encountered shall be conserved and treated as recommended by the Tree Expert (as defined in LAMC Section 17.02).

- Utility trenches shall be routed outside the protective zone of a preserved tree as determined by the City's Department of Urban Forestry.

Equipment Storage:

- No storage of equipment, supplies, vehicles, or debris shall be allowed within the protective zone of a preserved tree to avoid soil compaction.
- No dumping of construction wastewater, paint, stucco, concrete, or any other clean-up waste shall occur within the protective zone of a preserved tree.
- No temporary structures shall be placed within the protective zone of any preserved trees.

Frequency of Watering Around Oak Trees:

- Irrigation water shall not reach within 15 feet of any oak trunk.
- Neither grass nor any other ground cover shall be planted under the canopy of oak trees.

Pruning:

- Pruning of preserved trees shall comply with the National Arborist Association guidelines; in no case shall more than 20 percent of a preserved tree canopy be removed. As determined to be necessary by a certified arborist, after pruning, installation of support cables to prevent future main crotch failures are required.
- Branches that could be injured by vehicles or that interfere with construction shall be pruned to the satisfaction of a certified arborist.

MM BIO-3: A Tree Expert (as defined in LAMC Section 17.02) shall be present for on-site construction and grading activities occurring within 10 feet of the protected zone of all preserved trees. If any major roots larger than 1 inch in diameter are encountered during construction activities, the qualified arborist (i.e., ISA certified arborist) shall be notified to provide recommendations to avoid damaging roots, so that the health of the tree will not be compromised.

MM BIO-4: Post-Construction Monitoring and Reporting - After three years following the completion of Project construction a Tree Expert (as defined in LAMC Section 17.02) shall assess the health and overall condition of all preserved trees that have been encroached upon by the Project. The condition of the trees shall be compared with the data provided in this report to determine if the Project may have had a negative effect on the health or physical structure of the tree. A monitoring report shall be prepared by a Tree Expert (as defined in LAMC Section 17.02) and submitted to the City's Urban Forester within one-month following the completion of the post-construction monitoring. If any of the preserved trees die within three years as a consequence of construction, they shall also be replaced at a 1:1 replacement ratio for non-protected trees and a 2:1 replacement ratio for protected trees.

4. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into Alternative 5 that avoid or substantially lessen the significant impacts as identified in the EIR.

5. Rationale for Finding

As set forth on pages III-34 through III-40 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, PDF-BIO-1 would require the replacement of non-protected trees at a 1:1 ratio, and would therefore eliminate any scenic resource impacts to trees that could result from the removal of non-protected trees. MM-BIO-2 through 4 would require a variety of measures designed to protect trees that are being retained on the Project Site, and would reduce any potentially significant impacts to retained trees to a level of less than significant. Through the implementation of PDF-BIO-1 and MM-BIO-2 through 4, Alternative 5's potential scenic resource impacts to both non-protected removed trees and retained trees would be reduced to a level of less than significant.

6. Reference

For a complete discussion of Alternative 5's scenic resources impacts to trees, see pages III-34 through III-40 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR.

B. Air Quality

1. Impact Summary

Applicable Air Quality Plans (Construction)

Criteria Air Pollutants (Construction)

Cumulative Impacts (Construction)

An analysis of the Original Project's impacts with respect to consistency with applicable air quality plans and criteria air pollutants is set forth in the Draft EIR in Section IV.B, *Air Quality*, of Chapter IV. Additional text providing an analysis of the Original Project's consistency with the 2016 AQMP, which was approved by USEPA subsequent to the publication of the Draft EIR, is included on pages III-108 through III-110 of the Final EIR, and incorporated into relevant portions of Section IV.B of the Draft EIR. As explained in Section IV.B, operation of the Wellness Pavilion would not result in less than significant impacts with respect to both consistency with applicable air quality plans and the cumulatively considerable net increase of criteria pollutants. However, impacts during construction would exceed the relevant thresholds of significance without mitigation.

The Draft EIR provided worst-case daily emissions calculations for each phase of construction, including combined calculations when construction phases would overlap. It should be noted that the maximum daily emissions are predicted values for the worst-case day scenario and do not represent the emissions that would occur every day during the construction period. These emissions estimates assumed the implementation of required dust control measures that would be used during each phase of development, as required by SCAQMD Rule 403 (Control of Fugitive Dust). Results of the criteria pollutant calculations are presented in Draft EIR Table IV.B-4, *Estimated Maximum Unmitigated Regional Construction Emissions*. As shown therein, construction-related daily emissions for the criteria and precursor pollutants would not exceed the SCAQMD thresholds for VOC, CO, SOX, PM10, and PM2.5. However, the NOx emissions during the overlap of the site preparation and demolition phases would exceed the SCAQMD thresholds. Therefore, the Original Project's regional construction emissions would result in a potentially significant NOx impact.

According to the SCAQMD, individual construction impacts that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants which the Air Basin is in non-attainment. As discussed in the Draft EIR and above, regional NO_x construction-related daily emissions would exceed the applicable threshold. It should be noted that on-site emissions of NO_x, combined with existing ambient levels, would not be expected to result in a localized exceedance during construction of the Original Project.

As explained on page IV.B-44 of the Draft EIR, because the Original Project would result in NO_x emissions exceeding applicable regional thresholds, the Original Project's contribution to construction cumulative impacts would be potentially significant.

As discussed on page III-43 through III-45 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's impacts with respect to operations emissions would be less than significant. While construction emissions would be incrementally reduced as a result of the reduction of the Wellness Pavilion and certain construction phases, the days of highest activity and highest levels of emissions would be similar to those of the Original Project, and NO_x emissions during construction would therefore be similar. Therefore, Alternative 5 would have potentially significant impacts with respect to consistency with an applicable air quality plan and a cumulatively considerable net increase of a criteria pollutant. As shown below, Alternative 5's incorporation of MM-AQ-1 would reduce these impacts to a level of less than significant.

2. Mitigation Measures

The following mitigation measure is identified in the EIR to reduce potentially significant air quality impacts to a less than significant level.

MM AQ-1: Mobile off-road construction equipment (wheeled and tracked) used during construction of the Project shall meet or exceed the Interim USEPA Tier 4 standards. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. The mitigation applies to off-road equipment and does not apply to on-road vehicles.

3. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into Alternative 5 that avoid or substantially lessen the significant impacts as identified in the EIR.

4. Rationale for Finding

Table IV.B-8 in the Draft EIR shows the level of the Original Project's NO_x emissions during construction with the implementation of MM-AQ-1. As shown therein, implementation of MM-AQ-1 would reduce NO_x construction-related emissions to below threshold levels. Alternative 5 would also implement MM-AQ-1, and as discussed above, would have similar impacts with respect to NO_x emissions during construction as compared to the Original Project. Therefore, with implementation of MM-AQ-1, Alternative 5's impacts with respect to consistency with applicable air quality plans and cumulative increase of criteria pollutants would be less than significant for both project-level and cumulative impacts.

5. Reference

For a complete discussion of Alternative 5's impacts associated with Air Quality, see Section IV.B, *Air Quality*, of the Draft EIR; Appendix B – Air Quality and Greenhouse Gas Emissions Technical

Report, of the Draft EIR; and Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR.

C. Biological Resources

1. Impact Summary

Migration and Nursery Sites Local Policies or Ordinances

The Original Project's impacts with respect to migratory wildlife species are discussed on pages IV.C-28 through IV.C-29 of the Draft EIR. The Biological Study Area has the potential to support both raptor and songbird nests due to the presence of trees, shrubs, and ground cover. Nesting activity typically occurs from February 15 to August 31 (January 15 to August 31 for raptors). Disturbing or destroying active nests is a violation of the Migratory Bird Treaty Act (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Game Code Section 3503. The removal of vegetation during the breeding season is considered a significant impact due to potential effects on raptor and songbird nests. Therefore, the Original Project was projected to have a potentially significant impact with respect to migration and nursery sites.

As explained on page III-47 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5, similar to the Original Project, would also remove trees, shrubs, and ground cover that have the potential to support both raptor and songbird nests. With implementation of MM-BIO-1, this potentially significant impact would be reduced to a less than significant level.

The Original Project's impacts with respect to consistency with local policies or ordinances protecting biological resources are discussed on pages IV.C-29 through IV.C-35 of the Draft EIR. For those protected or non-protected trees that may potentially be encroached upon or avoided by Alternative 5, construction activities (e.g., excavation, trenching, soil compaction, change of grade and site drainage, pruning, mechanical damage from construction equipment, landscaping, and irrigation) have the potential to significantly impact trees that are to be preserved and/or their root systems.

As explained on page III-48 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5, similar to the Original Project, would also involve the removal and replacement of native and non-native trees, but would preserve 20 additional non-protected trees as compared to the Original Project. Like the Original Project, Alternative 5 would result in potentially significant impacts related to trees and compliance with relevant provisions of the LAMC and the City's Conservation Element. However, implementation of MM-BIO-1 through MM-BIO-4 would ensure compliance with relevant local policies and ordinances and impacts would be less than significant after mitigation.

2. Project Design Features

The following PDF addresses biological resource impacts and is considered in the analysis of this impact.

- PDF-BIO-1** Prior to issuance of a grading permit, the Project Applicant shall coordinate with the City and replace any non-protected significant trees that are 8 inches or more in diameter at breast height (DBH), or cumulative trunk diameter if multi-trunked, that were removed during the Project construction period, at a 1:1 ratio with a minimum 24-inch box tree. Replacement trees should be planted on-site; however, if there is insufficient space,

replacement trees can also be planted elsewhere on the Mount St. Mary's University Chalon Campus.

3. Mitigation Measures

The following mitigation measures are identified in the EIR to reduce potentially significant biological resource impacts to a less than significant level.

MM BIO-1: Prior to issuance of a grading permit, the Project Applicant shall demonstrate that the following requirements have been included in the Project construction plan:

1. Nesting activity typically occurs from February 15 to August 31 (January 15 to August 31 for raptors). Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds. This includes vegetation removal associated with on-going fuel modification activities.
2. Any construction activities or fuel modification activities that occur during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) shall require that all suitable habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist monitor (i.e., professional biologist with a minimum of two years of avian survey experience or equivalent) before commencement of clearing. If any active nests are detected, a buffer of at least 300 feet (500 feet for raptors), or as determined appropriate by the qualified biologist monitor, shall be delineated, flagged, and avoided until the nesting cycle is complete as determined by the qualified biologist monitor.

MM BIO-2: For preserved trees (e.g., trees to be avoided or that may potentially be encroached upon), the following protection measures shall be implemented during the construction of the Project:

Protective Fencing:

- Protective fencing not less than four feet in height shall be placed at the limits of the protective zone of a preserved tree located within 50 feet of the grading limits. Protective fencing shall be inspected by a qualified biologist prior to grading or ground disturbing activities, and shall be maintained in place until construction is completed.
- Fencing shall remain intact until a Tree Expert (as defined in LAMC Section 17.02) and/or the City's arborist verifies that it can be removed.

Grading Restrictions Near Trees:

- The grade shall not be lowered or raised within the protective zone of a preserved tree without the approval from the City's Department of Urban Forestry. A Tree Expert (as defined in LAMC Section 17.02) shall supervise all excavation or grading approved within the protective zone.

Trenching and Excavation:

- Trenching, excavation, or clearance of vegetation within the protective zone of a preserved tree shall be accomplished by the use of hand tools or small hand-held power tools, and shall be monitored by a Tree Expert (as defined in Section 17.02). If major roots are encountered during grading activities (including trenching, excavation,

and other related ground disturbance activities), a qualified arborist (i.e., ISA certified arborist) shall be notified to provide recommendations for pruning or avoidance measures. Any major roots encountered shall be conserved and treated as recommended by the Tree Expert (as defined in LAMC Section 17.02).

- Utility trenches shall be routed outside the protective zone of a preserved tree as determined by the City's Department of Urban Forestry.

Equipment Storage:

- No storage of equipment, supplies, vehicles, or debris shall be allowed within the protective zone of a preserved tree to avoid soil compaction.
- No dumping of construction wastewater, paint, stucco, concrete, or any other clean-up waste shall occur within the protective zone of a preserved tree.
- No temporary structures shall be placed within the protective zone of any preserved trees.

Frequency of Watering Around Oak Trees:

- Irrigation water shall not reach within 15 feet of any oak trunk.
- Neither grass nor any other ground cover shall be planted under the canopy of oak trees.

Pruning:

- Pruning of preserved trees shall comply with the National Arborist Association guidelines; in no case shall more than 20 percent of a preserved tree canopy be removed. As determined to be necessary by a certified arborist, after pruning, installation of support cables to prevent future main crotch failures are required.
- Branches that could be injured by vehicles or that interfere with construction shall be pruned to the satisfaction of a certified arborist.

MM BIO-3: A Tree Expert (as defined in LAMC Section 17.02) shall be present for on-site construction and grading activities occurring within 10 feet of the protected zone of all preserved trees. If any major roots larger than 1 inch in diameter are encountered during construction activities, the qualified arborist (i.e., ISA certified arborist) shall be notified to provide recommendations to avoid damaging roots, so that the health of the tree will not be compromised.

MM BIO-4: Post-Construction Monitoring and Reporting - After three years following the completion of Project construction a Tree Expert (as defined in LAMC Section 17.02) shall assess the health and overall condition of all preserved trees that have been encroached upon by the Project. The condition of the trees shall be compared with the data provided in this report to determine if the Project may have had a negative effect on the health or physical structure of the tree. A monitoring report shall be prepared by a Tree Expert (as defined in LAMC Section 17.02) and submitted to the City's Urban Forester within one-month following the completion of the post-construction monitoring. If any of the preserved trees die within three years as a consequence of construction, they shall also be replaced

at a 1:1 replacement ratio for non-protected trees and a 2:1 replacement ratio for protected trees.

4. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into Alternative 5 that avoid or substantially lessen the significant impacts as identified in the EIR.

5. Rationale for Finding

Implementation of MM-BIO-1 would avoid vegetation removal during raptor and songbird nesting season. If construction must occur within the nesting season and nests are present, MM-BIO-1 would require a buffer area be established around nests until completion of the nesting cycle. With implementation of MM-BIO-1, impacts to migratory wildlife, including nesting birds, would be reduced to a level of less than significant.

PDF-BIO-1 requires removed non-protected significant trees to be replaced at a 1:1 ratio with a minimum 24-inch box tree, and implementation, together with existing regulations pertaining to the replacement of protected trees, would result in a net increase of trees on the Campus when compared to existing conditions. MM-BIO-2 through 4 would require a variety of measures designed to protect trees that are being retained on the Project Site, and would reduce any potentially significant impacts to retained trees to a level of less than significant. Therefore, the implementation of MM-BIO-1 through MM-BIO-4 would reduce Alternative 5's potentially significant biological resource impacts to a level of less than significant.

6. Reference

For a complete discussion of Alternative 5's impacts associated with Biological Resources, see Section IV.C, *Biological Resources*, of the Draft EIR; Appendix C – Biological Resources Data, of the Draft EIR; and Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR.

D. Cultural Resources

1. Impact Summary

Archaeological Resources

The Original Project's impacts to archaeological resources are discussed on pages IV.D.1-17 and IV.D.1-18 of the Draft EIR. No known archaeological resources (historic and prehistoric) have been recorded within the Project Site or within a one-half mile radius of the Project Site. It is likely that any surface archaeological resources that may have existed at the Project Site have likely been displaced by prior construction and ground disturbing activities on the Project Site. The Project Site is located entirely within an existing developed area; construction activities would not extend into undeveloped areas. While this does not preclude the potential for an archaeological site to be identified during construction activities, this would be unlikely because disturbance of the ground surface has previously occurred. Moreover, the entire Project Site contains surface exposures of the Jurassic-aged (201 to 145 million years ago) Santa Monica Slate which is not conducive to retaining subsurface archaeological resources given its old age. The Geotechnical Report for the Original Project indicates that artificial fill was encountered throughout the Campus at depths between 1 to 30 feet below the ground surface (approximately 20 feet in thickness in the southwest portion of the Site) and that Santa Monica Slate was mapped at all of the boring locations extending from depths of 3 to 51± feet. The maximum depth of excavation would be approximately 11.5 feet below the existing ground surface. Accordingly,

excavation activities would be largely limited to the disturbance of artificial fill and would be unlikely to encounter archaeological resources. Nevertheless, because there is some potential for previously unknown archaeological resources to be discovered during construction activities, the Original Project's impacts are considered potentially significant.

As discussed on pages III-48 and III-49 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5's impacts to archaeological resources would be less from those of the Original Project as a result of the reduction of the extent of foundation development and overall earthwork, but impacts to archaeological resources would remain potentially significant without mitigation. Implementation of MM-APR-1 would reduce Alternative 5's impacts to a level of less than significant.

2. Mitigation Measures

The following mitigation measure is identified in the EIR to reduce potentially significant archaeological resource impacts to a less than significant level.

MM APR-1: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed during ground-disturbing activities associated with construction of the Project, the Applicant shall halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated by a Qualified Archaeologist. A Qualified Archaeologist is an individual who meets the Secretary of the Interior's Professional Qualifications Standards for an Archaeologist. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a Qualified Archaeologist. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes. The Qualified Archaeologist, in consultation with the City and Applicant, shall determine the need for archaeological construction monitoring in the vicinity of the find thereafter.

The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of treatment and/or the any follow-up archaeological construction monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies.

3. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into Alternative 5 that avoid or substantially lessen the significant impacts as identified in the EIR.

4. Rationale for Finding

Implementation of MM-APR-1 would require that all construction activities stop and/or be redirected away from any potential archaeological resource(s) discovered during construction until the resource can be evaluated by a Qualified Archaeologist. Therefore, implementation of MM-APR-1 would reduce Alternative 5's potentially significant impacts to archaeological resources to a level of less than significant.

5. Reference

For a complete discussion of Alternative 5's impacts associated with Archaeological Resources, see Section IV.D, *Archaeological and Paleontological Resources*, of the Draft EIR; Appendix E – Geotechnical Report, of the Draft EIR; and Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR.

E. Noise

1. Impact Summary

Ambient Noise Levels (On-Site Construction Noise)

The Original Project's noise impacts are discussed in Section IV.I, *Noise*, of the Draft EIR, with on-site construction noise impacts discussed on pages IV.1-27 through IV.1-29. The threshold of significance used in the Draft EIR's construction noise analysis is an increase in the ambient exterior noise levels of 5 dBA Leq at a noise sensitive use. Construction of the Original Project would require the use of heavy equipment during the demolition, grading, and excavation activities at the Project Site. During each stage of development, there would be a variety of equipment used. As such, construction activity noise levels at and near the Project Site would fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment.

Individual pieces of construction equipment expected to be used during Project construction could produce maximum noise levels of 75 dBA L_{max} to 90 dBA L_{max} at a reference distance of 50 feet from the noise source, as shown in Table IV.I-7, *Construction Equipment Noise Levels* of the Draft EIR. These maximum noise levels would occur when equipment is operating at full power. The estimated usage factor for the equipment is also shown in Draft EIR Table IV.I-7. The usage factors are based on FHWA's RCNM User's Guide.

As explained on Pages III-58 through III-59 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Alternative 5 would generate similar on-site noise levels as compared to the Original Project during construction, and on-site construction noise impacts would therefore be potentially significant for Alternative 5. Implementation of MM-NOISE-1 would reduce Alternative 5's on-site construction noise impacts to a level of less than significant.

2. Mitigation Measures

The following mitigation measure is identified in the EIR to reduce potentially significant on-site construction noise impacts to a less than significant level.

MM-NOISE-1: On-site power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and muffling devices achieving a 10 dBA noise level reduction from standard equipment noise emissions. All equipment shall be properly maintained in compliance with manufacturers' standards.

3. Finding

Pursuant to Public Resources Code section 21081(a)(1), changes or alterations have been required in, or incorporated into Alternative 5 that avoid or substantially lessen the significant impacts as identified in the EIR.

4. Rationale for Finding

Implementation of MM-NOISE-1 would require that construction equipment is equipped with properly maintained and operating mufflers, consistent with manufacturers' standards, reducing construction noise. Draft EIR Table IV.I-8, *Estimate of Construction Noise levels (L_{eq}) at Off-Site Sensitive Receptor Locations*, shows the estimated construction noise levels that would occur at the nearest off-Campus sensitive uses during a peak day of construction activity at the Project Site. "Reference Noise Levels" were estimated without consideration of existing vegetation, variations in topography (approximately 300 feet), or installation of noise muffling devices per Mitigation Measure MM-NOISE-1. "Mitigated Construction Noise Level Under Existing Conditions" take credit for existing conditions and installation of noise muffling devices.

As shown in Table IV.I-8, construction noise levels would not exceed the City's significance threshold at the five studied sensitive receptors taking into consideration the existing manufacturer standards, installation of noise muffling devices per Mitigation Measure MM-NOISE-1, and existing conditions. As such, on-site construction activities associated with the Original Project would not result in exposure of persons (including the surrounding sensitive receptors) to or generation of noise levels in excess of standards established by the Threshold Guide and/or the City's Noise Regulations. On-site construction noise impacts would be less than significant with implementation of mitigation.

As explained on Pages III-58 through III-59 of Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, on-site construction noise impacts would be potentially significant for Alternative 5. Implementation of MM-NOISE-1 would reduce Alternative 5's on-site construction noise impacts to a level of less than significant.

5. Reference

For a complete discussion of Alternative 5's Noise impacts, see Section IV.I, *Noise*, of the Draft EIR; Appendix G – Noise and Vibration Report, of the Draft EIR; and Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR.

VI. ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT EVEN AFTER MITIGATION

The EIR concluded that the following impacts remain significant and unavoidable even with implementation of all feasible mitigation measures described in the Draft and Final EIR. Consequently, in accordance with PRC Section 21081(b) and CEQA Guidelines Section 15093, a Statement of Overriding Considerations has been prepared as set forth in Section IX of these Findings. The City finds and determines that:

- A. All significant environmental impacts that can feasibly be avoided or substantially lessened have been avoided or substantially lessened through either incorporation of PDFs (see CEQA Guidelines Section 15064(f)(2)) and/or implementation of mitigation measures; and
- B. Based on the EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction and operation of Alternative 5, all remaining unavoidable significant impacts, as set forth in these Findings, are overridden by the benefits of Alternative 5, as described in the Statement of Overriding Considerations for the construction and operation of Alternative 5, and all implementing actions.

A. Noise

1. Impact Summary

Construction

Exposure of Persons to or Generation of Noise Levels in Excess of Standards

Off-Site Noise

As demonstrated by the analyses at pages III-58 through III-59 in Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Section IV.I, *Noise*, of the Draft EIR, and Appendix G – Noise and Vibration Report, of the Draft EIR, off-site construction traffic under both the Original Project and Alternative 5 would increase noise levels at noise-sensitive receptors (residential uses) in the Project Site vicinity in excess of applicable threshold standards. Alternative 5 would incrementally reduce the scale of the Original Project's construction activity. Because of the reduced concrete work associated with the elimination of the two-story, concrete parking deck; incremental reduction in the size of the Wellness Pavilion; and reduction in Site buttressing requirements under Alternative 5, the duration of Alternative 5's concrete pour phase would be reduced. Truck trips and noise levels associated with maximum pour days would be similar to those of the Original Project and, as with the Original Project, would have significant and unavoidable noise impacts. But, noise impacts would occur over fewer days under Alternative 5 than under the Original Project. Although noise impacts from concrete trucks along Chalon Road would exceed threshold standards and would be significant and unavoidable under both the Original Project and Alternative 5, impacts would be less under Alternative 5 because of the reduction in the duration of construction activity.

Cumulative Impacts

Construction Groundborne Noise and Vibration

Human Annoyance

As demonstrated by the analysis on page III-60 of the Final EIR, while project-level human annoyance impacts during construction under either the Original Project or Alternative 5 would be less than significant, in the event that hauling activities from related projects were to occur concurrently with hauling under the Original Project or Alternative 5, the number and duration of perceptible vibratory events could potentially increase along Sunset Boulevard between Bundy and I-405. These human annoyance vibration impacts from cumulative traffic are conservatively considered to be cumulatively considerable and significant for both the Original Project and Alternative 5. Alternative 5 would reduce construction truck activity compared to the Original Project as a result of Alternative 5's shorter duration of construction activity, and would therefore have less impact with respect to vibration resulting in human annoyance than the Original Project.

2. Project Design Features

The following PDF addresses potential construction noise impacts and is considered in the analysis of this impact.

- PDF-TRAF-1:** Construction Traffic Management Plan. MSMU shall prepare a detailed Construction Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans as necessary and satisfactory to LADOT. The Construction Traffic Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:
- Appropriate temporary traffic controls (signs and temporary signals) shall be installed along the public rights-of-way during all construction activities to ensure pedestrian and vehicular safety during construction.
 - During peak haul traffic, if off-site staging is required, trucks would be radioed in from an off-site staging area to avoid queuing along adjacent street.
 - Schedule construction-related deliveries, other than concrete and earthwork-related deliveries, between the hours of 7:00 AM and 3:00 PM to avoid the PM peak hour commuter traffic period as identified in the Project's Traffic Study and to reduce the potential of trucks waiting to load or unload for protracted periods of time. This restriction shall not apply to trucks being used for the concrete pour that cannot feasibly be finished before 3:00 PM. No on-street staging or idling of haul trucks on public roadways will be allowed.
 - Maintain access for surrounding residential uses in proximity to the Project Site during Project construction.
 - Identify designated transport routes for haul trucks and heavy trucks to be used over the duration of the Project. Develop a plan for staging trucks prior to arriving at the Site. Temporary haul truck staging will not be permitted on local hillside streets.
 - Truck loading/unloading will occur on the MSMU Campus, not on local hillside streets.
 - Construction truck travel on local streets shall be limited to Bundy Drive, Norman Place, and Chalon Drive only; trucks would not travel on any other local streets serving the neighborhoods surrounding the Project Site.
 - Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring residences at all times.

- In the event of temporary lane closures, a worksite traffic control plan, approved by LADOT, should be implemented to route vehicular traffic or pedestrians around any such closures.
- Unrestricted access for school buses shall be maintained on street rights-of-way during construction.
- MSMU shall attend bi-monthly (or at a frequency determined appropriate by City Staff) construction management meetings conducted by City Staff and the operators or contractors for the Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities. Coordination shall ensure that construction activities associated with these concurrent related projects and hauling activities are managed in collaboration with one another.
- MSMU shall provide advance notification to LADOT, the Archer School for Girls, the Brentwood School, and St. Martin of Tours School of its upcoming construction activities, including durations and daily hours of construction, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Barriers and/or fencing shall be installed around construction sites to secure construction equipment and the Site and to prevent trespassing, vandalism, and attracting nuisances.
- Safe truck driving practices, including low gear, not passing another vehicle, deployment of optional 4th axle, if available, shall be required.
- During construction, MSMU shall clearly post a hotline in several areas around the Campus, including along the construction fence and at the entrance to the Campus, to enable the public to call and report non-compliance with the Construction Traffic Management Plan.

3. Mitigation Measures

The following mitigation measure is identified for Alternative 5 to minimize significant off-site construction noise impacts and cumulative groundborne noise and vibration impacts.

- MM-NOISE-2:** All on-road heavy-duty construction vehicles used during the demolition, concrete pouring, and asphalt paving phases of construction shall be equipped with properly operating and maintained noise mufflers that achieve a minimum 10 dBA noise level reduction, based on the manufacturer's specifications for noise reduction performance.

4. Finding

Pursuant to Public Resources Code section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, Alternative 5 that mitigate or avoid the significant effects on the environment. However, these effects have not been reduced to less than significant. Pursuant to Public Resources Code, section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

5. Rationale for Finding

Construction

Exposure of Persons to or Generation of Noise Levels in Excess of Standards Off-Site Noise

As demonstrated by the analysis in Section IV.I, *Noise*, of the Draft EIR, Mitigation Measure MM-NOISE-2 is identified as the only feasible mitigation measures to address the Original Project's significant off-site construction noise impacts; however, even with implementation of this mitigation measure, the Original Project's construction noise impacts remain significant, and are therefore unavoidable. Alternative 5 would incrementally reduce the duration of the Original Project's construction activities, but even with the implementation of MM-NOISE-2 impacts would remain significant.

Alternative 5 would implement a modified PDF-TRAF-1 requiring that no haul truck trips occur between 3:00 P.M. and 7:00 A.M. Monday through Saturday, except for concrete pour truck trips that cannot feasibly be finished prior to 3:00 P.M. MM-NOISE-2 requires that all off-site heavy duty trucks accessing the Project Site during the demolition, concrete pouring, and asphalt paving phase shall install noise dampening mufflers that achieve a minimum 10 dBA noise level reduction, based on the manufacturer specifications for noise reduction performance. With implementation of MM-NOISE-2 under Alternative 5, off-road construction noise impacts would be reduced to less than significant levels during the demolition and asphalt paving phases of construction. However, impacts from concrete trucks would remain significant and unavoidable along Chalon Road. With implementation of MM NOISE-2, some off-site noise impacts associated with haul trucks would be reduced to less than significant levels during Alternative 5's peak high-noise phases, which include hauling of demolition debris and concrete deliveries. No feasible mitigation would reduce the significant and unavoidable noise impacts associated with concrete trucks under Alternative 5, and, as such, noise impacts related to truck activity would be significant and unavoidable.

Cumulative Impacts

Construction Groundborne Noise and Vibration Human Annoyance

As demonstrated by the analysis in Section IV.I, *Noise*, of the Draft EIR, if hauling activities from related projects were to occur concurrently with hauling under the Original Project or Alternative 5, the number and duration of perceptible vibratory events could potentially increase along Sunset Boulevard between Bundy and I-405, and cumulative impacts are therefore conservatively anticipated to be cumulatively considerable and significant, even after the implementation of all feasible mitigation measures (MM-NOISE-2). Project-level human annoyance vibration impacts under Alternative 5 would remain less than significant.

Neither the Applicant nor the City has any control over the timing or extent of the construction of any of the related projects. Combined human annoyance vibration impacts from Alternative 5 and related projects, if they were to occur simultaneously, would be intermittent, temporary, would cease at the end of the construction phase, and their construction days and hours will comply with time restrictions and other relevant provisions in the LAMC.

6. Reference

For a complete discussion of Alternative 5's Noise impacts, see Section IV.I, *Noise*, of the Draft EIR; Appendix G – Noise and Vibration Report, of the Draft EIR; and Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR.

B. Transportation and Traffic

1. Impact Summary

Construction

Intersection Capacity and Neighborhood Street Intrusion Criteria

As demonstrated by the analyses at pages III-58 through III-59 in Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR, Section IV.K, Transportation and Traffic, of Chapter IV of the Draft EIR, Draft EIR, Appendix I, Transportation and Traffic, and Appendix C: Level of Service Analysis Results for MSMU Wellness Pavilion Alternative 5, Alternative 5 would incrementally reduce the Original Project's significant and unavoidable construction traffic impacts, but these would remain significant and unavoidable even after the implementation of all feasible mitigation measures. Alternative 5 would incrementally reduce the scale of the Project's construction activity through reduced grading (20,524 cubic yards under the Original Project compared to 9,343 cubic yards under Alternative 5) and reduction in concrete pours (8,155 cubic yards under the Original Project compared to 1,864 cubic yards under Alternative 5). Alternative 5's concrete pour phase would be shorter compared to the Project as the two-story parking deck would not be constructed, the Wellness Pavilion would be smaller, and fewer buttresses would be installed.

Truck trips associated with maximum pour days would be similar to those of the Original Project and, as with the Original Project, have significant and unavoidable construction traffic impacts. But, significant and unavoidable construction traffic impacts would occur over fewer days under Alternative 5 than under the Original Project. Traffic impacts would exceed threshold standards and would be significant and unavoidable at two neighborhood street segments and at intersections during concrete pours under both the Original Project and Alternative 5; however, these impacts would be less under Alternative 5 because of the reduction in the duration of construction activity. Alternative 5's traffic impacts at study area intersections during construction would therefore be potentially significant, but these would be reduced to a level of less than significant through the implementation of MM-TRAF-1. Both the Original Project and Alternative 5 would result in significant and unavoidable traffic impacts during periods of peak construction at three street segments: Bundy Drive north of Norman Place, with a projected increase of 11.7 percent, exceeding the applicable impact criteria of 10 percent, Chalon Road east of Bundy Drive with an increase of 18.3 percent, exceeding the applicable impact criteria of 12 percent, and Bundy Drive north of Sunset Boulevard with an increase of 8.6 percent, exceeding the applicable impact criteria of 8 percent.

2. Project Design Features

The following PDF addresses potential construction traffic impacts and is considered in the analysis of this impact.

PDF-TRAF-1: Construction Traffic Management Plan. MSMU shall prepare a detailed Construction Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans as necessary and satisfactory to LADOT. The Construction Traffic Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

- Appropriate temporary traffic controls (signs and temporary signals) shall be installed along the public rights-of-way during all construction activities to ensure pedestrian and vehicular safety during construction.
- During peak haul traffic, if off-site staging is required, trucks would be radioed in from an off-site staging area to avoid queuing along adjacent street.
- Schedule construction-related deliveries, other than concrete and earthwork-related deliveries, between the hours of 7:00 AM and 3:00 PM to avoid the PM peak hour commuter traffic period as identified in the Project's Traffic Study and to reduce the potential of trucks waiting to load or unload for protracted periods of time. This restriction shall not apply to trucks being used for the concrete pour that cannot feasibly be finished before 3:00 PM. No on-street staging or idling of haul trucks on public roadways will be allowed.
- Maintain access for surrounding residential uses in proximity to the Project Site during Project construction.
- Identify designated transport routes for haul trucks and heavy trucks to be used over the duration of the Project. Develop a plan for staging trucks prior to arriving at the Site. Temporary haul truck staging will not be permitted on local hillside streets.
- Truck loading/unloading will occur on the MSMU Campus, not on local hillside streets.
- Construction truck travel on local streets shall be limited to Bundy Drive, Norman Place, and Chalon Drive only; trucks would not travel on any other local streets serving the neighborhoods surrounding the Project Site.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring residences at all times.

- In the event of temporary lane closures, a worksite traffic control plan, approved by LADOT, should be implemented to route vehicular traffic or pedestrians around any such closures.
- Unrestricted access for school buses shall be maintained on street rights-of-way during construction.
- MSMU shall attend bi-monthly (or at a frequency determined appropriate by City Staff) construction management meetings conducted by City Staff and the operators or contractors for the Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities. Coordination shall ensure that construction activities associated with these concurrent related projects and hauling activities are managed in collaboration with one another.
- MSMU shall provide advance notification to LADOT, the Archer School for Girls, the Brentwood School, and St. Martin of Tours School of its upcoming construction activities, including durations and daily hours of construction, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Barriers and/or fencing shall be installed around construction sites to secure construction equipment and the Site and to prevent trespassing, vandalism, and attracting nuisances.
- Safe truck driving practices, including low gear, not passing another vehicle, deployment of optional 4th axle, if available, shall be required.
- During construction, MSMU shall clearly post a hotline in several areas around the Campus, including along the construction fence and at the entrance to the Campus, to enable the public to call and report non-compliance with the Construction Traffic Management Plan.

3. Mitigation Measures

The following mitigation measure is identified for Alternative 5 to minimize construction traffic impacts.

MM-TRAF-1: During construction, in each individual hour within the PM peak period (4 PM to 6 PM), allow a maximum of 37 outbound Passenger Car Equivalent (PCE) vehicle trips and 6 inbound PCE vehicle trips.

4. Finding

Pursuant to Public Resources Code section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, Alternative 5 that mitigate or avoid the significant effects on the environment. However, these effects have not been reduced to less than significant. Pursuant to Public Resources Code, section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

5. Rationale for Finding

As with the Original Project, Alternative 5 would incorporate design features, PDF-TRAF-1 (Construction Traffic Management Plan), to maintain access for land uses in proximity to the Project Site during construction and to prevent truck parking, unloading, or staging on the public street. PDF-TRAF-1 would require that all heavy truck hauling of construction equipment and construction materials deliveries shall be limited to hours between 7:00 AM and 3:00 PM to avoid the PM peak-hour commuter traffic period. This restriction does not apply to concrete pour activities that cannot feasibly be finished prior to 3:00 PM. No on-street staging or idling of haul trucks on public roadways will be allowed. PDF-TRAF-1 would also require construction management meetings with City Staff and the operators or contractors for the Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities, would require MSMU to develop a plan for coordinating access for construction workers, school employees, students, and bus access when school and construction are concurrent, and would limit construction truck travel to Bundy Drive, Norman Place, and Chalon Drive only.

Alternative 5 would implement MM-TRAF-1 to reduce construction traffic impacts on study area intersections. MM-TRAF-1 establishes a limit of 37 outbound passenger car equivalent (PCE) trips and six inbound PCE trips during each individual hour of the PM peak period (4 PM to 6 PM). With the implementation of MM-TRAF-1, traffic impacts to study area intersections during construction would be reduced to a level of less than significant.

However, even with the implementation of PDF-TRAF-1 and MM-TRAF-1, because of concrete truck activity during the PM peak hours, Alternative 5 would still result in significant and unavoidable construction traffic impacts on neighborhood street segments, including on Bundy Drive north of Norman Place (Street Segment A), Chalon Road east of Bundy Drive (Street Segment B), and Bundy Drive north of Sunset Boulevard (Street Segment H). No feasible mitigation measures are available to reduce these neighborhood street segments impacts during construction.

6. Reference

For a complete discussion of Alternative 5's construction traffic impacts, see Section IV.K, *Transportation and Traffic*, of the Draft EIR; Appendix I – Transportation and Traffic, of the Draft EIR; Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR; and Appendix C: Level of Service Analysis Results for MSMU Wellness Pavilion Alternative 5.

VII. ALTERNATIVES TO THE PROJECT

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (PRC § 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternatives analysis included in the Draft EIR (Alternatives 1-4) and Final EIR (Alternative 5), therefore identified a reasonable range of project alternatives focused on avoiding or substantially reducing the Original Project's significant impacts.

A. Summary of Findings

Based on these Findings, the EIR, and the whole of the administrative record, the City finds that the EIR analyzes a reasonable range of alternatives that would feasibly attain most of the basic objectives of, and would substantially lessen the significant impacts of the Original Project, and that the EIR adequately evaluates the comparative merits of each alternative. Specifically, the EIR considers the following alternatives: (1) No Project/No Build; (2) Reduced Intensity Alternative – 50 Percent Floor Area Reduction; (3) Alternative Construction Route; (4) Reduced Events Alternative; and (5) Alternative 5.

Having weighed and balanced the pros and cons of each of the alternatives analyzed in the EIR, each of the analyzed alternatives, other than Alternative 5, is hereby found to fail to meet most of the basic objectives of the Project or to be infeasible. Based on the EIR's analyses, the Project Objectives, these CEQA Findings, and specific economic, social, or other considerations, including the provision of employment opportunities for highly trained workers as identified in Section IX of these Findings (Statement of Overriding Considerations), the City finds that four of the five alternatives analyzed warrant rejection. All such findings are found to be supported by the evidence contained in the whole of the administrative record and the evidence, documents and testimony presented in this matter. On pages V-2 through V-4 of Chapter V, *Alternatives*, of the Draft EIR, the EIR also identifies the alternatives that were considered but rejected as infeasible during the scoping process, including an alternative off-site location, alternative on-site uses, and an alternative on-site location, and adequately explains the reasons underlying their rejection, including, without limitation, their failure to meet most of the Project's basic objectives and their infeasibility.

Based upon the following analysis, the City finds, pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, make Alternatives 1, 2, 3, and 4 infeasible. The City finds that Alternative 5 lessens the environmental impacts of the Original Project while substantially complying with the Project Objectives, and is feasible.

B. Project Objectives

Section 15124(b) of the CEQA Guidelines states that a project description shall contain a "Statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project."

The purpose of the Project is to develop a new on-Campus facility that provides MSMU students with comprehensive health and wellness services including modern amenities needed for physical health education. The objectives of the Project are as follows:

Update Inadequate Facilities

1. Replace the Campus' inadequate fitness and recreation facilities with state-of-the-art physical fitness facilities.
2. Provide a practice facility that can accommodate MSMU's club sports teams (volleyball and basketball) that will eliminate current team shuttle trips to and from the Campus for practices.

Student Health and Well Being

3. Provide MSMU's students with facilities and wellness programming, including group fitness facilities, to address the specific health challenges and goals of MSMU's diverse student body. Promote increased physical activity and improved academic performance, self-esteem, and cognitive function. Utilize new facilities to comprehensively educate students regarding nutrition and health.

Design

4. Site the proposed Wellness Pavilion in a manner that is compatible with the existing buildings' architectural styles and designated historic structures, while providing outdoor spaces for students and visitors to socialize and take in scenic views.
5. Ensure that the structure will exceed the State's Title 24 energy requirements by at least 20 percent. This will be achieved by: high performance glazing with solar heat gain coefficient (SHGC) less than Title 24 prescriptive maximum, ultra-high efficiency LED lighting systems, over insulated roof assembly exceeding Title 24 prescriptive minimums, variable capacity mechanical systems reducing over cooling, and dual maximum variable air volume (VAV) control sequence to reduce fan energy.

Enhance Campus Programming

6. Through improved facilities enable the potential for enhancement of Homecoming and Athenian Day events by incorporating fitness and wellness programming as part of the events, and create the opportunity for new external Summer Sports Camps, a Health and Wellness Speaker Series, and other activities or events that complement the purpose of the proposed Wellness Pavilion (i.e., MSMU community or external rental health, wellness, and sports activities).

Improve Pedestrian Safety, Circulation and Parking

7. Consolidate parking currently provided in various scattered surface parking lots at the northern end of the Campus into one parking facility to improve safety by reducing pedestrian/vehicle conflicts that occur along an existing access road and at surface parking areas and driveways.
8. Improve circulation and wayfinding to increase the efficiency, accessibility and convenience of parking for students and visitors to the Campus.

C. Project Alternatives Analyzed

Alternative 1—No Project/No Build Alternative

Description

Under the No Project/No Build Alternative, no new development would occur on the Project Site, and the existing uses at the Project Site would continue to operate in their current state. Thus, the physical conditions of the Project Site would remain exactly as they are today, with the Project Site occupied by the existing fitness center, swimming pool and tennis courts, Facilities

Management Buildings, and scattered surface parking lots containing 226 spaces. No additional parking would be added.

Impact Summary

The No Project/No Build Alternative would avoid all of the Original Project's less than significant, potentially significant and significant and unavoidable impacts, because no new development would occur on the Project Site.

Finding

Pursuant to PRC Section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

With this Alternative, all of the environmental impacts projected to occur from the development of the Original Project would be avoided. Therefore, this Alternative would be environmentally superior to the Original Project. However, CEQA requires that if the environmentally superior alternative is the "no project" alternative, the EIR shall identify an environmentally superior alternative from among the other alternatives. (CEQA Guidelines, Section 15126.6(e)(2).)

Further, the No Project/No Build Alternative would not realize any of the Project objectives. Although the No Project/No Build Alternative would have fewer impacts than the Original Project and Alternative 5, because this Alternative would not include a new Wellness Pavilion, it would not update inadequate fitness and recreation facilities with state-of-the-art physical fitness facilities, accommodate MSMU's club sports teams, enhance existing Campus programming, or create the opportunity for new events or activities that complement the purpose of the Wellness Pavilion and therefore, it would not satisfy any of the Project Objectives. Therefore, for the reasons stated above, this Alternative is infeasible and less desirable than Alternative 5, and is rejected.

References

For a complete discussion of impacts associated with Alternative 1, refer to Chapter V, *Alternatives*, of the Draft EIR.

Alternative 2—Reduced Intensity – 50% Floor Area Reduction

Description

Alternative 2 would reduce the floor area of the proposed Wellness Pavilion by 50 percent as compared to the Original Project. Under this Alternative, the proposed Wellness Pavilion would have a total floor area of approximately 19,000 square feet, compared to the Original Project, which would have a total floor area of 38,000 square feet, and Alternative 5, which would have a total of 35,500 square feet. The maximum height (approximately 42 feet) would be similar to the Original Project and Alternative 5, because the gymnasium requires essentially two stories of open area for recreational activities (i.e. basketball and volleyball). Thus, Alternative 2's floor area reduction would be achieved through a reduced building footprint with potentially less second story floor area. Alternative 2's reduced floor area would not change attendance capacity at existing or new school year events or alter summer camp activities. Alternative 2, as with the

Original Project, would consolidate surface parking within a 281-space parking deck, and would provide more parking than provided under Alternative 5.

Impact Summary

Under Alternative 2, impacts related to Transportation and Traffic (construction, operation) and Noise (construction) would remain significant and unavoidable, although incrementally less with respect to construction traffic and construction noise as compared to the Original Project and Alternative 5.

Alternative 2 would have impacts similar to those of the Original Project and Alternative 5 in the categories of Aesthetics (views, scenic resources, visual character, light and glare), Air Quality (consistency with air quality management plan), Biological Resources (special status, sensitive, or candidate species, riparian habitat, wildlife movement, local policies and ordinances), Cultural Resources (archaeological resources, paleontological resources, historic resources), Geology and Soils (exacerbation of existing conditions, soil erosion, unstable geologic unit, destruction of prominent geologic features), Hydrology and Water Quality (consistency with water quality standards, alteration of drainage patterns, stormwater drainage system capacity), Land Use and Planning, Transportation and Traffic (operation traffic, consistency with public transit, bicycle, or pedestrian plans), Tribal Cultural Resources, and Utilities (water supply).

Benefits of Alternative 2 would include a reduction of the Original Project's and Alternative 5's less than significant impacts associated with Air Quality (air quality standards violation, cumulatively considerable increase of criteria pollutant in nonattainment area, sensitive receptors exposure to pollutant concentrates), Greenhouse Gas Emissions, Public Services (fire, police), Noise (groundborne vibration), Utilities (solid waste), and Energy (energy consumption, energy infrastructure). However, no significant and unavoidable impact is eliminated or reduced to a level of less than significant under Alternative 2.

Finding

Pursuant to PRC Section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

Alternative 2 would provide for the development of a Wellness Pavilion with approximately 50 percent of the floor area proposed for the Original Project. The Parking Deck would be the same as the Original Project's, and larger than Alternative 5's and would replace relocated parking spaces and potentially alleviate on-street parking.

Alternative 2 would meet the Project objective to update inadequate fitness and recreation facilities with state-of-the-art physical fitness facilities. Alternative 2 also provides a practice facility that would accommodate MSMU's club sports teams (volleyball and basketball). However, because of the proposed reduced floor area, some space for indoor sports such as volleyball and basketball may be reduced. In that case, Alternative 2 would not meet the objective to accommodate club sports to the same extent as under the Original Project or Alternative 5.

Alternative 2 would meet the purpose of the Project to provide students with facilities and wellness programming. However, the reduced floor area would result in a corresponding reduction in wellness programming. It is expected that Alternative 2 would result in a building that is compatible with the existing buildings' architectural styles and designated historic structures. In addition, Alternative 2 would provide outdoor spaces for students and visitors to socialize and take in scenic views. Alternative 2 would meet the objective to enhance Campus programming, such as Homecoming and Athenian Day events by incorporating fitness and wellness programming as part of the events. Alternative 2 would also meet the Project objective to create the opportunity for new external Summer Sports Camps, a Health and Wellness Speaker Series, and other activities and events that complement the purpose of the Wellness Pavilion. Alternative 2 would also improve pedestrian safety and improved circulation and parking by consolidating parking in a single structure and improved wayfinding that would increase the efficiency and accessibility of parking for students and visitors. In addition, Alternative 2 would provide for new pathways and pedestrian access and, by removing existing scattered, unconsolidated surface parking and driveways, would meet the Project objective to reduce pedestrian/vehicle conflicts that occur along the existing roadway and surface parking areas and driveways.

Although Alternative 2 would meet most of the Project's objectives, because it would reduce the intended scale of development and reduce potential recreational activities and wellness programming compared to the Original Project and Alternative 5, it would not meet the Project's objectives to the same degree as either the Original Project or Alternative 5. Therefore, Alternative 2 is infeasible and less desirable than Alternative 5, and is rejected.

Alternative 3—Alternative Construction Route

Description

Alternative 3 would require construction employees and all construction-related traffic to access the Project Site via Getty Center Drive. Access to the Campus from I-405 northbound off-ramps would occur via two options. First, vehicles could exit Moraga Drive, then proceed northerly along Sepulveda Boulevard to the Getty Center underpass, turning easterly to Getty Center Drive to the private section of Chalon Road, then onto Chalon Road to the Campus. Second, vehicles traveling along I-405 northbound could exit at Getty Center Drive, then proceed south along Sepulveda Boulevard, then east under the Getty Center overpass to Getty Center Drive, at which point the route would be the same as the first option above.

Access to the Campus from I-405 southbound would be from the Getty Center Drive off-ramp, then southerly along Sepulveda Boulevard, then east under the Getty Center overpass to Getty Center Drive. From here, the route would be the same as both options above.

Construction-related vehicles would exit the Campus east onto Chalon Road, continuing to the east of Norman Place onto the private section of Chalon Road. Vehicles would continue south on the private section of Chalon Road, turning east onto Getty Center Drive. On Getty Center Drive, vehicles would continue northerly to the Getty Center Drive underpass to Sepulveda Boulevard. At that point, vehicles would proceed north on Sepulveda Boulevard and continue to the I-405 Sepulveda Boulevard/Getty Center Drive northbound and southbound ramps. Draft EIR Figure V-1, *Alternative Construction Route Map*, illustrates the construction vehicle routes to and from the Campus. This route would shorten the distance between the I-405 freeway and the Project Site

by approximately two miles and would eliminate construction traffic from travelling along Sunset Boulevard, Bundy Drive, and Norman Place. Other than this change in the construction route all other aspects of Alternative 3 would be the same as the Original Project (i.e., the on-site construction and operation of the proposed Wellness Pavilion).

Impact Summary

Under Alternative 3, impacts related to Transportation and Traffic (construction, operation) and Noise (construction) would remain significant and unavoidable, although incrementally less than the Original Project with respect to construction traffic and construction noise. Alternative 3 would have impacts similar to those of the Original Project and Alternative 5 in the categories of Aesthetics (views, scenic resources), Air Quality (consistency with air quality management plan, sensitive receptors exposure to pollutant concentrates), Biological Resources (special status, sensitive, or candidate species, riparian habitat, wildlife movement, local policies and ordinances), Cultural Resources (archaeological resources, paleontological resources, historic resources), Geology and Soils (exacerbation of existing conditions, soil erosion, unstable geologic unit, destruction of prominent geologic features), Hydrology and Water Quality (consistency with water quality standards, alteration of drainage patterns, stormwater drainage system capacity), Land Use and Planning, Transportation and Traffic (construction traffic, consistency with public transit, bicycle, or pedestrian plans), Tribal Cultural Resources, Utilities (water supply, solid waste).

Benefits of Alternative 3 would include a reduction of the Original Project's and Alternative 5's less than significant impacts associated with Air Quality (air quality standards violation, cumulatively considerable increase of criteria pollutant in nonattainment area), Greenhouse Gas Emissions, Public Services (fire, police), Noise (groundborne vibration), and Energy (energy consumption, energy infrastructure). However, no significant and unavoidable impact is eliminated or reduced to a level of less than significant under Alternative 3.

Finding

Pursuant to PRC Section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

Alternative 3 would differ from the Original Project and Alternative 5 in requiring construction traffic to access and leave the Project Site via an alternative route using Getty Center Drive, and would not make any other changes to the Original Project. As the Project objectives do not apply to construction activities, Alternative 3 would meet the Project objectives to the same degree as the Original Project and a similar degree to Alternative 5.

However, following the release of the Draft EIR for public review and comment, it became clear to the City and MSMU that Getty disputed that MSMU had any access rights pursuant to the easement which formed the basis for Alternative 3, and that Getty would not allow the use of the easement for construction vehicles under any circumstances. Because Alternative 3 would require the use of Getty Center Drive and Getty will not allow that use, the City finds that Alternative 3 is infeasible and rejects it from further consideration.

References

For a complete discussion of impacts associated with Alternative 3, refer to Chapter V, *Alternatives*, of the Draft EIR. For a discussion of Alternative 3's infeasibility, see Topical Response No. 5 in Chapter II, *Responses to Comments*, of the Final EIR.

Alternative 4—Reduced Events Alternative Description

Alternative 4, the Reduced Events Alternative, would place a cap on the maximum visitor attendance at the Project's Other Wellness/Sports Events and Health & Wellness Speaker Series events. MSMU's club basketball and volleyball activities (Club Sports), which are currently conducted off-Campus, would be allowed to occur in the Pavilion during the school year. A vehicle trip limitation would be placed on Summer Camps. Alternative 4 would implement reduced peak hour trips, a cap on total daily summer camp trips, and other measures designed to limit trips and reduce the Original Project's significant and unavoidable operational traffic impacts, similar to Alternative 5. Alternative 4 would restrict Health and Wellness Speaker Series and Other Wellness/Sports Activities to the school year only, unlike the Original Project and Alternative 5, which would allow them year round. Alternative 4 would also limit the total outside guests for Club Sports to a total of 30 outside visitors, and restrict Club Sports activities to after 8:00 PM during weeknights and any time during the day on weekends. Other than these event limitations, the construction and operation of the proposed Wellness Pavilion would be the same as under the Original Project.

Impact Summary

Under Alternative 4, impacts related to Transportation and Traffic (construction) and Noise (construction) would remain significant and unavoidable, similar to the Original Project as there is no change proposed to the Wellness Pavilion's physical characteristics. As compared to Alternative 5, Alternative 4 impacts related to construction Transportation and Traffic and construction Noise would be slightly greater, as Alternative 5 would result in a reduced construction schedule. Similar to Alternative 5, Alternative 4 would reduce the Original Project's significant and unavoidable traffic impacts during operation to a level of less than significant.

Alternative 4 would have impacts similar to those of the Original Project and Alternative 5 in the categories of Aesthetics (views, scenic resources, visual character, light and glare), Air Quality (consistency with air quality management plan, sensitive receptors exposure to pollutant concentrates), Biological Resources (special status, sensitive, or candidate species, riparian habitat, wildlife movement, local policies and ordinances), Cultural Resources (archaeological resources, paleontological resources, historic resources), Geology and Soils (exacerbation of existing conditions, soil erosion, unstable geologic unit, destruction of prominent geologic features), Hydrology and Water Quality (consistency with water quality standards, alteration of drainage patterns, stormwater drainage system capacity), Land Use and Planning, Noise (groundborne vibration), Transportation and Traffic (construction traffic, consistency with public transit, bicycle, or pedestrian plans), Tribal Cultural Resources, Utilities (water supply).

Similar to Alternative 5, benefits of Alternative 4 would include a reduction of the Original Project's less than significant impacts associated with Air Quality (air quality standards violation, cumulatively considerable increase of criteria pollutant in nonattainment area), Greenhouse Gas Emissions, Public Services (fire, police), Transportation and Traffic (consistency with congestion

management plan), Utilities (solid waste), and Energy (energy consumption, energy infrastructure).

Finding

Pursuant to PRC Section 21081(a)(3), the City finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

Alternative 4 would result in the construction of the same Wellness Pavilion building, with the same frequency and type of operation activity as the Original Project, while incrementally reducing attendance at school year events and Summer Sports Camps. Alternative 4 would meet the Project objective to update inadequate fitness and recreation facilities with state-of-the-art physical fitness facilities. Alternative 4 would provide a practice facility that would accommodate MSMU's club sports activities, while eliminating current team shuttle trips to and from the Campus for both practices and games. It would meet the purpose of the Project to provide students with facilities and wellness programming, including group fitness facilities, to address the specific health challenges and goals of MSMU's diverse student body. Alternative 4 would be developed at the same scale as the Original Project, and slightly larger than Alternative 5, and, as such, would result in a building that is compatible with the existing Campus buildings' architectural styles and designated historic structures, while providing outdoor spaces for students and visitors to socialize and take in scenic views. Under Alternative 4 new facilities would be developed that would enhance Campus programming, such as Homecoming and Athenian Day events by incorporating fitness and wellness programming as part of the events. Alternative 4 would meet the Project objective to improve pedestrian safety and improve circulation and parking by consolidating parking in a single structure. Alternative 4 would also meet the Project objective to reduce off-Campus parking through added spaces and improved wayfinding that would increase the efficiency and accessibility of parking for students and visitors. In addition, Alternative 4 would provide for new pathways and pedestrian access and, by consolidating surface parking lots and scattered spaces, would meet the Project objective to reduce pedestrian/vehicle conflicts that occur along the existing on-Campus roadway and surface parking areas and driveways. Alternative 4 would also meet the Project objective to create the opportunity for new events and activities that complement the purpose of the Wellness Pavilion, but because of attendance restrictions, Alternative 4 would not meet this objective to the same extent as the Original Project and/or Alternative 5.

Alternative 4 would substantially meet all of the Project objectives while reducing the Original Project's significant and unavoidable operational traffic impacts to a level of less than significant, although the Original Project's significant and unavoidable construction traffic impacts would remain. As explained in the Final EIR, Alternative 5 would also substantially meet all of the Project objectives, would also reduce the Original Project's significant and unavoidable operational traffic impacts to a level of less than significant, while further reducing environmental impacts in a number of other categories as compared to Alternative 4. Therefore, Alternative 4 is not an environmentally superior alternative to Alternative 5. For the reasons stated above, the City finds that the Reduced Events Alternative is infeasible and less desirable than Alternative 5, and rejects this Alternative.

Reference

For a complete discussion of impacts associated with Alternative 4, refer to Chapter V, *Alternatives*, of the Draft EIR.

Alternative 5

Description

Alternative 5 is described above in Section III of these Findings, and is fully described in Chapter III, *Revisions, Clarifications and Corrections*, of the Final EIR. Alternative 5 would impose operational restrictions on new events in the form of daily trip caps on days when an event is being held in the Wellness Pavilion, as well as a variety of other restrictions designed to limit traffic. Like Alternative 4, Alternative 5 would allow Club Sports activities currently conducted off Campus, both practices and games, to take place in the Wellness Pavilion, but would bring such activities under the daily trip cap applicable to school year Wellness Pavilion events. Alternative 5 would also eliminate the Original Project's proposed parking deck, reduce the size of the Wellness Pavilion from 38,000 sf to 35,500 sf, and shift the location of the Wellness Pavilion on the Project Site.

Impact Summary

Under Alternative 5, impacts related to Transportation and Traffic (construction) and Noise (construction) would remain significant and unavoidable, although incrementally less than the Original Project.

Alternative 5 would reduce the Original Project's operation traffic impacts to a level of less than significant.

Alternative 5 would have impacts similar to those of the Project in the categories of Aesthetics (views, scenic resources, light and glare), Air Quality (consistency with air quality management plan, sensitive receptors exposure to pollutant concentrates), Biological Resources (special status, sensitive, or candidate species, riparian habitat, wildlife movement, local policies and ordinances), Cultural Resources (historic resources), Hydrology and Water Quality (consistency with water quality standards, alteration of drainage patterns, stormwater drainage system capacity), Land Use and Planning, Transportation and Traffic (construction traffic, consistency with public transit, bicycle, or pedestrian plans), and Utilities (operation).

Benefits of Alternative 5 would include a reduction of the Original Project's less than significant impacts associated with Aesthetics (visual character), Air Quality (air quality standards violation, cumulatively considerable increase of criteria pollutant in nonattainment area), Cultural Resources (archaeological resources, paleontological resources, human remains,), Greenhouse Gas Emissions, Geology and Soils (exacerbation of existing conditions, soil erosion, unstable geologic unit, destruction of prominent geologic features), Public Services (fire, police during both construction and operation), Noise (operation noise, structural damage and project-level human annoyance ground noise and groundborne vibration during construction), Transportation and Traffic (consistency with congestion management plan), Tribal Cultural Resources, Utilities (water supply and infrastructure, construction, solid waste), and Energy (energy consumption, energy infrastructure).

Finding

Pursuant to PRC Section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into Alternative 5 that substantially lessen or avoid the significant impacts as identified in the EIR.

Rationale for Finding

Alternative 5 provides for the construction of a Wellness Pavilion of slightly reduced size as compared to the Original Project, which would otherwise be a similar building supporting the same uses and providing the same features. Therefore, Alternative 5 would meet the Project objective to update inadequate fitness and recreation facilities with state-of-the-art physical fitness facilities. Alternative 5 would provide a facility that would accommodate MSMU's Club Sports activities, while eliminating current team shuttle trips to and from the Campus. It would achieve the purpose of the Original Project to provide students with facilities and wellness programming, including group fitness facilities, to address the specific health challenges and goals of MSMU's diverse student body. Alternative 5 would be developed in a similar architectural style although in reduced scale compared to the Original Project and, as such, would result in a building that is compatible with the existing Campus buildings' architectural styles and historic structures. As with the Original Project, Alternative 5 would meet the Project objective to reduce energy demand. It would provide indoor and outdoor spaces for students and visitors to socialize and take in scenic views. Under Alternative 5 new facilities would be developed that would enhance Campus programming by incorporating fitness and wellness as part of new events. Alternative 5 would also meet the Project objective to create the opportunity for new external Summer Sports Camps, a Health and Wellness Speaker Series, and other activities or events that complement the purpose of the Wellness Pavilion. Alternative 5 would meet the Project objective to improve pedestrian safety and circulation by reorganizing existing surface parking and providing a dedicated path to the Pavilion. Therefore, Alternative 5 would substantially meet all of the Project Objectives.

Because Alternative 5 would reduce the Original Project's significant and unavoidable operation traffic impacts to a level of less than significant, incrementally reduce the Project's significant and unavoidable construction traffic and noise impacts, and incrementally reduce the Project's impacts in a variety of other categories while substantially meeting all of the Project objectives, it would be considered the Environmentally Superior Alternative, as further described in this Section VII, subsection E (Environmentally Superior Alternative) below.

Reference

For a complete discussion of impacts associated with Alternative 5, refer to Chapter III, Section 1, Subsection d), *Evaluation of Impacts*, of the Final EIR, and Appendix B of the Final EIR. For a discussion of Alternative 5's relationship to the Project Objectives and an analysis of Alternative 5 as the environmentally superior alternative, refer to Chapter III, Section 2, Subsection e), *Relationship of Alternative 5 to Project Objectives*, and Section 3, *Environmentally Superior Alternative*, of the Final EIR.

D. Project Alternatives Considered and Rejected

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were rejected as infeasible and briefly explain the reasons for their rejection. According to the

CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Original Project that were considered and rejected as infeasible, as described on pages V-2 through V-4 of Chapter V, *Alternatives*, of the Draft EIR, include the following:

Alternative Off-Site Location

Relocation of the Project to MSMU's Doheny Campus was considered as an alternative, but rejected on the basis that this alternative location would defeat the primary purpose of the Project to develop a new on-Campus facility that provides MSMU's students with comprehensive health and wellness services including modern amenities needed for physical and health education. Nearly all of the Project objectives are specific to the Chalon Campus, most notably, the need to replace the Campus' inadequate fitness and recreational facilities. Because this alternative would not have achieved any of the Project's objectives, it was not considered a feasible alternative to the Original Project and was rejected from further consideration in the EIR. The City rejects this alternative on the grounds that it would not have achieved any of the Project's objectives.

Alternative On-Site Uses

The development of the Project Site with a land use other than a health and wellness facility was considered, but rejected on the basis that it would not achieve the basic purpose of the Project or meet the Project's objectives, which are primarily focused on addressing the Campus need for improved health and wellness facilities. As such, it was not considered a feasible alternative to the Original Project and was rejected from further consideration in the EIR. The City rejects this alternative on the grounds that it would not have achieved the Project's primary purpose or have met the Project's objectives.

Alternative On-Site Location

An alternative on-site location, in which the proposed Wellness Pavilion would be developed in another area of the Campus, including switching the locations of the parking deck proposed for the Original Project and the Wellness Pavilion, was also considered and rejected. The Project Site is currently the most underutilized section of the Campus and, because of the space required for the proposed building, an alternative location on the Campus would potentially encroach on or require demolition of at least one of MSMU's six historic buildings of the Campus Circle. Further, switching the location of the Wellness Pavilion with that of the parking deck under the Original Project was determined to result in blocking existing views from both Campus residences and the Wellness Pavilion, but would not have had an impact on off-site view locations. This switch was also determined to result in an inferior design from the standpoint of improving pedestrian access and increasing pedestrian connections on the Campus. Therefore, this alternative was rejected from further consideration in the EIR. The City rejects this alternative on the following grounds, each of which provides a full and independent justification for rejection of the alternative: (1) the alternative would not reduce the Project's significant impacts (2) would likely increase environmental impacts relative to the Project as a result of the need to demolish a historic building.

E. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines states that an analysis of alternatives to a Project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Original Project.

The Draft EIR analyzed a range of feasible Alternatives including (1) the No Project/No Build Alternative, (2) the Reduced Intensity Alternative – 50 percent Floor Area Reduction Alternative, (3) the Alternate Construction Route Alternative, and (4) the Reduced Events Alternative. A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project is provided in Table V-12, *Comparison of Impacts Summary*, on pages V-95 through V-99 of Chapter V, *Alternatives* of the Draft EIR.

An additional alternative, Alternative 5, was analyzed in the Final EIR. A comparative summary of the environmental impacts anticipated under Alternative 5 to the environmental impacts associated with the Original Project is provided on pages III-29 through III-91 of the Final EIR, and a comparison of the environmental impacts anticipated under Alternative 5 to each of the four alternatives analyzed in the Draft EIR is provided in Table III-15 of the Final EIR.

Alternative 5 – Environmentally Superior Alternative

In accordance with the State CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project/No Build Alternative, Alternative 5 is selected from among the alternatives evaluated in the Draft EIR and Final EIR as the Environmentally Superior Alternative, since it would reduce the Original Project’s significant and unavoidable operation traffic impacts to less than significant levels and reduce the duration of significant and unavoidable construction traffic and noise impacts compared to the other Alternatives. Alternative 5 would limit daily vehicle trips, and thus, reduce emissions and energy demand compared to the Original Project. In addition to Alternative 5’s operational restrictions, Alternative 5 would also eliminate the Original Project’s two-story concrete parking deck, incrementally reduce the Wellness Pavilion’s floor area, and shift the Wellness Pavilion to a more geologically stable part of the Project Site. As a result of these physical changes, Alternative 5 would substantially reduce the concrete otherwise needed for foundations, walls and extensive buttressing, reducing the duration of the concrete pour phase of construction as compared to the Original Project. Because of this, there would be fewer days during which construction noise and traffic impacts would exceed the relevant thresholds of significance.

As shown in Table III-15 of the Final EIR, Alternative 5 would reduce the Original Project’s impacts over a greater range of environmental issues than other Project Alternatives. The City further finds that Alternative 5 is substantially consistent with the Project Objectives.

VIII. OTHER CEQA CONSIDERATIONS

A. Significant Irreversible Environmental Changes

According to Section 15126.2(d) of the CEQA Guidelines, an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented.

Development of Alternative 5 requires a commitment of resources that include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation.

Construction requires the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil will also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site.

Operation of Alternative 5 will continue to expend nonrenewable resources that are currently consumed within the City. These include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels represent the primary energy source associated with both construction and ongoing operation of Alternative 5, and the existing, finite supplies of these natural resources will be incrementally reduced.

Alternative 5 includes design features and is subject to building regulations that reduces the demands for energy resources needed to support its operation. Alternative 5 would involve the installation of solar panels on the Wellness Pavilion roof, a feature not included in the Wellness Pavilion under the Original Project. Alternative 5 would incorporated high efficiency, low-e insulated glass units that meet the State's Title 24 energy requirements and CALGreen requirements, and glazing would be protected from direct sunlight by overhangs, reducing glare, solar radiation and heat gain. Low Volatile Organic Compound levels would be used for paints, coatings, adhesives, caulking, carpeting, resilient flooring and engineered wood, and installation of low flow and sensor-activated plumbing fixtures would reduce water use and wastewater in restrooms and showers.

Alternative 5 would implement PDF-AQ-1 through PDF-AQ-8 to reduce demand on energy supplies, and would comply with or exceed applicable provisions of Title 24 and the CalGreen Code in effect at the time of building permit issuance, and would be designed similar to a LEED equivalent building. As discussed on pages III-53 through III-55 of Chapter III, Revisions, Clarifications, and Corrections, of the Final EIR, Alternative 5 would have less than significant impacts with respect to the generation of GHG emissions and consistency with applicable plans, policies, or regulations to reduce GHG emissions.

Alternative 5's continued use of non-renewable resources will be on a relatively small scale and is consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. Furthermore, Alternative 5 neither affects access to existing resources, nor interferes with the production or delivery of such resources. The

Project Site contains no energy resources that will be precluded from future use through implementation of Alternative 5. Therefore, no significant impacts relating to irreversible environmental changes are anticipated.

C. Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

Because Alternative 5 would not include any new residential development, it would not result in direct population growth. However, Alternative 5 has the potential to result in varying types of incremental indirect growth.

With respect to permanent employment, Alternative 5 would add only one new employee, and its potential to generate indirect population growth as a result of new permanent employees is therefore limited. With respect to temporary employment, Alternative 5 would have the potential to generate indirect population growth in the Project Site vicinity as a result of new temporary employees during construction. Given the supply of construction workers in the local work force and the temporary nature of such jobs, it is likely that construction workers would come from within the Los Angeles area. Therefore, given the availability of local workers, Alternative 5 would not be considered growth inducing from a short-term employment perspective, but rather would provide a public benefit by providing new employment opportunities during the construction period.

Long-term operation of Alternative 5 would not result in an increase in the regional population. As stated in the Final EIR, Alternative 5 would add only one new permanent employee. Proposed new events at the Wellness Pavilion under Alternative 5 are not anticipated to result in any population increase as these events would be temporary in nature, outside guests attending new events during the school year are anticipated to be the same or similar groups as outside guests who currently come to the Campus for existing events (i.e. friends and family of students and faculty, faculty of other institutions in the Los Angeles area, members of the community, etc.), and outside guests attending Summer Sports Camps are anticipated to be existing residents of the area. Further, Alternative 5 would not result in an increase to student enrollment, nor would it involve the construction of any additional student housing and therefore would not result in population growth as a result of an increase in either total student enrollment or the existing student population living on Campus.

The Project Site is located in a portion of the Campus that is already developed and served by existing infrastructure (e.g., roads and utilities), and the Campus is itself located in an urbanized area that is already served by existing infrastructure and community service facilities. Alternative 5 will not involve the development of any new off-site roads or off-site infrastructure, or any other changes to off-site roads or infrastructure that would provide additional capacity for other future

development. Alternative 5 does not open inaccessible sites to new development other than existing opportunities for development that are already available.

Therefore, Alternative 5 will not spur additional growth other than that already anticipated, does not eliminate impediments to growth, and will not foster growth inducing impacts.

IX. STATEMENT OF OVERRIDING CONSIDERATIONS

The EIR identifies the following unavoidable significant impacts resulting from Alternative 5: project-level off-site noise during construction, project-level traffic impacts during construction, and cumulative human annoyance vibration impacts during construction. All other impacts associated with Alternative 5 would either be less than significant without the need for mitigation, or less than significant after implementation of mitigation.

Section 21081 of PRC and Section 15093(b) of the CEQA Guidelines provide that when a lead agency approves a project with significant impacts identified in a Final EIR that are not avoided or substantially lessened, the lead agency must state in writing the specific reasons supporting its decision based on the Final EIR and/or other information in the record. Article I of the City's CEQA Guidelines incorporates all of the CEQA Guidelines contained in Title 15, California Code of Regulations, Sections 15000 et seq., and thereby requires, pursuant to Section 15093(b) of the CEQA Guidelines, that the decision-maker adopt a Statement of Overriding Considerations at the time a project is approved if the decision-maker finds that significant adverse environmental effects identified in the Final EIR cannot be substantially lessened or avoided. These Findings and this Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Draft and Final EIR, the source references in the Draft and Final EIR, and other documents and material that constitute the record of proceedings.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts will result from implementation of Alternative 5. Having: (i) adopted all feasible mitigation measures, (ii) considered but rejected as infeasible all alternatives with the exception of Alternative 5, which was put forward by the applicant for the City's consideration as the project to be approved; (iii) recognized all significant, unavoidable impacts; and (iv) balanced the benefits of Alternative 5 against its significant and unavoidable impacts, the City hereby finds that the each of Alternative 5's benefits, as listed below, outweighs and overrides the significant unavoidable impacts of Alternative 5.

Summarized below are the benefits of Alternative 5. These provide the rationale for its approval. Any one of the overriding considerations of economic, social, aesthetic and environmental benefits individually is sufficient to outweigh the significant unavoidable impacts of Alternative 5 and justifies the approval, adoption or issuance of all of the required permits, approvals and other entitlements for Alternative 5 and the certification of the completed Final EIR. Despite the unavoidable project-level construction noise and traffic impacts and the cumulative construction human annoyance vibration impacts caused by Alternative 5, the City approves Alternative 5 based on its following contributions to the community:

- Alternative 5 would update the Campus' existing outdated, undersized and functionally inadequate recreational facilities to support the health and wellness of students, thereby supporting the needs of MSMU's student body and supporting the mission of the only women's university in Los Angeles.

- Alternative 5 would support the needs of existing and future student populations, in a way that is consistent with other institutions of higher education throughout the City of Los Angeles.
- By supporting and enhancing an existing educational institution and its students who live and work in Los Angeles, Alternative 5 will help the City fulfill General Plan Framework Element Goal 3A (i.e., contributing to the City's long-term economic viability) and Objective 3.1 (i.e., supporting the needs of the City's existing and future residents and businesses).
- Alternative 5 would implement a variety of measures designed to control traffic and limit vehicle trips associated with the new Wellness Pavilion, would limit average daily trips for the entire Campus to one percent below the 2016 trip counts taken for the Campus, and would reduce trips to and from Campus by providing health and wellness facilities and services on Campus which students currently seek elsewhere.
- Alternative 5 would be consistent with the State's SB 375 plans and greenhouse gas emission (GHG) targets, the City's Green Building Code, and the City's Green New Deal (Sustainable City pLAn 2019). Alternative 5 will be designed and constructed to incorporate sustainable and green building design, by siting the facility on a previously developed portion of the site and thereby preserving other open space areas within the Campus, and including electric-vehicle charging and water conservation measures consistent with Code requirements.
- Alternative 5 would provide construction employment opportunities that would maintain and enhance the economic vitality of the region.

X. GENERAL CEQA FINDINGS

1. The City, acting through the Department of City Planning, is the "Lead Agency" for the Project evaluated in the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.
2. The EIR evaluated the following potential project and cumulative environmental impacts: aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, noise, public services (fire, police), transportation and traffic, tribal cultural resources, utilities, alternatives, and other CEQA considerations. Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes and Growth Inducing Impacts. The significant environmental impacts of the Project and the alternatives were identified in the EIR.
3. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the Project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft

EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.

4. Textual refinements were compiled and presented to the decision-makers for review and consideration. The City staff has made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents associated with Project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require clarifications and corrections. Second, textual clarifications were necessitated to describe refinements suggested as part of the public participation process.
5. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.
6. The Final EIR documents changes to the Draft EIR. Having reviewed the information contained in the Draft EIR, the Final EIR, and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant new information in the record of proceedings or other criteria under CEQA that would require additional recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR. Specifically, the City finds that:
 - The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.
 - The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.
 - None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be

credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.

- The mitigation measures identified for the project were included in the Draft EIR and Final EIR. As revised, the final mitigation measures for the Project are described in the Mitigation Monitoring Program (MMP). Each of the mitigation measures identified in the MMP is incorporated into the Project. The City finds that the impacts of the Project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.
8. CEQA requires the Lead Agency approving a project to adopt a MMP or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the Project and has been designed to ensure compliance with such measures during implementation of the Project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts the MMP.
 9. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Project.
 10. The custodian of the documents or other materials which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.
 11. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.
 12. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the project.
 13. The EIR is a project EIR for purposes of environmental analysis of the Project. A project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the project by the City and the other regulatory jurisdictions.
 14. The City finds that none of the public comments to the Draft EIR or subsequent public comments or other evidence in the record, including any refinements in the Project in response to input from the community, includes or constitutes substantial evidence that requires recirculation of the Draft or Final EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the Draft or Final EIR prior to its certification, and that neither the Draft EIR nor the Final EIR need to be recirculated prior to certification.

PUBLIC HEARING AND COMMUNICATIONS

A public hearing conducted by a Hearing Officer, on behalf of the City Planning Commission, on this matter, was conducted telephonically and virtually via Zoom on July 14, 2021 at 9:30 A.M. Participating were representatives from LAFD, LADOT, Council District 11, the Project Representative, and a number of stakeholders and members of the general public. As discussed above, after the Public Hearing, the City Clerk notified Planning Staff that the Public Hearing Notice and NOA/NOC had not been published in the Daily Journal, as required by the LAMC. Thus, a Public Hearing will be held by the City Planning Commission on October 21, 2021 and Alternative 5 has now been noticed in accordance with LAMC Section 12.24 C.1. It should be noted that a summary of the testimony provided during the July 14, 2021 Public Hearing, as well as comment letters received prior to and after the hearing are part of the administrative record and summarized in this staff report to ensure the City Planning Commission is aware of the issues that have been raised by members of the public.

Summary of Public Hearing and Communications

1. Present: There were over 75 participants during the meeting, including City Planning Staff, Chief Armando Hogan from LAFD and Senior Transportation Engineer Eddie Guerrero, the Applicant team, and members of the public.
2. Public Speakers: Approximately 71 people spoke at the hearing, not inclusive of the Applicant team, Council District 11, LADOT, or LAFD; approximately 51 people spoke in support of the Original Project/Alternative 5; approximately 20 people spoke in opposition to the Original Project/Alternative 5.
3. Debra Martin, Vice President of Administration and Finance of MSMU, spoke on behalf of MSMU and noted that the University was founded in 1925 by the Sisters of St. Joseph of Carondelet who established the Campus on its current site in 1929. Ms. Martin explained that Alternative 5 reflects substantial revisions to the Original Project based on community feedback and that the proposed improvements are needed to address students' health, fitness, and wellness goals, and that many MSMU students grew up in and continue to reside in communities that do not have access to any type of fitness facilities. As a majority of MSMU students graduate and work in the healthcare industry, MSMU's goal is to have a healthy student body that is able serve the City in the healthcare industry.

The Applicant's Architect and Representative provided context regarding the Original Project and Alternative 5's architecture and design and explained the design differences between the Original Project and Alternative 5. The presentation provided went over the primary construction, physical, and operational differences between the Original Project and Alternative 5, specifically that under Alternative 5 the Wellness Pavilion will be reduced in size by 2,500 square feet, the number of Campus-wide vehicle parking spaces will be reduced by 46 spaces, the amount of concrete cubic yards will be reduce by up to 77 percent, the amount of grading will be reduced by up to 54 percent, the number of new events will be reduced, no off-Campus parking will be permitted, there will be no AM/PM peak hours permitted, all of the Original Project's operational traffic impacts will be reduced to a level of less than significant, and Alternative 5 will reduce the number of average daily vehicle trips as compared to 2016 conditions.

4. Public Hearing Testimony

Speaker Comments Supporting the Wellness Pavilion

General Comments:

- The Campus has been in operation on the current site since 1929 and the surrounding community has developed around the Campus
- This will be the first new building on Campus in over a decade
- The Campus is an important part of the community
- MSMU is a good neighbor that works with the surrounding residential neighborhood to resolve issues and allows neighbors to use their pool and attend Campus events
- MSMU provides social mobility opportunities for women, many of which who are people of color, and first generation college students
- The existing fitness facilities are inadequate, do not meet the needs of the students, and are not comparable to the fitness facilities located at nearby high schools and universities
- The Wellness Pavilion will provide students with the resources needed to reach their fitness goals, improve their overall health, and increase their resiliency
- The Wellness Pavilion is an opportunity for equity and to show MSMU students that they can find representation and equity at MSMU

Wellness Pavilion:

- The Wellness Pavilion will be located on a developed portion of the Campus
- The construction activities will be a temporary inconvenience that will be less or comparable to the construction activities of new single-family residences in the neighborhood
- Students will no longer have to leave Campus to exercise
- The new summer events will not be disruptive as MSMU currently hosts summer events that are not impactful

MSMU Students:

- MSMU students are an important part of the community; many students graduate and work in the healthcare industry contributing to the overall health of City residents
- MSMU students are disproportionately impacted by inequality and have grown up and continue to live in communities that do not have access to fitness, health, and wellness facilities and/or park space
- A majority of MSMU student cannot afford to pay for gym memberships as 60 percent of the student body is eligible for Pell Grants (Pell Grants are provided to undergraduate students whose total family income is less than \$20,000)

Wildfire and Evacuation

- MSMU has learned numerous lessons from the 2019 Getty Fire
- MSMU hired a Director of Emergency Management and Environmental Health and Safety Staff member
- Best practices have been implemented to strengthen MSMU's response to emergencies including partnering with LAFD to review MSMU's wildfire and emergency response plans, and holding evacuation and shelter in place trainings
- The building will be constructed out of noncombustible materials and will be required to comply with LAFD's brush clearance regulations

- The shelter in place approach is good for the community and University

Traffic and Parking

- There will be no increase in vehicle trips to and from the Campus as MSMU will be required to comply with PDFs that establish strict operational restrictions and reduce the 2016 trips
- The existing vehicle congestion along Sunset Boulevard is a culmination of the various schools located in the area, single-family residences, and commercial uses
- The Campus will become a closed campus and off-Campus parking and walking onto the Campus will no longer be allowed

Specific Alternative 5 Comments

- Alternative 5 reflects a compromise between MSMU and the surrounding residential community
- Alternative 5 responds to the surrounding community's concerns and will ensure the number of vehicles accessing the Campus are reduced and that no off-Campus parking will be allowed
- The Original Project would have been disruptive to the surrounding community
- Alternative 5 reflects a great deal of redesign and if it is not approved MSMU will be able to continue to operate without any transportation operational regulations
- Alternative 5 will improve traffic as compared to existing conditions
- Alternative 5 reduces the overall size of the Wellness Pavilion and will require shuttles in place of private vehicles being driven to Campus

Speaker Comments in Opposition to the Wellness Pavilion

General Comments:

- MSMU's original approvals never envisioned a Campus of this size
- A petition has been submitted opposing the Wellness Pavilion with 100 signatures
- The Wellness Pavilion will be better suited for the Doheny Campus which has access to public transit and is located in an urbanized area
- The solutions that MSMU suggests are worse than the initial problem i.e., the bus/shuttles are not suitable for the local roadways
- MSMU is primarily a commuter school; the original approval was for a residential college
- There are seven schools within a four mile radius; four of which have updated their facilities, but this often equates to also an increase in enrollment
- Projects similar to the Wellness Pavilion burden the neighbors while protecting the institution leaving no protection for the neighbors
- To require mitigation measures for the Wellness Pavilion while the remaining Campus can schedule unlimited events, increase enrollment, and host activities open to outside guests is not logical

Entitlements

- They do not comply with their CUP conditions and have been violating their enrollment conditions for the last three decades
- The approved enrollment is for 750 students but MSMU's current student enrollment is over 1,500 students and there is no way to determine what actual enrollment is
- The Campus is zoned for Minimum Low Density Residential uses; both the Project and Alternative demonstrate how MSMU has forgotten that the University operating on the site is a privilege and not a right

- Should be required to operate in a manner that reflects the residential setting
- The land use decisions need to take into account everyone in the community
- The record should be kept open for two weeks after the hearing
- The project is not in compliance with the Brentwood-Pacific Palisades Community Plan; the LAMC must be adhered to
- The Applicant is violating the Baseline Hillside Ordinance's standards regarding to permitted height, grading and retaining walls
- The EIR should have analyzed the 2,244 student enrollment number stated in the Draft EIR
- The only protection the community has is through conditions that the City imposes on a project that include a limit on hours of operation, enrollment, vehicle trips during peak hours, restrictions for summer events, which other schools already comply with; MSMU should be subject to these restrictions

EIR

- The EIR must be recirculated as it is supposed to be an informational document, but the EIR is misleading, relies on unsupported information and omits critical analysis
- The Project should be rejected due to the impacts that cannot be mitigated

Wellness Pavilion:

- MSMU should be required to reduce their footprint and not allowed to increase it
- None of the events proposed for the Wellness Pavilion should be permitted
- General opposition to the size of the gym and events associated with the Wellness Pavilion
- The Project is disingenuous and dishonest; construction of the gym is fine but there should not be a programming component
- The proposed Summer Sports Camps will destroy the tranquility of the surrounding area that is experienced during the summer months; the Summer Sports Campus will impact the neighbors
- This is a commercial event center that will serve a large audience
- The Wellness Pavilion will allow for the commercialization of the Campus
- The Wellness Pavilion will further degrade the adjacent properties
- Commercial activities associated with the Wellness Pavilion should be removed for the health, welfare, and safety of the neighborhood
- The Wellness Pavilion is too large and larger than the surrounding university gyms
- The Wellness Pavilion programs will equate to an expanded Campus
- If MSMU does not comply with the approved conditions, the events should be prohibited

MSMU Students:

- MSMU students speed, text while driving, and run stops the signs
- MSMU students have damaged surrounding residences' vehicles

Wildfire and Evacuation

- The Campus is located in a Very High Fire Hazard Severity Zone at the top of a ridgeline; the state is in a drought
- There is only one ingress/egress access point; there is no secondary access
- During the 2019 Getty Fire MSMU students evacuated the Campus by walking on their own towards Sunset Blvd; several residents gave rides to students trying to leave the Campus

- MSMU does not have an effective evacuation plan in place
- The Draft EIR incorrectly stated that there is emergency access through Stoney Hill Road and Mountaingate Drive
- The surrounding neighbors are not able to secure fire insurance for their property
- This Project is a tipping point for the overall neighborhood safety
- The Project will increase fire risk

Traffic and Parking

- Operation of the Wellness Pavilion will result in traffic impacts
- The traffic congestion is unmanageable; residents cannot drop their kids off at school or run errands
- All vehicles accessing MSMU must travel two miles from Sunset along substandard hillside roadways
- The shuttle buses are too large for the surrounding roadways
- MSMU students have crashed into neighbors vehicles while driving to and from the Campus
- They are the only educational facility in the area without access to a major thorough fare; the University should not be permitted to build the Wellness Pavilion because of the lack of access
- MSMU should research an alternative that provides vehicle access from the Getty to Sepulveda
- The Campus should become a closed campus with no off-Campus parking permitted
- The Wellness Pavilion will generate new trips and the surrounding roadways will become bottlenecked during events
- Bundy Drive is already congested and not wide enough to allow two vehicles to pass simultaneously
- The community has requested that MSMU be a closed Campus and prohibit off-Campus parking prior to the Project; MSMU has said it was not possible, but is now trying to include it as a feature of the Alternative
- If there is a trip cap in place, there need to be enforceable measures to ensure MSMU is complying with the trip cap

Specific Alternative 5 Comments

- Alternative 5 will result in the Wellness Pavilion being slightly reduced in size and removal of the two-story parking deck
- The Alternative claims to meet the Sunset Standard but provides no evidence as to how this will be done

5. Council District 11, LAFD, and LADOT

Council District Senior Planning Deputy Jason Douglas spoke at the Public Hearing and thanked all the individuals for participating, as well as Chief Hogan from LAFD and Senior Transportation Engineer Eddied Guerrero from LADOT. Mr. Douglas stated that CD 11 listened to all of the public testimony provided and will take all comments into consideration, while continuing to work with MSMU to reduce impacts on the community.

Chief Hogan from the LAFD stated that he was appreciative for the opportunity to attend the public hearing and that the goal of the LAFD is to provide exemplary service through education, exercise and information sharing. Chief Hogan thanked all participants for their comments and noted that

the LAFD will continue to work with MSMU to ensure the entire community (both the residences and MSMU) remains safe.

Senior Transportation Engineer Eddie Guerrero stated that he was glad to attend the public hearing and that the concerns raised during the public testimony seemed to focus on traffic management issues and how MSMU can execute this. He explained that LADOT understands that there are traffic peaks associated with school activities and that the Department recognizes the importance of schools implementing a meaningful traffic management plan so that the institution can manage the traffic conditions. Further, trip caps are a measure that is often used and can help LADOT determine if a school is complying with their measures, and if not, what appropriate remediation can be implemented that can address the issue to ensure the school can operate and community concerns are addressed. He explained that this is the opportunity for the community to actively participate in this process and help create an instrument that can meet the school's needs and at the same time address community concerns regarding traffic management.

6. Response to Public Testimony:

Applicant Rebuttal

The Applicant's Representative began by thanking all individuals who spoke in support of the Wellness Pavilion and stated the following points:

A substantial amount of misinformation has been spread throughout the community regarding the Wellness Pavilion, specifically that MSMU is requesting a facility that is larger than UCLA's 14,000 square-foot fitness facility. The Representative noted that Wellness Pavilion will not be larger than the fitness facilities located on the UCLA Campus and the referenced 14,000 square-foot facility is a dorm fitness room; UCLA has over 500,000 square-feet of athletic and fitness space. However, he noted that MSMU is not using UCLA as a school to be compared to and instead cited numerous surrounding schools, a majority of which are high schools, which provide or have been approved for much larger fitness facilities. These schools included:

- Archer School for Girls: Approved for a 39,300 square-feet of facilities and is in a VHFHSZ;
- Upper Brentwood School: 75,000 square feet of facilities;
- Loyola Marymount University: 192,000 square feet of facilities;
- Crespi High School: 49,662 square-feet of facilities;
- Harvard Westlake High School: 44,161 square-feet of facilities and is in a VHFHSZ;

The Wellness Pavilion will be smaller than all of these schools' athletic/fitness facilities. He also explained that a number of these schools who had increased enrollment had recently approved Master Plans and nothing in the record implies that MSMU has any intention of seeking an increase in enrollment.

Regarding wildfire, the Applicant's Representative stated that LAFD has said that the Wellness Pavilion will be built on a developed site and not increase wildfire risk. The Representative confirmed that MSMU will not need or request access through Mountaingate Drive and that while the LAFD may use the fire access roads, that these roads will not be used by MSMU.

The Representative acknowledged that MSMU is in a residential area similar to other schools such as Archer, Harvard Westlake, and the Buckley School and that further the LAMC CUP entitlement process allows for the approval of schools in residential areas as educational institutions are an important part of a community. Further, the Wellness Pavilion will be consistent with the City's General Plan and the Brentwood-Pacific Palisades Community Plan as both of those plans support equity, all things that this project will also support.

Lastly, the Applicant's Representative noted the Transportation PDFs that Alternative 5 will be subject to and that currently there are no trip caps for any of the existing events held on Campus. Implementation of these PDFs will establish trip caps for the new events that will be held at the Wellness Pavilion, a parking reservation program and ensure that there are no traffic impacts and an average trip reduction of one percent, which includes all vehicles accessing the Campus.

7. Written Testimony

Since the public hearing, Planning Staff received written comments (outside of the comment letters on the Draft EIR, which were responded to as part of the Final EIR and during the public hearing) from approximately 121 individuals, community groups, and law firms in opposition to the Project and 139 individuals in support of the Project.

The main arguments in opposition of the Wellness Pavilion largely mirror those which were brought up in response to the Draft EIR and provided at the Public Hearing, pertaining to vehicle congestion and the surrounding roadway infrastructure (i.e., roadway widths, lack of sidewalks, limited ingress/egress to the Campus), the need for traffic calming infrastructure to be installed on the local roadways, photos documenting buses/shuttles travelling along the local roadways (illustrating the minimal clearance between parked vehicles and the buses/shuttles), photos documenting vehicle congestion along the local roadways, wildfire risk, the Campus being located on a ridgeline in a Canyon (which increases fire risk), students were forced to evacuate on their own and walk towards Sunset Boulevard during the Getty Fire, the Campus is exceeding their permitted student enrollment, Campus evacuation, the Wellness Pavilion will exceed the Baseline Hillside Ordinance standards for height, grading, and number and height of retaining walls, the Campus is not in compliance with their CUP, the EIR should be recirculated with an accurate project description, the project should be built on the Doheny Campus, the Wellness Pavilion will result in further commercialization of the Campus, and MSMU continues to try and characterize the project as a gym that is being built for students. Additionally, comments in opposition of the Wellness Pavilion were received that claimed MSMU is in violation of their CUP, the Campus should be required to return to a residential college and a proposed CUP was circulated in the community that would require a reduction in vehicle trips by 50 percent (through the use of carpools, buses, and online learning), a maximum student enrollment, a requirement for a certain percentage of students to live on Campus, a restriction on construction hours, establishment of fire evacuation procedures, no new events on the Campus, compliance of PDFs would be confirmed by a third party, and issuance of penalties if MSMU fails to comply. Numerous comments were received that expressed support of the measures included in the proposed CUP. Commenters also stated that during the Getty Fire, single-family residences that unfortunately were destroyed, could have been protected, but fire resources were focused on protecting the Campus. Lastly regarding traffic, commenters note that PM peak hours should be from 3 PM to 7 PM and the City should consider a reverse traffic lane along Sunset Blvd.

A majority of the support letters echoed the public testimony provided during the Public Hearing including that MSMU's fitness facilities are out of date, MSMU should be permitted to update their fitness facilities to ensure the mental well-being and health of their students, the Wellness Pavilion construction activities would be similar to the construction activities of the new single-family homes in the surrounding neighborhood, the Campus was established in 1929 and the surrounding residential community has developed around it, MSMU is comprised of a diverse student body of which many of their students enter into the healthcare field, and MSMU is a good neighbor.

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 Irvine, California 92617

SITE DESCRIPTION SUMMARY TABLE

PROJECT AREA
 TOTAL PROJECT SITE SQUARE FOOTAGE: 168,557 SQUARE FEET (3.9 ACRES)
 TOTAL CAMPUS AREA: 1,977,156 SQUARE FEET

SCOPE OF DEVELOPMENT
 A. BUILDING: 13%
 B. HARDSCAPE: 72%
 C. LANDSCAPE: 15%

BUILDING HEIGHTS
 WELLNESS PAVILION MAXIMUM HEIGHT: 42'

FLOOR AREA
 WELLNESS PAVILION MAXIMUM FLOOR AREA: 35,500 SF

NUMBER OF EXISTING BUILDING ON PROJECT SITE
 EXISTING BUILDINGS BEFORE CONSTRUCTION: 3
 EXISTING BUILDINGS AFTER CONSTRUCTION: 1

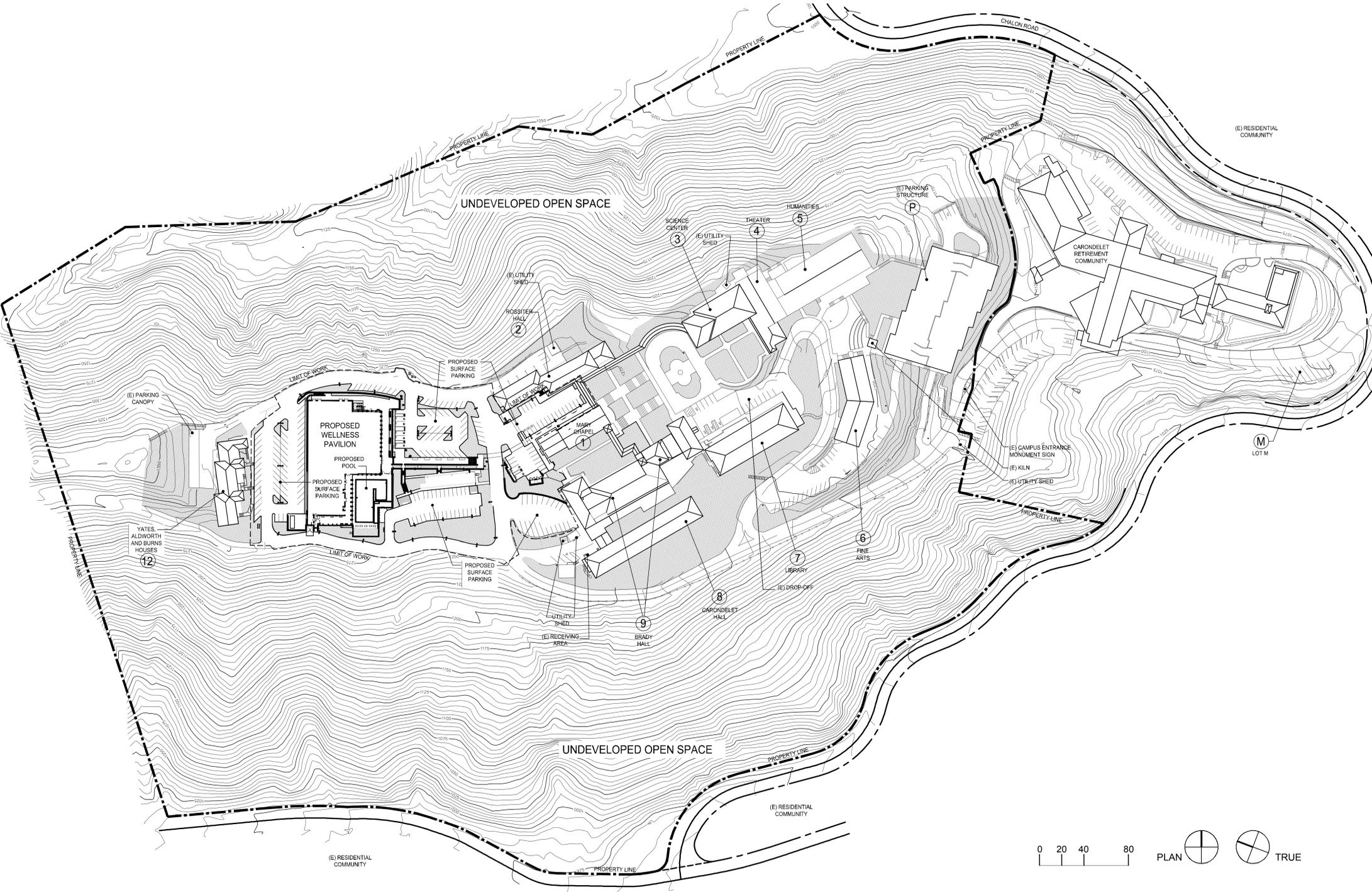
PARKING
 PARKING ANALYSIS:
 TOTAL PARKING ON CAMPUS (PRIOR TO CONSTRUCTION): 561 SPACES
 TOTAL PARKING ON CAMPUS (AFTER CONSTRUCTION): 515 SPACES
 PARKING ON PROJECT SITE (PRIOR TO CONSTRUCTION): 245 SPACES
 PARKING ON PROJECT SITE (AFTER CONSTRUCTION): 199 SPACES

PLANT MATERIAL CONCEPTUAL SUMMARY TABLE

PLANTING AREA
 TOTAL PLANTING AREA: 25,171 SQUARE FEET
 1 GALLON @ 50% (12,585 SF): 3,650 1 GALLON
 5 GALLON @ 25% (6,290 SF): 525 GALLON
 15 GALLON @ 25% (6,290 SF): 390 GALLON

PROJECT TEAM

LANDSCAPE ARCHITECT
 JEFFREY YAMAMOTO
 LICENSE NO. 5030
 5301 CALIFORNIA AVENUE, SUITE 100
 IRVINE, CALIFORNIA 92617
 (949)261-1001
 jyamamoto@lpadesignstudios.com



LEGAL DESCRIPTION

Real property in the City of Los Angeles, County of Los Angeles, State of California, described as follows:

BEING A PORTION OF PARCELS A AND B OF PARCEL MAP LA. NO. 4304 IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA AS PER MAPS RECORDED IN BOOK 141, PAGES 82 TO 84 INCLUSIVE OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE MOST NORTHERLY CORNER OF PARCEL A OF PARCEL MAP LA NO. 4304, RECORDS OF LOS ANGELES COUNTY; THENCE ALONG THE FOLLOWING DESCRIBED BOUNDARY SOUTH 44° 31' 27" EAST 263.62 FEET; THENCE SOUTH 14° 08' 01" EAST 306.03 FEET; THENCE SOUTH 35° 36' 07" EAST 437.18 FEET; THENCE SOUTH 05° 57' 32" EAST 133.68 FEET; THENCE SOUTH 41° 14' 50" EAST 193.16 FEET; THENCE SOUTH 39° 33' 46" EAST 270.77 FEET TO A POINT ON A CURVE CONCAVE SOUTHEASTERLY WITH A RADIUS OF 167.11 FEET A RADIAL LINE THROUGH SAID POINT BEARS NORTH 49° 45' 11" WEST SAID POINT ALSO BEING ON THE NORTHWESTERLY RIGHT OF WAY LINE OF CHALON ROAD; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 65° 33' 11", A LENGTH OF 191.19 FEET TO A POINT OF TANGENCY; THENCE SOUTH 25° 18' 22" EAST 61.81 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHWESTERLY WITH A RADIUS OF 278.07 FEET; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 40° 52' 45", A LENGTH OF 198.40 FEET TO THE SOUTHEASTERLY CORNER OF PARCEL A; THENCE LEAVING SAID RIGHT OF WAY LINE NORTH 90° 00' 00" WEST 122.37 FEET; THENCE NORTH 37° 30' 00" EAST 140.00 FEET; THENCE SOUTH 52° 30' 00" WEST 60.06 FEET; THENCE SOUTH 37° 30' 00" EAST 18.61 FEET; THENCE SOUTH 52° 30' 00" WEST 18.32 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHWESTERLY WITH A RADIUS OF 20.00 FEET; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 21° 34' 45", A LENGTH OF 7.53 FEET TO A POINT OF REVERSE CURVE CONCAVE SOUTHEASTERLY WITH A RADIUS OF 50.00 FEET, A RADIAL BEARING THROUGH SAID POINT BEARS SOUTH 15° 55' 15" EAST; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 16° 01' 24", A LENGTH OF 13.98 FEET TO A POINT OF TANGENCY; THENCE SOUTH 58° 03' 21" WEST 42.51 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHWESTERLY WITH A RADIUS OF 219.00 FEET; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 12° 08' 34", A LENGTH OF 44.93 FEET TO A POINT OF TANGENCY; THENCE SOUTH 70° 11' 55" WEST 15.76 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHWESTERLY WITH A RADIUS OF 120.00 FEET; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 19° 48' 05", A LENGTH OF 41.47 FEET TO A POINT OF TANGENCY; THENCE NORTH 90° 00' 00" WEST 38.35 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHEASTERLY WITH A RADIUS OF 25.00 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 40° 44' 20", A LENGTH OF 17.78 FEET TO A POINT OF TANGENCY; THENCE NORTH 49° 15' 40" WEST 7.77 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE SOUTHWESTERLY WITH A RADIUS OF 91.00 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 32° 20' 20", A LENGTH OF 51.36 FEET TO A POINT OF TANGENCY; THENCE NORTH 81° 36' 01" WEST 39.74 FEET; THENCE SOUTH 83° 21' 32" WEST 71.56 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE SOUTHWESTERLY WITH A RADIUS OF 152.00 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 07° 06' 17", A LENGTH OF 18.85 FEET TO A POINT OF TANGENCY; THENCE NORTH 84° 44' 12" WEST 61.36 FEET; THENCE SOUTH 00° 02' 58" EAST 25.09 FEET; THENCE NORTH 90° 00' 00" WEST 108.13 FEET; THENCE SOUTH 266.43 FEET TO A POINT ON THE NORTHEASTERLY RIGHT OF WAY LINE OF CHALON ROAD, 42 FEET WIDE; SAID POINT BEING ON A CURVE CONCAVE NORTHEASTERLY WITH A RADIUS OF 138.73 FEET, A RADIAL LINE THROUGH SAID POINT BEARS SOUTH 34° 54' 17" WEST; THENCE NORTHWESTERLY ALONG SAID CURVE AND CHALON ROAD RIGHT OF WAY THROUGH A CENTRAL ANGLE OF 30° 15' 07", A LENGTH OF 73.25 FEET TO A POINT OF TANGENCY; THENCE NORTH 24° 50' 36" WEST 26.26 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHEASTERLY WITH A RADIUS OF 197.21 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 34° 59' 55", A LENGTH OF 119.32 FEET TO A POINT OF TANGENCY; THENCE NORTH 59° 30' 31" WEST 59.24 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHEASTERLY WITH A RADIUS OF 178.27 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 24° 43' 01", A LENGTH OF 76.90 FEET TO A POINT OF TANGENCY; THENCE NORTH 34° 47' 30" WEST 37.13 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE SOUTHWESTERLY WITH A RADIUS OF 172.16 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 55° 09' 55", A LENGTH OF 165.76 FEET TO A POINT OF REVERSE CURVE CONCAVE NORTHEASTERLY WITH A RADIUS OF 128.17 FEET, A RADIAL BEARING THROUGH SAID POINT BEARS SOUTH 00° 02' 35" WEST; THENCE NORTHWESTERLY ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 62° 22' 17", A LENGTH OF 139.52 FEET TO A POINT OF TANGENCY; THENCE NORTH 27° 35' 08" WEST 141.25 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE SOUTHWESTERLY WITH A RADIUS OF 172.04 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 70° 07' 07", A LENGTH OF 210.54 FEET TO THE BEGINNING OF A CURVE CONCAVE NORTHEASTERLY WITH A RADIUS OF 28.00 FEET A RADIAL LINE THROUGH SAID POINT BEARS SOUTH 07° 42' 15" EAST; THENCE ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 75° 28' 26", A LENGTH OF 36.88 FEET TO A POINT OF TANGENCY ON THE EASTERLY RIGHT OF WAY LINE OF BUNNY DRIVE, A RADIAL LINE THROUGH SAID POINT BEARS SOUTH 67° 46' 11" WEST; THENCE NORTH 22° 13' 45" WEST ALONG SAID EASTERLY LINE OF BUNNY DRIVE 12.64 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE SOUTHEASTERLY WITH A RADIUS OF 197.50 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 10° 50' 05", A LENGTH OF 37.35 FEET TO A POINT OF TANGENCY; THENCE NORTH 11° 23' 44" WEST 124.98 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE SOUTHEASTERLY WITH A RADIUS OF 97.89 FEET; THENCE NORTHERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 27° 59' 40", A LENGTH OF 47.83 FEET TO A POINT OF TANGENCY; THENCE NORTH 16° 35' 56" EAST 122.67 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHWESTERLY WITH A RADIUS OF 238.00 FEET; THENCE NORTHERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 09° 56' 45", A LENGTH OF 41.31 FEET TO A POINT OF TANGENCY; THENCE NORTH 06° 39' 11" EAST 42.05 FEET TO THE BEGINNING OF A TANGENT CURVE CONCAVE NORTHWESTERLY WITH A RADIUS OF 386.00 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 10° 58' 15", A LENGTH OF 73.91 FEET TO A POINT OF COMPOUND CURVE WITH A RADIUS OF 354.71 FEET, A RADIAL LINE THROUGH SAID POINT BEARS NORTH 85° 40' 56" EAST; THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 10° 18' 42", A LENGTH OF 63.84 FEET TO A POINT OF NON TANGENCY; THENCE NORTH 14° 37' 46" WEST 11.99 FEET TO THE BEGINNING OF A NON TANGENT CURVE CONCAVE WESTERLY WITH A RADIUS OF 847.25 FEET, A RADIAL LINE THROUGH SAID POINT BEARS NORTH 81° 45' 51" EAST; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 09° 29' 30", A LENGTH OF 140.36 FEET TO A POINT OF TANGENCY; THENCE NORTH 17° 20' 28" WEST 183.99 FEET, TO THE NORTHWESTERLY CORNER OF SUBJECT PARCEL A; THENCE ALONG THE NORTHWESTERLY LINE OF PARCEL A NORTH 59° 52' 35" EAST 977.48 FEET TO THE POINT OF BEGINNING.

SAID LAND IS ALSO SHOWN AS PARCEL A OF THAT CERTIFICATE OF COMPLIANCE FOR LOT LINE ADJUSTMENT RECORDED JANUARY 14, 2013 AS INSTRUMENT NO. 20130064030 OF OFFICIAL RECORDS.
 APN: 4429-003-033

LEGEND

	(E) AND PROPOSED LANDSCAPED AREAS
①	MARY CHAPEL - 1 Story
②	ROSSITER HALL - Student Housing - 1 Story
③	ST JOSEPH ADMINISTRATION AND SEAVER SCIENCE CENTER - 3 Stories
④	WILLIAM H. HANNON THEATER - 1 Story
⑤	HUMANITIES BUILDING - 5 Stories
⑥	JOSE DRUIDS-BIADA ART GALLERY; FINE ARTS BUILDING - 3 Stories
⑦	CHARLES WILLARD COR MEMORIAL LIBRARY - 4 Stories
⑧	CARONDELET HALL - Student Housing - 1 Story
⑨	BRADY HALL - Student Housing - 4 Stories
⑩	YATES, ALDWORTH AND BURNS HOUSES CSJ Residences and Student Housing - 1 Story
Ⓟ	PARKING STRUCTURE - 6 STORIES
Ⓜ	LOT M - 10 STALLS

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MOUNT SAINT MARY'S UNIVERSITY
 CHALLON CAMPUS WELLNESS PAVILION and
 PARKING STRUCTURE
 12001 CHALON ROAD
 LOS ANGELES CA 90049
 Developed for
 MOUNT SAINT MARY'S UNIVERSITY

Date	Revision
08/20/2016	01
08/20/2016	02
08/20/2016	03
08/20/2016	04
08/20/2016	05
08/20/2016	06
08/20/2016	07
08/20/2016	08
08/20/2016	09
08/20/2016	10
08/20/2016	11
08/20/2016	12

Job No. 151060.10
 Date 17 MAY 2021
 Checked by .JY
 Scale 1" = 80'-0"

PLANTING LEGEND

TREE LIST					
REF.	SYM.	DESCRIPTION	SIZE/ SPACING	DETAIL/ SHEET	PLANT FACTOR
T1	⊙	LAGERSTROEMIA L. X FAURIEI 'NATCHEZ' STD NATCHEZ GRAPE MYRTLE	48" BOX/ PER PLAN	04,12/ L7.02	M
T2	●	TRISTANIA CONFERTA STD BRISBANE BOX	48" BOX/ PER PLAN	04,12/ L7.02	M
T3	■	QUERCUS AGRIFOLIA STD COAST LIVE OAK STD	48" BOX PER PLAN	04,12/ L7.02	L
E1	+	EXISTING TREE		PROTECT IN PLACE	

SHRUB

REF.	QTY.	SYM.	DESCRIPTION	SIZE/ SPACING	DETAIL/ SHEET	PLANT FACTOR
S1	AS REQ'D	⊖	AGAVE AMERICANA/ CENTURY PLANT	5 GAL/ PER PLAN	01,02/ L7.02	L
S2	AS REQ'D	⊖	AGAVE 'BLUE FLAME'/ BLUE FLAME AGAVE	5 GAL/ PER PLAN	01,02/ L7.02	L
S3	AS REQ'D	●	AGAVE ATTENUATA 'NOVA'/ BLUE FOX TAIL AGAVE	5 GAL/ PER PLAN	01,02/ L7.02	L
S4	AS REQ'D	⊖	BERBERIS THUNBERGII 'CRIMSON PYGMY'/ CRIMSON PYGMY JAPANESE BARBERRY	5 GAL/ 24" OC	01,02/ L7.02	L
S5	AS REQ'D	⊖	CAREX DIVULSA/ BERKLEY SEDGE	1 GAL/ 18" OC	01,02/ L7.02	L
S6	AS REQ'D	○	CHONDRPETALUM TECTORUM/ SMALL CAPE RUSH	5 GAL/ PER PLAN	01,02/ L7.02	M
S7	AS REQ'D	⊖	CISTUS X PURPUREUS/ PURPLE ROCK ROSE	15 GAL/ 48" OC	01,02/ L7.02	L
S8	AS REQ'D	⊖	FESTUCA MAIREI/ ATLAS FESCUE	1 GAL/ 36" OC	01,02/ L7.02	M
S9	AS REQ'D	⊖	GREVILLEA X 'NOELLII'/ NOELL GREVILLEA	5 GAL/ 36" OC	01,02/ L7.02	M
S10	AS REQ'D	⊖	MUHLENBERGIA RIGENS DEER GRASS	1 GAL/ 48" OC	01,02/ L7.02	L

SHRUBS CONT.

REF.	QTY.	SYM.	DESCRIPTION	SIZE/ SPACING	DETAIL/ SHEET	PLANT FACTOR
S11	AS REQ'D	⊖	SANSEVIERIA TRIFASCIATA SNAKE PLANT	5 GAL/ 18" OC	01,02/ L7.02	L
S12	AS REQ'D	⊖	SENECIO MANDRALISCAE BLUE CHALKSTICKS	1 GAL/ 18" OC	01,02/ L7.02	L
S13	AS REQ'D	⊖	SEDUM RUPESTRE 'ANGELINA' ANGELINA STONECROP	1 GAL/ 6" OC	01,02/ L7.02	L
S14	AS REQ'D	⊖	AGAVE 'BLUE CLOW' BLUE GLOW AGAVE	15 GAL/ PER PLAN	01,02/ L7.02	L
S15	AS REQ'D	⊖	YUCCA BRIGHT STAR 'WALBRISTAR' BRIGHT STAR YUCCA	5 GAL/ PER PLAN	01,02/ L7.02	L

VINES

REF.	QTY.	SYM.	DESCRIPTION	SIZE/ SPACING	DETAIL/ SHEET	PLANT FACTOR
V1	PER PLAN	▽	FIGUS PUMILA/ CREEPING FIG	15 GAL/ 15" OC	19/ L7.02	M

MISCELLANEOUS SYMBOLS

--- UNIVERSAL ROOT BARRIER AND BIOBARRIER 09/ L7.02



SITE PLAN 01

LPA
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Developed for
MOUNT SAINT MARY'S UNIVERSITY

Revision	Date

Submitted	Date
MASTER LAND USE APPLICATION SUBMITTAL	03/02/2016
MASTER LAND USE PROGRESS PRINTING	04/17/2016
MASTER LAND USE PROGRESS SET	04/27/2016
MASTER LAND USE APPLICATION	03/02/2017

Job. No. 151060.10
Date 17 MAY 2021
Checked by .JY
Scale 1" = 30'-0"

SITE
LANDSCAPE
PLAN

MLU 0.2

NOT FOR CONSTRUCTION FILE



GENERAL DEMOLITION NOTES:

1. CONTRACTOR TO CLEAR PROJECT SITE AREA WITHIN THE CONFINES OF THE DEMOLITION LIMIT LINE. THE CONTRACTOR SHALL DEMOLISH AND REMOVE FROM THE SITE ALL EXISTING UTILITIES, STRUCTURES, PAVEMENT, PLANTERS, TREES, AND ALL OTHER SITE FEATURES, UNLESS OTHERWISE NOTED ON THE PLAN TO BE PROTECTED, RELOCATED AND/OR SALVAGED.
2. REMOVAL OF LANDSCAPING SHALL INCLUDE ROOTS AND ORGANIC MATERIALS.
3. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ANY AND ALL PERMITS AND SHALL PAY ALL FEES NECESSARY FOR ENCROACHMENT, GRADING, DEMOLITION AND DISPOSAL OF SAID MATERIALS AS REQUIRED BY PRIVATE, LOCAL AND STATE JURISDICTIONS.
4. NOT ALL EXISTING SITE CONDITIONS AND IMPROVEMENTS MAY HAVE BEEN SHOWN ON DEMOLITION PLANS, THE CONTRACTOR SHALL BE RESPONSIBLE TO VISIT THE SITE TO FULLY ACKNOWLEDGE, UNDERSTAND AND INCLUDE THE EXTEND OF DEMOLITION WORK REQUIRED FOR THE IMPROVEMENTS SHOWN ON THE CONTRACT PLANS.
5. THE CONTRACTOR SHALL VERIFY AND LOCATE ALL EXISTING ABOVE AND UNDERGROUND UTILITIES. LOCATIONS SHOWN ON THE PLANS ARE APPROXIMATE AND ARE SHOWN FOR GENERAL INFORMATION ONLY.
6. DAMAGE TO ANY EXISTING UTILITIES AND SERVICES TO REMAIN SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR. CONTRACTOR SHALL REPAIR AND/OR REPLACE IN KIND.
7. EROSION CONTROL MEASURES SHALL BE IMPLEMENTED TO PREVENT DEBRIS AND UNSUITABLE MATERIALS FROM ENTERING STORM DRAINS, SANITARY SEWERS AND STREETS.
8. DUST CONTROL SHALL BE IMPLEMENTED DURING DEMOLITION.
9. DEMOLITION IS LIMITED TO WITHIN DEMOLITION LIMIT LINE UNLESS NOTED OTHERWISE.
10. CONTRACTOR SHALL INCLUDE IN THEIR SCOPE OF WORK DEMOLITION OF ALL EXISTING IMPROVEMENTS REQUIRED FOR THE CONSTRUCTION OF THE NEW IMPROVEMENTS SHOWN ON THE CONTRACT PLANS, REGARDLESS OF IF THE DEMOLITION AND REMOVAL OF THE EXISTING IMPROVEMENTS REQUIRED FOR NEW CONSTRUCTION IS EXPLICITLY SHOWN ON THESE PLANS TO BE DEMOLISHED AND REMOVED.
11. DEMOLITION CALLOUTS IN THIS SECTION ARE REPRESENTATIVE OF WHAT IS TO BE DONE, NOT AN ITEMIZED ACCOUNTING FOR EACH PIPE, CATCH BASIN, MANHOLE, VAULT, ETC, THAT IS TO BE DEMOLISHED, REMOVED AND DISPOSED OF.

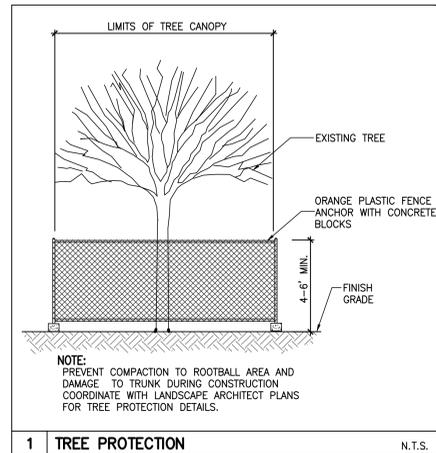
DEMOLITION NOTES:

- REMOVE & DEMOLISH/RELOCATE**
- 1 SEE GENERAL DEMOLITION NOTE #1 HEREON.
 - 2 FIRE HYDRANT TO BE RELOCATED PER UTILITY PLANS.
 - 3 CUT AND CAP UTILITY LINE.
 - 4 BUILDING.
 - 5 GRIND TO REMOVE EXISTING STRIPING.
 - 6 SWIMMING POOL.
 - 7 RETAINING WALL.
 - 8 TRASH COMPACTOR TO BE RELOCATED PER ARCHITECTURAL PLANS.
 - 9 SEWER CLEANOUT TO BE RELOCATED AND ADJUSTED TO NEW GRADE AS NEEDED.
 - 10 PULL BOX TO BE ADJUSTED TO NEW GRADE AS NEEDED.
 - 11 UTILITY VAULT COVER TO BE ADJUSTED TO NEW GRADE AS NEEDED.
 - 12 TOP OF GRATE TO BE ADJUSTED TO NEW GRADE AS NEEDED.
 - 13 GAS LINE SHOWN FOR REFERENCE ONLY. SEE PLUMBING PLANS FOR GAS LINE DEMOLITION.
 - 14 GAS VALVE TO BE ADJUSTED TO NEW GRADE AS NEEDED.
 - 15 WATER VALVE TO BE ADJUSTED TO NEW GRADE AS NEEDED.
 - 16 WATER LINE.
 - 17 ELECTRICAL LINE SHOWN FOR REFERENCE ONLY. SEE ELECTRICAL PLANS FOR ELECTRICAL LINE DEMOLITION.
 - 18 SEWER LINE.
 - 19 TRASH ENCLOSURE.
 - 20 LANDSCAPING INCLUDING TREES. CONTRACTOR TO CONFIRM WITH LANDSCAPE ARCHITECT PRIOR TO TREE REMOVAL.
 - 21 GUARD POST.

PROTECT-IN-PLACE

- 1 MANHOLE. ADJUST TO NEW GRADE AS NEEDED.
- 2 FIRE HYDRANT.
- 3 VAULT SHOWN FOR REFERENCE ONLY. SEE ELECTRICAL/LADWP PLANS FOR MORE INFORMATION.
- 4 GAS LINE SHOWN FOR REFERENCE ONLY. SEE PLUMBING PLANS FOR GAS LINE DEMOLITION.
- 5 GUARD POST
- 6 RETAINING WALL.
- 7 WATER LINE. CONTRACTOR TO REINSTALL EXISTING WATER LINE WITH 3" MINIMUM COVER FROM NEW GRADE AS NEEDED.
- 8 SEWER.
- 9 ELECTRICAL LINE SHOWN FOR REFERENCE ONLY. SEE ELECTRICAL PLANS FOR ELECTRICAL LINE DEMOLITION. CONTRACTOR TO REINSTALL EXISTING ELECTRICAL LINE WITH 3" MINIMUM COVER FROM NEW GRADE AS NEEDED.
- 10 CONCRETE WALK.
- 11 CONCRETE STAIRS.
- 12 CONCRETE MASONRY UNIT WALL.
- 13 ASPHALT PAVEMENT.
- 14 LANDSCAPE.
- 15 COMMUNICATION LINE SHOWN FOR REFERENCE ONLY. SEE ELECTRICAL PLANS FOR COMMUNICATION LINE DEMOLITION. CONTRACTOR TO REINSTALL EXISTING COMMUNICATION LINE WITH 3" MINIMUM COVER FROM NEW GRADE AS NEEDED.

- 16 PRESSURE REDUCING ASSEMBLY.
- 17 POWER POLE AND ELECTRICAL GUY WIRES SHOWN FOR REFERENCE ONLY, SEE ELECTRICAL PLANS FOR MORE INFORMATION.
- 18 BUILDING.
- 19 UTILITY LINE.
- 20 BACKFLOW PREVENTION DEVICE.
- 21 CONCRETE STAIR.
- 22 ELECTRICAL PANEL AND CONCRETE PAD.
- 23 PULL BOX.
- 24 MIDWEST GUARDRAIL.
- 25 ELECTRICAL UTILITY.
- 26 TREE. PROVIDE TREE PROTECTION PER DETAIL 1, HEREON.

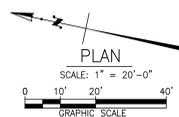


NOTE:
PREVENT COMPACTION TO ROOTBALL AREA AND DAMAGE TO TRUNK DURING CONSTRUCTION COORDINATE WITH LANDSCAPE ARCHITECT PLANS FOR TREE PROTECTION DETAILS.

DEMOLITION LEGEND:

- LIMIT LINE OF DEMOLITION
- DEMOLISH AND REMOVE UTILITY LINE
- ASPHALT PAVEMENT TO BE PROTECTED IN PLACE

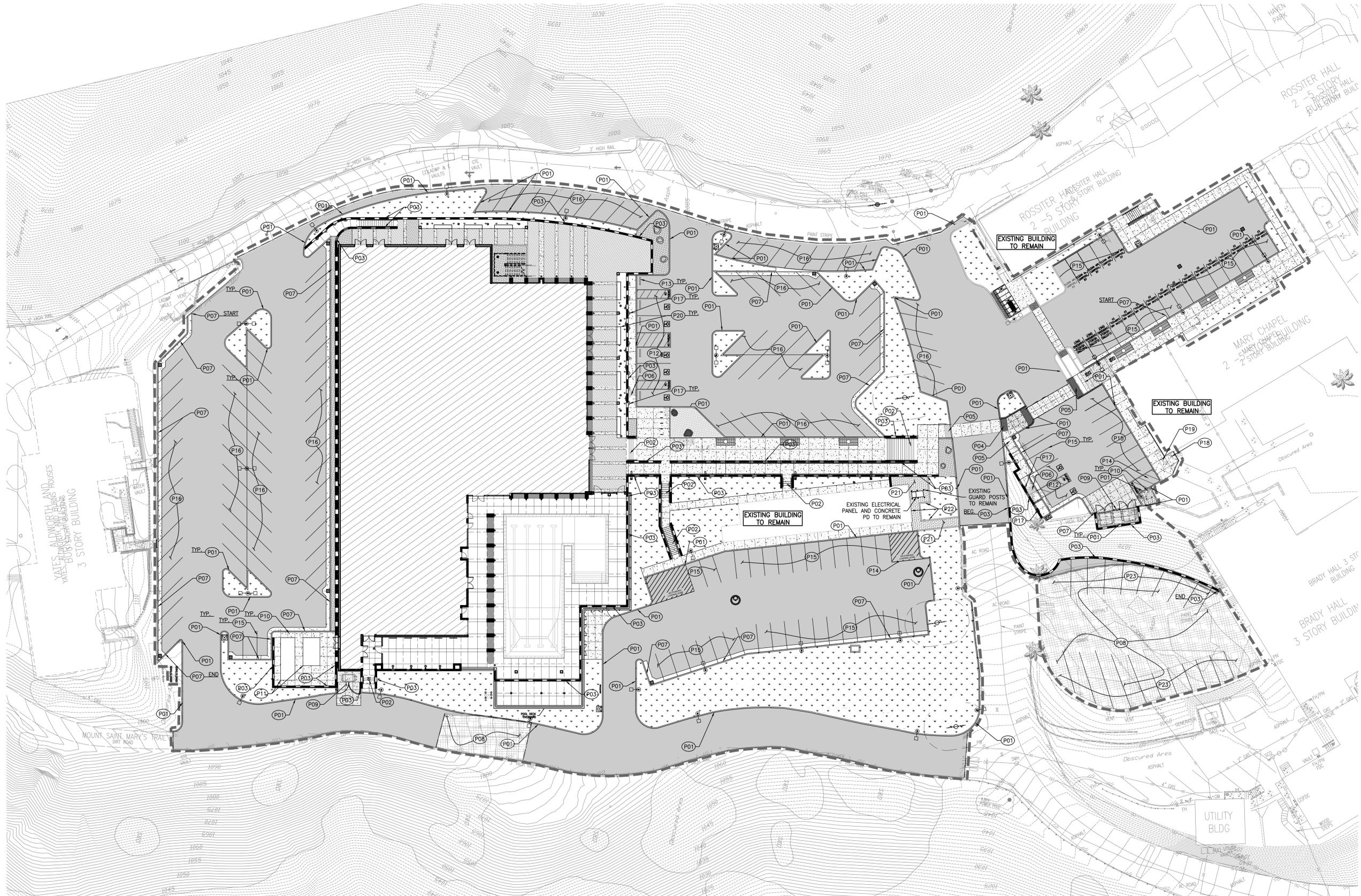
NOTE:
EXISTING UTILITIES ON THESE PLANS ARE BASED ON INFORMATION SHOWN ON UTILITY MAPPING BY PSOMAS (DATED: 07-17-02) AND C-BELOW SUBSURFACE IMAGING (DATED: 05-19-2016). INFORMATION HAS NOT BEEN FIELD VERIFIED BY KPFF. CONTRACTOR TO FOTHOLOG, FIELD VERIFY AND INFORM THE ENGINEER OF ANY DISCREPANCIES PRIOR TO THE START OF CONSTRUCTION.



Date	
Revision	
Date	03/30/2021
Author	MASTERLAND USE APPLICATION PROGRESS PRINTING
Job No.	15060.10
Date	03/30/2021
Checked by	Checker
Scale	

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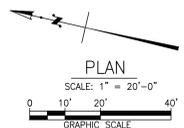


PAVING CONSTRUCTION NOTES:

- | | |
|---|--|
| (P01) CONCRETE CURB PER DETAIL 1/C5.00. | (P13) REINFORCED PRECAST WHEEL STOP PER DETAIL 3/C5.05. |
| (P02) STAIRS ON GRADE PER LANDSCAPING PLANS. | (P14) STRIPING PER DETAIL 4/C5.05. |
| (P03) RETAINING WALL PER STRUCTURAL PLANS. | (P15) STANDARD 90° PARKING STALL PER DETAIL 5/C5.05. |
| (P04) TRUNCATED DOMES PER DETAIL 8/C5.05. | (P16) ANGLED PARKING STALL (DOUBLE STRIPE) PER DETAIL 6/C5.05. |
| (P05) CURB RAMP PER DETAIL 1/C5.02. | (P17) ACCESSIBLE TOW AWAY SIGN PER DETAIL 7/C5.05. |
| (P06) CURB RAMP PER DETAIL 8/C5.01. | (P18) ADJUST EXISTING CLEANOUT TO NEW GRADE. |
| (P07) CONCRETE CURB AND GUTTER PER DETAIL 2/C5.00. | (P19) ADJUST EXISTING PULL BOX TO NEW GRADE. |
| (P08) SLURRY SEAL TO MATCH EXISTING. | (P20) CONCRETE SEATWALL PER LANDSCAPING PLANS. |
| (P09) TRASH ENCLOSURE PER LANDSCAPING PLANS. | (P21) DECOMPOSED GRANITE PAVING PER LANDSCAPING PLANS. |
| (P10) BOLLARDS PER LANDSCAPING PLANS. | (P22) CONCRETE HEADER PER LANDSCAPING PLANS. |
| (P11) GENERATOR OR TRANSFORMER CONCRETE PAD PER STRUCTURAL PLANS. | (P23) STRIPING TO MATCH EXISTING. |
| (P12) ACCESSIBLE 90° PARKING STALL PER DETAIL 1/C5.05. | |

LEGEND:

- | | |
|--|---|
| | ASPHALT CONCRETE PAVING PER DETAIL 3/C5.00. |
| | PLANTER AREA/LANDSCAPE (REFER TO LANDSCAPING PLANS FOR DETAILS) |
| | CONCRETE PAVING (REFER TO LANDSCAPING PLANS FOR DETAILS) |
| | DECOMPOSED GRANITE (REFER TO LANDSCAPING PLANS FOR DETAILS) |
| | PROPOSED BUILDING (REFER TO ARCHITECTURAL PLANS FOR DETAILS) |
| | GRAVEL (REFER TO LANDSCAPING PLANS FOR DETAILS) |
| | SLURRY SEAL |



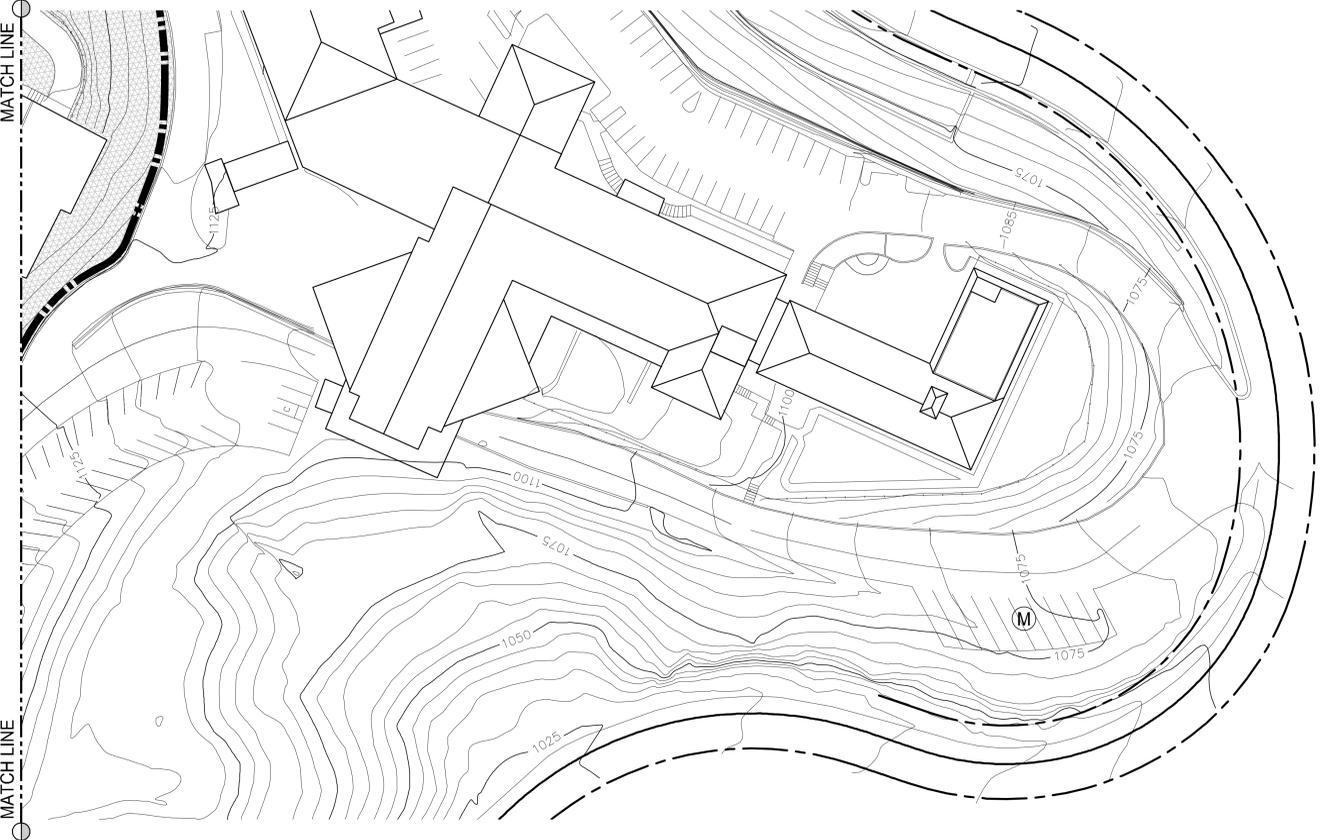
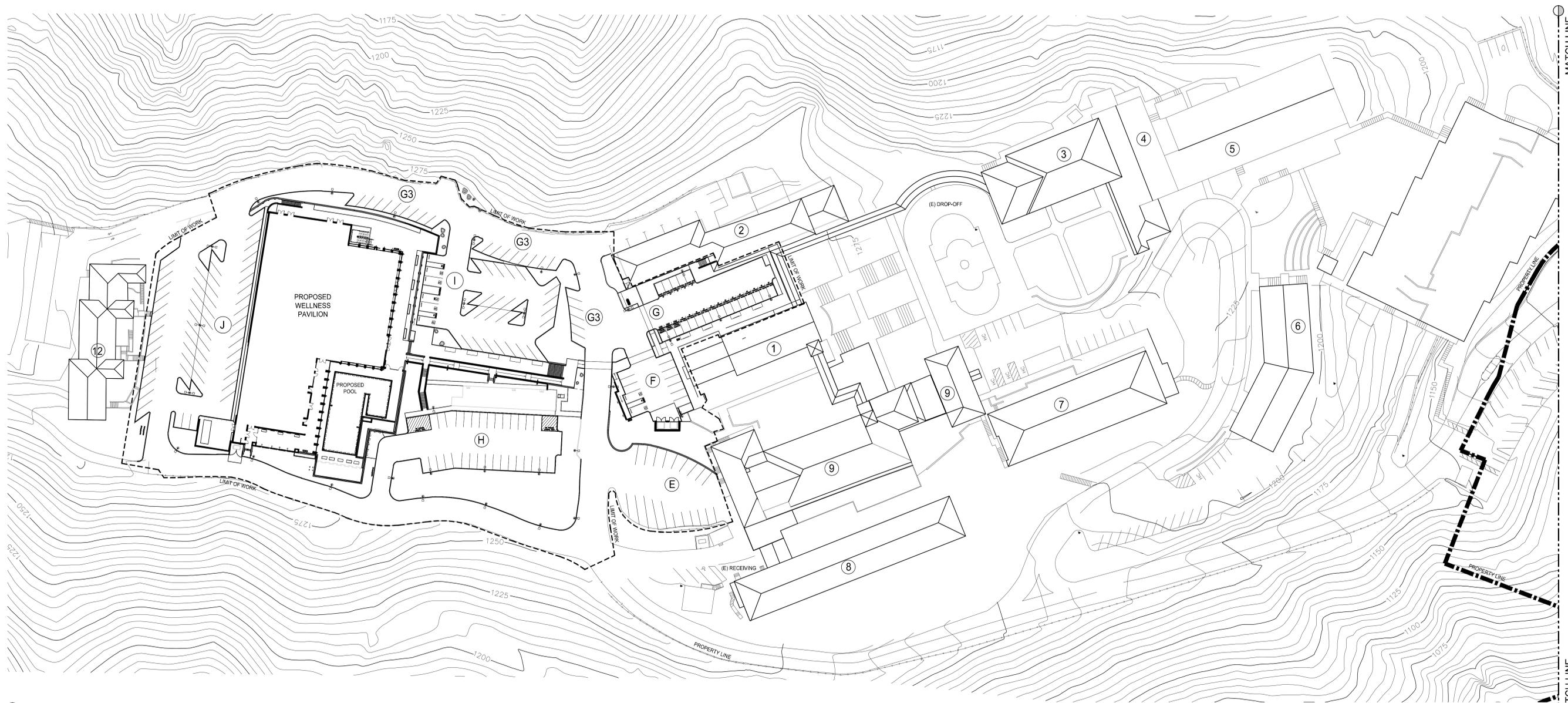
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 Last Saved: Friday, June 21, 2019 1:02:52 PM
 Last Plotted: Friday, June 21, 2019 4:17:18 PM
 By: Malory Noe

**MOUNT SAINT MARY'S UNIVERSITY,
 CHALON CAMPUS WELLNESS
 PAVILION**
 12001 Chalon Road
 Los Angeles, CA 90049
 APN: 4429-003-033
 Developed for
 Mount Saint Mary's University

Date:	
Revision:	

Date:	03/30/2021
Job No.:	15060.10
Date:	05/17/2021
Checked by:	Checker
Scale:	

GRADING PLAN

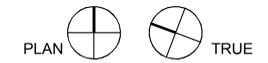
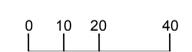


PARKING TABULATIONS

(E) PARKING	PROPOSED PARKING
Project Site Parking:	Project Site Parking:
Lot E - Brady 23	Lot E - Brady 19
Lot F - Chapel 15	Lot F - Chapel 12
Lot G - Reserved 19	Lot G - Reserved 21
Lot G3 - Fitness Center 13	Lot G3 - Fitness Center 19
Lot G3 - Tennis Courts 9	Lot G3 - Tennis Courts 6
Lot H - Facilities 42	Lot H - Facilities 32
Lot I - Lower 76	Lot I - Lower 32
Lot J - Upper 48	Lot J - Upper 58
Total Project Site 245	Total Project Site 199
Remainder of Campus 316	Remainder of Campus 316
Total: 561	Total: 515

LEGEND

- ① MARY CHAPEL - 1 Story
- ② ROSSITER HALL - Student Housing - 1 Story
- ③ ST JOSEPH ADMINISTRATION AND SEAVER SCIENCE CENTER - 3 Stories
- ④ WILLIAM H. HANNON THEATER - 1 Story
- ⑤ HUMANITIES BUILDING - 5 Stories
- ⑥ JOSE DRUDIS-BIADA ART GALLERY, FINE ARTS BUILDING - 3 Stories
- ⑦ CHARLES WILLARD COR MEMORIAL LIBRARY - 4 Stories
- ⑧ CARONDELET HALL - Student Housing - 1 Story
- ⑨ BRADY HALL - Student Housing - 4 Stories
- ⑩ YATES, ALDWORTH AND BURNS HOUSES CSJ Residences and Student Housing - 1 Story



LPA
 ARCHITECTURE ENGINEERING INTERIORS
 LANDSCAPE ARCHITECTURE PLANNING
 949-261-1001 Office
 949-260-1190 Fax
LPA Design Studios.com
 5161 California Avenue, Suite 100
 Irvine, California 92617

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**MOUNT SAINT MARY'S UNIVERSITY
 CHALLON CAMPUS WELLNESS PAVILION and
 PARKING STRUCTURE**
 12001 CHALON ROAD
 LOS ANGELES CA 90049
 Developed for
 MOUNT SAINT MARY'S UNIVERSITY

Revision	Date

Submitted	Date
MASTER LAND USE APPLICATION SUBMITTAL	03/02/2016
MASTER LAND USE PROGRESS PRINTING	04/17/2016
MASTER LAND USE PROGRESS SET	04/27/2016
MASTER LAND USE APPLICATION	03/02/2017

Job. No. 151066.10
 Date 17 MAY 2021
 Checked by .JY
 Scale 1" = 80'-0"

PARKING PLAN

MLU2.3

NOT FOR CONSTRUCTION FILE

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MOUNT SAINT MARY'S UNIVERSITY,
CHALON CAMPUS WELLNESS
PAVILION

12001 Chalon Road
Los Angeles, CA 90049
APN: 4429-003-033

Developed for
Mount Saint Mary's University

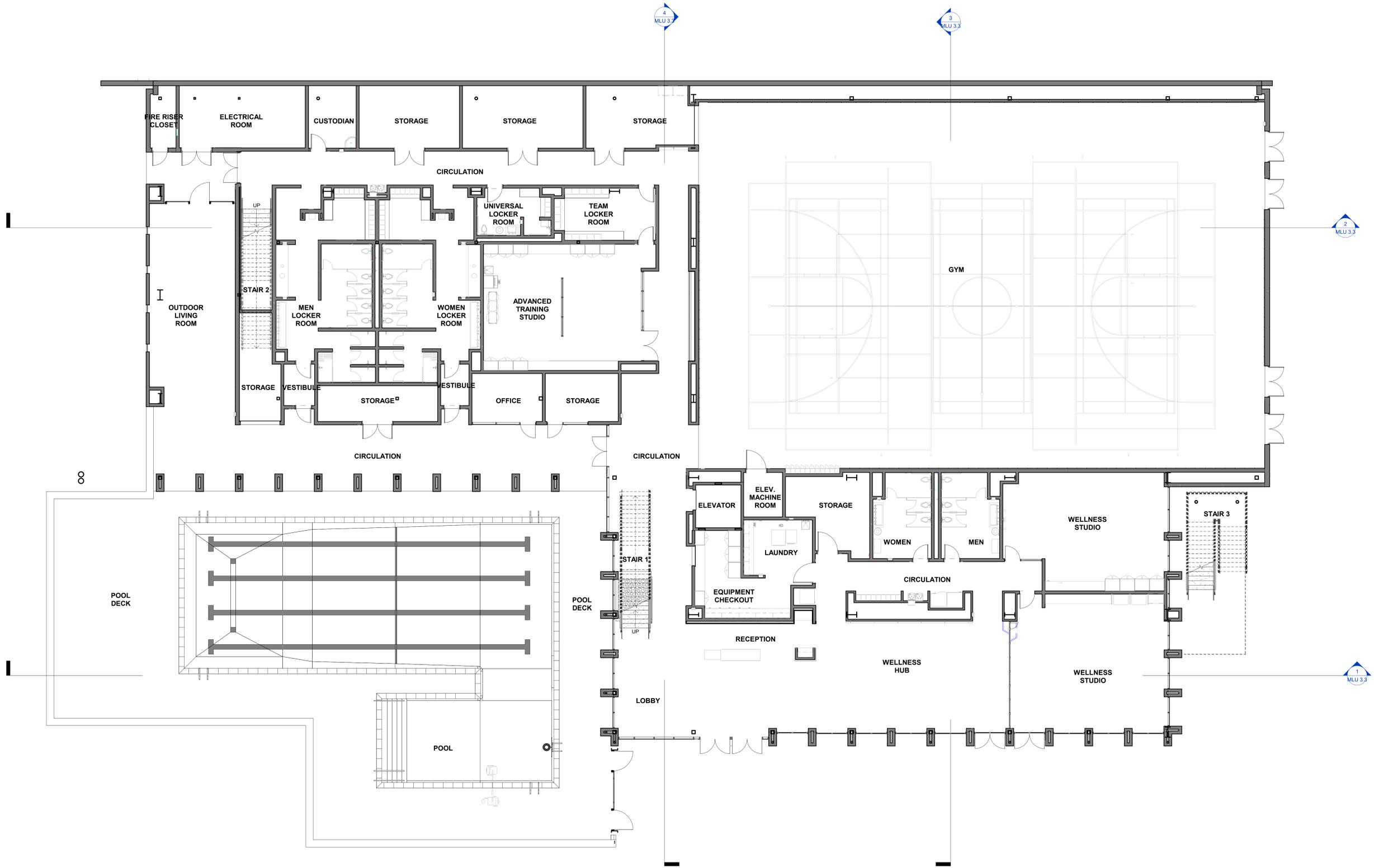
Date	Revision

Date	Revision
03/30/2021	

Job No.	15060.10
Date	03/30/2021
Checked by	ND
Scale	1/8" = 1'-0"

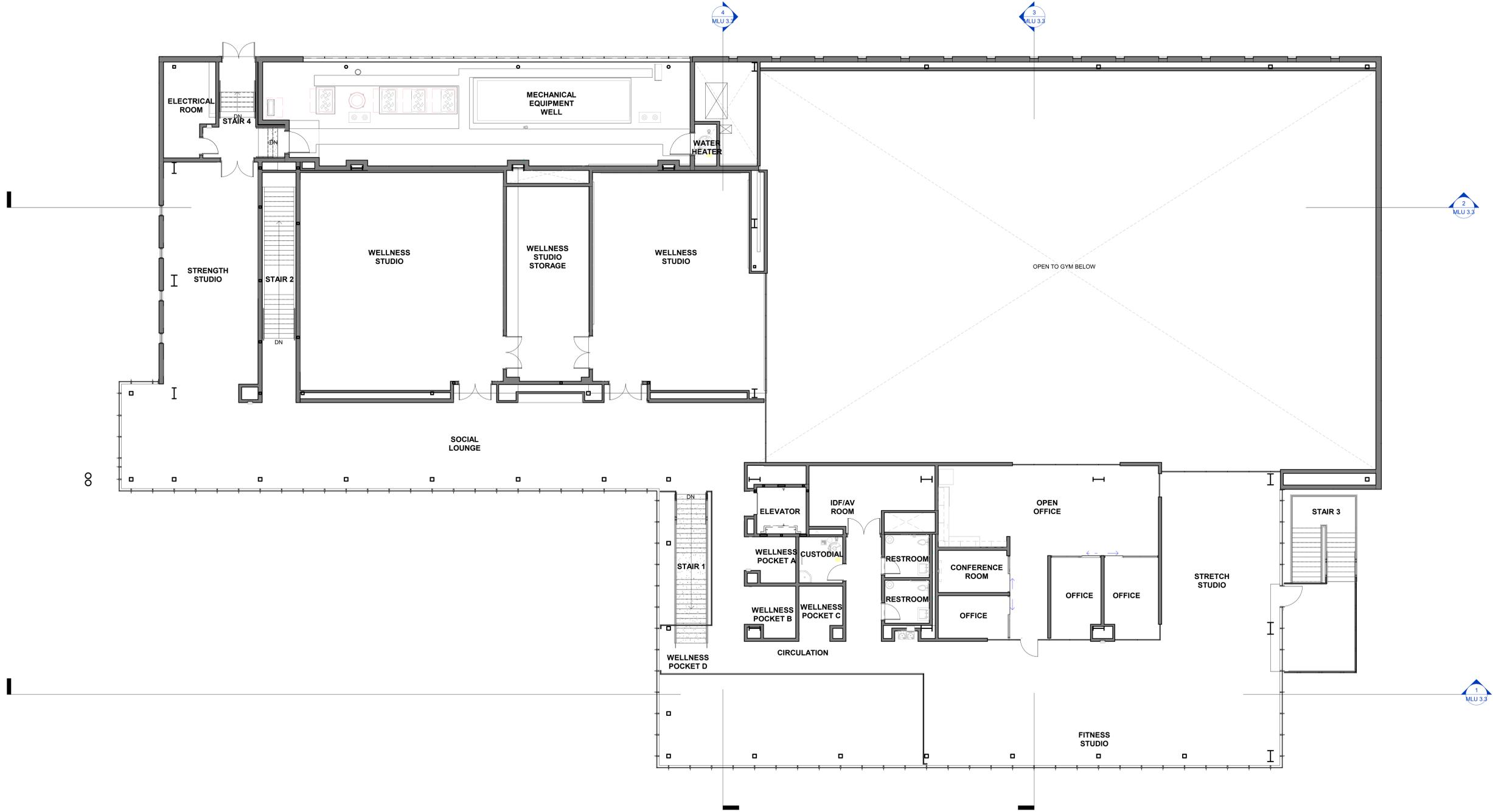
FIRST FLOOR PLAN

MLU 2.11



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SECOND FLOOR PLAN

1/8" = 1'-0"

1

**MOUNT SAINT MARY'S UNIVERSITY,
CHALON CAMPUS WELLNESS
PAVILION**
12001 Chalon Road
Los Angeles, CA 90049
APN: 4429-003-033
Developed for
Mount Saint Mary's University

Date	Revision

Date	Description
03/30/2021	MASTERLAND USE APPLICATION

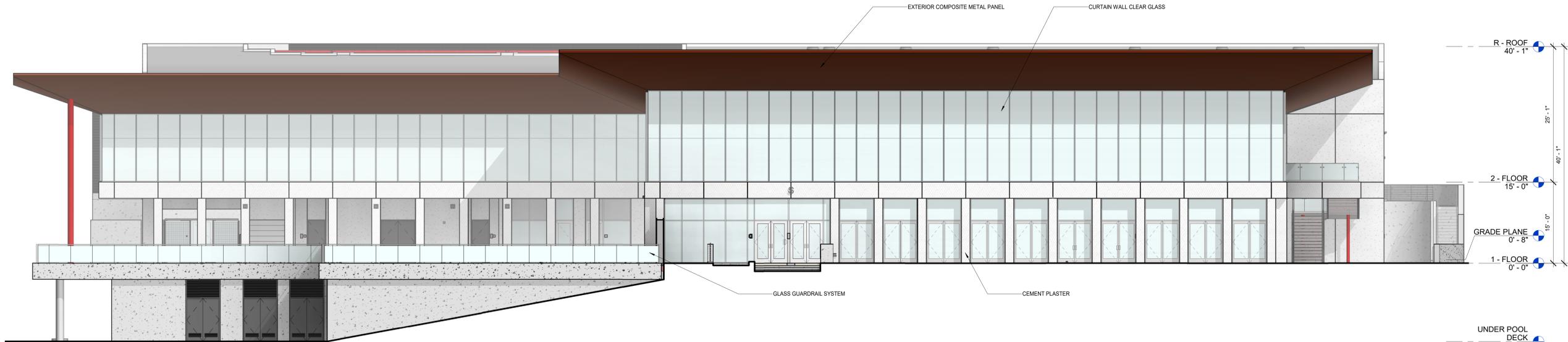
Job No.	15060.10
Date	03/30/2021
Checked by	ND
Scale	1/8" = 1'-0"

**SECOND FLOOR
PLAN**

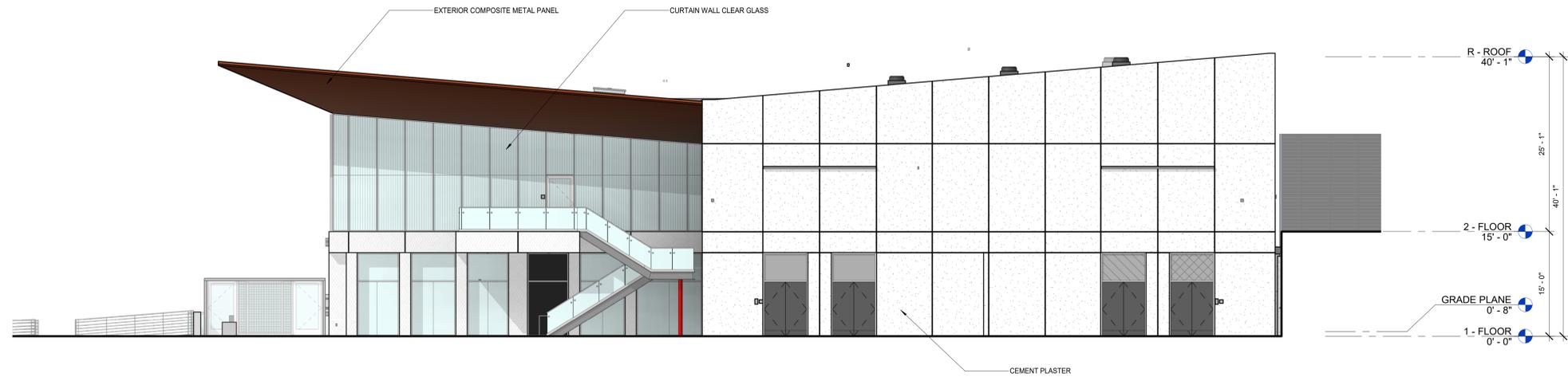
MLU 2.12

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OVERALL SOUTH ELEVATION 1/8" = 1'-0" 1



OVERALL EAST ELEVATION 1/8" = 1'-0" 2

MOUNT SAINT MARY'S UNIVERSITY,
CHALON CAMPUS WELLNESS
PAVILION

12001 Chalon Road
Los Angeles, CA 90049
APN: 4429-003-033

Developed for
Mount Saint Mary's University

Date	Revision

Date	Revision
03/30/2021	

Job No.	15060.10
Date	03/30/2021
Checked by	Checker
Scale	1/8" = 1'-0"

EXTERIOR
ELEVATIONS

MLU 3.1



EXHIBIT A2
CPC-1952-4072
AND ZA-2017-928
RENDERINGS



Mount 
Saint Mary's
University

WELLNESS PAVILION : CHALON CAMPUS



Mount Saint Mary's University

WELLNESS PAVILION : SOUTHWEST CORNER



Mount  Saint Mary's
University

RECEPTION + WELLNESS HUB





Mount  Saint Mary's
University

SOCIAL LOUNGE : LOBBY



LPA

Mount Saint Mary's
University

GYMNASIUM





Mount 
Saint Mary's
University

FITNESS STUDIO



Mount 
Saint Mary's
University



Mount 
Saint Mary's
University

STRENGTH STUDIO



Mount 
Saint Mary's
University

BUILDING ENTRY



Mount 
Saint Mary's
University

POOL + POOL DECK

**EXHIBIT B1
CPC-1952-4072 AND
ZA-2017-928
VICINITY MAP**



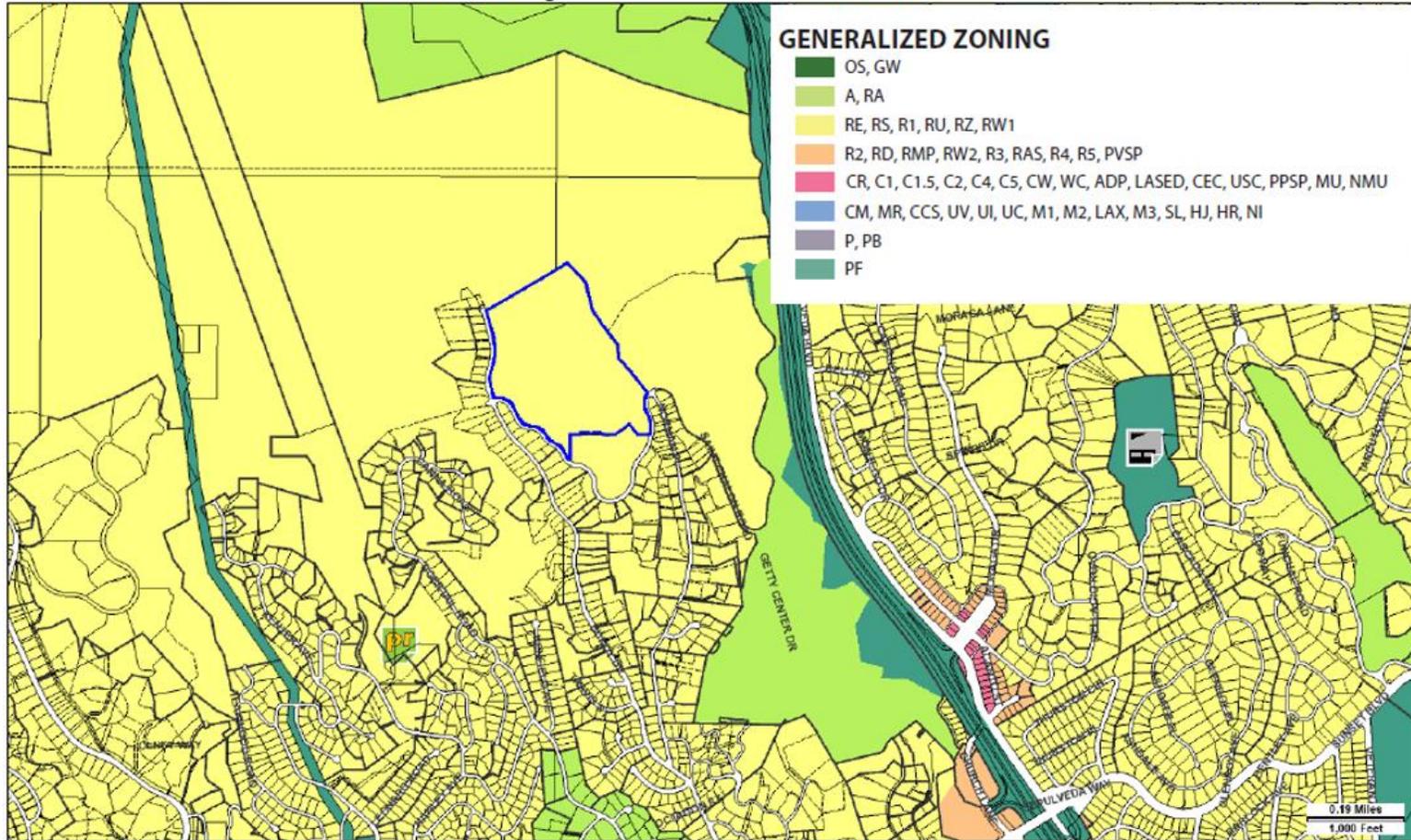
**EXHIBIT B2
CPC-1952-4072
AND ZA-2017-928
ZONING MAP**

ZIMAS PUBLIC

Generalized Zoning

09/20/2021

City of Los Angeles
Department of City Planning



GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

Address: 12001 W CHALON ROAD
APN: 4429003033
PIN #: 141B141 5

Tract: P M 4304
Block: None
Lot: A
Arb: None

Zoning: RE40-1-H
General Plan: Minimum Residential



**EXHIBIT B3
CPC-1952-4072 AND
ZA-2017-928
LAND USE MAP**

ZIMAS PUBLIC

General Plan Land Use

09/20/2021

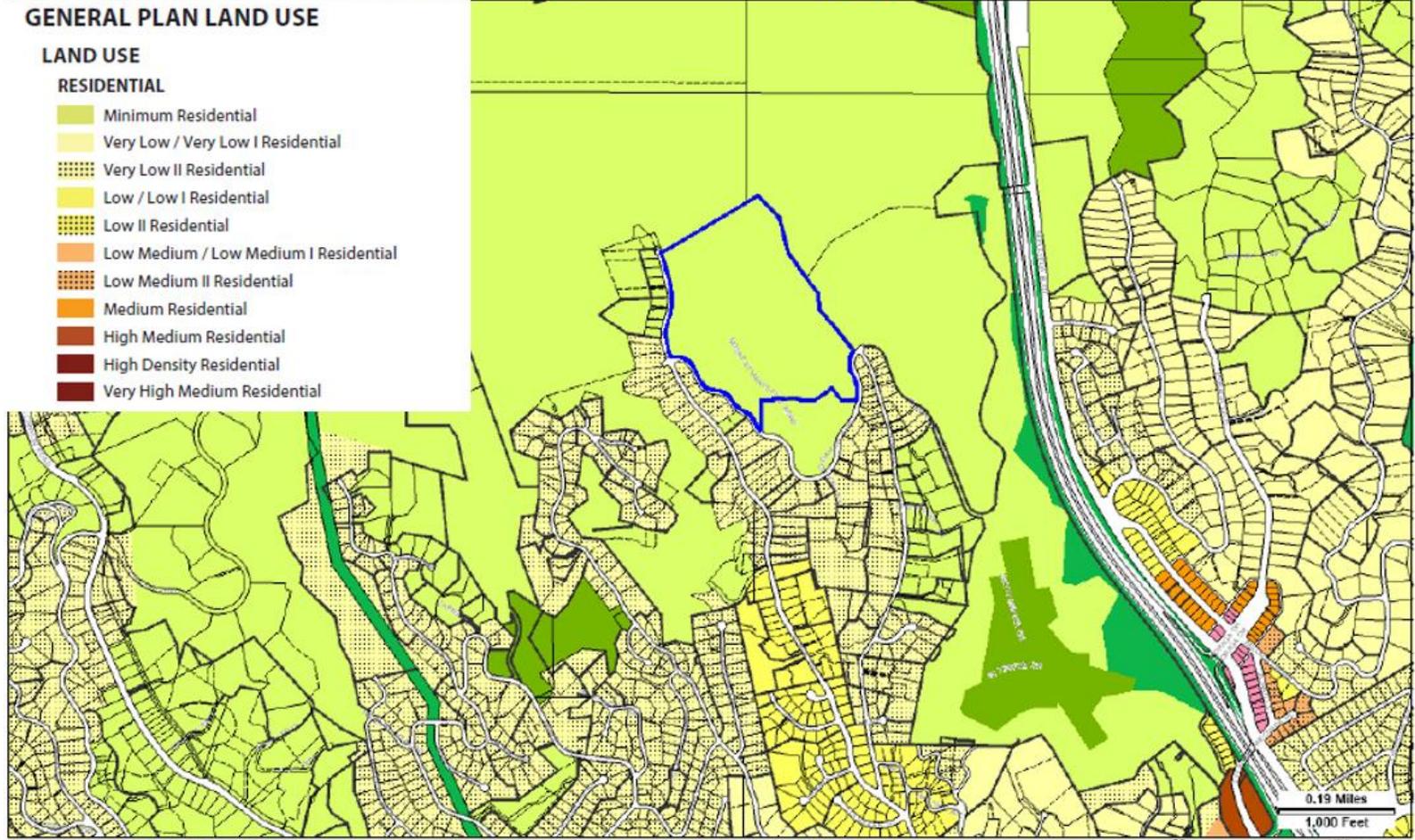
City of Los Angeles
Department of City Planning

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

-  Minimum Residential
-  Very Low / Very Low I Residential
-  Very Low II Residential
-  Low / Low I Residential
-  Low II Residential
-  Low Medium / Low Medium I Residential
-  Low Medium II Residential
-  Medium Residential
-  High Medium Residential
-  High Density Residential
-  Very High Medium Residential



Address: 12001 W CHALON ROAD
APN: 4429003033
PIN #: 141B141 5

Tract: P M 4304
Block: None
Lot: A
Arb: None

Zoning: RE40-1-H
General Plan: Minimum Residential



**EXHIBIT C1
CPC-1952-4072 AND
ZA-2017-928
ORDINANCE NO. 62,642**

ORDINANCE NO. 62642

An Ordinance making an exception to certain provisions of Ordinance No. 42,666 (New Series), approved October 19, 1921, pursuant to the provisions of Section 4 thereof.

The People of the City of Los Angeles do ordain as follows:

Section 1. Application No. 3066 signed by L.A. Mountain Park Company having heretofore been filed in the office of the City Planning Commission, pursuant to Section 4 of Ordinance No. 42,666 (New Series), entitled "An Ordinance providing for the creation in the City of Los Angeles of five (5) zones, consisting of various districts and prescribing the classes of buildings, structures and improvements in said several zones and the use thereof; defining the terms used herein, prescribing the penalty for the violation of the provisions hereof, and repealing certain ordinances," approved October 19, 1921, asking that exception be made from certain provisions of the above ordinance affecting the property described in said application, and setting forth the specific reasons therefor and the circumstances in connection therewith; and a recommendation having been made by the City Planning Commission to this Council; and a complete investigation having been made and full consideration given thereto by this Council of the facts bearing upon such application; this Council determines that the granting of the request made therein will not be materially detrimental to the public welfare or injurious to the property or improvements within the zone and district in which said property is located and will not be inconsistent with the general purposes of the said Ordinance No. 42,666 (New Series), and that unless such request is granted substantial property rights of the said applicant will be curtailed; and that this Council therefore excepts from the provisions of said ordinance, but only so far as such exception is necessary to establish a college on that certain property particularly described as follows, to-wit:

These portions of Blocks 32 and 33, Santa Monica Land & Water Co. Tract as per map recorded in Book 78, pages 44 to 49 both inclusive of Miscellaneous Records of Los Angeles County, described as follows, to wit: beginning at a point in the westerly line of Lot 37, Westgate Gardens, Sheet No. 2 as per map recorded in Book 16, page 37 of Maps, Records of said County, distant thereon three hundred seventeen and seventy hundredths (317.70) feet southerly from the northwesterly corner of said Lot 37, thence South $80^{\circ} 08' 45''$ West a distance of one hundred ninety-two and thirty-four hundredths (192.34) feet to a point, thence North $8^{\circ} 28' 55''$ West a distance of one hundred sixty-one and seventy-nine hundredths (161.79) feet to a point, thence northerly along a curve concave to the east, tangent at its point of beginning to said last mentioned line and having a radius of two hundred and ninety (290) feet, a distance of thirty-five and eighty-one hundredths (35.81) feet measured along the arc of said curve to a point, thence North $1^{\circ} 24' 25''$ West tangent to said last mentioned curve at its point of ending a distance of one hundred seventeen and twenty-one hundredths (117.21) feet to a point, thence North $64^{\circ} 11' 52''$ West a distance of one hundred forty-eight and fourteen hundredths (148.14) feet to a point, thence North $20^{\circ} 26' 27''$ West a distance of two hundred seventy-three and eighty-nine hundredths (273.89) feet to a point, said last mentioned point being the true point of beginning for this description, thence southwesterly along a curve concave to the northwest, tangent at

its point of beginning to a line bearing South $78^{\circ} 04' 04''$ West from the true point of beginning, and having a radius of two hundred and fifty (250) feet, a distance of thirty-seven and eighty-five hundredths (37.85) feet measured along the arc of said curve to a point, thence northwesterly along a curve concave to the northeast tangent at its point of beginning to said last mentioned curve at its point of ending and having a radius of one hundred and fifty (150) feet a distance of two hundred thirty-eight and forty-six hundredths (238.46) feet measured along the arc of said curve to a point, thence North $2^{\circ} 10' 30''$ West tangent to said last mentioned curve at its point of ending, a distance of thirty-two and sixteen hundredths (32.16) feet to a point, thence northwesterly along a curve concave to the southwest tangent at its point of beginning to said last mentioned line and having a radius of two hundred (200) feet a distance of two hundred ninety-two and ninety-five hundredths (292.95) feet measured along the arc of said curve to a point, thence northwesterly along a curve concave to the northeast tangent at its point of beginning to said last mentioned curve at its point of ending and having a radius of one hundred sixty-and seventy-one hundredths (160.71) feet a distance of one hundred seventy-one and eighty-eight hundredths (171.88) feet measured along the arc of said curve to a point, thence North $24^{\circ} 49' 15''$ West tangent to said last mentioned curve at its point of ending a distance of twenty-nix and thirty-nine hundredths (26.39) feet to a point, thence northwesterly along a curve concave to the southwest, tangent at its point of beginning to said last mentioned line and having a radius of one hundred and

seventy-five (175) feet a distance of one hundred six and three hundredths (106.03) feet measured along the arc of said curve to a point, thence North $59^{\circ} 32' 05''$ West tangent to said last mentioned curve at its point of ending a distance of fifty-nine and twenty hundredths (59.20) feet to a point, thence northwesterly along a curve concave to the northeast, tangent at its point of beginning to said last mentioned line and having a radius of two hundred (200) feet a distance of eighty-six and thirty-nine hundredths (86.39) feet measured along the arc of said curve to a point, thence North $34^{\circ} 47' 10''$ West tangent to said last mentioned curve at its point of ending a distance of thirty-seven and nineteen hundredths (37.19) feet to a point, thence northwesterly along a curve concave to the southwest, tangent at its point of beginning to said last mentioned line and having a radius of one hundred and fifty (150) feet a distance of one hundred forty-four and fifty-five hundredths (144.55) feet measured along the arc of said curve to a point, thence northwesterly along a curve concave to the northeast, tangent at its point of beginning to said last mentioned curve at its point of ending and having a radius of one hundred and fifty (150) feet a distance of one hundred sixty-three and forty-seven hundredths (163.47) feet measured along the arc of said curve to a point, thence North $27^{\circ} 33' 30''$ West tangent to said last mentioned curve at its point of ending a distance of one hundred forty-one and forty-four hundredths (141.44) feet to a point, thence northwesterly along a curve concave to the southwest, tangent at its point of beginning to said last mentioned line and having a radius of one hundred and fifty (150) feet a distance of two hundred twenty-one and forty-

seven hundredths (221.47) feet measured along the arc of said curve to a point, thence North $22^{\circ} 09' 18''$ West a distance of seventy-three and twenty-five hundredths (73.25) feet to a point, thence northwesterly along a curve concave to the northeast, tangent at its point of beginning to said last mentioned line and having a radius of one thousand (1000) feet a distance of one hundred thirty-one and sixty-four hundredths (131.64) feet measured along the arc of said curve to a point, thence North $65^{\circ} 41' 21''$ East a distance of eight hundred thirty-one and sixty-three hundredths (831.63) feet to a point, thence North $70^{\circ} 24' 45''$ East a distance of two hundred sixty-one and two hundredths (261.02) feet to a point, thence South $69^{\circ} 59' 34''$ East a distance of two hundred twenty-five and thirty-two hundredths (225.32) feet to a point, thence South $13^{\circ} 23' 33''$ East a distance of two hundred fifteen and eighty-seven hundredths (215.87) feet to a point, thence South $34^{\circ} 56' 00''$ East a distance of six hundred twelve and twelve hundredths (612.12) feet to a point, thence North $64^{\circ} 41' 45''$ East a distance of seventy and fourteen hundredths (70.14) feet to a point, thence southerly along a curve concave to the west, tangent at its point of beginning to a line bearing South $25^{\circ} 18' 15''$ East and having a radius of three hundred (300) feet a distance of two hundred fourteen and nine hundredths (214.09) feet measured along the arc of said curve to a point, thence South $15^{\circ} 35' 00''$ West tangent to said last mentioned curve at its point of ending a distance of eighty-four and seventy-five hundredths (84.75) feet to a point, thence southwesterly along a curve concave to the northwest, tangent at its point of beginning to said last mentioned line and having a radius of three hundred (300) feet a distance of one hundred twenty-six and

eleven hundredths (126.11) feet measured along the arc of said curve to a point, thence South $39^{\circ} 40' 05''$ West tangent to said last mentioned curve at its point of ending a distance of sixty-eight and seventy-five hundredths (68.75) feet to a point, thence southwesterly along a curve concave to the southeast, tangent at its point of beginning to said last mentioned line, and having a radius of two hundred and fifty (250) feet a distance of one hundred sixty and twenty-five hundredths (160.25) feet measured along the arc of said curve to a point, thence South $2^{\circ} 55' 30''$ West tangent to said last mentioned curve at its point of ending a distance of forty-seven and one hundredths (47.01) feet to a point, thence southwesterly along a curve concave to the northwest, tangent at its point of beginning to said last mentioned line and having a radius of two hundred and fifty (250) feet a distance of three hundred twenty-seven and eighty-hundredths (327.80) feet measured along the arc of said curve to the true point of beginning.

Provided:

That the plans for the buildings and the location of the same upon the land be approved by the Council of the City of Los Angeles prior to the issuance of a building permit.

Sec.....2.....The City Clerk shall certify to the passage of this ordinance by a unanimous vote and cause the same to be published once in.....

THE LOS ANGELES DAILY JOURNAL

I hereby certify that the foregoing ordinance was passed by the Council of the City of Los Angeles by the unanimous vote of all the members of said Council present, there being not less than twelve members present, at its meeting of.....

JANUARY 3 1929

Approved this.....*14th*.....day of.....*January*....., 19.....

Robt Dominguez City Clerk

1/12/29

George E. Conroy Mayor

Ordinance No. 62,642
 An Ordinance making an addition to certain provisions of Ordinance No. 42,666 (New Series) approved October 19, 1929, pursuant to the provisions of Section 2 of Article IV of the Constitution of the State of California, and the provisions of Section 2 of Article IV of the Constitution of the City of Los Angeles, to read as follows: Sec. 1. The City Planning Commission, pursuant to Section 4 of Ordinance No. 42,666 (New Series) entitled "An Ordinance providing for the creation of the City of Los Angeles Districts and zones, consisting of various districts and zones, prescribing the classes of buildings, streets, and improvements in said several zones and the use thereof, defining the terms used herein, prescribing the penalty for the violation of the ordinances, and repealing Ordinance No. 19,121, as amended, approved October 19, 1921, asking that certain provisions of Ordinance No. 42,666 (New Series) be amended to read as follows: Sec. 2. The City Clerk shall certify to the passage of this ordinance by a unanimous vote and cause the same to be published once in the Los Angeles Daily Journal. Sec. 3. I hereby certify that the foregoing ordinance was passed by the Council of the City of Los Angeles by the unanimous vote of all the members of said Council present at its meeting on January 14, 1929.
 ROBERT DOMINGUEZ
 City Clerk
 Approved this 4th day of January, 1929.
 GEORGE E. CRYSTAL

Affidavit of Publication

State of California,
 County of Los Angeles, } ss.
 City of Los Angeles

CHAS. D. ROE

being duly sworn, deposes and says: that he is a resident of the City of Los Angeles, said County and State, and a citizen of the United States, over twenty-one years of age; that he is and was at all the times herein mentioned the Principal Clerk of the Daily Journal Company, the printer and publisher of The Los Angeles Daily Journal, a daily newspaper printed, published, and having a general circulation in said City of Los Angeles, that as such Principal Clerk he has and had charge, during all the times herein mentioned, of all the advertisements in said newspaper, and that the annexed printed copy has been published once in the above named newspaper, to-wit: on

JAN 12 1929

and in the regular and entire issue of said newspaper proper, and not in a supplement.

Chas D Roe

Subscribed and sworn to before me

JAN 14 1929

Robert Dominguez
 City Clerk of the City of Los Angeles.

By *Geo. F. Keller*, Deputy.

ZONING ORDINANCE No. 90,500

Sec. 12.24—Conditional Uses Permitted by Commission

A. LOCATION OF PERMITTED USES—Wherever it is stated in this Article that the following uses may be permitted in a zone if their location is first approved by the Commission, said uses are deemed to be a part of the development of the Master Plan or its objectives and shall conform thereto. Before the Commission makes its final determination a public hearing by the Commission shall be mandatory for certain uses and optional for others:

1. Uses for which at least one public hearing shall be held include: airports or aircraft landing fields; cemeteries; educational institutions; and golf courses (except driving tees or ranges, miniature courses and similar uses operated for commercial purposes).

2. Uses for which a public hearing is optional include: churches (except rescue mission or temporary revival); schools, elementary and high; and public utilities and public service uses or structures.

B. ADDITIONAL USES PERMITTED—The Commission, after public hearing, may permit the following uses in zones from which they are prohibited by this Article where such uses are deemed essential or desirable to the public convenience or welfare, and are in harmony with the various elements or objectives of the Master Plan:

1. Airports or aircraft landing fields.

2. Cemeteries.

3. Development of natural resources (excluding the drilling for or producing of oil, gas or other hydrocarbon substances) together with the necessary buildings, apparatus or appurtenances incident thereto.

4. Educational institutions.

5. Governmental enterprises (federal, state and local)

Sec. 45. Subsection B of Sec. 12.24 of the Los Angeles Municipal Code is hereby amended by adding thereto a new paragraph 5.1 to read as follows:

5.1. Hospitals or sanitariums (one hundred (100) beds or more).

8. Large scale neighborhood housing projects, provided they comply with all the requirements of the boundary of the property of not less than five (5) acres, provided they comply with all the yard requirements on the boundary of the property and with the height and lot area regulations of the zone in which they are located and in no case cover more than forty (40) per cent of the buildable area of the site (excluding accessory buildings).

Sec. 45. Paragraph 8 of Subsection B of Sec. 12.24 of the Los Angeles Municipal Code is hereby amended to read as follows:

8. Large scale neighborhood housing projects having a gross area of not less than five (5) acres, provided they comply with all the yard requirements on the boundary of the property and with the height and lot area regulations of the zone in which they are located and in no case cover more than forty (40) per cent of the buildable area of the site (excluding accessory buildings).

communities with town lot subdivision, provided adequate open spaces and municipal facilities, utilities and services are made available in a manner satisfactory to the Commission. Upon the approval of the location and design of any such self-contained community, the Commission shall initiate any rezoning of the affected area which, in its judgment, is necessary or desirable.

Sec. 19. The last paragraph following Paragraph 9 of Subsection B of Sec. 12.24 of the Los Angeles Municipal Code is hereby amended to read as follows:

Any of the above enumerated uses legally existing at the time this Ordinance becomes effective, shall be deemed to have been approved by the Commission and nothing in this Section shall be construed to prevent the enlargement of existing buildings for such use if all other regulations of this Article are complied with, including the conditions of any special district ordinance, exception or variance heretofore granted authorizing such use. Provided, however, that in the case of educational institutions and elementary or high schools, the erection and maintenance of additional buildings or structures for school purposes shall be permitted on existing sites owned or controlled by the Los Angeles City Board of Education at the time this Article becomes effective or on land subsequently purchased for expansion purposes adjoining such sites, if all other regulations of this Article are complied with.

Sec. 47. The last paragraph following Paragraph 9 of Subsection B of Sec. 12.24 of the Los Angeles Municipal Code is hereby amended to read as follows:

Any of the uses enumerated in this Section which are legally existing at the time it became effective, shall be deemed to have been approved by the Commission and nothing in this Section shall be construed to prevent the enlargement of existing buildings for such use if all other regulations of this Article are complied with, including the conditions of any special district ordinance, exception or variance heretofore granted authorizing such use. Provided, however, that in the case of educational institutions and elementary or high schools, the erection and maintenance of additional buildings or structures for school purposes shall be permitted on existing sites owned or controlled by the Los Angeles City Board of Education at the time this Article becomes effective or on land subsequently purchased for expansion purposes adjoining such sites, if all other regulations of this Article are complied with.

arrangement of inform in all re- in which the on, shall have n the site, if it onformance with s located. Upon ntained on the h such plan. onal in connec- herein provided.

...tive date of this Article, may also be building or structure was de- within a period of one (1) year after

...nonconforming use of a building or dilations, shall not be expanded or of such conforming building or conforming use. If such a non- is discontinued or changed to a uch building, structure or portion i the regulations of the zone in located. Provided, however, that or structures conforming to the ed not later than five (5) years le.

OF LAND

...nonconforming use of land (where at the time this Article became es Municipal Code more than five (5)

...use of land (w e this Article bea shall in any way more than five oining property. subject to the follo

...be expanded or ex or any portion ing property; of such land r any portion thereo ticle. uch land shall be in

...Space — Where the rtising struc- ed on a lot in con- tained at the although such ded, however, provided, fur- mmercial ad- ng members, ater than (5)

...r the produc- hich is a non- l or deepened.

...sign, billboard, com- lawfully existed and effective, may be con- to all the provisions are made thereto and mmercial advertising embers shall be com- n five (5) years from

IFICATION

...well for the produc- which is a noncon- shall be redrilled or which hereafter become noncon- of zones under this Article or any ons of this Article; provided, how- s is specified in this Section for the ngs, structures or uses, said period of such reclassification or change.

500 R+G Ord.

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2-7-46
90.

92,066

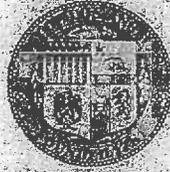
92,066

ORD 11

92,066

CITY OF LOS ANGELES

CALIFORNIA



FLETCHER BOWRON
MAYOR

DEPARTMENT OF
CITY PLANNING
351 CITY HALL
LOS ANGELES 12
MICHIGAN 5211

CHARLES B. BENNETT
DIRECTOR

COMMISSIONERS
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VICE-PRESIDENT
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KERSEY KINSEY
EDMUND P. MCKANNA

EDITH S. JAMESON
SECRETARY

**EXHIBIT C3
CPC-1952-4072 AND
ZA-2017-928
MAY 23, 1952 LETTER OF
DETERMINATION**

*MSMC property
grant for widening &
extending Bundy Rd.*

CHALON CAMPUS

May 23, 1952

City Plan Case 4072

Sister Agnes Marie, President
Mount St. Mary's College
12001 Chalon Road
Los Angeles 49, California

Department of Building and Safety
Room 200, City Hall

Board of Public Works
Room 173, City Hall

Greetings:

As required by Section 12.24 of the Municipal Code, and without a public hearing, the City Planning Commission, on Thursday, May 22, 1952, considered a conditional use application to add to the existing college site at 12001 Chalon Road. This property is described as being Blocks 32 and 33, portion of Lot 12, Division 1 of Region 36, Tract 9479, more particularly noted in the application. Since it will be in harmony with the objectives of the Master Plan, the addition was approved, subject to the following conditions:

1. Inasmuch as it appears that in the future development of the applicant's property and of other property contiguous thereto, it will become necessary to extend Bundy Drive along the westerly line of applicant's property and that one-half of the width of said street should be dedicated from applicant's property and since the applicant is not prepared to record a subdivision tract map at this time which would otherwise be a condition upon which this Conditional Use would be granted, the applicant shall forthwith record an agreement in the office of the County Recorder that in consideration of being permitted to extend its school

Zoning

*139 1/2 Bundy
2nd floor*

Community

City Planning 705 State of Record

May 23, 1952

facilities onto the subject property without filing and recording a subdivision tract map at this time, applicant will dedicate the one-half width of Bundy Drive along the westerly line of the subject property by joining with the owners of contiguous property on a subdivision map at such time as such owners desire to subdivide, or applicant will make such dedication whenever the City Planning Commission deems it necessary for the development of contiguous property and that said dedication will be improved in accordance with specifications of the City Engineer without expense to the City

2. That all the requirements of the Comprehensive Zoning Ordinance be complied with in the development of this site, unless otherwise modified by the City Planning Commission.
3. That this grant shall only apply to a school use involving educational subjects which are in conformance with the State Educational Code, religious services, or religious educational activities. This grant does not apply to any such activities conducted in tents or temporary structures.
4. That a precise plot plan showing the location of all buildings on the property involved, parking areas, walls, fences, hedges, driveways, and paved parking areas, be submitted to the City Planning Department for approval prior to the issuance of any and all subsequent building permits or certificates of occupancy.
5. That the applicant shall comply with all the regulations of the Department of Building and Safety, regarding the use of existing buildings, and proposed buildings, before any of these buildings are used for the parochial school purposes herein requested.

Enclosed please find an agreement form which should be filled out and recorded in order to comply with the requirements of Condition No. 1 of this grant. After this agreement has been recorded, will you please send us a copy for our files.

Your attention is called to the provisions of Section 12.24-E that this approval is conditional upon the privileges being utilized within one hundred and eighty days (180 days) after the effective date of the approval, and if such privileges are not utilized, or construction work is not begun within said time and carried on diligently to completion of at least one usable unit, the authorization to establish the use shall become void.

May 23, 1952

This conditional use grant does not waive the necessity of securing any other required permits or licenses. If any condition of this grant is violated, or if the same is not complied with in every respect, then this conditional use shall be subject to revocation, as provided for in Section 22.02 of the Municipal Code. In the event the property is sold, leased, rented or occupied by any person or corporation other than the applicant, it is incumbent that they be advised of the conditions of this grant. Unless an appeal is filed with the City Clerk, the Commission's determination in this matter shall become effective ten days from the date of this communication.

Very truly yours,

Edith S. Jameson
Edith S. Jameson
Secretary

ESJ/mms
Encl.



CITY PLAN CASE NO. 4072

BRENTWOOD-PACIFIC PALISADES
DISTRICT
COUNCIL DISTRICT NO. 11
Bk. 2, Page 490
Grid AZ/37

DECISION DATE: January 26, 1984
TIME: After 9:30 A.M.
LOCATION: Van Nuys Woman's Club
14836 Sylvan Street
Van Nuys, CA

To: City Planning Commission

From: Zoning Plans Section

Requested by: Mt. St. Mary's College, Chalon Campus

Subject: APPROVAL OF PLANS - FACULTY RESIDENCE BUILDING

Property

Involved: Located at 12001 Chalon Road, east of Bundy Drive.

TABLE OF CONTENTS

RECOMMENDATION	P.	1
STAFF REPORT		
Request	P.	2
Comments	P.	2-3
Conclusion	P.	3
EXHIBITS:		
ZP-1 (Radius Map)		Attached
ZP-2 (set of site plans, floor plans and elevations)		Attached

EXHIBITS: COPIES FOR COMMISSIONERS ONLY

RECOMMENDATION

ACTION RECOMMENDED BY THE STAFF: That the Commission

Consider the Staff Report.

Approve the construction of a faculty residence hall, a one-story parking garage and a relocation of 39 parking spaces, subject to the following conditions:

- ✓ 1. There shall be no increase in student enrollment beyond 750 students, until a parking structure is constructed at the southern end of the campus. In lieu of this, when an increase in enrollment beyond 750 students is contemplated, the college may apply to the City Planning Commission for a review of the adequacy of existing and any proposed on-campus surface parking.
- ASL 2. The faculty residence/hall shall contain not more than three dwelling units nor ~~32~~ bedrooms, including three bedrooms to be used as guest rooms.
- AS 2 3. The faculty residence hall shall not exceed three stories in height, and the garage building shall not exceed one story in height.
- AS 5/6 4. The faculty residence hall shall not exceed three stories in height, and the garage building shall not exceed one story in height.
- ✓ 4. The subject property shall be developed substantially in accordance with the plans, Exhibit ZP-2, attached to City Plan Case No. 4072, on file in the Los Angeles City Planning Department, except as the subject property may be required to meet the provisions set down by the Municipal Code and the conditions herein.
- 5. Prior to the issuance of building permits, detailed development plans, including a complete landscape plan, shall be submitted to the Department of City Planning for approval.
- 6. Eleven parking spaces shall be provided adjacent to the faculty residence hall.
- 7. This approval shall be utilized within two years after the effective date of approval. If at least one usable dwelling is not completed by that date, this approval shall become void.

33 AVH per CPC correction

FEE PAID

Receipt No. 129041 Date

APPROVED PLAN NO. CPC 4072
 CITY PLANNING COMMISSION
 DATE 5-17-84
 BY [Signature]

Recommended by:

BY [Signature]

Approved by:

paid prior AVH
 refund given to applicant rep. Jim Broeske

[Signature]
 John J. Parker, Jr.
 City Planner

[Signature]
 William E. Lillenberg
 Senior City Planner

STAFF REPORTRequest:

The Commission has received a request from Mt. St. Mary's College (Chalon Campus) for approval for a three-dwelling unit apartment building, containing 32 bedrooms, including several guest rooms, to be used for housing faculty and staff presently located elsewhere on the campus. The housing used elsewhere will be made available for students living on-campus.

Comments:

The proposed structure would be three stories in height. To the north would be a one-story garage structure, let into the earth bank on the north side. The requested faculty residence hall would also entail a minor reconfiguration of campus parking, as explained below.

The college, for the past five years, has maintained a constant enrollment of between 700 and 750 students. The college is planning to keep enrollment steady at its current level in the foreseeable future. The new residence hall is therefore being built to increase the number of students living on-campus, not to increase enrollment. The construction of the new faculty residence hall will open up rooms in Rossiter Hall, located approximately at the center of the campus, which can then be occupied by students.

By Code. the proposed residence hall will require seven additional parking spaces. This includes two parking spaces for each of the three dwelling units, and one additional space for three guest bedrooms (the latter requirement is so low because more than 60 guest rooms are located elsewhere within the campus). The proposed new residence hall is being built on the northern-most parking lot within the campus which currently contains 39 spaces. Eleven new spaces would be contained within the proposed garage building, for a net loss of 28 spaces on the site. The lost spaces would be replaced on a lower lot (see Drawing AS-5 in the exhibits) through the removal of several temporary trailers and a portion of a dilapidated building. This will create 38 new parking spaces at that location resulting in an overall campus gain of 10 parking spaces (or three more than the seven required for the new residence hall).

In addition to increasing the net existing number of parking spaces on the campus by 10, the relocation of parking from the northern-most lot where the residence hall will be constructed to the more southerly location will place that parking in a more convenient location and it should be more fully utilized. It should also be noted that, at the southern end of the campus, there is a proposed future parking structure. While no new parking is needed at the present time, future changes in enrollment could create a demand for more parking. The future parking

structure will be constructed if and when the need for it becomes apparent.

The requested faculty residence hall will have no discernible impact on any surrounding development. The Mt. St. Mary's campus is located atop a leveled ridge. The campus is straddled on both sides by precipitous canyons which are uninhabited. The nearest development is to the west of Chalon Road and Bundy Drive.

At the specific location of the proposed residence hall at the northern end of the campus, the view to both the east and west is composed of plunging canyons which then rise precipitously to ridge lines along which no development is visible. To the north, the topography rises steeply, again with no visible development (the garage building would be let in to this north rising slope). The sole direction in which development is visible is to the south, the campus itself.

Conclusion:

It is the staff recommendation that, with the recommended conditions, the requested addition of a faculty residence hall and reconfiguration of parking be approved. In consideration of the severe topography on three sides of the subject site, in combination with the total lack of any visible development to and beyond the ridge lines in these three directions, the proposed development will have no impact of any type on surrounding off-campus developments. The relocation of the existing parking lot from its present position to a more centralized location, will be beneficial since it will promote a greater utilization of the parking spaces.

The staff has recommended that any future expansions of enrollment be predicated upon the construction of the future parking structure at the southern end of the campus. While it is true, as the applicant has noted, that the proposed faculty residence hall contemplates a net addition of 10 parking spaces on-campus with no increase in student enrollment, there would be no inherent control in this approval to insure that enrollment would not grow in an ad hoc fashion, apart from the condition relating future increases to the proposed parking structure.

CITY OF LOS ANGELES
CALIFORNIA



CITY PLANNING
COMMISSION
—
DANIEL P. GARCIA
PRESIDENT
J. S. KRUEGER
VICE-PRESIDENT
STEVE HARRINGTON
CARL MASTON
SUZETTE NEIMAN
—
RAYMOND I. NORMAN
SECRETARY

DEPARTMENT OF
CITY PLANNING
361 CITY HALL
LOS ANGELES, CA 90012
—
CALVIN S. HAMILTON
DIRECTOR

TOM BRADLEY
MAYOR
January 31, 1984

Mount St. Mary's College
12001 Chalon Road
Los Angeles, CA 90049

CITY PLAN CASE NO. 4072
COUNCIL DISTRICT NO. 11

Department of Building & Safety
Room 423, City Hall

Please be advised that the City Planning Commission on January 26, 1984 conditionally approved the plans (Exhibit ZP-2 attached to the file) for the construction of a faculty residence hall, a one-story parking garage and relocation of 39 parking spaces on the Mount St. Mary's Chalon Campus site located at 12001 Chalon Road, east of Bundy Drive.

Vote:

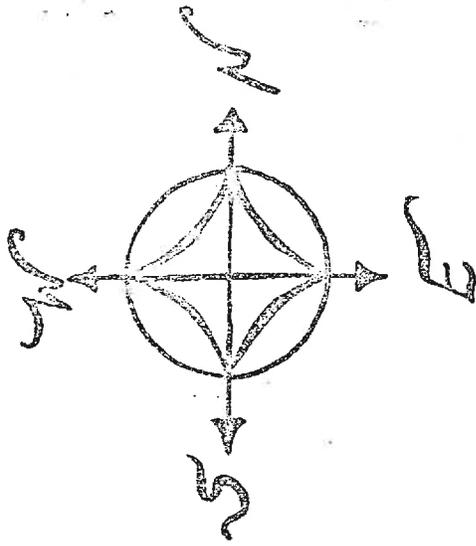
Moved: Harrington
Seconded: Neiman
Ayes: Krueger, Garcia
Absent: Maston

Transmitted herewith is a copy of the Staff Report adopted by the Commission, including the conditions of approval that were imposed.

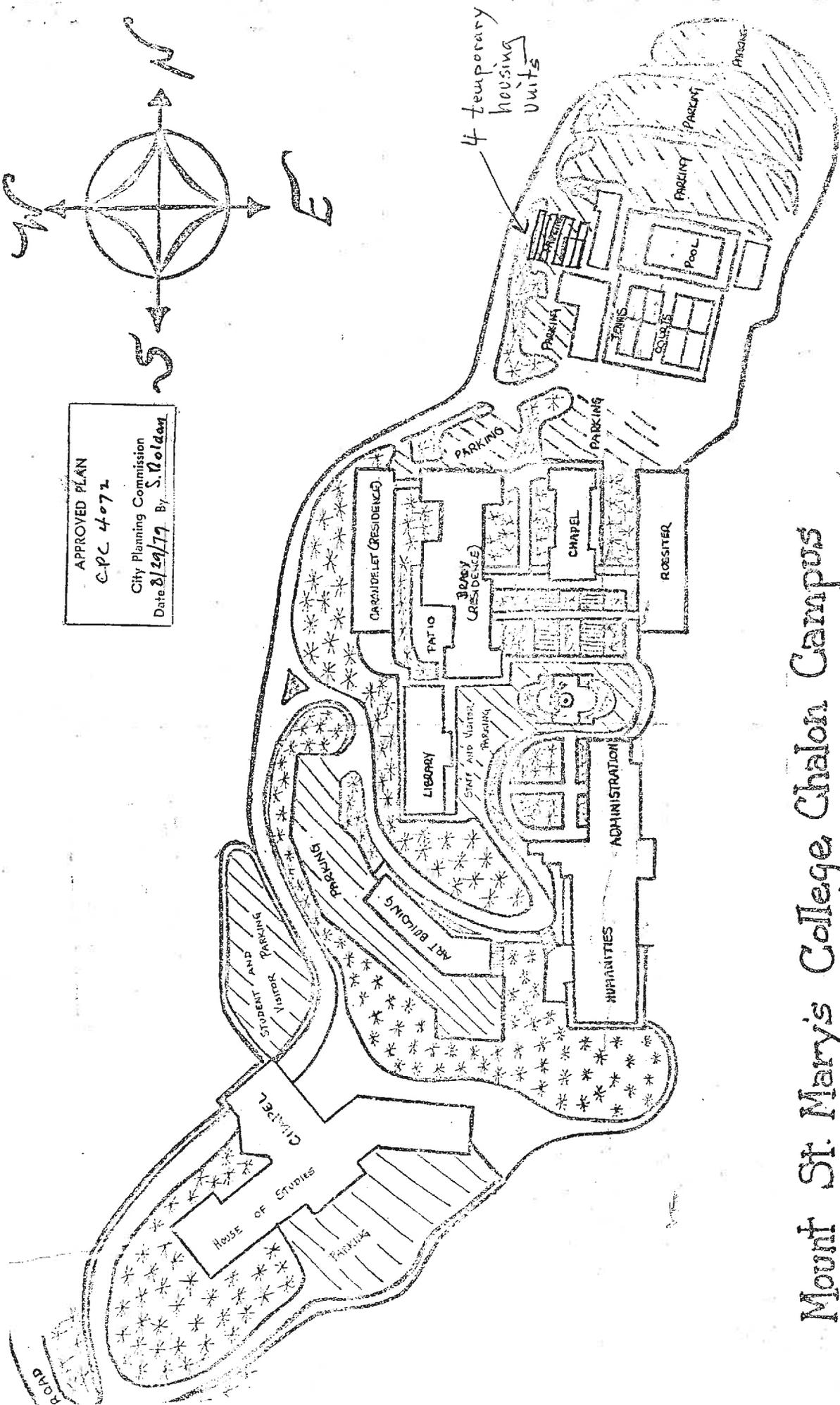
CALVIN S. HAMILTON
Director of Planning


Raymond I. Norman, Secretary
City Planning Commission

RIN:ct
cc: The Blurock Corp.
2300 Newport Blvd.
Newport Beach, CA 92663



APPROVED PLAN
 C.P.C. 4072
 City Planning Commission
 Date 8/29/79 By: S. Noldan



Mount St. Mary's College Chalon Campus

DEPARTMENT OF CITY PLANNING
Room 561-1, City Hall
200 North Spring Street
Los Angeles, CA 90012
485-3505 (Please make appointments by phone)

CITY PLAN CASE NO. 4072-CU Council District No. 11
Brentwood-Pacific Palisades District
DECISION DATE: ~~July 5, 1984~~ ^{JUL 12 1984} District Map No. 7235, 7297
and 144-141
Time: 9:30 a.m. Book 2, Page 490, Grid AZ-37
Location: Rm. 350, City Hall Env'l File No. MND-113-84-CUC
Los Angeles, CA
To: City Planning Commission
From: Zoning Plans Section
Requested by: Mount St. Mary's College
Subject: APPROVAL OF PLANS - TWO- TO FOUR-LEVEL
PARKING STRUCTURE FOR 244 AUTOMOBILES

Property Involved: 12001 Chalon Road, east of Bundy Drive

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ZP- 4: Elevation Plan	
ZP- 5: Site-line Study (file copy only)	

FILE COPY #9

RECOMMENDATION

ACTION RECOMMENDED BY THE STAFF: That the Commission

Consider the Staff Report

Approve the plot plan and elevation plans as shown on Exhibits ZP-2 and ZP-3, subject to the following conditions:

1. That the property be developed substantially in accordance with the plot plan and elevation plans, Exhibit Nos. ZP-2 and ZP-3 attached to the subject file, City Plan Case No. 4072.
2. That along the south and east sides of the parking structure, landscaping be provided to further screen the structure from the view of adjacent residential properties.
3. That the ratio of parking to students shall not be less than $\frac{1}{4}$ parking spaces for each student enrolled at Mount St. Mary's College.
4. That not more than 268 automobile parking spaces be constructed on the subject site.
5. That open areas adjoining the parking structure and which areas are not used for buildings, driveways, parking areas, or walks, shall be attractively landscaped in accordance with a landscape development plan prepared by a licensed landscape architect, or licensed architect or landscape contractor to the satisfaction of the Planning Department. Approved copies of such plans shall be submitted to the Department of Building and Safety before issuance of a building permit.
6. All lighting shall be directed onto the site, and no floodlighting shall be located as to be seen directly by the adjacent residential areas. This condition shall not preclude the installation of low-level security lighting.
7. That the University of California at Los Angeles Research Center be notified when the project is started and, if any archaeological materials are encountered during the course of the project development, that the project be halted and the Research Center contacted at once for a proper assessment of the resource and an evaluation of the impact.
8. If the subject plan approval privileges are not utilized or construction work not begun and carried on diligently to completion of at least one useable unit within two years after the effective date of any plan approval authorization, the plan approval authorization shall become void.

Prepared by:

Approved by:


 Anne V. Howell
 City Planner


 Bob Rogers
 Senior City Planner

STAFF REPORTThe Request:

Approve plans and elevations for a 244-space parking structure, as is shown on the location map, Exhibit ZP- 3 and 4 attached.

Proposed Project:

The applicant proposes to develop the property with a 244-space parking structure to replace the existing 56-space parking lot on the site; a.g. to add 188 new parking spaces.

The applicant states that the plans should be approved because:

On January 26, 1984 the City Planning Commission approved the plans and staff report concerning the construction of a Faculty Residence facility on the Mt. St. Mary's Chalon Campus. In the approved staff report and on the plan, there was a reference to the construction of the proposed parking garage.

"It should also be noted that, at the southern end of the campus, there is a proposed future parking structure. While no new parking is needed at the present time, future changes in enrollment could create a demand for more parking. The future parking structure will be constructed if and when the need for it becomes apparent."

At this time, the Mt. St. Mary's College would like to begin construction of this proposed parking structure. If the current ratio of students to parking available is used, the enrollment on campus could increase to 1037 from 750 with the additional 188 spaces (244-56 existing). The parking garage is being constructed over an existing parking lot at the southern entrance to the campus which will better facilitate "commuter" students traffic from the surrounding area.

The current siting and configuration of the parking garage is the result of recommendations made at a meeting with City Geology Specialists of the Los Angeles Grading Department of the Department of Building and Safety.

This site is located at the closest possible position to the Academic Center of Campus and any other location would unnecessarily increase traffic to the northern residential end of campus.

General Plan Designation:

The subject property is located within the Brentwood-Pacific Palisades District Plan which designates the property for "Quasi-Public" (private School) use. No zoning designation is indicated on the plan.

Existing Zoning and Land Use:

The subject property is zoned RE40-1-H and improved with Mount St. Mary's College.

Adjoining property is zoned RE15-1-H and improved with single-family dwellings or is vacant.

Environmental Clearance:

In accordance with the Environmental Quality Act of 1970, the subject property was granted a Conditional Negative Declaration.

The environmental review determined that potential impacts could occur from the project's implementation. However, changes and alterations have been required, or incorporated into the conditions of approval or procedural requirements for this project which mitigate or avoid the environmental effects identified in the environmental clearance, including the following plan approval conditions:

1. Preservation or replacement of desirable trees.
2. Protection of any archaeological materials encountered during the course of project development.

Prior Relevant Cases:

The college has existed since 1929 under a zone variance (Zoning Administration Case No. 3066) grant by the City Council. It is considered a "deemed to be approved" conditional use. Subsequent plan approvals permitted expansion of the campus facilities beginning in 1952. The most recent grant was on January 26, 1984 to permit the construction of a faculty residence hall in anticipation of enlargement of the student enrollment. The Planning Commission stipulated in the grant that the college enrollment could not be expanded until adequate parking facilities had been constructed.

Conclusion:

The subject plans should be approved as shown on Exhibits ZP-3 and 4 with conditions as recommended because:

1. The project will enable the college to increase its enrollment consistent with the Commission's action of January 21, 1984 relative to its approval of a faculty residence hall. The Commission required that no increase in enrollment would be permitted until parking facilities had been provided. From the "Site-Line Study" (Exhibit ZP-5)
2. It does not appear that the project will have a visual impact on surrounding developments outside the subject ownership provided that additional trees are planted to screen the parking structure from view of residential properties to the south.
3. The project appears consistent with prior plan approval actions relative to the subject ownership.
4. The proposed parking facility will result in a student-parking ratio of approximately .23 spaces per student.

EXISTING SLOPE

NEW DRAINAGE CHANNEL

992

982.3

996.75

987.25

977.75

968.25

3.5 feet

9.6 feet

9.6 feet

9.6 feet

EXISTING SLOPE

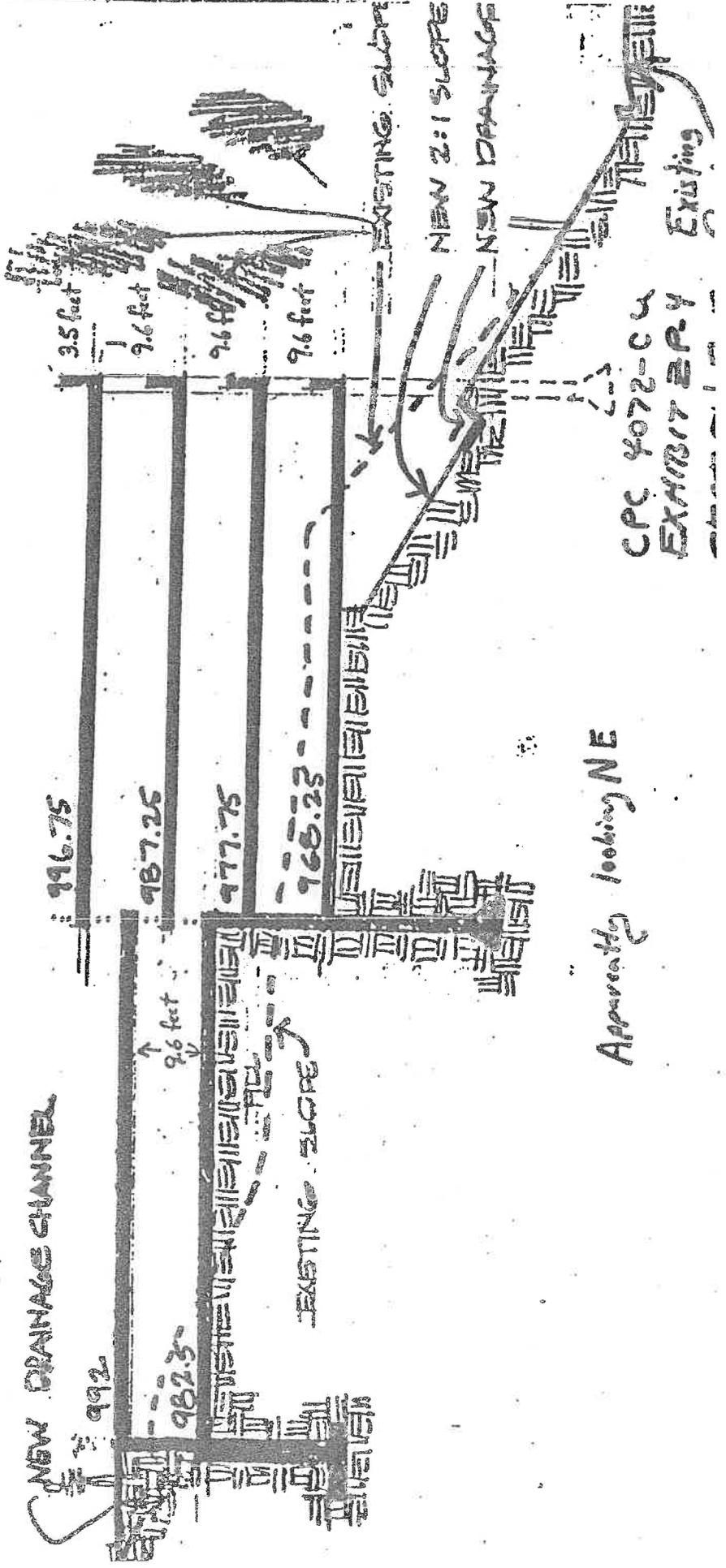
EXISTING SLOPE

NEW 2:1 SLOPE

NEW DRAINAGE

Apparently looking NE

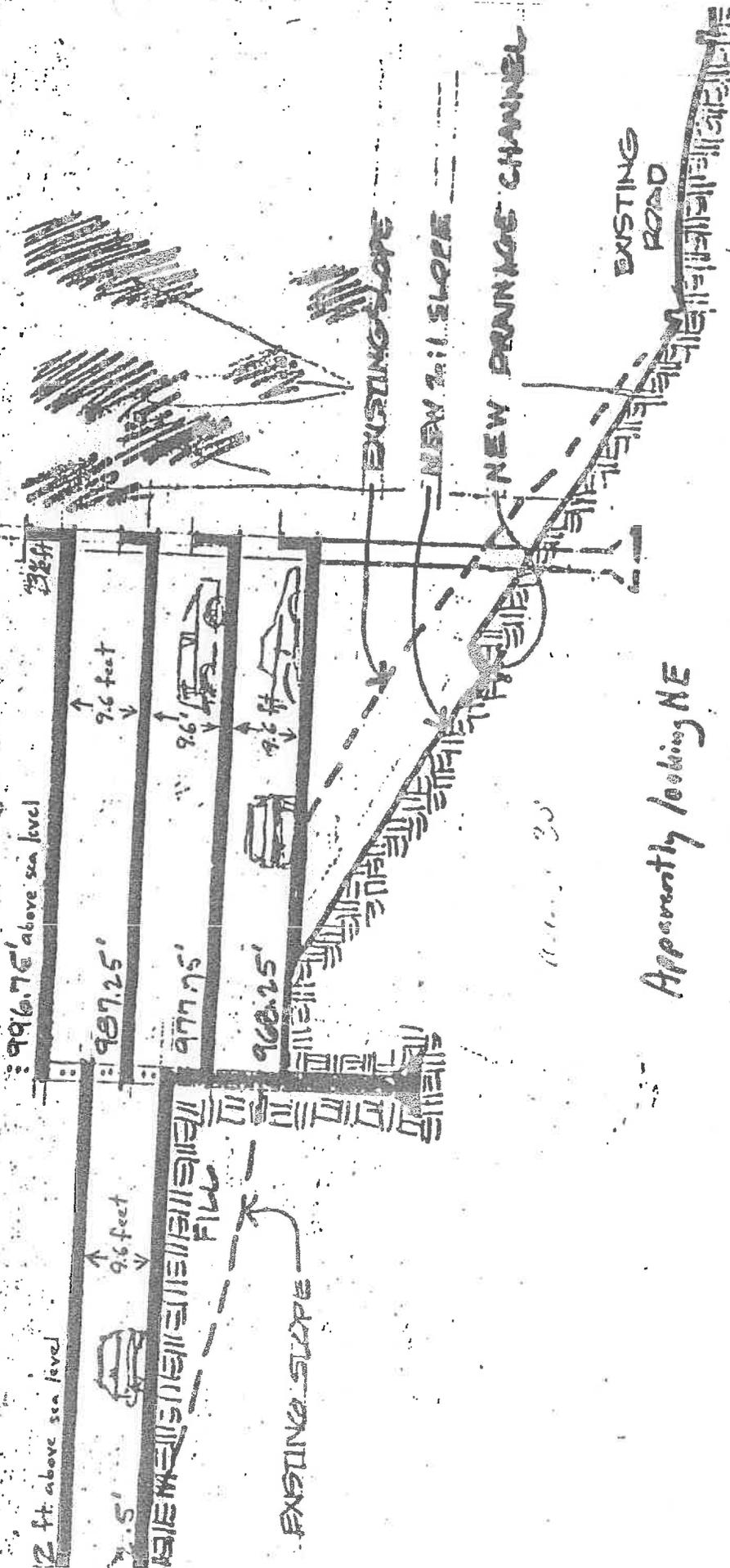
CPC 4072-CW
EXHIBIT B.P.4 Existing



D6

ING SLOPE

RAIN CHANNEL



Apparently looking NE

An average of 30 feet between the new grade and first level

SECTION A-A

EXHIBIT 2P-4

CPC 4072-C1

MT ST MARYS PARKING GARAGE



City Plan Base No. 4092
Exhibit ZP-3

PARKING

PROPOSED
212' x 125'
PARKING GARAGE

125'-0"

212'-0"

WALKWAY

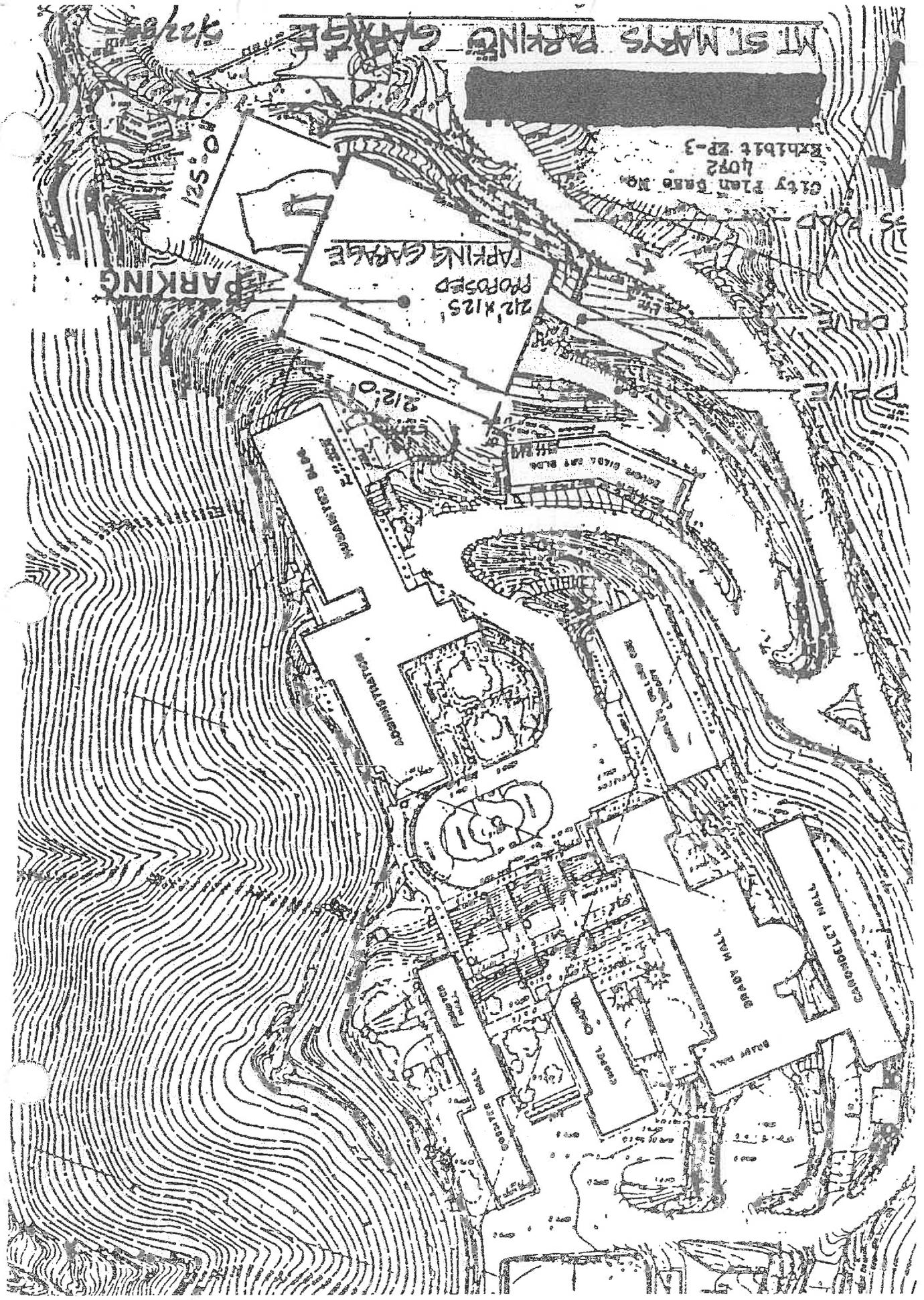
EXISTING BLDG

ADJOINING TOWER

EXISTING BLDG

BRADY MALL

GARDNER MALL



CITY PLANNING
COMMISSION

DANIEL P. GARCIA
PRESIDENT
ARL MASTON
VICE-PRESIDENT
EVE HARRINGTON
J. S. KRUEGER
SUZETTE NEIMAN
RAYMOND I. NORMAN
SECRETARY

CITY OF LOS ANGELES
CALIFORNIA



TOM BRADLEY
MAYOR

Temp file

DEPARTMENT OF
CITY PLANNING
561 CITY HALL
LOS ANGELES, CA 90012

CALVIN S. HAMILTON
DIRECTOR

KEI UYEDA
DEPUTY DIRECTOR

JUL 27 1984

CRC
8258

Mt. St. Mary's College
1201 Chalon Road
Los Angeles, CA 90049

Alan E. Smith
The Blurock Corporation
2300 Newport Boulevard
Newport Beach, CA 92663

Department of Building & Safety
Zoning - Room 423, City Hall

CITY PLAN CASE NO. 4072 CU

COUNCIL DISTRICT NO. 11

Please be advised that the City Planning Commission on July 12, 1984 conditionally approved the plans (Exhibit ZP-2 and ZP-3, attached to the file) for a multi-level parking structure on the Mt. St. Mary's College site, located at 12001 Chalon Road, east of Bundy Drive.

This action was taken by the following vote:

Moved: Harrington
Seconded: Maston
Ayes: Krueger, Neiman, Garcia

Attached is a copy of the Staff Report adopted by the Commission, including the Conditions of Approval that were imposed (Condition No. 4 revised to permit 268 spaces).

CALVIN S. HAMILTON
Director of Planning

Raymond I. Norman, Secretary
City Planning Commission

RIN:ct

CITY OF LOS ANGELES

CALIFORNIA



TOM BRADLEY
MAYOR

CITY PLANNING
COMMISSION

DANIEL P. GARCIA
PRESIDENT

J. S. KRUEGER
VICE-PRESIDENT

STEVE HARRINGTON
CARL MASTON
SUZETTE NEIMAN

RAYMOND I. NORMAN
SECRETARY

DEPARTMENT OF
CITY PLANNING
561 CITY HALL
LOS ANGELES, CA 90012

CALVIN S. HAMILTON
DIRECTOR

EXHIBIT C6
CPC-1952-4072 AND ZA-2017-928
MITIGATED NEGATIVE DECLARATION
JULY 1984 PARKING STRUCTURE

April 18, 1984

The Blurock Partnership
Alan E. Smith
2300 Newport Boulevard
Newport Beach, CA 92663

RE: MND-113-84-CUC
PARKING STRUCTURE FOR MOUNT ST. MARY'S COLLEGE

The Environmental Review Committee on April 18, 1984, granted the subject project a Mitigated Negative Declaration with four impacts that will be mitigated through the approval process. In addition to those four concerns, the Committee is concerned about the view/aesthetics impacts and recommends that a site line analysis be done for the project and its impact on surrounding single-family uses. This should be done by the time the Hearing Examiner holds a public hearing on the Conditional Use application.

Kei Uyeda
Acting Director

BOB ROGERS
Senior City Planner
Chairman of Environmental Review Committee

BR:AMS:gk

CITY OF LOS ANGELES

CITY CLERK'S USE

OFFICE OF THE CITY CLERK

ROOM 395, CITY HALL

LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

MITIGATED NEGATIVE DECLARATION

(Article V — City CEQA Guidelines)

LEAD CITY AGENCY Los Angeles City Planning Department	COUNCIL DISTRICT 11
PROJECT TITLE MND-113-84-CUC	CASE NO.

PROJECT LOCATION
12001 Chalon Road between Chalon Road and Bundy Drive; Brentwood-Pacific Palisades.

PROJECT DESCRIPTION:
Conditional Use for a 4-story, 80,000 sq.ft. parking structure for 244 cars located on the Mount St. Mary's College campus on 45.5 net acres, zoned RE40-1-H.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Mount St. Mary's College
12001 Chalon Road
Los Angeles, CA 90049

FINDING:

▶ The City Planning Department Environmental Review Committee of the City of Los Angeles has determined that this project will not have a significant effect on the environment for the following reasons:

The ERC initial study prepared for the proposal indicates that possible environmental impacts could occur due to major landforms on the site. However, the potential grading and subsidence impacts will be dealt with and mitigated by administrative procedures required by the Municipal Code.

The ERC initial study also indicates that the property is potentially subject to flood hazards. Any flood hazard that exists will be mitigated to a level of insignificance if the requirements of the Flood Hazard Management Specific Plan Ordinance are complied with. (This MND does not apply should a waiver be given under provisions of the Flood Hazard Management Specific Plan).

(continued on page 2)

▶ SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

"Any written objections received during the public review period are attached together with the responses of the Lead City Agency."

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM Alta Shigeta	TITLE City Planner	TELEPHONE NUMBER (213) 485-5776
ADDRESS 200 N. Spring Street, Room 655 Los Angeles, CA 90012	SIGNATURE (Official) Bob Rogers, Chairman ERC <i>Bob Rogers</i>	DATE 04-18-84

The ERC initial study prepared for the proposal also indicates that possible environmental impacts could occur due to the potential loss of significant trees on the site. However, these impacts can be mitigated to a level of insignificance by requiring the preservation of as many trees as possible on the site; and by replacement of other desirable trees in the parkway area on a 1:1 basis to the satisfaction of the Street Tree Division of the Bureau of Street Maintenance.

The ERC initial study prepared for the proposal also indicates possible environmental impacts due to its location in an area likely to yield unrecorded archaeological sites. However, previous surveys conducted in the area, plus field inspection, revealed that the area immediately surrounding the subject property does not appear to contain significant cultural resources. Yet it is possible that some archaeological materials may have been buried by modern activity.

As a safety factor, UCLA Archaeological Research Center should be notified when the project is started. If any archaeological materials are encountered during the course of the project development, the project should be halted and the Research Center contacted at once for a proper assessment of resource and evaluation of the impact. (See letter dated April 11, 1984 from the UCLA Archaeological Research Center on file).

The conditions imposed in the mitigated negative declaration shall be fulfilled as a condition of the decision-making body.

Therefore, it is concluded that no significant impacts are apparent which might result from this project's implementation.

This action is based on the project description on the preceding page.

CITY OF LOS ANGELES
 OFFICE OF THE CITY CLERK
 ROOM 395, CITY HALL
 LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
AND CHECKLIST

(Article IV — City CEQA Guidelines)

LEAD CITY AGENCY <i>City Planning Department</i>	COUNCIL DISTRICT <i>11</i>	DATE <i>3-29-84</i>
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PROJECT TITLE/NO. <i>Conditional Use</i>	CASE NO. <i>113-84-CLZ</i>
---	-------------------------------

PREVIOUS ACTIONS CASE NO. DOES have significant changes from previous actions.
 DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:
Conditional Use for a 4 story, 80,000 sq. ft. parking structure for 244 cars located on the Mt. St. Mary's College campus on 45.5 net acres, zoned RE 40-1-H.

PROJECT LOCATION
12001-Chalon Rd. between Chalon Rd. and Bundy Dr.

PLANNING DISTRICT <i>Brentwood-Pacific Palisades</i>	STATUS: <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED <i>7-13-77</i> <small>date</small>
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EXISTING ZONING <i>RE 40-1-H</i>	MAX. DENSITY ZONING <i>49 d.u.s</i>	PROJECT DENSITY <input checked="" type="checkbox"/> DOES CONFORM TO PLAN <input type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO PLAN
PLANNED LAND USE & ZONE <i>Quasi-Public</i>	MAX. DENSITY PLAN <i>—</i>	
PLAN DENSITY RANGE <i>—</i>	PROJECT DENSITY <i>—</i>	

DETERMINATION (to be completed by Lead City Agency)

On the basis of the attached initial study checklist and evaluation:

NEGATIVE DECLARATION	<input type="checkbox"/> I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
CONDITIONAL NEGATIVE DECLARATION	<input checked="" type="checkbox"/> I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A CONDITIONAL NEGATIVE DECLARATION WILL BE PREPARED. (See attached condition(s))
ENVIRONMENTAL IMPACT REPORT	<input type="checkbox"/> I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

<i>Olga Arroyo</i> SIGNATURE	<i>City Planner</i> TITLE
---------------------------------	------------------------------

TIAL STUDY CHECKLIST (To be completed by Lead City Agency)

BACKGROUND

PROPOSER NAME

PHONE

PROPOSER ADDRESS

AGENCY REQUIRING CHECKLIST

DATE SUBMITTED

PROPOSAL NAME (if applicable)

ENVIRONMENTAL IMPACTS

(Explanations of all "yes" and "maybe" answers are required to be attached on separate sheets.)

1. EARTH. Will the proposal result in:

- a. Unstable earth conditions or in changes in geologic substructures?
- b. Disruptions, displacements, compaction or overcovering of the soil?
- c. Change in topography or ground surface relief features?.....
- d. The destruction, covering or modification of any unique geologic or physical features?
- e. Any increase in wind or water erosion of soils, either on or off the site?
- f. Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet or lake?.....
- g. Exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?.....

YES	MAYBE	NO
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2. AIR. Will the proposal result in:

- a. Air emissions or deterioration of ambient air quality?.....
- b. The creation of objectionable odors?.....
- c. Alteration of air movement, moisture or temperature, or any change in climate, either locally or regionally?.....
- d. Expose the project residents to severe air pollution conditions?

YES	MAYBE	NO
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. WATER. Will the proposal result in:

- a. changes in currents, or the course or direction of water movements, in either marine or fresh waters?.....
- b. Changes in absorption rates, drainage patterns, or the rate and amounts of surface water runoff?.....
- c. Alterations to the course or flow of flood waters?.....
- d. Change in the amount of surface water in any water body?.....
- e. Discharge into surface waters, or in any alteration of surface water quality, including but not limited to temperature, dissolved oxygen or turbidity?
- f. Alteration of the direction or rate of flow of ground waters?.....
- g. Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?.....
- h. Reduction in the amount of water otherwise available for public water supplies?
- i. Exposure of people or property to water related hazards such as flooding or tidal waves?
- j. Significant changes in the temperature, flow, or chemical content of surface thermal springs.

YES	MAYBE	NO
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. PLANT LIFE. Will the proposal result in:

- a. Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops and aquatic plants)?.....
- b. Reduction of the numbers of any unique, rare or endangered species of plants?
- c. Introduction of new species of plants into an area, or is a barrier to the normal replenishment of existing species?.....
- d. Reduction in acreage of any agricultural crop?.....

YES	MAYBE	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	YES	MAYBE	NO
5. ANIMAL LIFE. Will the proposal result in:			
a. Change in the diversity of species, or numbers of any species of animals (birds, land animals including reptiles, fish and shellfish, benthic organisms or insects)?	_____	_____	✓
b. Reduction of the numbers of any unique, rare or endangered species of animals?	_____	_____	✓
c. Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?	_____	_____	✓
d. Deterioration to existing fish or wildlife habitat?	_____	_____	✓
6. NOISE. Will the proposal result in:			
a. Significant increases in existing noise levels?	_____	_____	✓
b. Exposure of people to severe noise levels?	_____	_____	✓
7. LIGHT AND GLARE. Will the proposal			
a. Produce new light or glare from street lights or other sources? ...	_____	_____	✓
b. Reduce access to sunlight of adjacent properties due to shade and shadow	_____	_____	✓
8. LAND USE. Will the proposal result in an alteration of the present or planned land use of an area?	_____	_____	✓
9. NATURAL RESOURCES. Will the proposal result in:			
a. Increase in the rate of use of any natural resources?	_____	_____	✓
b. Depletion of any non-renewable natural resource?	_____	_____	✓
10. RISK OF UPSET. Will the proposal involve:			
a. A risk of an explosion or the release of hazardous substances (including, but not limited to, oil, pesticides, chemicals or radiation) in the event of an accident or upset conditions?	_____	_____	✓
b. Possible interference with an emergency response plan or an emergency evacuation plan.	_____	_____	✓
11. POPULATION. Will the proposal result in:			
a. The relocation of any persons because of the effects upon housing, commercial or industrial facilities?	_____	_____	✓
b. Significantly change in the distribution, density or growth rate of the human population of an area?	_____	_____	✓
12. HOUSING. Will the proposal:			
a. Affect existing housing, or create a demand for additional housing?	_____	_____	✓
b. Have a significant impact on the available rental housing in the community?	_____	_____	✓
c. Result in significant demolition, relocation or remodeling of residential, commercial, or industrial buildings or other facilities?	_____	_____	✓
13. RIGHT OF WAY. Will the proposal result in:			
a. Reduced front/side lot area?	_____	_____	✓
b. Reduced access?	_____	_____	✓
c. Reduced off-street parking?	_____	_____	✓
d. Creation of abrupt grade differential between public and private property?	_____	_____	✓
14. Transportation/Circulation. Will the proposal result in:			
a. Generation of significant additional vehicular movement?	_____	_____	✓
b. Significant effects on existing parking facilities, or demand for new parking?	_____	_____	✓
c. Impact upon existing transportation systems?	_____	_____	✓
d. Alterations to present patterns of circulation or movement of people and/or goods?	_____	_____	✓
e. Alterations to waterborne, rail or air traffic?	_____	_____	✓
f. Significant increase in traffic hazards to motor vehicles, bicyclists or pedestrians?	_____	_____	✓
15. PUBLIC SERVICES. Will the proposal have a significant effect upon, or result in a need for new or altered governmental services in any of the following areas:			
a. Fire protection?	_____	_____	✓
b. Police protection?	_____	_____	✓
c. Schools?	_____	_____	✓
d. Parks or other recreational facilities?	_____	_____	✓
e. Maintenance of public facilities, including roads?	_____	_____	N/A
f. Other governmental services?	_____	_____	N/A

Major Landforms

(Earth)grading

The ERC initial study prepared for the proposal indicates that possible environmental impacts could occur due to major landforms on the site. However, the potential grading and subsidence impacts will be dealt with and mitigated by administrative procedures required by the Municipal Code.

Flood Hazard

also

The ERC initial study indicates that the property is potentially subject to flood hazards. Any flood hazard that exists will be mitigated to a level of insignificance if the requirements of the Flood Hazard Management Specific Plan Ordinance are complied with. (This CND does not apply should a waiver be given under provisions of the Flood Hazard Management Specific Plan).

Trees

also

The ERC initial study prepared for the proposal indicates that possible environmental impacts could occur due to the potential loss of significant trees on the site. However, these impacts can be mitigated to a level of insignificance by requiring the preservation of as many trees as possible on the site; and by replacement of other desirable trees in the parkway area on a 1:1 basis to the satisfaction of the Street Tree Division of the Bureau of Street Maintenance.

Archaeology (UCLA)

also

The ERC initial study prepared for the proposal indicates possible environmental impacts due to its location in an area likely to yield unrecorded archaeological sites. However, previous surveys conducted in the area, plus field inspection, revealed that the area immediately surrounding the subject property does not appear to contain significant cultural resources. Yet it is possible that some archaeological materials may have been buried by modern activity.

As a safety factor, UCLA Archaeological Research Center should be notified when the project is started. If any archaeological materials are encountered during the course of the project development, the project should be halted and the Research Center contacted at once for a proper assessment of resource and evaluation of the impact. (See letter dated April 16, 1984 from the UCLA Archaeological Research Center on file).

The conditions imposed in the ~~conditional~~ ^{mitigated} negative declaration shall be fulfilled as a condition of the decision-making body.

In view of the above, it is concluded that no significant impacts are apparent which might result from this project's implementation.

**INITIAL STUDY
TRAFFIC ANALYSIS**

EIR CASE NO.: 113-84-CU2 TRANSMITTAL DATE: 3-28-84

PROJECT DESCRIPTION: Cond. Use for a 4 story, 80,000 sq. ft. parking structure for 244 cars located on the Mt. St. Mary's College property on 45.5 net acres, zoned RE40-1-H.

PROJECT LOCATION: 12001 - Chalon Rd.

EXISTING ZONES: RE40-1-H PLANNED ZONES: RE40-1-H

PROJECTED GENERATED TRIPS: —

Bundy Dr. ADT 290 TPH 35
(Street)

_____ ADT _____ TPH _____
(Street)

CRITICAL INTERSECTIONS:

_____ &	_____ &
_____	_____
_____ AM PM	_____ AM PM
NB _____	_____
SB _____	_____
EB _____	_____
WB _____	_____

COMMENTS: * Provided that no enrollment increase is allowed.

IMPACT OF TRAFFIC GENERATION:

~~NOT SIGNIFICANT~~ * MAY BE SIGNIFICANT MAY BE CUMULATIVE TRAFFIC STUDY NEEDED

Prepared by: [Signature] Date: 4/4/84

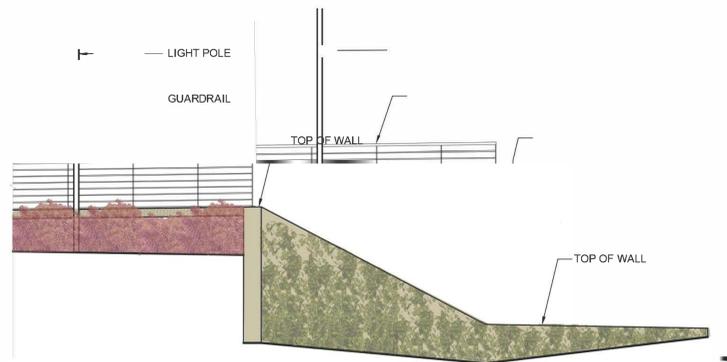
RW1	Landscape plan shown below.	
RW2	Landscape plan shown below.	
RW3	No portion of wall is greater than eight feet in height.	
RW4	No portion of wall is greater than eight feet in height.	
RW5	Landscape plan shown below.	
RW6	No portion of wall is greater than eight feet in height.	
RW7	No portion of wall is greater than eight feet in height.	
RW8	Wall completely hidden from view.	
RW9	Landscape plan shown below.	
RW10	Portion of wall greater than eight feet in height is completely hidden from view.	
RW11	Landscape plan shown below.	
RW12	Portion of wall greater than eight feet in height is de minimis.	

Landscape plan for retaining walls eight feet or greater in height as per LAMC Section 12.21.C.8.b. Figures are intended to illustrate design concept only, species and design are subject to change.

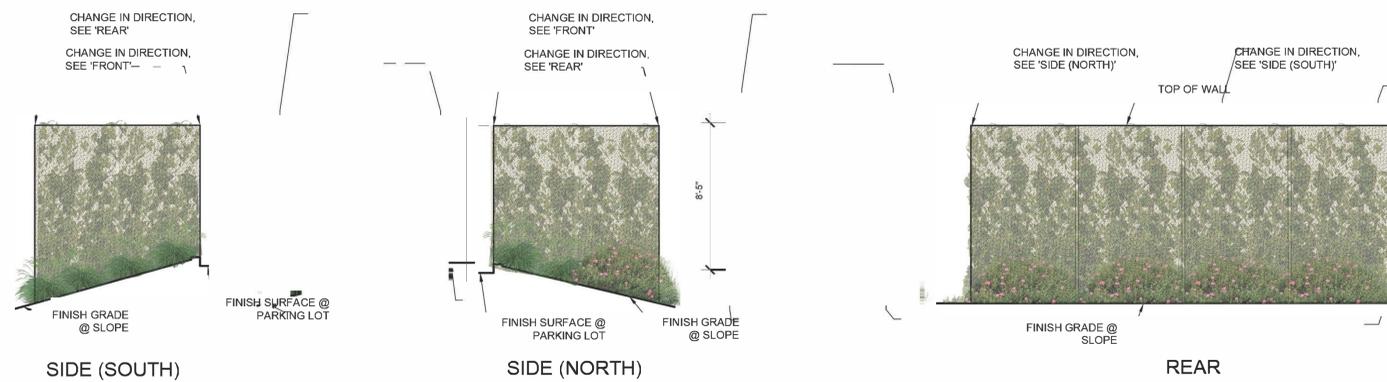


ELEVATION OF RETAINING WALL 9 @ ELECTRICAL ENCLOSURE 1/4"=1'-0" | 03

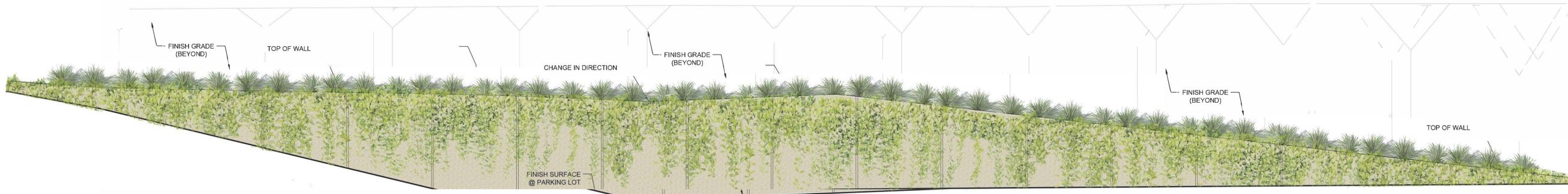
RETAINING WALL LEGEND | L



ELEVATION OF RETAINING WALL 5 1/4"=1'-0" | 18



ELEVATION OF RETAINING WALL 2 (TRASH ENCLOSURE) - CHAPEL PARKING LOT 1/4"=1'-0" | 02



ELEVATION OF RETAINING WALL 1 - BRADY PARKING LOT 1/4"=1'-0" | 01

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Mount Saint Mary's University

Revision	Date	Submitted
01	05/26/2019	AGENCY SUBMITTAL
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Date Published	08/04/2021
Checked By	JY / MCF
Scale	AS SHOWN

RETAINING WALL EXHIBIT

Chapter IV

Mitigation Monitoring Program

1. Introduction

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which 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 State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that 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. An EIR has been prepared to address the Project’s potential environmental impacts. The evaluation of the Project’s impacts takes into consideration project design features (PDFs), which are measures that are a component of the Project’s design and are detailed in the EIR. Where appropriate and feasible, the EIR also identifies mitigation measures to avoid or substantially lessen significant and unavoidable impacts. This MMP is designed to monitor implementation of the PDFs and mitigation measures.

Section 5, below, provides a complete MMP for the Project as studied in the Draft EIR and corrected and modified in Chapter III, *Revisions, Clarifications, and Corrections*, of this Final EIR. As stated previously in the Final EIR, in a letter dated February 5, 2021, MSMU has requested that the Department of City Planning consider the recommendation of Alternative 5.

Alternative 5 would reduce the Project’s significant and unavoidable operational traffic impacts identified in the Draft EIR to a level of less than significant and would incrementally reduce the Project’s significant and unavoidable off-site construction noise impacts. As explained in Chapter III, *Revisions, Clarifications, and Corrections*, and shown in Table III-15, *Comparison of Impacts Summary*, Alternative 5 would reduce the Project’s environmental impacts over a broad range of environmental issues in the categories of Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse

Gas Emissions, Hydrology and Water Quality, Noise and Vibration, Public Services, Transportation and Traffic, Tribal Cultural Resources, and Utilities.

With respect to its PDFs and Mitigation Measures, Alternative 5 is consistent with the Project in every category apart from Transportation and Traffic, and would, if approved by the Lead Agency, incorporate the Project's MMP as provided in Section 6, below, other than with respect to Transportation and Traffic. Section 6, below, provides mitigation and monitoring program elements specific to Alternative 5's Transportation and Traffic PDFs and MMs.

Therefore, any reference to the "Project" (or project) below shall apply to both the Project and Alternative 5, unless otherwise noted.

2. Purpose

It is the intent of the MMP to:

1. Verify compliance with the PDFs and mitigation measures identified in the EIR;
2. Provide a framework to document implementation of the identified PDFs and mitigation measures;
3. Provide a record of mitigation requirements;
4. Identify monitoring and enforcement agencies;
5. Establish and clarify administrative procedures for the clearance of PDFs and mitigation measures;
6. Establish the frequency and duration of monitoring; and
7. Utilize the existing agency review process whenever feasible.

3. Organization

As shown on the following pages, each required project design feature and mitigation measure for the Project is listed and categorized by impact area, with an accompanying identification of the following:

- **Enforcement Agency:** The agency with the power to enforce the project design feature or 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 or mitigation measure shall be monitored;
- **Monitoring Frequency:** The frequency at which the project design feature or mitigation measure shall be monitored; and
- **Action Indicating Compliance:** The action(s) of which the Enforcement or Monitoring Agency indicates that compliance with the required project design feature or mitigation measure has been implemented.

4. Administrative Procedures and Enforcement

This MMP shall be enforced throughout all phases of the Project. MSMU shall be responsible for implementing each PDF and mitigation measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. MSMU shall maintain records demonstrating compliance with each PDF and mitigation measure. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, MSMU shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of MSMU's compliance with the PDFs and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by MSMU and Construction Monitor and be included as part of MSMU's Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if MSMU does not correct the non-compliance within a reasonable time of notification to MSMU by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

5. Program Modification

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and mitigation measures contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or mitigation measure may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or mitigation measures. Any addendum or

subsequent CEQA clearance shall explain why the PDF or mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or mitigation measure, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or mitigation measure shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or mitigation measure results in a substantial change to the Project or the non-environmental conditions of approval.

6. Draft EIR Project – Mitigation Monitoring Program

a) Aesthetics

(1) Project Design Features

PDF-AES-1: Outdoor lighting, including walkway security lighting, plaza lighting, and lighting for the parking areas, shall be designed and installed with shielding, such that the light source cannot be seen from residential properties in the area, or the off-site public right-of-way.

Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Phase:	Pre-construction; Pre-operation
Monitoring Frequency:	Periodic field inspections during construction; once at Project plan check; once during field inspection
Action Indicating Compliance:	Plan check approval and issuance of applicable building permit; compliance certification report by Project contractor; field inspection sign-off; issuance of Certificate of Occupancy

PDF-AES-2: Glass used in building facades shall minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted. Prior to issuance of a building permit, the City of Los Angeles Department of Building and Safety (LADBS) shall review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials, and would not cause significant glare impacts on motorists or nearby residential uses.

Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
----------------------------	--

Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Phase:	Pre-construction; Pre-operation
Monitoring Frequency:	Once at Project plan check; Once during field inspection
Action Indicating Compliance:	Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

b) Air Quality

(1) Project Design Features

PDF AQ-1: The Project shall comply with applicable CalGreen requirements regarding the number of EV Ready and EV Capable parking spaces. Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. When the application of the CalGreen requirement results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Phase:	Pre-construction; Pre-operation
Monitoring Frequency:	Once at Project plan check; once during field inspection
Action Indicating Compliance:	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

PDF AQ-2: Natural light would be incorporated in the design of the main building spaces using large expanses of glass and skylights.

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

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

PDF AQ-3: Installation of an interior light system that would be able to sense the amount of natural light available and automatically adjust the amount of artificial light needed.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; Pre-operation

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance. Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

PDF AQ-4: High efficiency, low-e insulated glass units would be used for the Project.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; Pre-operation

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

PDF AQ-5: The Project roof would be single-ply to reflect solar heat and reduce heat absorption into the building.

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 at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

PDF AQ-6: Water bottle filling stations would be provided in the proposed Wellness Pavilion, reducing waste from disposal of water bottles.

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; Pre-operation
Monitoring Frequency: Once at Plan Check, periodic inspections during occupancy
Action Indicating Compliance: Issuance of Certificate of Occupancy

PDF AQ-7: A minimum of 15 percent of the roof area would be solar ready.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Phase: Pre-construction; Pre-operation
Monitoring Frequency: Once at Project plan check; Once during field inspection
Action Indicating Compliance: Plan approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

PDF AQ-8: Where electricity from power poles is readily available, such electricity from power poles shall be used to power construction equipment during Project construction and/or solar power generators rather than temporary diesel- or gasoline-powered generators. In the event that electricity from power poles is not readily available during construction, solar-powered generators shall be used to power construction equipment during Project construction rather than temporary diesel or gasoline-powered generators. If electricity is not available from power poles or cannot be feasibly provided by solar-powered generators, then temporary diesel or gasoline-powered generators may be used to power construction equipment during Project construction.

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 during construction
Action Indicating Compliance: Field inspection sign-off; Compliance report by Project contractor

(2) Mitigation Measures

MM AQ-1: Mobile off-road construction equipment (wheeled and tracked) used during construction of the Project shall meet or exceed the Interim USEPA Tier 4 standards. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. The mitigation applies to off-road equipment and does not apply to on-road vehicles.

Enforcement Agency:	South Coast Air Quality Management District
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Phase:	Pre-construction; Construction
Monitoring Frequency:	Periodic field inspections during construction
Action Indicating Compliance:	Field inspection sign-off; compliance report by Project contractor

c) Biological Resources

(1) Project Design Features

PDF BIO-1: Prior to issuance of a grading permit, the Project Applicant shall coordinate with the City and replace any non-protected significant trees that are 8 inches or more in diameter at breast height (DBH), or cumulative trunk diameter if multi-trunked, that were removed during the Project construction period, at a 1:1 ratio with a minimum 24-inch box tree. Replacement trees should be planted on-site; however, if there is insufficient space, replacement trees can also be planted elsewhere on the Mount St. Mary's University Chalon Campus.

Enforcement Agency:	City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety
Monitoring Phase:	Pre-construction; Construction
Monitoring Frequency:	Once prior to Certificate of Occupancy
Action Indicating Compliance:	Field inspection sign-off; compliance report by Project contractor

(2) Mitigation Measures

MM BIO-1: Prior to issuance of a grading permit, the Project Applicant shall demonstrate that the following requirements have been included in the Project construction plan:

1. Nesting activity typically occurs from February 15 to August 31 (January 15 to August 31 for raptors). Vegetation removal activities shall be scheduled outside the nesting

season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds. This includes vegetation removal associated with on-going fuel modification activities.

2. Any construction activities or fuel modification activities that occur during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) shall require that all suitable habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist monitor (i.e., professional biologist with a minimum of two years of avian survey experience or equivalent) before commencement of clearing. If any active nests are detected, a buffer of at least 300 feet (500 feet for raptors), or as determined appropriate by the qualified biologist monitor, shall be delineated, flagged, and avoided until the nesting cycle is complete as determined by the qualified biologist monitor.

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 issuing a Building Permit, periodic field inspections during construction
Action Indicating Compliance:	Field inspection sign-off; compliance report by qualified consultant

MM BIO-2: For preserved trees (e.g., trees to be avoided or that may potentially be encroached upon), the following protection measures shall be implemented during the construction of the Project:

Protective Fencing:

- Protective fencing not less than four feet in height shall be placed at the limits of the protective zone of a preserved tree located within 50 feet of the grading limits. Protective fencing shall be inspected by a qualified biologist prior to grading or ground disturbing activities, and shall be maintained in place until construction is completed.
- Fencing shall remain intact until a Tree Expert (as defined in LAMC Section 17.02) and/or the City's arborist verifies that it can be removed.

Grading Restrictions Near Trees:

- The grade shall not be lowered or raised within the protective zone of a preserved tree without the approval from the City's Department of Urban Forestry. A Tree Expert (as defined in LAMC Section 17.02) shall supervise all excavation or grading approved within the protective zone.

Trenching and Excavation:

- Trenching, excavation, or clearance of vegetation within the protective zone of a preserved tree shall be accomplished by the use of hand tools or small hand-held power tools, and shall be monitored by a Tree Expert (as defined in Section 17.02). If major roots are encountered during grading activities (including trenching, excavation, and other related ground disturbance activities), a qualified arborist (i.e., ISA certified arborist) shall be notified to provide recommendations for pruning or avoidance measures. Any major roots encountered shall be conserved and treated as recommended by the Tree Expert (as defined in LAMC Section 17.02).
- Utility trenches shall be routed outside the protective zone of a preserved tree as determined by the City's Department of Urban Forestry.

Equipment Storage:

- No storage of equipment, supplies, vehicles, or debris shall be allowed within the protective zone of a preserved tree to avoid soil compaction.
- No dumping of construction wastewater, paint, stucco, concrete, or any other clean-up waste shall occur within the protective zone of a preserved tree.
- No temporary structures shall be placed within the protective zone of any preserved trees.

Frequency of Watering Around Oak Trees:

- Irrigation water shall not reach within 15 feet of any oak trunk.
- Neither grass nor any other ground cover shall be planted under the canopy of oak trees.

Pruning:

- Pruning of preserved trees shall comply with the National Arborist Association guidelines; in no case shall more than 20 percent of a preserved tree canopy be removed. As determined to be necessary by a certified arborist, after pruning, installation of support cables to prevent future main crotch failures are required.
- Branches that could be injured by vehicles or that interfere with construction shall be pruned to the satisfaction of a certified arborist.

Enforcement Agency:	City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety
Monitoring Phase:	Construction

Monitoring Frequency: Once, prior to issuing a Building Permit, periodic field inspections during construction

Action Indicating Compliance: Field inspection sign-off; compliance report by qualified consultant/certified arborist

MM BIO-3: A Tree Expert (as defined in LAMC Section 17.02) shall be present for on-site construction and grading activities occurring within 10 feet of the protected zone of all preserved trees. If any major roots larger than 1 inch in diameter are encountered during construction activities, the qualified arborist (i.e., ISA certified arborist) shall be notified to provide recommendations to avoid damaging roots, so that the health of the tree will not be compromised.

Enforcement Agency: City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic during construction per recommendations of consultant

Action Indicating Compliance: Field inspection sign-off; compliance report by qualified consultant

MM BIO-4: Post-Construction Monitoring and Reporting - After three years following the completion of Project construction a Tree Expert (as defined in LAMC Section 17.02) shall assess the health and overall condition of all preserved trees that have been encroached upon by the Project. The condition of the trees shall be compared with the data provided in this report to determine if the Project may have had a negative effect on the health or physical structure of the tree. A monitoring report shall be prepared by a Tree Expert (as defined in LAMC Section 17.02) and submitted to the City's Urban Forester within one-month following the completion of the post-construction monitoring. If any of the preserved trees die within three years as a consequence of construction, they shall also be replaced at a 1:1 replacement ratio for non-protected trees and a 2:1 replacement ratio for protected trees.

Enforcement Agency: City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Urban Forestry; City of Los Angeles Department of Building and Safety

Monitoring Phase: Post-construction

Monitoring Frequency: Once, three years subsequent to completion of construction

Action Indicating Compliance: Field inspection sign-off; compliance report by qualified consultant

d) Cultural Resources

(1) Mitigation Measures

MM APR-1: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed during ground-disturbing activities associated with construction of the Project, the Applicant shall halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated by a Qualified Archaeologist. A Qualified Archaeologist is an individual who meets the Secretary of the Interior’s Professional Qualifications Standards for an Archaeologist. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a Qualified Archaeologist. If a resource is determined by the Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes. The Qualified Archaeologist, in consultation with the City and Applicant, shall determine the need for archaeological construction monitoring in the vicinity of the find thereafter.

The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of treatment and/or the any follow-up archaeological construction monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies.

Enforcement Agency: City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction
Monitoring Frequency: Periodic per recommendations of archeologist
Action Indicating Compliance: Compliance report by qualified archaeologist

e) Geology and Soils

(1) Project Design Features

PDF-GS-1: A qualified geotechnical engineer (e.g., a Certified Engineering Geologist or a Geotechnical Engineer as licensed by the State of California Board for Professional Engineers, Land Surveyors, and Geologists) shall be retained by the Applicant and be present on the Project Site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations specified in the Final Geotechnical Report, map geologic conditions during grading, and test all grading and earthwork.

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: Compliance certificate report by qualified consultant

f) Hydrology and Water Quality

(1) Project Design Features

PDF-H/WQ-1: An underground stormwater drain system shall be installed along the edges of the Project Site to collect and divert any uncontrolled sheet flow that would enter the Campus's east- and west-facing natural slopes.

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; Post-construction
Monitoring Frequency: Periodic field inspections during construction; once at Project plan check; once during field inspection
Action Indicating Compliance: Plan check approval and issuance of applicable building permit; compliance certification report by Project contractor; field inspection sign-off; issuance of Certificate of Occupancy

g) Noise

(1) Mitigation Measures

MM-NOISE-1: On-site power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and muffling devices achieving a 10 dBA noise level reduction from standard equipment noise emissions. All equipment shall be properly maintained in compliance with manufacturers' standards.

Enforcement Agency: City of Los Angeles Department of Building and Safety;
City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Building and Safety;
City of Los Angeles Department of City Planning

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Periodic field inspections

Action Indicating Compliance: Compliance certificate report by qualified consultant

MM-NOISE-2: All on-road heavy-duty construction vehicles used during the demolition, concrete pouring, and asphalt paving phases of construction shall be equipped with properly operating and maintained noise mufflers that achieve a minimum 10 dBA noise level reduction, based on the manufacturer's specifications for noise reduction performance.

Enforcement Agency: City of Los Angeles Department of Building and Safety;
City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance: Compliance certificate report by qualified consultant

h) Transportation and Traffic

(1) Project Design Features

PDF-TRAF-1: Construction Traffic Management Plan. MSMU shall prepare a detailed Construction Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans as necessary and satisfactory to LADOT. The Construction Traffic Management Plan shall be based on the nature and timing of the specific

construction activities and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

- Appropriate temporary traffic controls (signs and temporary signals) shall be installed along the public rights-of-way during all construction activities to ensure pedestrian and vehicular safety during construction.
- Scheduling construction activities to reduce the effect on traffic flow on arterial streets. During peak haul traffic, if off-site staging is required, trucks would be radioed in from an off-site staging area to avoiding queuing along adjacent street.
- Schedule construction-related deliveries, other than concrete and earthwork-related deliveries, between the hours of 7:00 AM and 3:00 PM to avoid the PM Peak hour as identified in the Project's Traffic Study and to reduce the potential of trucks waiting to load or unload for protracted periods of time. This restriction shall not apply to trucks being used for the concrete pour that cannot feasibly be finished before 3:00 PM.
- Maintain access for surrounding residential uses in proximity to the Project Site during Project construction.
- Identify designated transport routes for haul trucks and heavy trucks to be used over the duration of the Project. Develop a plan for staging trucks prior to arriving at the Site.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring residences at all times.
- In the event of temporary lane closures, a worksite traffic control plan, approved by LADOT, should be implemented to route vehicular traffic or pedestrians around any such closures.
- Unrestricted access for school buses shall be maintained on street rights-of-way during construction.
- Project contractors shall maintain ongoing communication with school administrators at affected schools along the haul route including Archer School for Girls, Brentwood School, and St Martin of Tours School, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Barriers and/or fencing shall be installed around construction sites to secure construction equipment and the Site and to prevent trespassing, vandalism, and attracting nuisances.
- Temporary haul truck staging will not be permitted on local hillside streets.
- Truck loading/unloading will occur on the MSMU Campus, not on local hillside streets.
- Safe truck driving practices, including low gear, not passing another vehicle, deployment of optional 4th axle, if available, shall be required.

- During construction, MSMU shall clearly post a hotline in several areas around the Campus, including along the construction fence and at the entrance to the Campus, to enable the public to call and report non-compliance with the Construction Traffic Management Plan.

Enforcement Agency:	City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
Monitoring Agency:	City of Los Angeles Department of Transportation
Monitoring Phase:	Pre-construction; Construction
Monitoring Frequency:	Once prior to issuance of Building Permit; Periodic field inspections during construction
Action Indicating Compliance:	Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

PDF-TRAF-2: Construction Parking Plan. MSMU shall prepare a Construction Parking Plan prior to the issuance of a building permit that identifies temporary parking locations for construction workers and for MSMU students, faculty/staff, and visitors and shall include the following elements as appropriate:

- Parking for MSMU students, faculty/staff, and visitors shall be accommodated via a valet service on the Campus. Valet operations would enable vehicles to be stacked in on-site parking lot aisles to maximize available vehicle parking spaces on the Campus.
- No construction worker parking will be allowed on local residential streets. Construction workers shall all park on the Campus.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park, and provide clear consequences to violators for failure to follow these regulations. All contracts with construction contractors shall expressly prohibit construction worker parking on residential streets. The contractor shall be responsible for informing subcontractors and construction workers of this requirement, for monitoring compliance of the subcontractors, and if necessary, for hiring a security guard to enforce these parking provisions.

Enforcement Agency:	City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
Monitoring Agency:	City of Los Angeles Department of Transportation
Monitoring Phase:	Pre-construction; Construction

Monitoring Frequency: Once prior to issuance of Building Permit; Periodic field inspections during construction

Action Indicating Compliance: Approval of Construction Parking Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

PDF-TRAF-3: The Project Applicant shall attend bi-monthly (or at a frequency determined appropriate by City Staff) construction management meetings conducted by City Staff and the operators or contractors for the Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities. Coordination shall ensure that construction activities associated with these concurrent related projects and hauling activities are managed in collaboration with one another. The Project Applicant shall provide advance notification to LADOT, the Archer School for Girls, and the Brentwood School of its upcoming construction activities, including durations and daily hours of construction.

Enforcement Agency: City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once prior to issuance of Building Permit; Periodic during construction

Action Indicating Compliance: Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit and City of Los Angeles Department of City Planning (Pre-construction); compliance certification report submitted by Project contractor (Construction)

PDF-TRAF 4: The Project Applicant shall develop a plan for coordinating access for construction workers, school employees, students, and bus access when school and construction are concurrent.

Enforcement Agency: City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once prior to issuance of Building Permit; Periodic field inspections during construction

Action Indicating Compliance: Approval of Construction Management Plan from the City of Los Angeles Department of Transportation and City of Los Angeles Department of City Planning prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

PDF-TRAF-5: Construction truck travel on local streets shall be limited to Bundy Drive, Norman Place, and Chalon Drive only; trucks would not travel on any other local streets serving the neighborhoods surrounding the Project Site.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once prior to issuance of Building Permit; Periodic field inspections during construction

Action Indicating Compliance: Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

PDF-TRAF-6: All heavy truck hauling of construction equipment and construction materials deliveries shall be limited to hours between 7:00 AM and 3:00 PM to avoid the PM peak-hour commuter traffic period. This restriction shall not apply to concrete pour that cannot feasibly be finished prior to 3:00 PM. No on-street staging or idling of haul trucks on public roadways will be allowed.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once prior to issuance of Building Permit; Periodic field inspections during construction

Action Indicating Compliance: Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

PDF-TRAF-7: Campus Event Coordination Plan. MSMU shall develop a Campus Event Coordination Plan that would define the parameters of the valet parking program, monitor off-Campus parking during events, and provide staff/signage to direct traffic during

events. This Plan shall be submitted to LADOT for review and approval prior to issuance of a certificate of occupancy for the proposed Wellness Pavilion.

Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Phase:	Operation
Monitoring Frequency:	Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation
Action Indicating Compliance:	Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

PDF-TRAF-8 – MSMU will limit the total number of outside guests to 400 on a daily basis for new events such as the Other Wellness/Sports Events and Health and Wellness Speaker Series, and 200 campers and 40 staff on a daily basis for Summer Sports Camps. No new Wellness Pavilion event may occur concurrently with any existing event.

Enforcement Agency:	City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of Transportation
Monitoring Phase:	Operation
Monitoring Frequency:	Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation
Action Indicating Compliance:	Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

(2) Mitigation Measures

MM-TRAF-1: During construction, in each individual hour within the PM peak period (4 PM to 6 PM), allow a maximum of 37 outbound PCE vehicle trips and 6 inbound PCE vehicle trips.

Enforcement Agency:	City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of Transportation
Monitoring Phase:	Construction
Monitoring Frequency:	Periodic field inspections during construction

Action Indicating Compliance: Compliance certification report submitted by Project contractor

7. Alternative 5 – Mitigation Monitoring Program

As mentioned above, Alternative 5's Mitigation Monitoring Program will be consistent with the Project's apart from the Transportation and Traffic section. Alternative 5's Transportation and Traffic mitigation and monitoring program follows below. As discussed in Chapter III, *Revisions, Clarifications, and Corrections*, Alternative 5 incorporates modified versions of the Project's PDF-TRAF-1, PDF-TRAF-2, and PDF-TRAF-7 that incorporate all of the substantive provisions of the Project's PDF-TRAF-3, PDF-TRAF-4, PDF-TRAF-5, and PDF-TRAF-6.

Additionally, as PDF-TRAF-8 provided for a daily outside guest limit applicable to Other Wellness/Sports Activities, Health and Wellness Speaker Series, and Summer Camps, implementation of Alternative 5 would restrict vehicle trips in place of establishing a maximum number of daily outside guests. PDF-TRAF-8 would no longer establish a meaningful threshold given Alternative 5's use of a different metric (restriction of vehicle trips in place of a maximum outside guest attendance) to ensure that operational traffic impacts would be less than significant, and is therefore not included under Alternative 5.

Alternative 5 also incorporates new traffic PDFs PDF-TRAF-9 through PDF-TRAF-18. Therefore, the complete list of Alternative 5's traffic PDFs is as follows:

- PDF-TRAF-1
- PDF-TRAF-2
- PDF-TRAF-7
- PDF-TRAF-9
- PDF-TRAF-10
- PDF-TRAF-11
- PDF-TRAF-12
- PDF-TRAF-13
- PDF-TRAF-14
- PDF-TRAF-15
- PDF-TRAF-16
- PDF-TRAF-17
- PDF-TRAF-18

a) Transportation and Traffic

(1) Project Design Features

PDF-TRAF-1: Construction Traffic Management Plan. MSMU shall prepare a detailed Construction Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans as necessary and satisfactory to LADOT. The Construction Traffic Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

- Appropriate temporary traffic controls (signs and temporary signals) shall be installed along the public rights-of-way during all construction activities to ensure pedestrian and vehicular safety during construction.
- During peak haul traffic, if off-site staging is required, trucks would be radioed in from an off-site staging area to avoid queuing along adjacent street.
- Schedule construction-related deliveries, other than concrete and earthwork-related deliveries, between the hours of 7:00 AM and 3:00 PM to avoid the PM peak hour commuter traffic period as identified in the Project's Traffic Study and to reduce the potential of trucks waiting to load or unload for protracted periods of time. This restriction shall not apply to trucks being used for the concrete pour that cannot feasibly be finished before 3:00 PM. No on-street staging or idling of haul trucks on public roadways will be allowed.
- Maintain access for surrounding residential uses in proximity to the Project Site during Project construction.
- Identify designated transport routes for haul trucks and heavy trucks to be used over the duration of the Project. Develop a plan for staging trucks prior to arriving at the Site. Temporary haul truck staging will not be permitted on local hillside streets.
- Truck loading/unloading will occur on the MSMU Campus, not on local hillside streets.
- Construction truck travel on local streets shall be limited to Bundy Drive, Norman Place, and Chalon Drive only; trucks would not travel on any other local streets serving the neighborhoods surrounding the Project Site.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring residences at all times.
- In the event of temporary lane closures, a worksite traffic control plan, approved by LADOT, should be implemented to route vehicular traffic or pedestrians around any such closures.
- Unrestricted access for school buses shall be maintained on street rights-of-way during construction.

- MSMU shall attend bi-monthly (or at a frequency determined appropriate by City Staff) construction management meetings conducted by City Staff and the operators or contractors for the Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities. Coordination shall ensure that construction activities associated with these concurrent related projects and hauling activities are managed in collaboration with one another.
- MSMU shall provide advance notification to LADOT, the Archer School for Girls, the Brentwood School, and St. Martin of Tours School of its upcoming construction activities, including durations and daily hours of construction, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Barriers and/or fencing shall be installed around construction sites to secure construction equipment and the Site and to prevent trespassing, vandalism, and attracting nuisances.
- Safe truck driving practices, including low gear, not passing another vehicle, deployment of optional 4th axle, if available, shall be required.
- During construction, MSMU shall clearly post a hotline in several areas around the Campus, including along the construction fence and at the entrance to the Campus, to enable the public to call and report non-compliance with the Construction Traffic Management Plan.

Enforcement Agency:	City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of Transportation
Monitoring Phase:	Pre-construction; Construction
Monitoring Frequency:	Once prior to issuance of Building Permit; Periodic field inspections during construction
Action Indicating Compliance:	Approval of Construction Management Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

PDF-TRAF-2: Construction Parking Plan. MSMU shall prepare a Construction Parking Plan prior to the issuance of a building permit that identifies temporary parking locations for MSMU students, faculty/staff, and visitors and shall include the following elements as appropriate:

- Parking for MSMU students, faculty/staff, and visitors shall be accommodated via a valet service on the Campus. Valet operations would enable vehicles to be stacked in on-site parking lot aisles to maximize available vehicle parking spaces on the Campus.

- No construction worker parking will be allowed on local residential streets. Construction workers shall all park on the Campus.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park, and provide clear consequences to violators for failure to follow these regulations. All contracts with construction contractors shall expressly prohibit construction worker parking on residential streets. The contractor shall be responsible for informing subcontractors and construction workers of this requirement, for monitoring compliance of the subcontractors, and if necessary, for hiring a security guard to enforce these parking provisions.
- MSMU shall develop a plan for coordinating access for construction workers, school employees, students, and bus access when school and construction are concurrent.

Enforcement Agency:	City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of Transportation
Monitoring Phase:	Pre-construction; Construction
Monitoring Frequency:	Once prior to issuance of Building Permit; Periodic field inspections during construction
Action Indicating Compliance:	Approval of Construction Parking Plan from the City of Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

PDF-TRAF-7: MSMU shall develop a Campus Event Coordination Plan that would define the parameters of the parking reservation system, shuttling, valet parking program, monitoring of on-Campus parking and parking at designated off-Campus parking locations during Other Wellness/Sports Activities events, Health and Wellness Speaker Series events, Summer Sports Camps with up to 50 campers, and Club Sports activities, and-provision of staff/signage to direct vehicles during such events. This Plan shall be submitted to LADOT for review and approval prior to issuance of a certificate of occupancy for the proposed Wellness Pavilion. The Campus Event Coordination Plan shall implement the minimum performance standards set forth in PDF-TRAF-9 to PDF-TRAF-18.

Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Phase:	Prior to Operation; Operation

Monitoring Frequency: Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation

Action Indicating Compliance: Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

PDF-TRAF-9: MSMU shall maintain on its website a publicly accessible calendar, updated at least once per month, identifying all Campus events with over fifty outside guests.

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: Periodic inspections during operation

Action Indicating Compliance: Compliance certification report submitted by MSMU

PDF-TRAF-10: MSMU shall institute a parking reservation/ticketing system for outside guests arriving to Campus in non-shuttle vehicles for any Other Wellness/Sports Activities or Health and Wellness Speaker Series event, Summer Sports Camps with up to 50 campers, and for Club Sports activities.

- All outside guests shall be required to use the parking reservation/ticketing system, which shall clearly and conspicuously inform all outside guests that entrance to the Campus will only be permitted under the circumstances provided for by that outside guest's ticket (i.e. a parking reservation or shuttle).
- The reservation system shall include a reporting capability such that logs detailing issued reservations can be generated and reviewed. LADOT may audit the parking reservation system at any time.
- For regularly occurring events, such as Summer Sports Camps, entry to the Campus by outside guests will require permits issued through the parking reservation system.
- Outside guests and Summer Camp attendees will be required to identify at the time they register in the parking reservation/ticketing system whether they will be traveling in a private vehicle or via transportation network companies (TNCs) (such as Uber or Lyft) and their permit will specify their selected mode. Outside guests or Summer Camp attendees arriving by either private or TNC vehicles that do not have either a private vehicle or TNC permit, respectively, will not be allowed to enter the Campus.
- A reservation for a private vehicle or a Summer Sports Camp staff vehicle will count as two trips. A reservation for a TNC vehicle or private vehicle for outside guests or dropping off/picking up Summer Camp attendees will count as two trips for each arrival to or departure from Campus.

No additional parking reservations/tickets shall be issued once the maximum permitted attendance or trip cap limits are reached.

Accordingly, for outside guests to be granted access to the Campus for Other Wellness/Sports Activities, Health and Wellness Speaker Series events, Summer Sports Camps, or Club Sports activities they must either:

- (1) Arrive by shuttle;
- (2) Be Summer Sports Camp campers with parking permits; or
- (3) Be event outside guests with reservations issued through the parking reservation system.

Outside guests for Other Wellness/Sports Activities, Health and Wellness Speaker Series events, Summer Sports Camps, or Club Sports activities seeking entrance to the Campus in non-shuttle vehicles without a reservation or a permit will be denied access to the Campus. Pedestrian access shall be restricted in accordance with PDF-TRAF-17.

Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Phase:	Operation
Monitoring Frequency:	Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation
Action Indicating Compliance:	Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

PDF-TRAF-11: No Other Wellness/Sports Activities or Health and Wellness Speaker Series events shall be scheduled with start times between 7:00 to 9:30 AM and 4:00 to 7:30 PM or end times between 6:30 to 9:00 AM and 3:30 to 7:00 PM.

Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Phase:	Operation
Monitoring Frequency:	Once prior to issuance of Certificate of Occupancy; Periodic field inspections during operation

Action Indicating Compliance: Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by Project Applicant

PDF-TRAF-12: Total daily outside guest vehicle trips to/from Other Wellness/Sports Activities, Health and Wellness Speaker Series events, and Club Sports activities will be limited to 310 outside guest vehicle trips (155 inbound and 155 outbound), which will be applicable to all vehicles, including shuttles. Pedestrian access shall be restricted in accordance with PDF-TRAF-17.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Operation

Monitoring Frequency: Periodic field inspections during operation

Action Indicating Compliance: Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by Project Applicant

PDF-TRAF-13: MSMU shall require that campers attending Summer Sports Camps with more than 50 campers travel via shuttles and/or carpools. The number of allowable trips for each peak period would be restricted to 71 inbound and 31 outbound trips during any single hour within the weekday 7:00-9:00 AM peak period, 8 inbound and 34 outbound trips during the weekday 3:00-4:00 PM peak hour, and 3 inbound and 8 outbound trips during any single hour within the weekday 4:00-6:00 PM peak period. If MSMU permits Summer Sports Camps to begin or end during the AM-PM peak hours, it shall provide a Campus entry reservation system, to the satisfaction of LADOT, that shall log and ensure AM-PM peak period trips are not exceeded, and that can be audited by LADOT at any time.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Operation

Monitoring Frequency: Periodic field inspections during operation

Action Indicating Compliance: Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

PDF-TRAF-14: Total daily vehicle trips to/from Summer Sports Camps will be limited to 236 trips (118 inbound and 118 outbound), which will be applicable to all vehicles, including shuttles. Pedestrian access shall be restricted in accordance with PDF-TRAF-17.

Enforcement Agency: City of Los Angeles Department of Transportation
Monitoring Agency: City of Los Angeles Department of Transportation
Monitoring Phase: Operation
Monitoring Frequency: Periodic field inspections during operation
Action Indicating Compliance: Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

PDF-TRAF-15: Homecoming and Athenian Day events shall be held on weekends only.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Phase: Operation
Monitoring Frequency: Periodic field inspections during operation
Action Indicating Compliance: Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

PDF-TRAF-16: Club Sports activities scheduled during the week shall not begin prior to 7:30 PM. Prior to the beginning of each academic year, MSMU shall inform other schools participating in Club Sports activities of this limitation and of the requirements in PDF-TRAF-10, PDF-TRAF-12, and PDF-TRAF-17.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Phase: Operation
Monitoring Frequency: Periodic field inspections during operation
Action Indicating Compliance: Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

PDF-TRAF-17: Concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall institute and thereafter maintain a policy prohibiting entry on to the Campus by all pedestrians except persons meeting one of the following conditions:

- (1) Persons residing within the community around the Campus;
- (2) Persons entering the Campus via bicycle or similar conveyance, as established to the satisfaction of LADOT;
- (3) Persons arriving to the area around the Campus via public transportation, as established to the satisfaction of LADOT; and
- (4) Persons re-entering the Campus after walking outside of the Campus on the same day.

The objective of this PDF-TRAF-17 is to prevent parking by any MSMU users in the surrounding neighborhood. MSMU shall establish that the policy instituted in accordance with PDF-TRAF-17 meets this objective, to the satisfaction of LADOT.

Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Transportation
Monitoring Phase:	Operation
Monitoring Frequency:	Concurrent with the issuance of Certificate of Occupancy; Periodic field inspections during operation
Action Indicating Compliance:	Approval of Campus Event Coordination Plan from the City of Los Angeles Department of Transportation prior to issuance of Certificate of Occupancy; compliance certification report submitted by MSMU

PDF-TRAF-18: Concurrent with the issuance of a Certificate of Occupancy for the Wellness Pavilion, MSMU shall limit average daily total Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to 1 percent below the 2016 baseline trip counts taken for the Campus (2,160 average daily trips). Overall trip reductions shall be confirmed through trip counts conducted for at least two weeks each year (two in the spring semester and two in the fall semester) to the satisfaction of LADOT. Bi-annual monitoring reports documenting the trip counts shall be provided to LADOT until such reports demonstrate compliance for five consecutive years and thereafter every five years.

Enforcement Agency:	City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of Transportation

Monitoring Phase:	Concurrent with the issuance of the Certificate of Occupancy and during Operation
Monitoring Frequency:	Two times per year for five consecutive years and thereafter every five years, Periodic field inspections during operation
Action Indicating Compliance:	Biannual approval of two-week trip counts from the City of Los Angeles Department of Transportation; compliance certification report submitted by MSMU

(2) Mitigation Measures

MM-TRAF-1: During construction, in each individual hour within the PM peak period (4 PM to 6 PM), allow a maximum of 37 outbound PCE vehicle trips and 6 inbound PCE vehicle trips.

Enforcement Agency:	City of Los Angeles Department of Transportation
Monitoring Agency:	City of Los Angeles Department of Transportation
Monitoring Phase:	Construction
Monitoring Frequency:	Periodic field inspections during construction
Action Indicating Compliance:	Compliance certification report submitted by Project contractor (Construction)

Draft Memorandum

Date: May 14, 2020
To: Eddie Guerrero, LADOT
From: Tom Gaul
Subject: **Approach to VMT Analysis for Mount Saint Mary's University Wellness Pavilion Project**

LA15-2802

The environmental impact report (EIR) process for the Mount Saint Mary's University (MSMU) Wellness Pavilion Project ("Project") began with release of its notice of preparation in August 2016, well before the change from level of service to vehicle miles of travel (VMT) embodied in LADOT's *Transportation Assessment Guidelines* (TAG) published in 2019.¹ As such, a VMT analysis has not been conducted for the Project and a VMT analysis is not included in the transportation analysis report for the Project dated January 2018 which LADOT reviewed in its assessment letter dated April 4, 2018, nor in the Draft EIR released in April 2018.

Project Description

The Final EIR for the Project is currently under preparation. The Final EIR will present a Modified Project consisting of construction of a modified version of the proposed Wellness Pavilion on the MSMU Chalon Campus in Brentwood. The Wellness Pavilion will host numerous events that already take place on the Campus, plus the following new types of events:

- Health and Wellness Speaker Series (up to eight times per year)
- Other Wellness/Sports Activities events (up to 12 times per year) **Reduced from 4/mo.**
- Summer Sports Camps (summer months only)

It is these new events (not the hosting of events and activities that already exist on the campus) that were the subject of the traffic analysis in the Draft EIR.

Furthermore, the FEIR for the Modified Project will include a number of Project Design Features (PDFs) to avoid many of the significant intersection and street segment impacts that were

¹ Los Angeles Department of Transportation, *Transportation Assessment Guidelines*, July 2019.



identified in the Draft EIR. Two of the PDFs included in the Modified Project FEIR state the following:

- **PDF-TRAF-12:** Total daily outside guest vehicle trips to/from Other Wellness/Sports Activities, Health and Wellness Speaker Series events, and Club Sports activities will be limited to 310 outside guest vehicle trips (155 inbound and 155 outbound), which will be applicable to all vehicles, including shuttles. Pedestrian access shall be restricted in accordance with PDF-TRAF-17.
- **PDF-TRAF-14:** Total daily vehicle trips to/from Summer Sports Camps will be limited to 236 trips (118 inbound and 118 outbound), which will be applicable to all vehicles, including shuttles. Pedestrian access shall be restricted in accordance with PDF-TRAF-17.

Other related PDFs in the FEIR will include PDFs to require a parking reservation system for outside guests to an event with monitoring and reporting capabilities.

Vehicle Miles Traveled Screening

The Modified Project will not be approved prior to July 1, 2020, and as such we are now looking at the VMT implications of the Project. LADOT's TAG provides impact thresholds for vehicle miles of travel (VMT) for residential projects, office projects, and regional retail projects. The TAG states that VMT impacts for colleges/universities should be evaluated for the work trip element using the criteria for office projects. It is difficult to apply this criteria to the Modified Project, given that the new trips that will be generated are only for the new events that will be hosted at the Wellness Pavilion.

As you know, the TAG provides a screening criterion which says that a project is not required to analyze VMT if it does not generate a net increase of 250 or more daily vehicle trips. This criterion is typically applied to residential or office land uses that generate trips and VMT on a daily basis throughout the year. Implicit within the City's establishment of the 250 daily trip screening criterion is the idea that the amount of VMT generated by a project generating less than 250 trips per day on a consistent basis throughout the year is de minimis.

Given that the new events that are the subject of the Wellness Pavilion EIR will be infrequent (up to eight times per year for the Health and Wellness Speaker Series, up to 12 times per year for the Other Wellness/Sports Activities events, and Summer Sports Camps during the summer months only) and will be limited in regards to the total daily vehicle trips that can be generated by the project design features, these events will not generate overall VMT increases to anywhere near the extent to which a project that is a consistent generator of trips would.

Rather than considering an increase in vehicle trips on an individual day as the screening criterion for a project that will generate new trips on such few days throughout the year, it is therefore appropriate to consider the average number of new vehicle trips per day that would be generated



by these infrequent events across a year. This is especially appropriate because, unlike LOS and street segment analyses which are concerned with the worst-case impacts at any given point in time, VMT is not concerned with a worst-case impact on any given day, but rather is concerned with total VMT and its impact on greenhouse gas emissions, which is not dependent on vehicular trips during a worst-case scenario only. The table below shows the calculation.

New Event at Wellness Pavilion	Maximum Daily Vehicle Volume	Annual Frequency (Days per Year)	Annualized Vehicle Volume
Health & Wellness Speaker Series	310 [a]	8	2,480
Other Wellness/Sports Activities	310 [a]	12	3,720
Summer Sports Camps	236 [b]	60 [c]	14,160
Total			20,360
Average Trips per Weekday Across an Entire Year [d]			81
Notes:			
a. Outside guest daily vehicle trip limit per PDF-TRAF-12.			
b. Daily vehicle trip limit for Summer Sports Camps per PDF-TRAF-14.			
c. Assumes summer camps for 12 weeks, 5 days per week.			
d. Averaged across 250 weekdays per year.			

As can be seen, the new events at the Modified Project would generate an average of 81 vehicle trips per weekday across an entire year, below the 250 daily trip screening threshold in the TAG. As such, the Modified Project would be screened out from the TAG requirement to analyze VMT impacts.



February 5, 2021

Client-Matter: 62270-030

VIA E-MAIL: kathleen.king@lacity.org

Kathleen King
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Re: Mount Saint Mary's University Wellness Pavilion – Request for Department of City Planning to Only Process Entitlement Applications for FEIR Alternative 5

Dear Ms. King:

Our firm represents Mount Saint Mary's University ("MSMU"), the applicant for the Wellness Pavilion project (the "Project") that is the subject of the City's Environmental Case No. ENV-2016-2319-EIR.

Pursuant to the requirements of the California Environmental Quality Act ("CEQA"), the Draft EIR for the Project studied the environmental impacts of the Project and four project alternatives. As you know, the Project's Final EIR is now studying an additional alternative, Alternative 5, which MSMU designed in response to community input and to reduce the Project's environmental impacts.

After considering the environmental benefits of Alternative 5 compared to the Project, MSMU has decided to proceed solely with Alternative 5 and no longer wishes to proceed with the Project. MSMU therefore requests that the Department of City Planning consider only Alternative 5 with respect to the pending entitlement applications and any other discretionary City actions related to the Project.

Thank you for your attention to this matter.

Very truly yours,

Victor De la Cruz
Manatt, Phelps & Phillips, LLP