Chapter III

Revisions, Clarifications, and Corrections

Chapter III

Revisions, Clarifications, and Corrections

1. Introduction

As discussed in Chapter I, *Introduction*, and Chapter II, *Responses to Comments*, of this Final EIR, a new alternative (Alternative 5) was formulated in response to comments received during the Draft EIR public comment period and feedback provided at MSMU's community outreach events. As required by the California Environmental Quality Act (CEQA), the Draft EIR analyzed a reasonable range of potentially feasible alternatives that could attain most of the basic Project objectives, while reducing or substantially lessening the significant environmental effects of the Project. However, in a letter dated February 5, 2021, MSMU 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 Subsection d), *Evaluation of Impacts*, 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. In accordance with CEQA Guidelines Section 15132(a), the changes in this Chapter are made to clarify, correct, or supplement the information provided in the Draft EIR.

With respect to Transportation and Traffic impacts, the Draft EIR studied the Project's traffic impacts using the Level of Service (LOS) criteria, which involves an analysis of whether the Project would contribute to delays at intersections and cause congestion on nearby individual street segments. 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. For the purposes of providing a clear comparison to the Project's traffic analysis contained in the Draft EIR, this Final EIR provides a complete analysis of Alternative 5's traffic impacts using the LOS criteria. Further, the Los Angeles Department of Transportation (LADOT) determined that no VMT study for Alternative 5 was necessary because Alternative 5 will generate an average of less than 250 weekday vehicle trips per day across an entire year, and therefore falls below LADOT's Transportation Assessment Guidelines (TAG) screening criteria which 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. A VMT analysis, unlike LOS and street segment analyses, does not focus on a worst-case impact on a given day, but rather looks to total VMT and its impact on greenhouse gas emissions.

Both the Project and Alternative 5, unlike an office or residential project, will not add vehicle trips on a daily basis. Instead, the Project and Alternative 5 would 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. As discussed below, Alternative 5 restricts Health and Wellness Speaker series events to a maximum of eight times per year, Other Wellness/Sports Activities events to a maximum of 12 times per year, and Summer Sports Camps to the summer months only. Further, as explained below, Alternative 5 incorporates new Project Design Features (PDFs) PDF-TRAF-12 and PDF-TRAF-14, restricting total daily outside guest vehicle trips on days when an Other Wellness/Sports Activities and Health and Wellness Speaker Series event is held to 310, and total daily vehicle trips on days when a Summer Sports Camp is being held to 236 trips. 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 Project would generate approximately 205 average daily weekday vehicle trips under a worst-case scenario, also falling below the 250 weekday vehicle trips per day threshold. Alternative 5 also includes PDF-TRAF-18 (discussed below), which requires total vehicle trips for the Campus to remain below the levels of 2016 baseline trip counts taken for the Campus. 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. Because overall trip lengths are not being increased by either the Project or Alternative 5, and PDF-TRAF-18 will reduce total trips to Campus, total VMT generated by the Campus, inclusive of all VMT generated by Alternative 5, will be below 2016 levels.

This Chapter contains three subsections pertaining to changes in the Draft EIR. Section 2, *Alternative 5*; Section 3, *Environmentally Superior Alternative*; and Section 4, *Other Revisions, Clarifications, and Correction*s. The level of analysis provided for Alternative 5 is consistent with the level of analysis provided for each of the other Project alternatives in the Draft EIR. Under CEQA, alternatives do not need to be described or analyzed at the same level of detail as the Project.[1] Based on the comparative analysis, a revised evaluation of the Environmentally Superior Alternative is incorporated into this Chapter (Section 3, *Environmentally Superior Alternative*). Also included is a revision of the Draft EIR Table V-12, *Comparison of Impacts Summary* (from the Draft EIR), which compares the impact of all five alternatives to the Project. As provided in the following discussion and summarized in the revised Table V-12, Alternative 5 would be the Environmentally Superior Alternative

1 CEQA Guidelines Section 15126.6(d)

since it would achieve a greater reduction in the Project's significant and unavoidable construction and operational impacts compared to the other evaluated alternatives.

Section 4, *Other Revisions, Clarifications or Corrections*, includes revisions, corrections and clarifications that have been made to the Draft EIR based on comments received from the public and other items requiring revisions.

The differences between the Project and Alternative 5 primarily consist of modifications to Project Design Feature (PDF) TRAF-1 and PDF-TRAF-2, the deletion of PDF-TRAF-3, PDF-TRAF-4, PDF-TRAF-5, PDF-TRAF-6 (the substantive provisions of which have been incorporated into Alternative 5's modified PDF-TRAF-1 and PDF-TRAF 2), and PDF-TRAF-8 (which limited outside guest attendance under the Project and is no longer necessary for Alternative 5 as a result of the addition of new PDFs that limit daily outside guest vehicle trips), and the addition of PDF-TRAF-9 through PDF-TRAF-18. The new PDFs will restrict, and in many cases eliminate, Alternative 5's daily and peak hour vehicle trips.

With respect to the revised PDFs, all of the substantive provisions of PDF-TRAF-3, PDF-TRAF-4, PDF-TRAF-5, and PDF-TRAF-6 have been incorporated into Alternative 5's revised PDF-TRAF-1 and PDF-TRAF-2. These original PDFs included under the Project have been incorporated into Alternative 5 PDFs TRAF-1 and 2 for the sake of clarity. All of the substantive provisions of PDF-TRAF-7 have been retained in Alternative 5's PDF-TRAF-7. 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. Thus, under Alternative 5, 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.

The new information presented in this Chapter would not require recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. As demonstrated in this Final EIR, the changes discussed in this Chapter primarily apply to Alternative 5 and would result in a reduction in the Project's environmental impacts, including a reduction of the Project's significant and unavoidable operational traffic impacts to a less than significant level. As such, this Chapter does not introduce new significant information to the Draft EIR that would warrant its recirculation as set forth in CEQA Guidelines Section 15088.5.

2. Alternative 5

The primary differences between Alternative 5 and the Project are the following:

- An overall square footage reduction of the Wellness Pavilion from 38,000 square-feet (Project) to 35,500 square-feet (Alternative 5);
- Elimination of the Project's two-story concrete parking deck and the Project's proposed 55 new parking spaces;
- Consolidation of the existing surface parking lots located within the Project Site and replacement of 186 existing spaces within surface parking areas to the north, south, and east of the Wellness Pavilion (a net reduction of 46 spaces compared to existing conditions);
- The Campus Green included in as part of the Project, located on an existing surface parking area and informal open area between Rossiter Hall and Mary Chapel, would be eliminated and under Alternative 5 would be replaced by a surface parking lot;
- Relocation of the Wellness Pavilion to the north (to be constructed in the space that was designated for a two-story parking deck under the Project);
- Preservation of the existing two-story facilities management building (the largest of the three existing buildings that would require demolition under the Project);
- Preservation of 20 mature, on-site non-protected trees which would be removed as part of the Project, (the Project would require removal of 66 non-protected trees as compared to Alternative 5 which would remove 46 non-protected trees);
- Replacement of the Project's biofiltration planter box system with a different stormwater retention system using multiple underground water storage tanks for rainwater harvesting, while remaining compliant with the City's Low Impact Development (LID) program;
- The installation of solar panels on the Wellness Pavilion roof;
- A maximum daily vehicle trip cap for vehicles associated with Alternative 5's Health and Wellness Speaker Series, Other Wellness/Sports Activities, Summer Camps, and Club Sports activities;
- Prohibition of pedestrian access to the Campus except when pedestrians have not arrived by a private vehicle, ensuring that Alternative 5's trip caps and parking reservation system function to effectively limit vehicle trips and eliminating MSMU parking in the surrounding neighborhood; and
- The elimination of all AM and PM peak hour trips associated with Alternative 5's Health and Wellness Speaker Series, Other Wellness/Sports Activities, and Club Sports activities.

Implementation of PDF-TRAF-9 through PDF-TRAF-18, included as part of Alternative 5, and revisions to PDF-TRAF-1, PDF-TRAF-2, and PDF-TRAF-7 would ensure that Alternative 5 would reduce the Project's significant and unavoidable off-site construction

traffic noise and off-site construction traffic impacts, although not to a level of less than significant. Further, the Project's significant and unavoidable operational traffic impacts would be reduced to a level of less than significant under Alternative 5. Other than the physical and operational differences discussed further below (including modifications to PDFs included in the Draft EIR, the deletion of PDF-TRAF-8, and the inclusion of several new PDFs), Alternative 5 is identical to the Project and will include the implementation of all of the Project's PDFs and mitigation measures.

a) Physical Modifications

Table III-1, *Physical Changes under Alternative 5*, below, summarizes the primary physical differences and similarities between the Project and Alternative 5. As with the Project, Alternative 5 would include the development of a two-story (42-feet tall) Wellness Pavilion with a generally similar architectural style. Alternative 5 would result in the construction and operation of a 35,500-square-foot Wellness Pavilion as opposed to the Project's 38,000-square-foot Wellness Pavilion evaluated in the Draft EIR. The proposed physical changes would reduce the overall construction period by approximately two (2) months.

Alternative 5 would eliminate the Project's two-story concrete parking deck and shift the footprint of the 35,500 square-foot Wellness Pavilion to the location of the former planned parking deck. As described in the Draft EIR, under the Project, the proposed parking deck would have accommodated 281 spaces, including the replacement of 226 existing surface parking stalls and 55 new parking spaces. The total parking provided on the entire Campus under the Project would have been 616 spaces. Alternative 5 would remove 232 existing surface parking stalls and replace 186 stalls, leaving the Campus with a new total of 515 spaces, a net reduction of 46 spaces compared to existing conditions. As shown in **Table III-2,** *Alternative 5 and Campus Parking Requirements,* a total of 306 parking spaces would be required to comply with LAMC parking requirements.

Figure III-1, *Alternative 5: Site Plan*, illustrates proposed changes under Alternative 5, including the location of the Wellness Pavilion, landscaping, and the new surface parking lots. As shown in Figure III-1, the pool deck would be incorporated into the southwest corner of the Wellness Pavilion, similar to the Project. The pool deck would be reduced from 5,820 square feet under the Project to 3,757 square feet under Alternative 5.

Figure III-1 also illustrates a paved entrance plaza/walkway leading from the Pavilion entrance toward the Campus Core. Similar to the Project, the walkway and staircase leading to the Wellness Pavilion under Alternative 5 would facilitate pedestrian access to the Project Site. Pathways under the Project would have passed from the formerly proposed landscaped motor court around the east side of the Wellness Pavilion. Under Alternative 5, a walkway would be provided from the landscaped parking at the north edge of Mary Chapel to the entrance of the Wellness Pavilion. Pedestrian access would also be provided along the new driveway configuration, which would be northbound only along the east edge of the Wellness Pavilion and southbound only along the west edge of the Wellness Pavilion. The walkway and driveway configuration as well as the solar panels are illustrated in Figure III-1.

TABLE III-1
PHYSICAL CHANGES UNDER ALTERNATIVE 5

	Project as Evaluated in the Draft EIR	Alternative 5
Wellness Pavilion Floor Area	38,000 square feet	35,500 square feet
Wellness Pavilion Building Footprint	24,605 square feet (not including columns)	23,598 square feet (not including columns)
Building Height	42 feet	42 feet
Architectural Character	Modern, with features and color palette to complement existing historical character and colonnades of the Campus Circle	Similar design and color palette
Parking Facilities	Replacement of 226 existing surface parking with two-story Parking Deck with 281 spaces (a net increase of 55 spaces compared to existing conditions)	Replacement of 232 surface parking spaces with 186 new spaces (a net decrease of 46 parking spaces compared to existing conditions)
Wellness Pavilion Location	At the site of the existing tennis courts, pool, facilities management buildings, and fitness center (see Figure II-3 of the Draft EIR)	In the surface parking lot area to the north of the existing tennis courts, pool, facilities management buildings, and fitness center
Required Demolition	Existing tennis courts, pool, two facilities management buildings, and fitness center, surface parking lots	Existing tennis courts, pool, one building (the smaller, single-story of the two existing facilities management buildings), and fitness center, 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 (a 78 percent reduction from the Project)
Grading Cubic Yards	10,699 cubic yards of cut and approximately 9,825 cubic yards of fill (a total of 20,524 cubic yards)	4,884 cubic yards of cut and approximately 4,459 cubic yards of fill (a total of 9,343 cubic yards) (a 54 percent reduction from the Project)
Concrete Cubic Yards	8,155 cubic yards of concrete	1,864 cubic yards of concrete (a 77 percent reduction from the Project)

SOURCE: ESA, 2021.

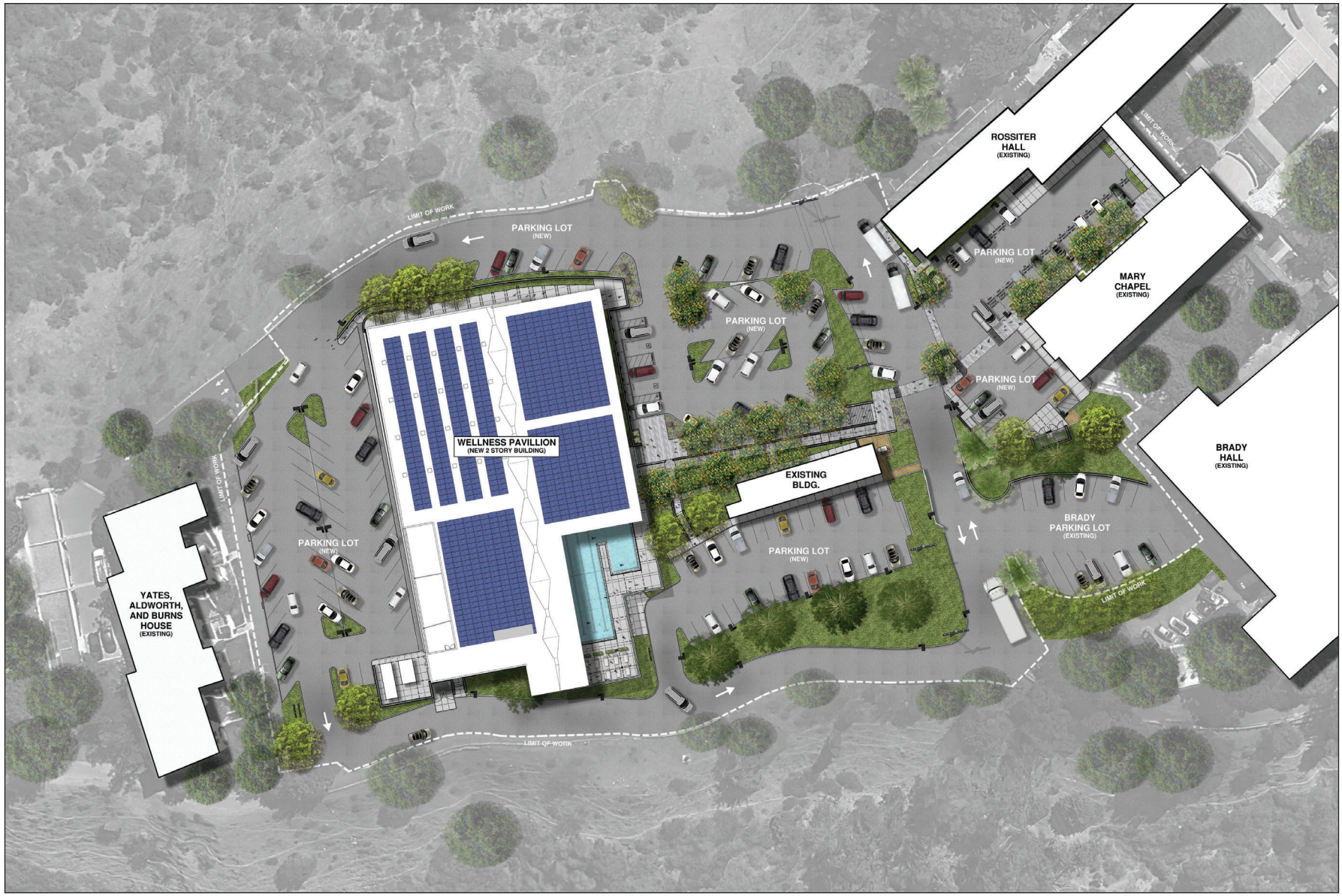
TABLE III-2
ALTERNATIVE 5 AND CAMPUS PARKING REQUIREMENTS

Year	Use		Required Parking
1964	Arts and Humanities Building CPC-4072, March 6, 1964		161
1975	Fine Arts Building Building Permit and Certificate of Occupancy No 1973LA74946, issued January 9, 1975		+ 39
Subtotal:			200
1984	Faculty Residence CPC-4072, January 31, 1984		+11
Subtotal:			211
1984	Parking Structure Approval CPC-4072, July 27, 1984		N/A
Subtotal:			211
2019	Wellness Pavilion Alternative 5		
	Assembly Area (Gym) (212 seats @ 1 space per 5 fixed seats)[1]	42 spaces	+95
	Remaining Floor Area (26,550 square feet @ 1 space per 500 square feet)[2]	53 spaces	
Total Required Campus Parking With Alternative 5:			306
Total Provided Campus Parking With Alternative 5:			515

TABLE NOTES:

[1] LAMC 12.21 A.4(e)

[2] LAMC 12.21. A.4(d)



SOURCE: LPA, Inc., 2021

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-1

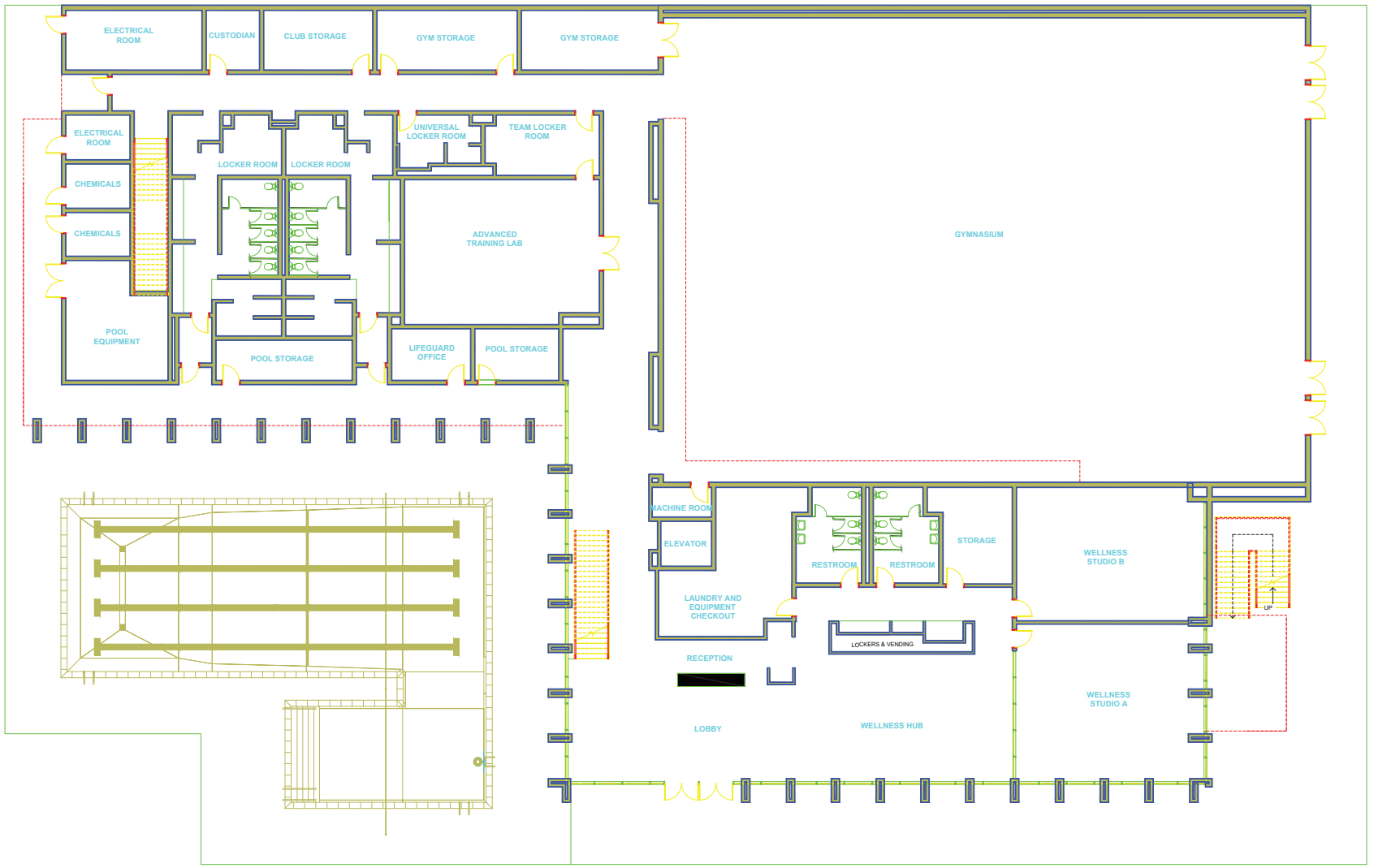
Alternative 5 Site Plan

Figure III-2, *Alternative 5: First Floor Plan*, shows the organization of the first floor of the Wellness Pavilion, including the gymnasium, locker rooms, and advanced training lab. The second floor is illustrated in **Figure III-3**, *Alternative 5: Second Floor Plan*. As shown therein, the second floor would be occupied by wellness studios, a social lounge, and staff offices. The space above the gymnasium would be open to accommodate the greater height of the first-floor gymnasium. Generally, while there are some minor differences in the internal wall configurations when comparing the floor plans of the Project to Alternative 5, there are no substantial differences in the internal uses and functions of the Wellness Pavilion.

Figure III-4, *Alternative 5: South and East Elevations*, and **Figure III-5,** *Alternative 5: North and West Elevations*, are drawings of the Wellness Pavilion's profile as viewed from four cardinal directions. With the exception of the removed parking deck, Alternative 5 would have a similar building type and silhouette as the original Project. However, as the Wellness Pavilion would be located on the northern portion of the Project Site, it would be less visible from the Campus Core and from some off-site locations (see the simulations in Figures III-10 through III-16, below).

Figure III-6, *Alternative 5: Conceptual View of the Wellness Pavilion's South Entrance*; and **Figure III-7** *Alternative 5: Conceptual View of the Wellness Pavilion's Pool Area* are architectural renderings of Alternative 5 and include future dimensional views of the building's entrance features and landscaping scheme. As shown in Figures III-6 and III-7, Alternative 5 would provide a dedicated walkway to the entrance plaza and complement the existing colonnade theme of the Campus Core with an archway along the entrance plaza. As with the original Project, Alternative 5's deep roof overhang would create a dramatic visual effect for those approaching the building from the lower elevation to the south. The soffit, as with the original Project, would be painted in a terra cotta color to complement the terra cotta roof tiles within the Campus Core and would be prominently visible to pedestrians approaching the entrance plaza. The Wellness Pavilion's second story would be constructed out of glazed glass to allow for broad views across the Campus, the Los Angeles Basin, and Santa Monica Bay.

Figure III-8, *Alternative 5: Conceptual Aerial View of the Wellness Pavilion and Campus Setting*, illustrates a birds-eye view of Alternative 5. The function of this rendering is to show the overall relationship and cohesiveness of the Wellness Pavilion and the surrounding Campus. As shown in Figure III-8, the Wellness Pavilion would complete the developed campus and bring continuity between the Campus Core in the south and the Yates, Aldworth and Burns Houses to the north. Similar to the Project, Alternative 5 would be constructed entirely within an existing developed portion of the Campus.

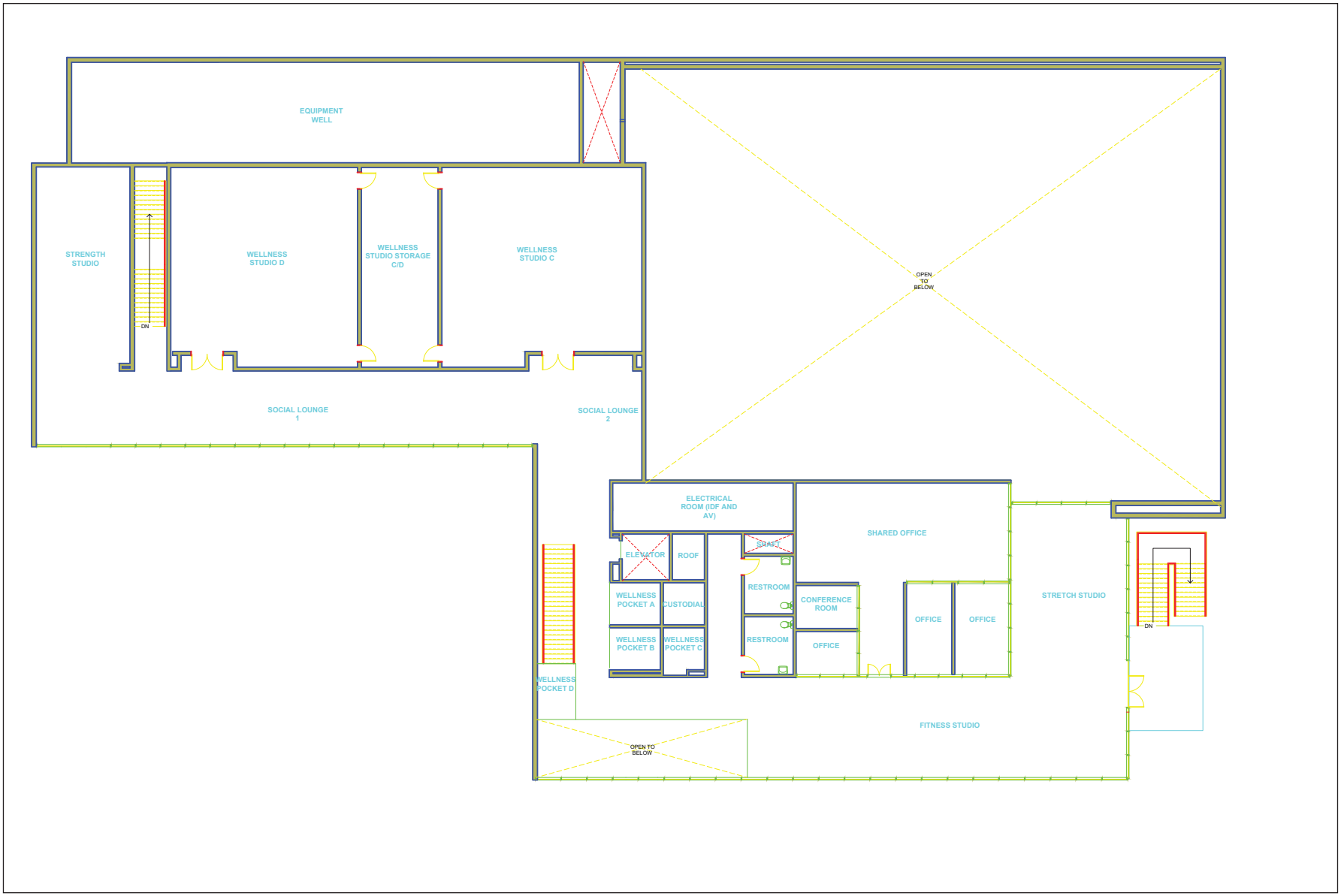


SOURCE: LPA, Inc., 2018

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-2

Alternative 5: First Floor Plan



SOURCE: LPA, Inc., 2018

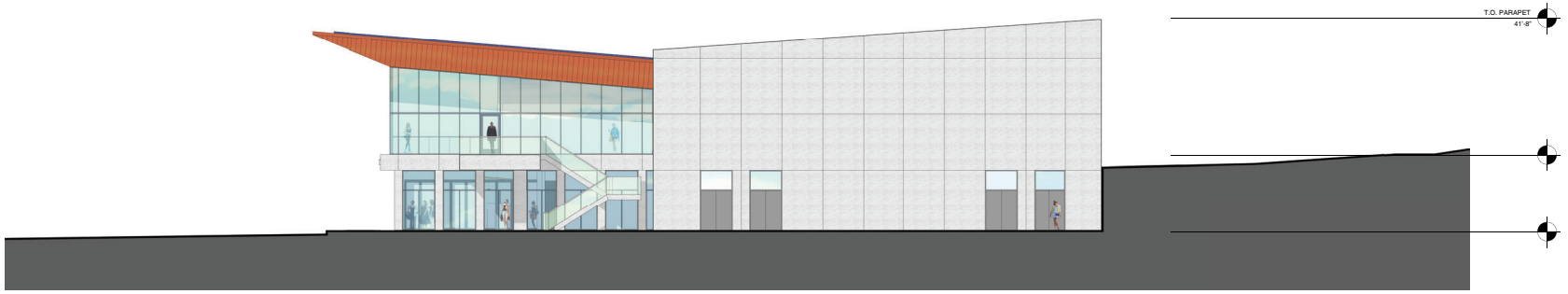
Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-3

Alternative 5: Second Floor Plan



EXTERIOR ELEVATION - SOUTH



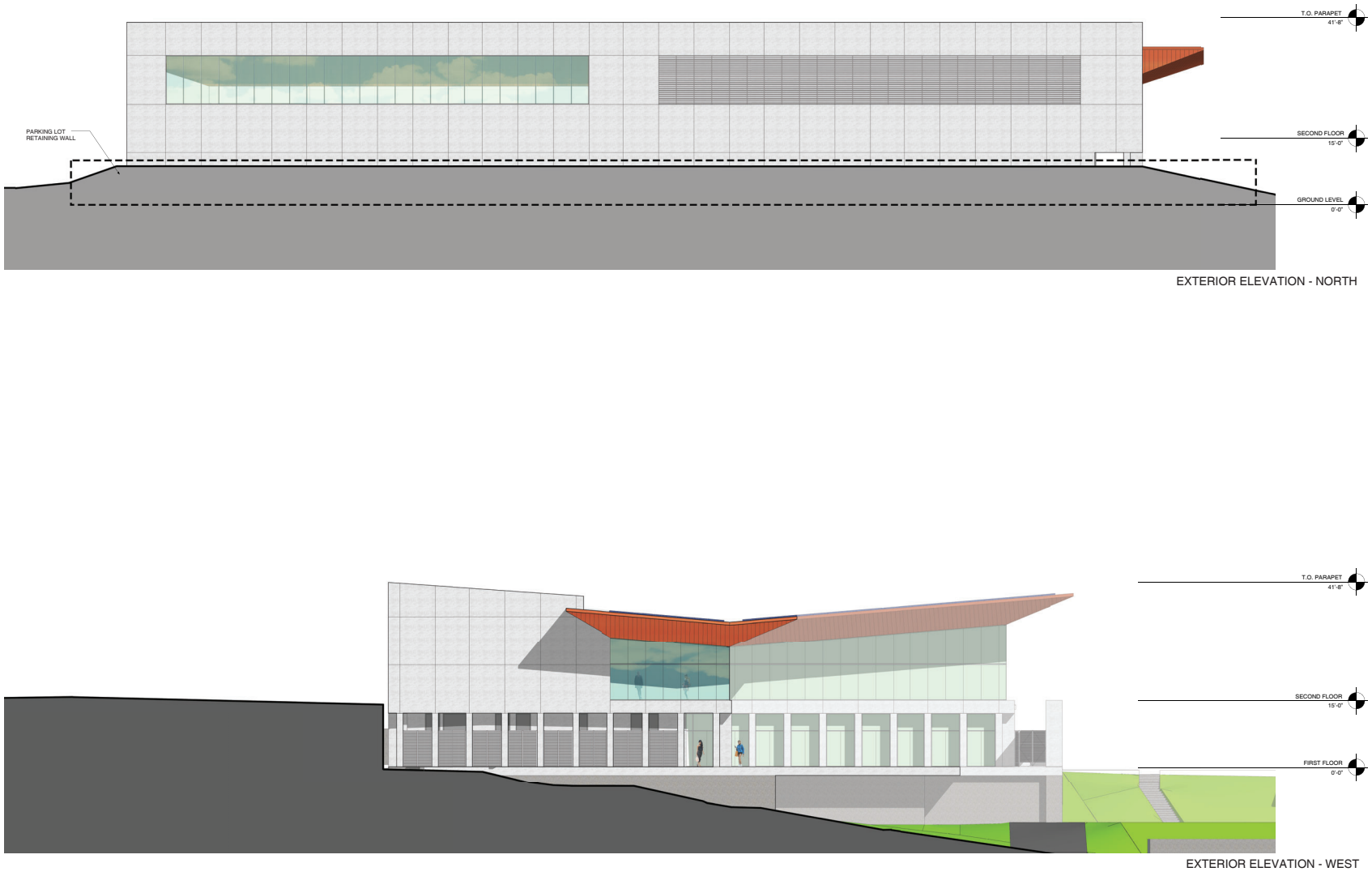
EXTERIOR ELEVATION - EAST

SOURCE: LPA, Inc., 2018

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-4

Alternative 5: South and East Elevations



SOURCE: LPA, Inc., 2018

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-5

Alternative 5: North and West Elevations



SOURCE: LPA, Inc., 2018

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-6

Alternative 5: Conceptual View of the Wellness Pavilion's South Entrance



SOURCE: LPA, Inc., 2018

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-7

Alternative 5: Conceptual View of the Wellness Pavilion's Pool Area



Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

SOURCE: LPA, Inc., 2018

Figure III-8

Alternative 5: Conceptual Aerial View of the Wellness Pavilion and Campus Setting

b) Operational Modifications

Alternative 5 reduces the Project's significant and unavoidable off-site construction traffic noise impacts although not to a level of less than significant. Alternative 5 would reduce the Project's significant and unavoidable operational traffic impacts to less than significant through the implementation of operational changes.

Alternative 5 would reduce the Project's construction traffic impacts at area intersections to less than significant levels, but impacts at three neighborhood street segments (Bundy Drive north of Norman Place, Chalon Road east of Bundy Drive, and Bundy Drive north of Sunset Boulevard) would remain significant and unavoidable. However, it should be noted that the Draft EIR's analysis of construction traffic impacts for intersection LOS and neighborhood street segments was included as a conservative approach, as LADOT has not adopted any thresholds regarding construction traffic impacts for intersection LOS or neighborhood street segments.

Table III-3, *Operational Changes under Alternative 5,* includes MSMU's existing and proposed events discussed in Chapter II, Project Description, of the Draft EIR, and also illustrates the operational changes with respect to the Wellness Pavilion under Alternative 5 as compared to the Project. Changes include a reduction in the frequency of Other Wellness/Sports Activities associated with the Alternative 5, which have the greatest potential for high outside guest attendance. Specifically, the Other Wellness/Sports Activities events would be reduced under Alternative 5 from approximately four per month to one per month (a reduction of 75 percent).

Further, through the implementation of PDF-TRAF-12 and PDF-TRAF-14, Alternative 5 would establish maximum daily vehicle trip caps for Health and Wellness Speaker Series, Other Wellness/Sports Activities, Summer Sports Camps, and Club Sports activities. The frequency and estimated attendance of events under the Project (evaluated in the Draft EIR) and Alternative 5 is shown in Table III-3 below.

Under Alternative 5, the maximum daily outside guest vehicle trips for Health and Wellness Speakers Series, Other Wellness/Sports Activities, and Club Sports activities would be reduced to a total of 310 (155 inbound and 155 outbound) (PDF-TRAF-12). The daily total would be applicable to all types of vehicles, including shuttles, as further specified in PDF-TRAF-12. PDF-TRAF-11 would restrict the start and end times of these events such that no trips will be generated during peak periods.

Summer Sports Camps would 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 would apply to certain peak hours as included in PDF-TRAF-13.

Alternative 5's traffic analysis includes projected vehicle trips, with the incorporation of PDFs TRAF-1, PDF-TRAF-2, and PDF-TRAF-7 (as proposed under Alternative 5), the elimination of PDF-TRAF-3, PDF-TRAF-4, PDF-TRAF-5, PDF-TRAF-6, and PDF-TRAF-8, and the

addition of PDF-TRAF-9 through PDF-TRAF-18, which are specific to Alternative 5. The new PDFs under Alternative 5, which will reduce the Project's significant and unavoidable operational traffic impacts identified in the Draft EIR to a level of less than significant and incrementally reduce the Project's significant and unavoidable off-site construction noise impacts, are listed below and included in Chapter IV, *Mitigation Monitoring Program*, of this Final EIR. As identified in the Draft EIR, the Project's only significant and unavoidable impacts were construction and operational traffic and off-site construction noise. As explained in Subsection d), *Evaluation of Impacts*, and shown in Table III-15, *Comparison of Impacts Summary*, Alternative 5 would also reduce the Project's environmental impacts in several other categories. Therefore, the balance of Alternative 5's environmental impacts will be less than the Project's and will all remain less than significant.

As mentioned above, all of the substantive provisions of PDF-TRAF-3, PDF-TRAF-4, PDF-TRAF-5, and PDF-TRAF-6 have been incorporated into Alternative 5's revised PDF-TRAF-1 and PDF-TRAF-2. Therefore, the deletions of these PDFs do not in any way make Alternative 5 less restrictive than the Project. Instead, Alternative 5's PDF-TRAF-1, PDF-TRAF-2, PDF-TRAF-7, and the new PDFs that are specific to Alternative 5 (PDF-TRAF-9 through PDF-TRAF-18) are more restrictive with respect to traffic impacts as compared to the Project. This greater level of restriction is reflected in Alternative 5's reduction in both construction and operational traffic impacts relative to the Project.

Alternative 5's PDFs TRAF-1, TRAF-2, and TRAF-7 are shown below. (Deletions shown in ~~strikethrough~~, additions shown in <u>underline</u>).

> **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 avoid queuing along adjacent street<u>.</u>
> - 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. <u>No on-street staging or idling of haul trucks on public roadways will be allowed.</u>

TABLE III-3
OPERATIONAL CHANGES UNDER ALTERNATIVE 5

Event Name		Frequency	Timing	Time of Day	Location	Description	Project Estimated Attendance: Students/ Faculty/Staff (S/F/S) + Outside Guests (OG)	Alternative 5 Estimated Attendance	Difference Between Project and Alternative 5
Existing Events with Potential to Change									
Spring Convocation	*Existing*	Annually (1-Day Event)	January	8:00 a.m. -2:00 p.m. Weekday	CC, Circle	Internal meeting of faculty/staff prior to start of semester. Typically about 12-25 outside guests.	275 (SFS) + 25 (OG) 300	--	--
	With Project	Same as above	Same as above	Same as above	Potentially move to Pavilion	Same as above	Same as above	Same	No Change compared to Project
Nursing Panel	*Existing*	Annually (1-Day Event)	January	3:00 -10:00 p.m. Weekday	CC	Career Services. Nursing professionals. Some outside vendors and panelists. Approx. 25 outside people.	125 (SFS) + 25 (OG) 150	--	--
	With Project	Same as above	Same as above	Same as above	Potentially move to Pavilion	Same as above	Same as above	Same	No Change compared to Project
Woman's Leadership Conference	*Existing*	Annually (1-Day Event)	September	8:00 a.m. -5:00 p.m. Weekend Day	CC, Circle, Classrooms	About 175 students and remainder women from the community.	175 (SFS) +175 (OG) 350	--	--
	With Project	Same as above	Same as above	Same as above	CC, Circle, Classrooms, and potentially Pavilion	Potentially move some sessions to Pavilion.	Same as above	Same	No Change compared to Project
Live at the Mount	*Existing*	Semi-Annually (8 Days Total)	4 days fall/ 4 days spring	Weekday AM.	Theater, CC, Circle	High school students who are interested in learning more about college choices. Students come in 5 buses for each day.	30 (SFS) +250 (OG) 280	--	--
	With Project	Same as above	Same as above	Same as above	Potentially move to Pavilion	Same as above	Same as above	Same	No Change compared to Project

TABLE III-3
OPERATIONAL CHANGES UNDER ALTERNATIVE 5

Event Name		Frequency	Timing	Time of Day	Location	Description	Project Estimated Attendance: Students/ Faculty/Staff (S/F/S) + Outside Guests (OG)	Alternative 5 Estimated Attendance	Difference Between Project and Alternative 5
Student Orientation	*Existing*	Annually 2 Days	Summer	8:00 a.m. -5:00 p.m. Weekend Days	CC, Theater, Circle, Classrooms	Orientation for students and family members	400 (SFS) + 600 (OG) 1,000	--	--
	With Project	Same as above	Same as above	Same as above	CC, Theater, Circle, Classrooms and potentially Pavilion	Same as above	Same as above	Same	No Change compared to Project
Existing Events with Potential for Increased Attendance									
Homecoming	*Existing*	Annually (1-Day Event)	October	2:00 -4:00 p.m. Weekend Day	CC, Circle, Classrooms	Students, faculty, staff and alums.	150 (SFS) +100 (OG) 250	--	--
	With Project	Same as above	Same as above	Same as above	CC, Circle, Classrooms, and potentially Pavilion	Potentially more rooms for added health and wellness sessions in Pavilion.	200 (SFS) +150 (OG) 350	Same Increase	Alternative 5 requires Homecoming on weekends only. (Alternative 5 PDF-TRAF-15)
Athenian Day	*Existing*	Annually (1-Day Event)	Spring	8:00 a.m. -5:00 PM. Weekend Day	CC, Pool/Fitness Facilities, Circle	Athletic event for students and alums. Includes use of existing pool and fitness facilities.	150 (SFS) + 50 (OG) 200	--	--
	With Project	Same as above	Same as above	Same as above	Circle and possibly Pavilion	Would utilize new gym, pool, and fitness facilities in Pavilion.	200 (SFS) + 100 (OG) 300	Same Increase	Alternative 5 requires Athenian Day on weekends only. (Alternative 5 PDF-TRAF-15)
Potential New Events/Activities									
Summer Sports Camps	*Project*	Daily (Mon-Sun)	Summer (over 12 weeks)	8:00 AM – 5:00 PM Daily	Pavilion	Camps could be made available to the community/ public and/or students/ faculty/staff.	50-400 (OG) No SFS Estimated 480 total vehicle trips per day Per PDF-TRAF-8, a maximum of 400 OG per event would be allowed	50-400 (OG) No SFS	Alternative 5 requires shuttles or a carpool program for campers on days with over 50 campers arriving or departing during the summer weekday AM peak period (7:00-9:00 AM) or the summer weekday PM peak period (3:00-6:00 PM). (Alternative 5 PDF-TRAF-13) Alternative 5 places a Summer Sports Camps vehicle trip restriction of 236 trips per day. (Alternative 5 PDF-TRAF-14) Alternative 5 places a Summer Sports Camps vehicle trip restriction of 102 trips during any single hour within the summer weekday 7:00-9:00 AM peak period. (Alternative 5 PDF-TRAF-13) Alternative 5 places a Summer Sports Camps vehicle trip restriction of 42 trips during the summer weekday 3:00- 4:00 PM peak hour. (Alternative 5 PDF-TRAF-13)

TABLE III-3
OPERATIONAL CHANGES UNDER ALTERNATIVE 5

Event Name		Frequency	Timing	Time of Day	Location	Description	Project Estimated Attendance: Students/ Faculty/Staff (S/F/S) + Outside Guests (OG)	Alternative 5 Estimated Attendance	Difference Between Project and Alternative 5
									Alternative 5 places a Summer Sports Camps vehicle trip restriction of 11 trips during any single hour within the summer weekday 4:00-6:00 PM peak period. (Alternative 5 PDF-TRAF-7, PDF-TRAF-9, PDF-TRAF-10, PDF-TRAF-13, PDF-TRAF-17)
Health and Wellness Speaker Series	*Project*	8/year	Throughout Year	Vary by speaker. Approximately 3 hours per event. Could occur from mid-morning to evening hours on weekday or weekend day.	Pavilion	New lecture series designed to support MSMU Wellness curriculum with periodic lectures from experts in health and wellness for students, faculty, staff and alums.	100-450 (50-200 SFS and 50-250 OG for each event) or 400 estimated vehicle trips/day	100-450 (50-200 SFS and 50-250 OG for each event) or 310 outside guest trips per day	Alternative 5 eliminates any Health and Wellness Speaker Series event with outside guests that starts between 7:00-9:30 AM and 4:00-7:30 PM on weekdays, or ends between 6:30-9:00 AM or 3:30-7:00 PM on weekdays, eliminating trips during the weekday AM peak period (7:00-9:00 AM) and the weekday PM peak period (4:00-7:00 PM). (PDF-TRAF-11) Alternative 5 places a vehicle trip restriction of 310 outside guest trips per day, applicable to Health and Wellness Speaker Series events, Other Wellness/Sports Activities events, and Club Sports activities. (PDF-TRAF-12) (Alternative 5 PDF-TRAF-7, PDF-TRAF-9, PDF-TRAF-10, PDF-TRAF-13, PDF-TRAF-17)
Other Wellness/ Sports Activities	*Project*	Up to 4 times per month	Throughout Year	Vary by activity. Could occur from morning to evening hours on weekday or weekend day.	Pavilion	MSMU community or external rental activities that could be held periodically throughout the year. Activities would be complimentary and consistent with the purpose of the Wellness Pavilion (i.e., health, wellness, and sports).	50 – 400 (all OG) [1] or 400 estimated vehicle trips/day	50 – 400 (all OG) [1]	Alternative 5 frequency of 12 times per year compared to Project frequency of 48 times per year. Alternative 5 eliminates any Other Wellness/Sports Activities event with outside guests that starts between 7:00-9:30 AM and 4:00-7:30 PM on weekdays, or ends between 6:30-9:00 AM or 3:30-7:00 PM on weekdays, eliminating trips during the weekday AM peak period (7:00-9:00 AM) and the weekday PM peak period (4:00-7:00 PM). (Alternative 5 PDF-TRAF-11) Alternative 5 places a vehicle trip restriction of 310 outside guest trips per day, applicable to Health and Wellness Speaker Series events, Other Wellness/Sports Activities events, and Club Sports activities. (Alternative 5 PDF-TRAF-12) (Alternative 5 PDF-TRAF-7, PDF-TRAF-9, PDF-TRAF-10, PDF-TRAF-13, PDF-TRAF-17)
Club Sports	*Alternative 5 Only*	No restriction on frequency	School year	After 7:30 PM on weekdays; no time restrictions on weekends	Pavilion	MSMU club basketball and volleyball activities	Not applicable – currently conducted off-Campus	20-40 OG	Alternative 5 requires that Club Sports activities do not begin earlier than 7:30 PM during the week. (Alternative 5 PDF-TRAF-16) Alternative 5 places a vehicle trip restriction of 310 outside guest trips per weekday, applicable to Health and Wellness Speaker Series events, Other Wellness/Sports Activities events, and Club Sports activities. (Alternative 5 PDF-TRAF-12) (Alternative 5 PDF-TRAF-7, PDF-TRAF-9, PDF-TRAF-10, PDF-TRAF-13, PDF-TRAF-17)

CC = Campus Center
SFS = Students, Faculty and Staff. Numbers shown represent the total number of students, faculty and staff combined.
OG = Outside Guests

[1] Attendance at Other Wellness/Sports Activities assumes all Outside Guests for purposes of analyzing a worst-case traffic scenario. However, it is acknowledged that attendees could include a combination of faculty, staff, students and outside guests.

SOURCE: ESA, 2021.

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- 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 Tour's 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.
- ~~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.
- 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.

PDF-TRAF-2: Construction Parking Plan. ~~The Project Applicant~~ MSMU shall prepare a Construction Parking Plan prior to the issuance of a building permit ~~to commencement of construction~~ that identifies temporary parking locations for construction workers and for MSMU students, faculty/staff, and visitors and shall include the following elements as appropriate:

- ~~-During the construction of the proposed parking deck,~~ 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.
- ~~During construction activities when MSMU students, faculty/staff, and visitors or construction worker parking cannot be accommodated on the Project Site, the plan shall identify alternate parking location(s) on Campus and the method of transportation to and from the Project Site for approval by the City 30 days before commencement of construction~~.
- ~~Construction workers shall park in designated areas on Campus or in available off-site parking facilities with~~ ~~n~~No construction worker parking will be allowed on ~~neighborhood~~ local residential streets. Construction workers shall all park on the Campus. ~~When construction worker parking is off site, a temporary shuttle would be operated for construction workers to and from the designated off-site parking location.~~
- 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.

PDF-TRAF-7: ~~Campus Event Coordination Plan.~~ MSMU shall develop a Campus Event Coordination Plan that would define the parameters of the parking reservation system, shuttling, valet parking program, monitoring of ~~valet parking program, monitor off-~~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 ~~provide~~ 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 through PDF-TRAF-18.

Proposed additional PDFs to enforce Alternative 5's commitments:

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.

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.

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.

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-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.

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.

PDF-TRAF-15: Homecoming and Athenian Day events shall be held on weekends only.

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.

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 this PDF-TRAF-17 meets this objective, to the satisfaction of LADOT.

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. 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.[2]

Alternative 5 will also incorporate the Project's MM-TRAF-1, as revised in Section 4, *Other Revisions, Clarifications, and Correction*s of this Chapter III of the Final EIR, below.

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.

c) Construction Modifications

Alternative 5 would reduce the Project's floor area from 38,000 square feet to 35,500 square feet for a reduction of 2,500 square feet and eliminate the Project's two-story,

[2] 2016 average daily trips for the Campus of 2,160 are based on counts taken by Wiltec on October 17–21, 2016, adjusted by Campus-related vehicles that were parked on Chalon Road.

concrete parking deck. The reduction in floor area compared to the Project, the elimination of the Project's two-story parking deck, and shifting the building footprint to a location that will require less hillside stabilization, would reduce the overall scale of construction and shorten the construction timeline. The reduction in scale of construction activity will result in a 54 percent reduction in grading (approximately 20,524 cubic yards under the Project compared to approximately 9,343 cubic yards under Alternative 5).

The elimination of the concrete parking deck would reduce the scale and the time required for concrete pours, which are a primary source of the Project's significant off-site construction noise and traffic impacts. In addition, the need for buttressing to address the Site's topography would be substantially reduced from approximately 120 concrete soldier piles under the Project to 27 or fewer under Alternative 5.

Table III-4, *Construction Phases – Alternative 5 Compared to the Project,* illustrates Alternative 5's estimated construction phases compared to those of the Project. As shown in Table III-4, the greatest incremental time difference would occur during concrete pour. As further shown in Table III-4, the overall construction under Alternative 5 would be reduced by approximately two months.

TABLE III-4
CONSTRUCTION PHASES – ALTERNATIVE 5 COMPARED TO THE PROJECT

Construction Phase	Project[a]	Alternative 5	Reduction of Duration
Phase I – Site Preparation	1 month	1 month	0%
Phase II – Demolition	1.5 months (6 weeks)	1.3 months (5 weeks)	15%
Phase III –Grading	1.5 months	1.5 months	0%
Phase IV – Concrete Pouring	7 months[b]	5.6 to 6.3 months	10–20%
Phase V – Building Construction (Structural Steel)	3 months	3 months (with minimal reduction)	0%
Phase VI – Building Construction (Framing/Walls/Finishes)	9 months	8 months	10%
Phase VII – Paving	6 months	5.4 months	10%
Total months (taking into account overlapping phases)	22 months	20 months	10%

NOTES:

[a] See Section 4, *Other Revisions, Clarifications, and Correction*s of this Chapter III of the Final EIR, below, showing revisions to the length of certain of the Project's construction phases included in the Project Schedule of Construction Activity on page 62 of Appendix I, *Transportation and Traffic*, of the Draft EIR

[b] Concrete pouring activities would be intermittent, in which various concrete pours would be conducted for a total collective of approximately 75 days under the Project, and a total collective of approximately 60 to 67 days under Alternative 5.

SOURCE: Illig Construction Company 2019.

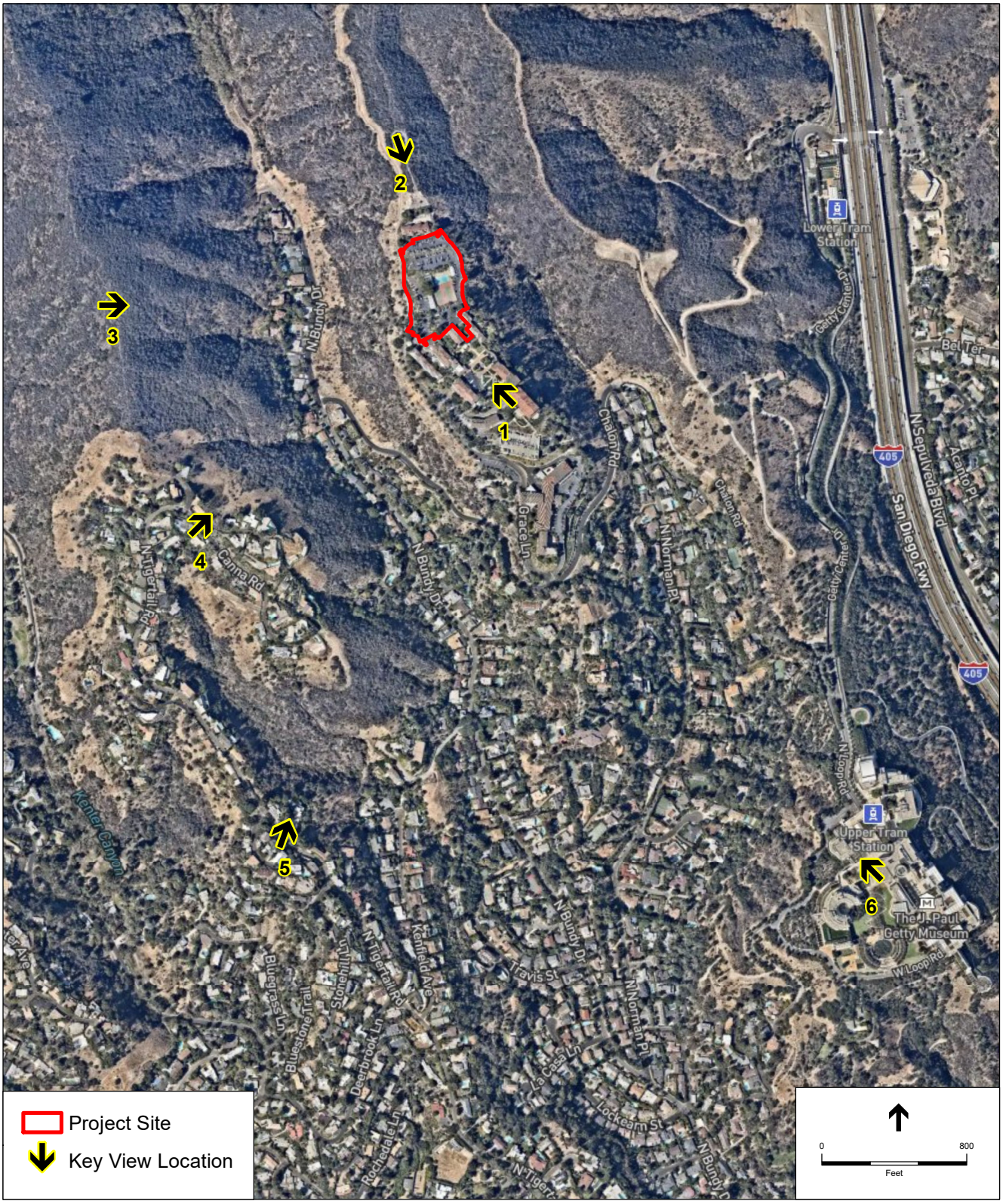
d) Evaluation of Impacts

(1) Aesthetics/Visual Resources

(a) Views

Alternative 5 would incrementally reduce the Wellness Pavilion footprint as compared to the Project, would not include the Project's two-story parking deck, and would locate the Wellness Pavilion on the northern portion of the Project Site. As described in Section IV.A, *Aesthetics*, of the Draft EIR, the LA CEQA Thresholds Guide describes view resources as either focal or panoramic. "Focal views" focus on a particular object, scene, setting, or feature of visual interest; "panoramic views" or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic view resources in the area, include (1) views of Santa Monica Mountains' open space, (2) distant views of the Westwood skyline, (3) horizon views across the Los Angeles Basin, and (4) distant views of the Pacific Ocean, as viewed from public locations in the Project vicinity. Focal view resources would be views of historic buildings in the Project vicinity, such as views of the Campus's historic district. The Project Site and Campus form the backdrop for panoramic views of open space, or are located within a line-of-sight between viewers on public trails and broad views of the Los Angeles Basin and distant cityscape features.

The Campus and Project Site are minimally visible from the surrounding properties due to the varying topography and dense vegetation along nearby roadways. **Figure III-9,** *Key View Location Map*, illustrates six key views locations in the area that have views or partial views of the Project Site from surrounding areas. **Figure III-10**, *Key View 1: Existing and Simulated Views from the Campus Circle – with Alternative 5,* compares existing views to future views from the Campus Circle with Alternative 5. As shown in Figure III-10, Alternative 5 would not be visible from the Campus Circle. Under the Project, the soffit of the Wellness Pavilion roof was visible through the background arches. However, under Alternative 5 the Wellness Pavilion would be located on the northern portion of the Project Site and thus would not be visible from this vantage point. As such, it would not conflict or contrast with views of the Campus's historic buildings in the Campus Circle. **Figure III-11,** *Key View 2: Existing and Simulated Views of the Project Site from the Hiking Trail to the North of the Campus – with Alternative 5* demonstrates that under future conditions, as with the Project, views of Alternative 5 from the northern hiking trail would be largely obscured by intervening land forms, vegetation, and buildings (the tops of the Yates, Aldworth and Burns Houses). The Mary Chapel bell tower would be taller than the Wellness Pavilion and would remain visible. Similar to the Project, Alternative 5 would not break the skyline and would 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.



SOURCE: Open Street Map, 2021.

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-9

Key View Location Map

PHOTOGRAPH 1. Existing north-facing view from the Campus Circle: Mary Chapel is visible on the left and the archway (loggia) connecting the Chapel to Rossiter Hall is visible in the center background.



PHOTOGRAPH 2. Simulated north-facing views from the Campus Circle: In the north-facing view, because of the shift of the Wellness Pavilion toward the northern part of the Project Site, views of the building would be entirely concealed by existing structures and landform, represented by the red polygon, and existing vegetation, represented by the green polygon.

SOURCE: KTUA, 2020

Figure III-10

Key View 1: Existing and Simulated Views from the Campus Circle – with Alternative 5



PHOTOGRAPH 1. Existing south-facing view from the off-site hiking trail to the north of the Campus: Note the distant views of hills within the Brentwood Community and the Westwood sklyine in the left of the photo. The Mary Chapel bell tower is visible in the center of the photograph.



PHOTOGRAPH 2. Simulated south-facing view from the existing hiking trail: Scenic resources such as the bell tower, skyline, nearby hills, and urban horizon would not be blocked by Alternative 5. The green polygon depicts the section of the Wellness Pavilion that would be screened by existing buildings or vegetation (to remain). The red polygon depicts the section of Alternative that would be screened by the existing landform.

SOURCE: KTUA, 2020

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-11

Key View 2: Existing and Simulated Views of the Project Site from the Hiking Trail to the North of the Campus – with Alternative 5

The Campus is also visible from hiking trails to the west and at a higher elevation than the Project Site. **Figure III-12**, *Key View 3: Existing and Simulated Views of the Project Site from the Hiking Trail to the West of the Campus – with Alternative 5* shows the Project Site as viewed from the hiking trail on the first major ridge to the west. The trail, which is located more than 0.32 miles west of the Project Site, is the closest western public access to the 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 would be located on the northern portion of the Project Site and the two-story parking deck would not be constructed. As shown in Figure III-12, the Campus is in the foreground/mid-ground of existing panoramic views of the Santa Monica/Hollywood Hills and the horizon currently across the Campus.

Overall, views of the Project and Alternative 5, from this location, are not dissimilar. As with the Project, Alternative 5 would not block any existing horizon views or existing views of natural hillsides.

The Project Site would 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, shown as in **Figure III-13**, *Key View 4: Existing and Simulated Views of the Project Site from Sky Lane/Canna Road – with Alternative 5*, is located approximately 0.32 miles southwest of the Site. As shown in Figure III-13, Alternative 5 would be a small background feature that would not block views of the Yates, Aldworth and Burns Houses. Additionally, Alternative 5 would 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.

Figure III-14, *Key View 5: Existing and Simulated Views of the Project Site from North Tigertail Road- with Alternative 5*, located approximately 0.58 miles southwest of the Project Site shows existing and future views of Alternative 5 from Tigertail Road. Under Alternative 5, the Wellness Pavilion would be located on the northern portion of the Site and would be largely obscured by landform and vegetation, and incrementally less visible than under the Project. Alternative 5's Wellness Pavilion 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 would be available from the Getty Center, approximately 0.58 mile to the southwest. As shown in **Figure III-15**, *Key View 6: Existing and Simulated Views of the Project Site from the Getty Museum – with Alternative 5*, illustrates existing views and future views from the Getty Museum. As shown in Figure III-15, views of the Wellness Pavilion would be obscured by the existing Humanities Building, landform, and

vegetation. Alternative 5 would not block any open space vistas, including ridgelines or open space as viewed from this location.

Based on the analysis above, Alternative 5 would not block any scenic vistas or views of open space, ridgelines, horizons, or other hillside and urban views and, as with the Project, 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 both the Project and Alternative 5.

(b) Scenic Resources

The Project Site is entirely developed and does not include natural open space resources. However, the Project Site contains landscape trees, including trees protected under the LAMC. The Project Site is not located within a state scenic highway.

Site development under both the Project and Alternative 5 would require removal of the same two protected trees as defined in LAMC Section 17.02 (Definitions). Alternative 5 result in 20 fewer removed non-protected trees compared to the Project, with the Project requiring removal of 66 non-protected trees and Alternative 5 removing 46 non-protected trees. Non-protected tree species, designated numbers, and locations are illustrated in **Figure III-16**, *Alternative 5 -Tree Removal and Preservation Plan*. Impacted protected trees would be replaced pursuant to LAMC Section 17.02, which requires protected native trees to be replaced at a minimum ratio of 2:1, including those that are encroached upon or die. PDF-BIO-1 would require the replacement of non-protected trees at a 1:1 ratio. In addition, Mitigation Measure (MM)-BIO-2 through MM-BIO-4 under both the Project and Alternative 5 would further mitigate the impacts of construction on the retained trees. The mitigation measures would provide for protection (fencing or avoidance) of individual trees as well as monitoring and preparation of a tree monitoring report by a Tree Expert as defined in Section 17.02.

Monitoring and reporting would occur during construction and for three years after construction of the Project is complete. Any trees that suffer severe damage or die during this time would be replaced in accordance with LAMC Section 17.02 or PDF-BIO-1. Therefore, 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 both the Project and Alternative 5, with impacts being less under Alternative 5.

Although the Project Site does not contain any historic buildings or other historic resources, as discussed in Section IV.D.2, *Historical Resources*, of the Draft EIR, adjacent Campus buildings are contributors to the Campus' listing in the California Register as a historic district. As discussed therein, the Project would not directly or indirectly limit any of the adjacent buildings as contributors to the historic district and, as such, impacts on these resources would be less than significant. Similar to the Project, Alternative 5 would not directly impact any on-site historic buildings that contribute to the historic district setting. Because the Wellness Pavilion would have a similar architectural style and character under Alternative 5 as compared to the Project, indirect impacts would be similar and would be less than significant.



PHOTOGRAPH 1. Existing east-facing view from the off-site hiking trail to the west of the Campus: The north-south axis of the Campus, expanses of open space in the near-ground and background, and the east horizon beyond the Campus are visible.



PHOTOGRAPH 2. Simulated east-facing view from the hiking trail to the west: The Wellness Pavilion, landscape trees, and parking area would be visible. The Welllness Pavilion would not intersect views of the horizon or views of background hills and open space. The difference between Alternative 5 and the Project is that the two-story parking deck is not part of Alternative 5 and the Wellness Pavilion is now located on the northern portion of the Project Site.

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

SOURCE: KTUA, 2020

Figure III-12

Key View 3: Existing and Simulated Views of the Project Site from the Hiking Trail to the West of the Campus – with Alternative 5



PHOTOGRAPH 1. Existing northeast-facing view from Canna Road: Mt. Saint Mary's residence halls are visible in the right of the photo and in the center background. The Project Site is visible in the center of the photograph. The scene is dominated by the background ridge and open space.



PHOTOGRAPH 2. The Wellness Pavilion would be visible in the center of the view field. As shown, the Wellness Pavilion would form a very small portion of the scenic vista and would not block views of the Yates, Aldworth and Burns Houses, the horizon, or the fire road/trail shown in the center left of the photograph.

SOURCE: KTUA, 2020

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-13

Key View 4: Existing and Simulated Views of the Project Site from Sky Lane/Canna Road – with Alternative 5

PHOTOGRAPH 1. Existing north-northeast-facing view from N. Tigertail Road: Mt. Saint Mary's parking structure and the Humanities Building in the south portion of the Campus are visible in the right center of the photograph, a portion of Carondelet Residence Hall within the Mt. Saint Mary's University Campus and Mary's Chapel are partially visible to the left of the residence hall. The Project Site is not visible.



PHOTOGRAPH 2. Simulated north/northeast-facing view from N. Tigertail Road: The Wellness Pavilion would be not be visible from this location. The small sector of green polygon represents the portion of the Pavilion that would be obscured by existing (to remain) vegetation and the red polygon area represents the portion of the Pavilion that would be obscured by existing building and landform.

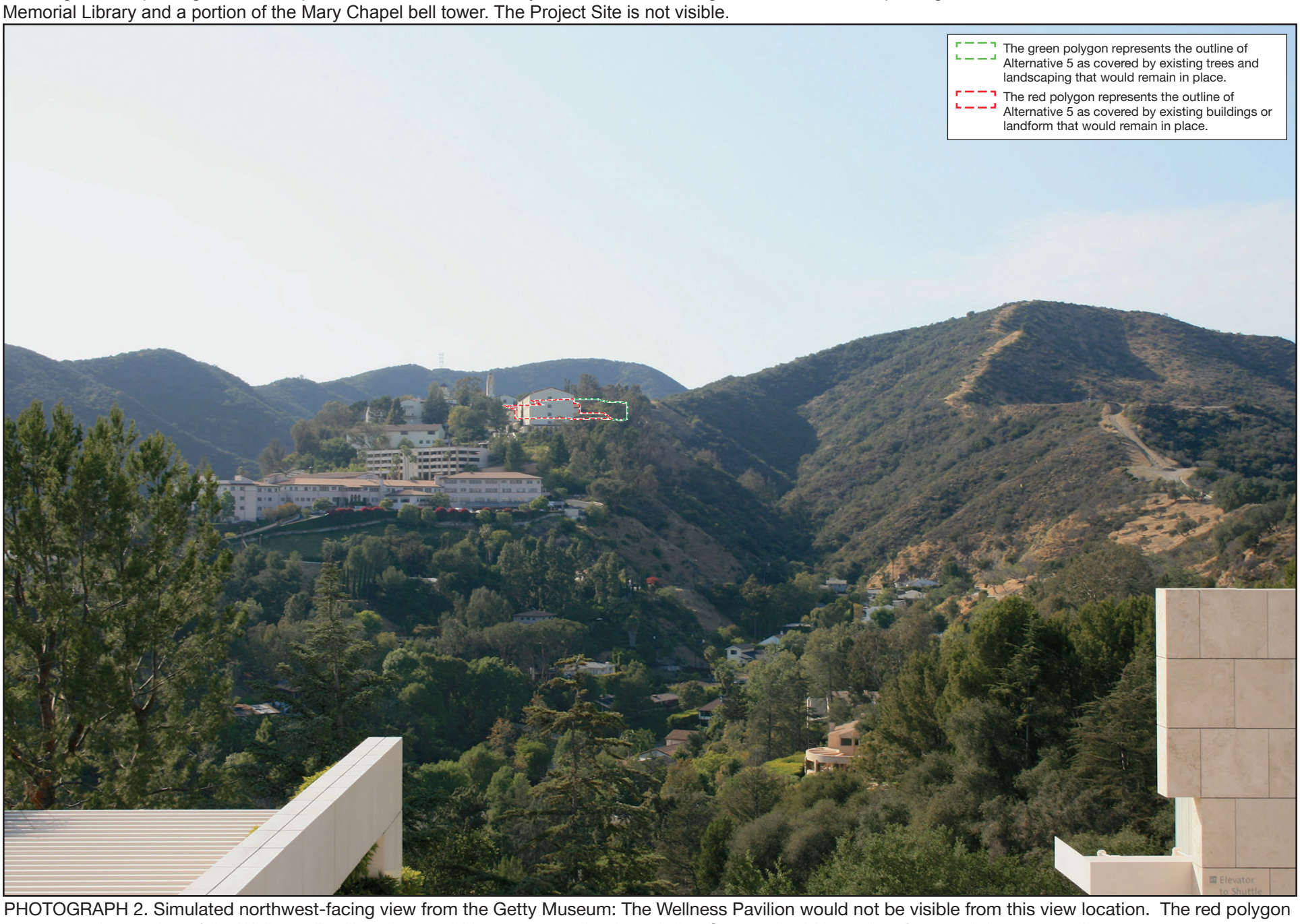
SOURCE: KTUA, 2020

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-14

Key View 5: Existing and Simulated Views of the Project Site from North Tigertail Road- with Alternative 5

PHOTOGRAPH 1. Existing northwest-facing view from the Getty Museum: The Carondelet Center, which is not part of the Mt. Saint Mary's campus, is located in the foreground. The Mt. Saint Mary's University parking structure is visible beyond the Carondelet Center, and the south wall of the Humanities Building is visible to the right of the parking structure. A portion of MSMU's Art Gallery and Fine Arts Building is visible behind the parking structure, as well as the south wall of the Memorial Library and a portion of the Mary Chapel bell tower. The Project Site is not visible.



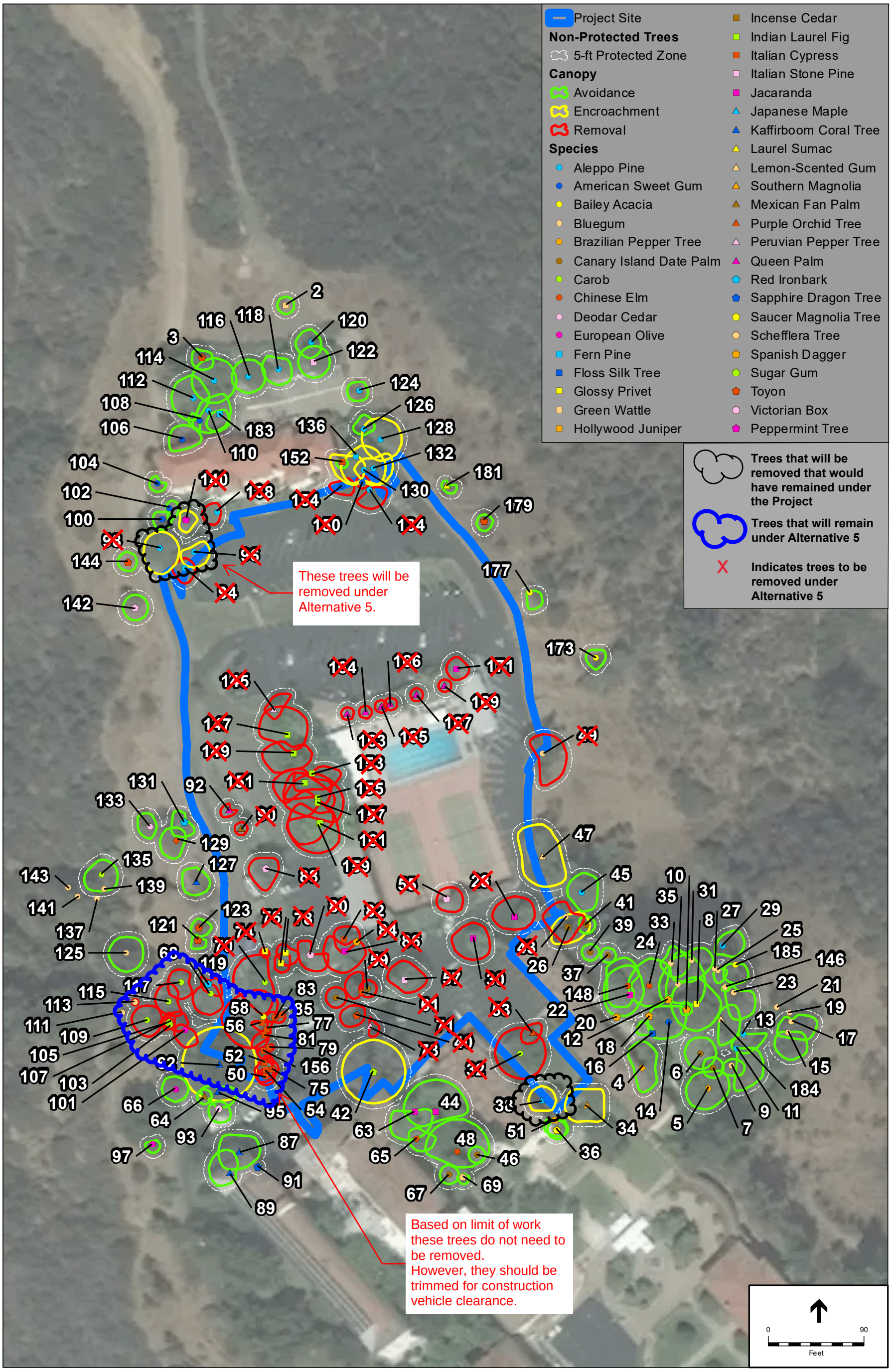
PHOTOGRAPH 2. Simulated northwest-facing view from the Getty Museum: The Wellness Pavilion would not be visible from this view location. The red polygon represents the section of the Wellness Pavilion that would be concealed by the existing Campus building or landform and the green polygon represents the section of the Wellness Pavilion that would be concealed by the existing (to remain) vegetation.

SOURCE: KTUA, 2020

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-15

Key View 6: Existing and Simulated Views of the Project Site from the Getty Museum – with Alternative 5



SOURCE: ESA, 2021

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Figure III-16

Alternative 5: Tree Removal and Preservation Plan

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(c) Visual Character and Quality

Alternative 5 would provide a similar building design and architectural style as compared to the Project. Because of the elimination of the Project's two-story parking deck and the relocation of the Wellness Pavilion to the northern portion of the Site, Alternative 5 would allow for the preservation of the existing two-story facilities management building. The existing one-story facilities management building would be removed. As such, Alternative 5's construction schedule would be reduced (as compared to the Project) and the associated effects of construction on visual character and quality, would be less than the Project's and therefore remain less than significant.

Alternative 5 would contribute to the visual character of the Campus. Alternative 5 would replace existing utilitarian buildings, including one of the facilities management buildings, fitness center, pool, and tennis courts, with a building that is designed in an architectural style that complements the surrounding buildings.

Similar to the Project, Alternative 5 would incorporate complementary materials that are seen throughout the Campus. For example, the Wellness Pavilion would 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 would 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 would continue the Circle's colonnade theme.

As with the Project, Alternative 5 would not encroach upon or adversely impact existing visual resources, including the surrounding undeveloped open space, the Circle, and the Campus's historic buildings. In addition, as Alternative 5 would not include the Project's parking deck (a two-story concrete structure that would have been located between the Yates, Aldworth, and Burns residence halls and the Wellness Pavilion), Alternative 5 would result in a better visual interface between the residence halls and the lower Campus. The Wellness Pavilion would also be set back farther from Mary's Chapel and other buildings near the Campus Circle than under the Project and, as such, would allow a greater visual break between the Pavilion's modernist architecture and the Spanish Colonial Revival architecture of the Campus Circle. Neither the Project nor Alternative 5 would substantially degrade the visual character or quality of the Campus or surrounding area. Impacts regarding visual character and quality would be less than significant under both the Project and Alternative 5. Overall, while there would be differences in the site layout, the primary visual components consisting of a new Wellness Pavilion (with a similar design in both), new landscaping and visible parking areas would occur under both the Project and Alternative 5. Compared to the Project, Alternative 5's Wellness Pavilion would be farther from the Campus Circle's buildings, the concrete parking deck would not be constructed, and 20 additional trees would be preserved. Alternative 5's visual quality impacts would be less than the Project's and therefore less than significant.

(d) Light and Glare

Under existing conditions lighting is provided for parking lots, tennis courts, the swimming pool deck, vehicle access security, wayfinding, and building operations. Off-site residential uses, street lighting, and traffic on local streets generate low light levels, typical of such settings. Both the Project and Alternative 5 would have similar lighting features. The Wellness Pavilion under both the Project and Alternative 5 would be larger in scale and taller than existing buildings located on the Project Site (although not taller than existing buildings within the Campus) and, as such, would generate more visible light from the Project Site than under existing conditions. Light sources include architectural and landscape light, wayfinding light, security lights, and light emanating from the building's interior. Lighting from the pool deck under both the Project and Alternative 5 would be similar to existing conditions in which the pool area is illuminated at night. Regarding security and wayfinding lights, architectural lights and other exterior lighting, PDF AES-1 under both the Project and Alternative 5 would shield light fixtures so the light sources would not be visible from off-site locations. In addition, compliance with LAMC Sec. 12.21 A.5(k), which requires that all lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises, and LAMC Sec. 93.0117(b), which requires that no exterior light may cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units, deck, balcony, or active outside areas, would ensure that lighting would not exceed threshold standards on any off-site property. Adjacent undeveloped open space would not be illuminated under the Project or Alternative 5]. With shielding of source light, and distance between the closest off-site residential viewers (0.3-mile), both the Project and Alternative 5 would have similar and less than significant impacts with respect to lighting.

Potential daytime glare from reflected sunlight (vehicle windshields, windows, walls or other expansive surfaces) and nighttime glare from headlights would occur under both the Project and Alternative 5. This type of lighting is transitory and is not considered to be significant. As the Project Site is currently developed with several surface parking lots, vehicular glare would not be substantially different from existing conditions. Further, because of the 0.3-mile distance between the Project Site and the nearest off-Campus residential locations to the west, glare would not exceed established Code standards under either the Project or Alternative 5. In addition, both the Project and Alternative 5 would implement PDF-AES-2, which requires that 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, 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. Overall, given that the Project Site is currently illuminated, and all exterior light sources would be shielded and building materials would be reviewed to minimize glare potential

under both the Project and Alternative 5, light and glare impacts would be similar and less than significant under both the Project and Alternative 5.

(2) Air Quality

(a) Consistency with Air Quality Management Plan

Operation of heavy-duty construction equipment during site preparation, demolition, and grading under Alternative 5 on peak days would be similar to that of the Project. However, certain construction phases would be reduced under Alternative 5 between approximately 10 and 20 percent (refer to Table III-4 above) because Alternative 5 would incrementally reduce the size (floor area and building footprint) of the Wellness Pavilion, locate the Wellness Pavilion in the northern portion of the Project Site, eliminate the two-story concrete parking deck, and reduce the grading from a total cut and fill under the Project of 20,524 cubic yards to a total cut and fill of 9,343 cubic yards. Although the duration of earthwork and other activities that require the use of heavy construction equipment would be less overall, the days of highest activity and the highest levels of emissions would be similar to those of the Project.

With respect to the determination of Alternative 5's consistency with the Air Quality Management Plan (AQMP) growth assumptions, as discussed in Section IV.B, Air Quality, of the Draft EIR, the projections in the AQMP for achieving air quality goals are based on assumptions included in the Southern California Association of Government's (SCAG) 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy (2016–2040 RTP/SCS) regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies.

Operation of the Project and Alternative 5 would result in the addition of one employee, thus the employment growth would fall well within the growth forecasts for the City and similar projections that form the basis of the 2016 AQMP. Similar to the Project, Alternative 5 would not result in an increase in the number of housing units and/or population growth. Thus, as with the Project, Alternative 5 would not exceed the AQMP housing, population, and/or employment projections. Similar to the Project, construction of Alternative 5 would require implementation of Mitigation Measure (MM) AQ-1, which would require the use of Tier 4 or Tier 4 equivalent off-road construction equipment to ensure NOx construction emissions do not exceed the SCAQMD regional threshold. Therefore, with implementation of MM AQ-1, NOx construction emissions would be less than significant.

As shown in Section IV.B, *Air Quality*, of the Draft EIR, the Project has incorporated into its design appropriate control strategies set forth in the AQMP for achieving its emission reduction goals and the Project is consistent with the demographic and economic assumptions upon which the plan is based. These control strategies would also be

incorporated into Alternative 5. Both the Project and Alternative 5's criteria pollutant emissions would not cause the Air Basin's criteria pollutant emissions to worsen so as to impede the SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment, or to cause the Air Basin to deteriorate from its current attainment status with respect to any other criteria pollutant emissions. During its construction phase Alternative 5 would ensure compliance with the California Air Resources Board's (CARB) requirements to minimize short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations for controlling fugitive dust and other construction emissions. Compliance with these measures and requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Therefore, impacts with respect to consistency with the AQMP standards would be less than significant under both the Project and Alternative 5. Because the duration and overall scale of activity would be incrementally reduced under Alternative 5, AQMP impacts under Alternative 5 would be less than those of the Project.

(b) Air Quality Standard Violation

As with the Project, Alternative 5's heavy-duty construction equipment and activities would generate NOx emissions that exceed the SCAQMD's regional threshold (refer to Table IV.B-4 of the Draft EIR) without adoption of mitigation. The implementation of MM AQ-1, which requires that wheeled or tracked, off-road construction equipment shall meet or exceed the United States Environmental Protection Agency's (USEPA) Tier 4 standards would reduce NOx construction-related emissions to below regulatory thresholds. With mitigation, neither the Project nor Alternative 5 would exceed the SCAQMD's air quality standards during construction. Thus, similar to the Project, with implementation of MM AQ-1, construction impacts under Alternative 5 would be less than significant. Because it would have a slightly reduced construction schedule, Alternative 5's construction emissions would be less than compared to the Project.

During operation of Alternative 5, emission levels would be generally the same as under the Project and would not exceed the SCAQMD's regional thresholds (see Table IV.B-5 of the Draft EIR). Impacts associated with operation of Alternative 5 would be similar to the Project and less than significant.

(c) Cumulatively Considerable Increase of Criteria Pollutant in Nonattainment Area

As discussed above, with implementation of MM AQ-1, construction emissions from both the Project and Alternative 5 would be reduced to below the SCAQMD regional and local NOx threshold. Additionally, implementation of MM AQ-1 would further reduce the emissions of the other criteria pollutants (under both the Project and Alternative 5). Thus, construction emissions associated with the Project or Alternative 5 would not result in pollutant concentrations that exceed the National Ambient Air Quality Standards (NAAQS) or the California Ambient Air Quality Standards (CAAQS). Further, with

implementation of MM AQ-1, neither the Project nor Alternative 5 would result in a cumulatively considerable net increase in non-attainment pollutants or ozone precursors during construction. Construction impacts relative to criteria pollutants would be less than significant under the Project or Alternative 5. In addition, as the scale of Alternative 5 would be incrementally less (as compared to the Project), the total number of construction vehicles would be incrementally reduced, and mileage and mobile emissions associated with hauling would also be reduced compared to the Project.

Impacts associated with operation emissions would be less than significant and similar during operation of both the Project and Alternative 5. Operational emissions would not exceed the SCAQMD regional or local thresholds and would not result in pollutant concentrations that exceed the NAAQS or CAAQS thresholds. Thus, operational emissions associated with the Project or Alternative 5 would not result in a cumulatively considerable net increase of any non-attainment criteria pollutants.

(d) Sensitive Receptors Exposure to Pollutant Concentrations

Maximum daily localized construction emissions for sensitive receptors (single family residences within 100 meters (328.1 feet) of the construction activities) would be similar under the Project and Alternative 5 and would not exceed the localized thresholds for NOx, CO and PM10, or PM2.5 (refer to Table IV.B-6 of the Draft EIR). Therefore, neither the Project's or Alternative 5 's construction emissions would exceed the SCAQMD LST thresholds and sensitive receptors would not be exposed to substantial pollutant concentrations from localized construction emissions. Thus, similar to the Project, localized construction emissions impacts under Alternative 5 would be less than significant and with a slightly reduced construction schedule, Alternative 5's localized construction emissions would be less compared to the Project.

During operation of Alternative 5, localized emission levels would be generally the same as under the Project and would not exceed the SCAQMD's localized thresholds (refer to Table IV.B-7 of the Draft EIR). Impacts associated with operation of Alternative 5 would be less than significant and similar to the Project.

As with the Project, given Alternative 5's short-term nature of construction activities, type of construction activities occurring at the Site, the increasing stringency in emission requirements of off-road construction fleets, the distance of the Site to the nearest sensitive receptors, and the incorporation of Mitigation Measure MM AQ-1, the Toxic Air Contaminants (TAC) emissions from construction activities would result in a less than significant incremental increase in lifetime carcinogenic health risks to off-site receptors. With a slightly reduced construction schedule, Alternative 5 's overall TAC construction emissions during construction would be less compared to the Project.

As with the Project, operation of Alternative 5 would not contain substantial TAC sources and would be consistent with the CARB and SCAQMD guidelines. Similar to the Project, Alternative 5 would not result in the exposure of off-site sensitive receptors to

carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant and similar to the Project.

As with the Project, Alternative 5 would not contribute considerably to the formation of CO hotspots. Thus, similar to the Project, CO hotspots impacts under Alternative 5 would be less than significant and with slightly reduced trips under Alternative 5, Alternative 5's contribution to CO hotspots impacts would be less compared to the Project.

(3) Biological Resources

(a) Special Status, Sensitive, or Candidate Species

The Project Site would continue to be located within an entirely developed/disturbed area of the Campus. Alternative 5 would result in an incrementally smaller building footprint (24,605 square feet under the Project, versus 23,598 square feet under Alternative 5 (a reduction of approximately 1,006 square feet). Additionally, under Alternative 5, the Wellness Pavilion would be located on the northern portion of the Project Site. The vegetation communities to the west and east of the Campus adjacent to the Project Site and within the fuel modification zone under either scenario would be generally similar. As with the Project, Alternative 5 would result in the expansion of the Project Site's 200-foot fuel modification zone into 0.9 acres of native plant communities (i.e., 0.5 acre of laurel sumac scrub and 0.4 acre of greenbark ceanothus chaparral). However, as noted in Section IV.C *Biological Resources*, of the Draft EIR, for the three special-status plant species (Brewer's calandrinia, Catalina mariposa lily, and Plummer's mariposa lily), that were not observed but have a low potential to occur within the fuel modification areas of the Biological Study Area, the indirect effect of habitat conversion as a result of fuel modification activities is anticipated to favor these special-status plant species, as these species prefer disturbed sites, grasslands and openings within chaparral.

As with the Project, indirect impacts from fuel modification could occur from thinning vegetation during fuel modification, which could result in habitat conversion of intact native habitat to a disturbed community. However, due to the proximity of the 200-foot fuel modification area to developed areas of the Campus, the fuel modification area is already subject to indirect effects associated with Campus activities, and indirect effects of the Project or Alternative 5 would be largely similar to existing on-site conditions related to noise or lighting. Project lighting would be installed to minimize impacts to the surrounding on-site and off-site uses. Construction noise would be temporary on an intermittent basis, and impacts would not diminish the chances for long-term survival of a special-status species, and therefore would not be significant. Indirect impacts associated with a change in the on-site ambient noise during operation would be very low for all surrounding developed and undeveloped areas and would not significantly impact special-status wildlife species. As such, direct and indirect impacts to plant communities and special status plant species would be similar and less than significant under the Project and Alternative 5.

As the Project Site is currently developed and construction of the Project or Alternative 5 would not extend beyond the existing developed area into an undisturbed open space area, the only impacts to native habitat that have the potential to support special-status, sensitive and candidate wildlife species would be associated with operational fuel modification activities where periodic thinning and/or removal of vegetation would occur. Because of the existing fuel modification activities and adjacency to the disturbed vegetation areas, the native laurel sumac scrub (0.5 acre) and greenbark ceanothus chaparral (0.4 acre) habitat is of marginal quality to support special-status wildlife. If any special-status, candidate and/or sensitive wildlife species are located in the native laurel sumac scrub and greenbark ceanothus chaparral that would be subject to the expanded fuel modification activities associated with Alternative 5, extensive higher quality native chaparral habitat occurs to the north, east, and west, and these species would most likely move into these adjacent areas. The Biological Study Area is not located within US Fish and Wildlife (USFW) designated critical habitat for any special-status wildlife species. As indicated in Section IV.C *Biological Resources*, of the Draft EIR, four special-status wildlife species were not observed but have the potential to occur within the fuel modification areas of the Biological Study Area, including coastal whiptail, western mastiff bat, pallid bat, and San Diego desert woodrat. Based on the known behaviors for these species, the coastal whiptail and San Diego desert woodrat would flee active fuel modification implementation and escape direct impacts. Furthermore, the two bat species, which have a low potential to occur for foraging only, are not expected to be directly impacted based on their high mobility levels and the lack of suitable roosting habitat observed within the Biological Study Area. Further, special-status wildlife species would likely already be exposed to the existing on-going fuel modification activities (e.g., noise, vegetation removal, introduction of non-native grasses) and, because of proximity to the developed areas of the Campus, the fuel modification area is already subject to indirect effects, including noise and light. Neither the Project nor Alternative 5 would disturb wildlife in a way that would meaningfully diminish the chances for long-term survival of a special-status species and, as such, impacts on special status species under the Project or Alternative 5 would be less than significant and similar.

(b) Riparian and Sensitive Natural Communities Habitat

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 under the jurisdiction of the California Department of Fish and Wildlife (CDFW). The Project or Alternative 5 would have no impact with respect to riparian and sensitive natural habitat and communities. As such, neither the Project nor Alternative 5 would impact riparian and sensitive natural habitat. Impacts would be less than significant and similar.

(c) Wildlife Movement

As with the Project, under Alternative 5, trees, shrubs, and ground cover that have the potential to support both raptor and songbird nests would be removed. Implementation of MM BIO-1 would reduce this potentially significant impact to a less than significant level

by avoiding 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. As both the Project and Alternative 5 would implement MM BIO-1, impacts to migratory wildlife, including nesting birds, would be less than significant and similar.

(d) Local Policies and Ordinances

As with the Project, Alternative 5 would involve the removal and replacement of native and non-native trees. The Project and Alternative 5 would be required to comply with LAMC Section 17.02, which requires that any removal of protected native trees shall be replaced at a minimum ratio of 2:1. In addition, the City's General Plan Conservation Element requires protection and restoration of habitat areas, linkages, and habitat corridors to the extent practicable. Both the Project and Alternative 5 would impact two of the four native, protected trees in the Biological Study area (See Figures IV.C-3 and IV.C-4 in the Draft EIR). Of the 169 non-native, non-protected trees, the Project would preserve 88 trees and Alternative 5 would preserve 108 trees (see Figure III-16, Tree Removal and Preservation Plan). With the adherence to LAMC Section 17.05 and implementation of MM BIO-2, which requires MSMU to coordinate with the City and replace any removed non-protected significant trees at a 1:1 ratio in compliance with the City's planning policy, neither the Project nor Alternative 5 would conflict with the Conservation Element's endangered species and habitat policies or Code requirements. MM-BIO-3 and MM-BIO-4 further require the monitoring of trees during and post-construction, including the reporting of the health and overall condition of preserved trees. As such, with respect to local policies and ordinances, both the Project and Alternative 5 would implement MM BIO-2 through MM BIO-4 and impacts would be less than significant under both the Project and Alternative 5 and slightly less under Alternative 5 because of the preservation of 20 additional trees.

(4) Cultural Resources

(a) Archaeological Resources

As with the Project, Alternative 5 would require grading and other earthwork to establish building and retaining wall foundations. However, overall earthwork would be less under Alternative 5, with a total of 10,099 cubic yards of cut under the Project, compared to 4,884 cubic yards under Alternative 5 and a reduction from 120 concrete soldier piles under the Project compared to 27 or fewer under Alternative 5. Although the Project Site is entirely developed, any disruption of existing soils has the potential to uncover archaeological resources. If an archaeological resource or human remains were discovered during construction of the Project or Alternative 5, implementation of MM APR-1 would require work in the area to cease. Deposits would be treated in accordance with existing regulations, including those set forth in PRC Section 21083.2. With implementation of existing regulations and MM ARCH-1, impacts to archaeological resources under either the Project or Alternative 5 would be reduced to a less than significant level. However, because the extent of foundation development would be less

under Alternative 5, impacts to archaeological resources would also be less than under the Project.

(b) Paleontological Resources

As with the Project, Alternative 5 would require grading and other earthwork to establish building foundations. Under both the Project and Alternative 5, the Project Site's underlying fill soils and a metamorphic rock unit indicate that the Project Site is not conducive to retaining paleontological resources. Given these conditions and the Project's proposed foundation development, the potential to encounter paleontological resources during ground disturbing activities is considered negligible. Thus, neither construction of the Project nor Alternative 5 would directly or indirectly destroy a unique paleontological resource, site, or unique geological feature. Impacts to paleontological resources under the Project and Alternative 5 are considered less than significant. However, because the extent of foundation development would be less under Alternative 5, impacts to paleontological resources would be less than under the Project. This discussion of Alternative 5's environmental impacts in the area of paleontological resources is included here as a subcategory of Cultural Resources to be consistent with the analysis of the Project's impacts in the Draft EIR, however, the 2018 CEQA guidelines provide for the analysis of paleontological resources as a subcategory of Geology and Soils.

(c) Human Remains

Construction activities under either the Project or Alternative 5 would potentially uncover any undiscovered human remains. SCCIC or the NAHC SLF records searches did not identify any known human remains within the Project Site or within a one-half mile radius. In the unlikely event that previously unknown human remains are encountered during construction excavations, MSMU would be required to comply with State Health and Safety Code Section 7050.5 and Section 15064.5(e) of the California Code of Regulations. With compliance to applicable regulations per California Health and Safety Code Sections 7050.5, 7051, and 7054 and California Code of Regulations Section 15604.5(e), the Project would not disturb any human remains. Impacts to human remains under either the Project or Alternative 5 would be less than significant. Since Alternative 5 would reduce grading and installation of soldier piles compared to the Project, impacts associated with the potential uncovering of human remains would be less than under the Project.

(d) Historical Resources

Both the Project and Alternative 5 would require the demolition of existing buildings and structures, although Alternative 5 would retain the existing two-story facilities management building. However, none of the affected buildings and structures proposed to be demolished are considered historic resources or contributors to the historic district. Neither the Project nor Alternative 5 would impair the significance of the historic district as a historic resource, since the existing character-defining buildings, landscapes, and features of the historic district from its period of significance would be retained and

preserved intact. Direct impacts to historic resources under both the Project and Alternative 5 would be similar and less than significant.

Neither the Project nor Alternative 5 would reduce or materially impair the integrity or significance of important historic resources in the vicinity of the Project, including the historic district on the Campus, such that these historical resources would no longer be eligible. The siting, features, design, massing, scale, proportion, and materials of the Project and Alternative 5 would be designed to protect the integrity of the contributing buildings and historic district. Both the Project and Alternative 5 would complement the color palette and colonnade theme of the Campus's historic buildings and Circle. Thus, construction and/or operation of the Project or Alternative 5 would not cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5. Indirect impacts to historic resources under both the Project and Alternative 5 would be less than significant. However, the Wellness Pavilion would be located farther from the Campus's historic district under Alternative 5 and, as such, would reduce the contrast between the modern Wellness Pavilion and the Campus' historic buildings. Therefore, Alternative 5 would have less impact with respect to indirect impacts to historical resources than the Project.

(5) Geology and Soils

(a) Exacerbation of Existing Environmental Conditions.

(i) Ground Rupture

No active faults with the potential for surface ground rupture are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Thus, neither the Project nor Alternative 5 would exacerbate existing environmental conditions by bringing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. Impacts associated with surface rupture from a known earthquake fault would be similar and less than significant under either the Project or Alternative 5.

(ii) Ground Shaking

Neither the Project nor Alternative 5 would involve activities, such as mining or deep excavation into the earth, that would exacerbate ground shaking. The California Building Code and LAMC incorporate the seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses form an earthquake and maximize earthquake safety. Although reduced in scale compared to the Project, as with the Project, construction under Alternative 5 would require compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the Los Angeles Building Code. Pursuant to existing regulations, both the Project and Alternative 5 must demonstrate compliance with the applicable provisions of such safety requirements

before permits can be issued for construction. With adherence to existing seismic safety regulations, impacts with respect to existing geologic conditions under either the Project or Alternative 5 would not exacerbate existing seismic conditions. As such, the development of either the Project or Alternative 5 would not exacerbate seismic conditions on the Project Site and impacts would be similar and less than significant.

(iii) Liquefaction

The Project Site is underlain by bedrock below artificial fill and colluvium deposits. The lack of groundwater, and liquefaction mapping by the CGS, indicates the Project Site would not be susceptible to liquefaction during an earthquake event. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions and cause or accelerate geologic hazards related to liquefaction that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Seismically induced settlement or compaction of dry or moist, cohesionless soils is anticipated to be less than 0.5 inch and would be taken into account in the structural design of the proposed development. In addition, the Project would comply with LADBS' site plan review and permitting requirements, including the recommendations provided in a final, site-specific Geotechnical Report. Through compliance with regulations and site-specific geotechnical recommendations, neither the Project nor Alternative 5 would exacerbate, cause, or accelerate geologic hazards related to seismically induced settlement or liquefaction. Impacts associated with seismically induced settlement or liquefaction would be similar and less than significant under both the Project and Alternative 5.

(iv) Landslides

The area including the Project Site is identified by the State of California as being potentially susceptible to seismically induced landslides and, as such, slope stabilization is required. The south and southwest portions of the Project Site are characterized by shallow certified and uncertified fill soils, which require additional stabilizing structures, such as concrete soldier piles, to support building foundations. The north portion of the Project Site is underlain by shallow bedrock that can support conventional footings and is more geologically stable then the south and southwest portions of the Project Site. Locating the Wellness Pavilion in the north portion of the Project Site would provide a more geologically sound condition for building foundations and would require fewer soldier piles and other buttressing. As such, Alternative 5 would reduce the required number of soldier piles from approximately 120 to 27 or less. Slope stability under either the Project or Alternative 5 would be addressed through the implementation of PDF-GS-1 and recommended measures in the Geotechnical Report. With the implementation of this PDF and Geotechnical Report recommendations, neither the Project nor Alternative 5 would exacerbate, cause, or accelerate geological hazards related to landslides. Impacts associated with landslides would be less than significant.

Impacts under both Alternative 5 and the Project would be less than significant. However, because Alternative 5 would largely avoid construction in the geologically weaker sectors of the Project Site, impacts would be less than under the Project.

(b) Soil Erosion

Existing erosion conditions that occur along the edges of the Project Site would be addressed under both the Project and Alternative 5. Corrective measures include the installation of slope protection and drainage devices to divert existing surface runoff. Because both the Project and Alternative 5 would correct this condition, impacts related to soil erosion under both the Project and Alternative 5 would be less than significant. Further, Alternative 5 would reduce the Project's overall foundation development, which has the potential to expose soils to the elements (wind and rainfall). As such, impacts with respect to soil erosion would be less under Alternative 5 than under the Project.

(c) Unstable Geologic Unit or Soils

Both the Project and Alternative 5 would require excavation to install foundations, retaining walls, and new or additional buttressing. With implementation of temporary and permanent slope stability measures and correction of fill soils and other measures as recommended by the Preliminary Geotechnical Report, the Project and Alternative 5 would have less than significant impacts with respect to unstable geologic units and soils. Because both the Project and Alternative 5 would stabilize and correct soils or geologic units within the construction site as recommended by the Preliminary Geologic Report, impacts related to unstable geologic units and soils would be less than significant under both Alternative 5 and the Project. However, because Alternative 5 would avoid more of the unstable soils area than the Project, require less buttressing, and reduce overall grading, impacts would be less than under the Project.

(d) Topographic Features

Development of either the Project or Alternative 5 would generally maintain the same ground levels as compared to existing conditions. Grading activities would be required to remove unstable fill underlying the Project Site and to provide for stable road and building foundations. Removed fill would be corrected and re-used on-site. No mass grading across the Project Site is anticipated and drilled pile foundations would be required to span undocumented fill material along the eastern and western portions of the proposed Wellness Pavilion in an effort to limit the extent of grading. As the Project Site is currently entirely developed, no natural landforms or other geologic features, such as knolls, outcroppings, or ravines, occur within the Site or would be affected by grading activities. Although new retaining walls would be required to support the building foundations, no significant slopes would be removed or created under either the Project or Alternative 5. As such, impacts with respect to the modification of any geologic or topographic features would be less than significant under either the Project or Alternative 5. However, because Alternative 5 requires less overall grading, impacts with respect to topographic changes would be less than under the Project.

(6) Greenhouse Gas Emissions

(a) Consistency with GHG Reduction Plans, Policies, and Regulations

The Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the establishment of the 2030 and 2050 targets. As with the Project, Alternative 5 would implement PDF-AQ-1 through PDF-AQ-7, which would reduce energy demand. Both the Project and Alternative 5 would be consistent with the State's Climate Change Scoping Plan and incorporate characteristics to reduce vehicle travel consistent with the 2016 SCAG RTP/SCS. Both the Project and Alternative 5 would include sustainability features, such as solar collectors; storm water collection and treatment; provision of electric vehicle-ready stalls; high efficiency, low-e insulated glass, and other measures. The Project and Alternative 5 would also comply with Executive Orders S-3-05 and B-30-15, CARB's Climate Change Scoping Plan, the 2017 Scoping Plan Update, and the City of Los Angeles Green LA Plan, Sustainable City pLAn, and the Green Building Code. As with the Project, Alternative 5 would not conflict with applicable GHG reduction plans, and impacts with respect to these plans would be less than significant. Both the Project and Alternative 5 would be consistent with the 2017 Scoping Plan Update. The Project's consistency with applicable 2017 Scoping Plan Update actions and strategies is evaluated in detail in Subsection 4, Table IV.F-7a, below. As with the Project, Alternative 5 would not conflict with any of the applicable actions or strategies. Alternative 5 is consistent with those aspects of the Project that are analyzed in Table IV.F-7a, including the inclusion of PDF-AQ-1, requiring the provision of EV Ready and EV Capable parking spaces in compliance with applicable CalGreen requirements, and which form the basis of the Draft EIR's conclusion that the Project would not conflict with the 2017 Scoping Plan Update. However, VMT generation would be lower under Alternative 5 as compared to the Project, as explained in detail below. Therefore, with respect to the 2017 Scoping Plan Update actions and strategies related to implementation of Mobile Source Strategy (Cleaner Technology and Fuels) and Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets), Alternative 5 would more closely align with these goals than the Project.

Both the Project and Alternative 5 would be consistent with 2016 SCAG RTP/SCS and 2020-2025 RTP/SCS objectives to reduce vehicle travel and to achieve the regional per capita GHG reduction targets for passenger vehicles. The Project's consistency with the goals of the 2020-2045 RTP/SCS is evaluated in detail in Subsection 4, Table IV.H-6, below. As with the Project, Alternative 5 would be consistent with the 2020-2045 RTP/SCS goals to improve travel safety, increase travel choices, reduce greenhouse gas emissions, support healthy communities, adapt to changing climate and to support an integrated regional development pattern. Like the Project, Alternative 5 is not anticipated to add new daily vehicle trips such as those generated by an office or residential project, with workers driving to and from work or residents driving to and from their homes. Instead, Alternative 5 would add 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 were held at the Wellness Pavilion. The primary difference between Alternative 5 and the Project is the reduction of daily vehicle trips during operation and a reduction in the scale of construction activity. Therefore, Alternative 5 would be consistent with the 2020-2045 RTP/SCS goals listed above to at least the same extent as the Project, and with respect to the greenhouse gas emissions reduction goal, to a greater extent. As explained in Chapter III, *Revisions, Clarifications, and Corrections*, and in *Appendix G Modifications*, Appendix B of this Final EIR, Alternative 5 is anticipated to reduce the Project's approximately 205 average daily weekday vehicle trips by more than half, to 81, through a reduction in the frequency of new Wellness Pavilion events and the incorporation of new traffic Mitigation Measures (MM) to reduce trip generation. Alternative 5 would therefore result in substantially lower vehicle miles traveled (VMT) as compared to the Project. Further, overall vehicle trips would be reduced under Alternative 5 through the implementation of PDF-TRAF-18, which requires that totally daily vehicle trips generated by the MSMU Campus, inclusive of trips generated by the Wellness Pavilion, would be maintained to one percent below the 2016 trip counts (existing conditions for the purpose of the traffic study). Alternative 5's restrictions on daily vehicle trips, as opposed to the Project's restrictions on outside guest attendance, would also further encourage multimodal access to the new Wellness Pavilion, including via shuttles and carpools. Therefore, Alternative 5 would more closely align with the greenhouse gas emissions reduction goals of the 2020-2045 RTP/SCS as compared to the Project, including as measured by the metric of daily per capita VMT. Impacts with respect to consistency with GHG reduction plans, policies, and regulations would be less than significant under either the Project and Alternative 5, but because Alternative 5 would result in less vehicle use and fewer vehicle miles than the Project, impacts related to GHG would be less under Alternative 5.

(b) Emissions Generation

Both the Project and Mo Alternative 5 would incrementally increase GHG emissions over existing conditions. However, neither would generate enough GHG emissions to significantly influence global climate change. In addition, compliance with a GHG emissions reduction plan renders a project less than significant. As discussed above, both the Project and Alternative 5 would be consistent with applicable plans, such as Executive Orders S-3-05 and B-30-15, CARB's Climate Change Scoping Plan, and the City of Los Angeles Green LA Plan, Sustainable City pLAn, and the Green Building Code. As with the Project, Alternative 5 would increase GHG emissions, including CO_2, from construction equipment. The Project, assuming continuous operation through every work day, would generate a total of approximately 1,567 metric tons of CO_2e, which amortized over a 30-year period, would be approximately 52 metric tons of CO_2e. continuously throughout the work day. Under Alternative 5, the elimination of the Project's parking structure, the incrementally smaller building footprint, and location of the Wellness Pavilion to a more geologically stable area of the Project Site would incrementally reduce the construction activities and the Project's overall construction vehicle miles traveled (VMT). As such, Alternative 5's construction emissions would be less than those under the Project.

During operation, the Project's maximum annual net GHG emissions resulting from motor vehicles, energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, and solid waste would be approximately 763 CO_2e. Because emissions decrease with time, as applicable requirements intended to reduce energy consumption and/or GHG emissions are more fully implemented, this represents the worst case scenario. Alternative 5 reduces operational vehicle trips as compared to the Project, resulting in a respective reduction in vehicle miles traveled during operation. Alternative 5 further reduces vehicle miles traveled for the Campus as a whole through the implementation of PDF-TRAF-18, which limits the average daily Campus vehicle trips, inclusive of trips generated by the Wellness Pavilion, to 1 percent below the 2016 baseline trip counts taken for the Campus. Since both the Project and Alternative 5 would be consistent with applicable emissions reduction plans, such as CARB's Climate Change Scoping Plan, and the City of Los Angeles Green LA Plan, Sustainable City pLAn, the Green Building Code, and SCS/RTP, impacts would be less than significant. However, because Alternative 5's operational GHG emissions would be less than those of the Project, and Alternative 5 would further reduce GHG emissions through limitations on overall Campus vehicle miles traveled, it would better achieve the objectives of these plans than under the Project and GHG impacts would be less.

(7) Hydrology and Water Quality

(a) Consistency with Water Quality Standards

Both Alternative 5 and the Project would implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) in compliance with the National Pollution Discharge Elimination System (NPDES) General Construction Activity Permit. The SWPP would ensure that water quality standards are met throughout construction.

In addition, both Alternative 5 and the Project's stormwater control system would be designed in compliance with the City's Low Impact Development (LID) program, which includes goals and strategies to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The LID program implements the Regional Water Quality Control Board's Standard Urban Stormwater Mitigation Plan (SUSMP), which was developed as part of the municipal stormwater program. This program addresses stormwater pollution from new qualifying developments and redevelopment projects.

Alternative 5 proposes to implement stormwater capture and reuse best management practices (BMPs). The proposed BMPs include multiple underground water storage tanks for rainwater harvesting, which collect and store stormwater for later irrigation of landscaped areas. The proposed drainage design is to grade the new parking lots and access road to sheet flow surface drainage towards new curb and gutter, and to have it continue flowing in the gutter to new catch basins and area drains provided throughout the Project Site. Collected stormwater would convey to the proposed underground stormwater storage tanks via a new underground storm drain piping system. Roof drains

from the new Wellness Pavilion building would also be connected to the new underground storm piping system. Two (2) new separation units would be installed for pretreatment of stormwater before entering the storage tanks. The proposed tanks and CDS units would be installed within the parking lot located in the southwest portion of the Project Site.

Final review of the SWPPP's BMPs and operational stormwater system would be reviewed by the LADBS to ensure compliance with applicable regulations. While the Project would implement a biofiltration planter box system and Alternative 5 would implement a different system that uses multiple underground water storage tanks for rainwater harvesting (capture and reuse), each would similarly minimize pollutants from entering into the stormwater system or groundwater. With implementation of their respective water quality treatment systems, both the Project and Alternative 5 would have less than significant and similar impacts on surface and groundwater quality during operation.

Overall, because both the Project and Alternative 5 would comply with applicable regulations, impacts would be less than significant and similar for the Project and Alternative 5.

(b) Alteration of Drainage Patterns

As with the Project, Alternative 5 would implement BMPs under a required SWPPP to minimize erosion and sedimentation and prevent uncontrolled runoff that could otherwise alter existing drainage patterns. Thus, neither the Project or Alternative 5 would significantly alter drainage patterns during construction.

At present, permeability at the Project Site is approximately 23.2 percent. With the Project, the Project Site would have approximately 20.5 percent permeability. Under Alternative 5 the permeability would be reduced to approximately 18.1 percent. During operation, both the Project and Alternative 5 would increase runoff by approximately 0.06 cubic feet per second (cfs) during a 50-year storm event. This 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. In addition, both the Project and Alternative 5 would implement PDF HWQ-1 to correct existing uncontrolled sheet flow onto adjacent hillsides. With implementation of PDF HWQ-1, operational impacts with respect to surface runoff and alteration of existing drainage patterns under both the Project and Alternative 5 would be less than significant and similar.

(c) Exceedance of Stormwater Drainage System Capacity Creating Substantial Additional Polluted Runoff

As with the Project, a site-specific SWPPP that would specify BMPs, including sediment control and materials management BMPs, would be implemented to minimize discharge of pollutants in stormwater runoff. In addition, City grading permit regulations requiring a Soil Management Plan would prevent discharge that would result in water quality

contamination. Both Alternative 5 and the Project would result in less than significant and similar impacts associated with construction activities.

The Project and Alternative 5 would both implement a stormwater treatment system and operational source control BMPs to minimize pollutants from entering into stormwater discharge or groundwater. While the Project would implement a biofiltration planter box system and Alternative 5 would implement a different system which uses multiple underground water storage tanks for rainwater harvesting (capture and reuse), each would similarly minimize pollutants from entering into the stormwater system or groundwater. The amount of runoff during stormwater events would be similar under both the Project and Alternative 5, and would not exceed the capacity of existing storm drains serving the Campus. With implementation of their respective water quality treatment and drainage systems, both the Project and Alternative 5 would have less than significant impacts on surface and groundwater quality, as well as stormwater drainage system capacity, with impacts being similar during operation.

(8) Land Use and Planning

(a) Consistency with Adopted Plans and Policies

As with the Project, Alternative 5 would demolish the existing athletic and fitness facilities (with the exception of the existing two-story facilities management building). The two-story parking deck proposed as part of the Project would not be constructed under Alternative 5. Alternative 5 would require the same discretionary actions as the Project, including a Plan Approval, per LAMC Section 12.24 M; a Determination to Permit a Building Height Modification, per LAMC Section 12.24 F; and Zoning Administrator approvals for: (1) additional grading in a hillside area, per LAMC Section 12.24 X.28(a)(5), and (2) retaining walls that exceed the height and maximum number permitted in a hillside area, per LAMC Section 12.24 X.26. As with the Project, Alternative 5 would be 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. The Project's consistency with the goals of the 2020-2045 RTP/SCS is evaluated in detail in Subsection 4, Table IV.H-6, below. As with the Project, Alternative 5 would be consistent with the 2020-2045 RTP/SCS goals to improve travel safety, increase travel choices, reduce greenhouse gas emissions, support healthy communities, adapt to changing climate, and to support an integrated regional development pattern. Because both the Project and Alternative 5 would be built within the existing footprint of a long-established university campus that is a deemed approved conditional use, and the proposed Plan Approval and height and grading exceptions are provided under the LAMC, both Alternative 5 and the Project would be consistent with the provisions of the LAMC. As such, both Alternative 5 and the Project would have less than significant impacts with respect to the objectives and policies of applicable land use plans and regulations. However, because Alternative 5 would more strictly require the use of multimodal access and reduce VMT compared to the Project, it would more closely align with the greenhouse gas emissions reduction goals of the 2020-2045 RTP/SCS, including as measured by the metric of daily per capita VMT. Impacts with respect to consistency with GHG reduction

plans, policies, and regulations would be less than significant under either the Project or Alternative 5, but would be less under Alternative 5.

(9) Noise and Vibration

(a) Exposure of Persons to or Generation of Noise levels in Excess of Standards

(i) Construction Noise

Both the Project and Alternative 5 would generate construction noise associated with off-site and on-site construction activities and hauling. Regarding on-site construction activities, both the Project and Alternative 5 would implement MM-NOISE-1, which requires that on-site power construction equipment (including combustion engines), fixed or mobile, be equipped with noise shielding and muffling devices to achieve a minimum noise reduction of up to 10 dBA from standard equipment noise emissions. The on-site noise levels during construction under both the Project and Alternative 5 would be reduced to below the applicable noise standards and, as such, on-site construction noise impacts would be less than significant.

Off-site construction traffic under both the 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. Both the Project and 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 both the Project and 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-1 and MM NOISE-2, some off-site noise impacts associated with haul trucks would be reduced to less than significant levels during the Project and 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 either the Project or Alternative 5 and, as such, noise impacts related to truck activity would be significant and unavoidable.

Alternative 5 would incrementally reduce the scale of the 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 t 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 Project and, as with the Project,

have significant and unavoidable noise impacts. But, noise impacts would occur over fewer days under Alternative 5 than under the Project. Although noise impacts from concrete trucks along Chalon Road would exceed threshold standards and would be significant and unavoidable under both the Project and Alternative 5, impacts would be less under Alternative 5 because of the reduction in the duration of construction activity.

(ii) Operation Noise

Operation of either the Project or Alternative 5 would generate road noise associated with new outside guest traffic and stationary sources. Operational noise sources associated with the Project and Alternative 5 would include refuse collection areas, traffic on nearby roadways, on-site mechanical equipment, and open space related activities. Relative to the existing noise environment, the Project is estimated to increase the ambient noise level by approximately 1.3 dBA L_{eq} at the nearest noise-sensitive receptor (R2), which is less than the significance threshold of a 5 dBA increase for a location that currently experiences "normally acceptable noise levels." Composite noise level increases at all other receptor locations are expected to be less than significant as well, given their distance from the Project Site and the presence of intervening structures and variations in topography. Operational impacts under Alternative 5 would be similar or incrementally less because of reduced traffic, a smaller building requiring a small reduction in on-site mechanical equipment, and the elimination of the parking structure. As such, composite on-site operational noise under either the Project or Alternative 5 would not result in exposure of sensitive receptors to noise levels in excess of standards established by the L.A. CEQA Thresholds Guide and the City's Noise Regulations. Both Project-related and Alternative 5-related operational noise impacts would be less than significant. However, Alternative 5 would restrict maximum outside guest trips and result in fewer Other Wellness/Sports Activities (approximately 48 times per year under the Project and 12 per year under Alternative 5). As such, impacts under Alternative 5 would be less than under the Project.

(b) Construction Groundborne Noise and Vibration

(i) Structural Damage

On-site construction activities under the Project and Alternative 5 would result in sporadic, temporary vibration effects in areas adjacent to the Campus. The nearest off-Campus buildings to the Project Site are single-family homes located on Bundy Drive, approximately 540 feet to the west. Maximum construction vibration levels at 25 feet from on-site construction activity under both Alternative 5 and the Project would reach up to 0.089 in/sec PPV, below the threshold of 0.20 in/sec PPV. On-road rubber-tired haul trucks traveling on uneven roads could potentially generate transitory off-site vibration; however, such vibration is not anticipated to exceed 75 VdB, and would therefore be below the Federal Transit Administration (FTA)'s vibration impact threshold of 94 VdB (0.2 in/sec PPV) for non-engineered and masonry buildings. As such, construction truck traffic would not result in exposure of persons to or generation of excessive groundborne vibration that could result in any structural damage to off-Campus structures. Further,

Alternative 5 would reduce the scope and duration of on-site construction activities and would reduce off-site construction truck activity. Both Alternative 5 and the Project would have less than significant impacts with respect to structural damage vibration. However, because Alternative 5 would reduce construction and construction truck activity compared to the Project, it would have less impact with respect to vibration resulting in structural damage than under the Project.

(ii) Human Annoyance

On-site construction activities under the Project or Alternative 5 would result in sporadic and temporary vibration impacts in areas adjacent to the Campus. The nearest off-Campus buildings to the Project Site are single-family homes located on Bundy Drive, approximately 540 feet west of the Project Site. According to the FTA, vibration levels in excess of 72 VdB from frequent sources (such as haul truck traffic during construction) are considered a human annoyance. The Project's off-site construction haul trucks traveling along residential streets, including along Bundy Drive (incoming trucks only), Norman Place, and Chalon Road would rarely exceed 70 VdB (the maximum vibration) at any smooth surfaces, which is below the FTA 72 VdB threshold. As such, on-road truck travel would not result in exposure of persons to or generation of excessive groundborne vibration that could result in human annoyance to residential receptors along the construction route. Impacts with respect to human annoyance vibration under either the Project or Alternative 5 would be less than significant. While project-level impacts with respect to human annoyance vibration would be less than significant under both the Project and Alternative 5, in the event that hauling activities from related projects were to occur concurrently with hauling under the 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 Project and Alternative 5. Alternative 5 would reduce construction truck activity compared to the Project as a result of Alternative 5's shorter duration of construction activity. Therefore, Alternative 5 would have less impact with respect to vibration resulting in human annoyance than under the Project.

(c) Operation Groundborne Noise and Vibration

Day-to-day sources of vibration under either the Project or Alternative 5 would include operation of typical commercial-grade stationary mechanical and electrical equipment. Under the Project, a primary source of transient vibration would include passenger vehicle circulation within the proposed parking structure. Groundborne vibration from on-Campus activity would generate approximately up to 0.0039 in/sec PPV (60 VdB) at locations adjacent to the Project Site. The potential vibration levels from all Project operational sources at the nearest receptor locations would be less than the threshold criterion of 72 VdB for frequent sources. The Project's vibration impacts would be less than significant. However, Alternative 5 would not provide a parking deck and would reduce maximum outside guest vehicle trips, both of which are potential sources of groundborne vibration.

As such, impacts related to groundborne vibration would also be less than significant and less than under the Project.

(10) Public Services

(a) Fire Services

(i) Construction

The construction phases under the Project or Alternative 5 would result in construction truck trips and could potentially affect emergency access along roadways to the Campus. Alternative 5 would incrementally reduce the scale of the construction activities, resulting in reduced overall construction truck traffic and/or a shorter duration of construction activity. The City of Los Angeles Fire Department (LAFD) has priority use of roadways and secondary access to the Project Site and adjacent areas along the private segment of Chalon Road via Getty Center Drive and Mt. Saint Mary's Fire Road that would also facilitate emergency access. To reduce on-site construction fire hazard, both the Project and Alternative 5 would implement Fire Code regulations in the use of inflammable materials and chemicals, as well as implement Occupational Safety and Health Administration (OSHA) requirements for employee safety.

The Project Site is located within a Very High Fire Severity Zone (VHFSZ), more than two miles from the first-call fire station, Engine Company 19. Engine Company 19 serves a large mountainous area to the north of Sunset Boulevard, to the east and west of the I-405 Freeway on the east and to Topanga Canyon State Park on the west. This large geographic area is characterized by curved, narrow, mountain roads and a variety of fire roads on which the Engine Company is equipped to take access. It is also noted that the majority of the service area north of Sunset Boulevard is greater than 1.5 mile from the Engine Company 19 station. Implementation of MM-TRAF-1 (required under the Project and Alternative 5) would reduce the Project and Alternative 5's construction traffic at intersections to less than significant levels. However, the Project and Alternative 5 would significantly impact three neighborhood street segments during construction. PDF-TRAF-1 through PDF-TRAF-2 would be implemented by the Project to minimize construction traffic impacts to the extent feasible. Alternative 5 would implement the same measures included in PDF-TRAF-3 through PDF-TRAF-6 as the Project, but through a modified PDF-TRAF-1 and PDF-TRAF-2 that will further reduce construction traffic impacts. In addition, compliance with the Fire Code and other applicable regulations, LAFD's secondary access for fire apparatus to the Site via the Mount Saint Mary's and Getty Fire Roads, and the temporary nature of construction activities would ensure that emergency access is maintained during the Project and Alternative 5's construction schedule and, thus, would reduce fire hazard levels. With the reduction in fire hazard levels, impacts on existing LAFD services that would require the expansion of an existing or construction of new facilities would be less than significant. Because Alternative 5 would result in a shorter construction schedule and, thus, a reduction in overall construction truck trips, Alternative 5 would have incrementally less impact with respect to emergency access and capacities of existing fire safety services as compared to the Project.

(ii) Operation

Modified PDF-TRAF-7 and PDF-TRAF-9 through PDF-TRAF-18 would enforce Alternative 5's objectives to reduce and limit Alternative 5's maximum daily vehicle trips, eliminate all peak hour trips associated with Health and Wellness Speaker Series, Other Wellness/Sports Activities, and Club Sports (i.e. during the school year), and reduce the frequency of Other Wellness/Sports Activities. Alternative 5's reduction in vehicle trips would reduce the Project's significant and unavoidable operational traffic impacts at study area intersections and neighborhood street segments to less than significant levels. In addition, because the LAFD has priority use of roadways in congested conditions, neither the Project nor Alternative 5 would increase demand for fire services that would require the expansion of existing or construction of new fire facilities. The Project Site is located within a VHFSZ, more than two miles from the first-call fire station, which exceeds the maximum emergency fire distance of 1.5 mile for an Engine Company, as established under Fire Code Section 57.507.3.3. The first-due station to the Project Site is Fire Station 19, an Engine Company located at 12229 W. Sunset Boulevard approximately 2.6 miles from the Campus. Engine Company 19 serves a large mountainous area to the north of Sunset Boulevard, to the east and west of the I-405 Freeway on the east and to Topanga Canyon State Park on the west. This large geographic area is characterized by curved, narrow, mountain roads and a variety of fire roads on which the Engine Company is equipped to take access. It is also noted that the majority of the service area north of Sunset Boulevard is greater than 1.5 mile from the Engine Company 19 station. The establishment of the response distance value of 1.5 mile allows the City (through the Fire Code) to enforce additional fire protection features in a building's design for projects located beyond the 1.5-mile response distance. It is not intended to mean that a site cannot be adequately served beyond the distance of 1.5 mile. Pursuant to the Fire Code, specific design features must be added to a building to reduce the rate of a fire's progress if a project is located greater than 1.5 mile from an Engine Company. In the event that a project site would exceed the 1.5-mile emergency response distance, Fire Code Section 57.512 (entitled, "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 would exceed the Fire Code response distance standard, the Project is required to provide an automatic sprinkler system. Both the Project and Alternative 5 would include a complete hydraulically calculated automatic sprinkler system consistent with the Fire Code and in accordance with the requirements of the National Fire Protection Association (NFPA). With the installation of this system, the Project would be consistent with Fire Code's distance standards. With compliance with Fire Code requirements, the Project would not place an undue burden on existing facilities.

With regard to fire protection services, consistent with the *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing,

equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified that it will be constructing a new station in the area surrounding the Project Site because of either the Wellness Pavilion or other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, such facilities are anticipated to (1) occur where allowed under the designated land use, (2) be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) potentially qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts.[3] Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, impacts on fire protection and emergency medical services would be less than significant under either the Project or Alternative 5.

(b) Police Services

(i) Construction

The construction phases under the Project or Alternative 5 would result in construction truck trips and could potentially affect emergency access along roadways to the Campus. Alternative 5 would incrementally reduce the scale of the Project's construction activities, resulting in reduced overall construction truck traffic and and/or a shorter duration of construction activity. The construction phases under the Project or Alternative 5 would increase construction traffic and potentially affect police emergency access along roadways to the Campus. Implementation of Mitigation Measure MM-TRAF-1 under either the Project or Alternative 5 would reduce construction traffic to less than significant levels at intersections and thus, would facilitate emergency access. However, both the Project and Alternative 5 would significantly impact three neighborhood street segments during construction (PDF-TRAF-1 to TRAF-6 would be implemented by the Project, and Alternative 5 PDF-TRAF-1 and PDF-TRAF 2 would minimize construction traffic impacts). Although the Project and Alternative 5's construction traffic has the potential to impact emergency access, response times to a site are routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, and use of alternative routes. During construction under either the Project or Alternative 5, MSMU's existing 24-hour/seven-day Campus patrol program would continue to provide continuous patrol of the Campus, including the Project Site. The LAPD's priority access, the security of the Project Site during construction, and implementation of Alternative 5's PDF-TRAF-1, PDF-TRAF-2, MM-TRAF-1, and the intermittent and temporary nature of construction traffic impacts, would reduce impacts on police services such that the addition of or expansion of new police protection facilities would not be required to serve the Project Site under Alternative 5.

[3] Although an EIR was prepared for the construction of Fire Station 39, the EIR concluded there would be no significant impacts. See, Notice of Determination for Van Nuys Fire Station 39, at http://eng2.lacity.org/techdocs/emg/docs/vannuys_fs39/NOD_160701.pdf. Accessed December 2018.

Moreover, Alternative 5 would result in a shorter duration and/or scale of construction activity (a reduction in overall construction vehicle trips), and would have incrementally less impact with respect to emergency access and capacities of existing police safety services than under the Project.

(ii) Operation

Alternative 5 would have less daily vehicle trips than the Project, as well as less frequent Other Wellness/Sports Activities. Alternative 5's reduction in intermittent maximum vehicle trips would reduce the Project's operational traffic impacts at study area intersections and neighborhood street segments to less than significant levels. The West LA Community Station serving the Project Site has an average response time of 5.7 minutes. This exceeds the citywide response time of 4.1 minutes, reflecting the remote mountainous area in the Community Station's service area. Currently there is a lower per capita crime rate and a higher ratio of officers per resident (1 officer to approximately 877 residents in the West LA Community Station service area, versus 1 officer to 402 residents Citywide). In addition, with a large daytime population influx, in which the population of the West LA Station's commercial districts, such as Westwood and Century City, more than doubles, the ratio of police officers per person further decreases. However, as shown below, the character of crime is less violent in the West LA Community Station service area as compared to citywide.

Violent crimes constituted 9.38 percent of total crime in the West LA Community Station service area; whereas, violent crimes Citywide constituted approximately 21.593 percent of all crimes Citywide. The highest categories of crimes in the West LA Station Community Station service area are theft from auto and personal theft, which constitute approximately 63.19 percent of total crime. Citywide, these two categories constitute approximately 36 to 50 percent of total crime.

Because the LAPD has priority use of roadways in congested conditions, and both the Project and Alternative 5 propose a gym for existing students at an existing university campus, neither the Project nor Alternative 5 would increase demand for police services that would require the expansion of existing or construction of new police facilities. In addition, consistent with the *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate police protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAPD has not identified that it will be constructing a new station in the area surrounding the Project Site because of either the Wellness Pavilion or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities are anticipated to (1) occur where allowed under the designated land use, (2) be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) potentially qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and

would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. Both the Project and Alternative 5 would have a less than significant impact regarding the need for the expansion of existing LAPD services.

(11) Transportation

(a) Construction

(i) Intersection Capacity and Neighborhood Street Intrusion Criteria

Maximum daily construction activities would be similar under both the Project and Alternative 5, which would generate the same maximum number of trips during construction and have similar impacts on both intersection capacity criteria and neighborhood intrusion criteria for traffic at study area intersections and neighborhood street segments.

Both the Project and Alternative 5 would implement MM-TRAF-1, which establishes a limit of 37 outbound passenger car equivalent (PCE) trips and six inbound PCE trips during each peak individual hour of the PM peak period (4 PM to 6 PM). On a typical day of construction, inbound trips during the PM peak period are not anticipated, but a specific emergency or unforeseen situations may arise that would require an occasional inbound trip during the PM peak period. For both the Project and Alternative 5, the implementation of MM-TRAF-1 would reduce intersection capacity impacts during construction to a less than significant level.

Intersection capacity criteria for intersections are outlined in Table IV.K-5, Intersection Capacity Criteria – City of Los Angeles, Section IV.K Transportation and Traffic, in the Draft EIR. Neighborhood intrusion impacts comprise 120 vehicles or more where daily average trips on a road segment are 0 to 999; a 12 percent increase or more where daily average trips on a road segment are 1,000 to 1,999; a 10 percent increase or more where daily average trips on a road segment are 2,000 to 2,999; and an 8 percent increase or more where daily average trips on a road segment are 3,000 or more. Intersection capacity standards and neighborhood street segments intrusion levels are both set forth in the City's CEQA Threshold Guide.[4]

As with the Project, no feasible mitigation measures are available to address Alternative 5's significant daily construction impacts at study area neighborhood street segments. Both the 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

[4] City of Los Angeles Department of City Planning, L. A. CEQA Thresholds Guide, 2006. Available at: http://planning.lacity.org/Documents/MajorProjects/CEQAThresholdsGuide.pdf. Accessed August 27, 2019.

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.

(ii) Construction Schedule

Because peak hour impacts during construction would be the same as under the Project, the primary difference between the Project and Alternative 5 would be the duration of construction activities. As shown in Table III-4, Construction Phases – Alternative 5 Compared to the Project, above, the total duration of Project construction is expected to be approximately 22 months; whereas, the total duration of construction activities for Alternative 5 is expected to be 20 months. As mentioned above, the peak truck traffic would be the same as under the Project. Table IV.K-7, Construction Period Vehicle Trip Generation, in the Draft EIR shows trips in PCEs under each of the construction phases. As shown in Table IV.K-7, maximum PCE trips (280 per day) would occur during Phase IV (Concrete Pouring). Because the volume of concrete needed for construction of the Project would be reduced by approximately 77 percent under Alternative 5, the total trips generated by the concrete pour phase would be respectively reduced. The total length of Phase IV (Concrete Pouring) would be reduced from 10 to 20 percent under Alternative 5.

Project construction would occur between the hours of 7:00 AM and 5:00 PM; therefore, the Project would comply with the LAMC, which provides that construction activities are limited to the hours of 7:00 AM to 9:00 PM on weekdays. Construction is not anticipated on weekends; however, if weekend construction were necessary, the Project would adhere to LAMC construction hours from 8:00 AM to 6:00 PM on Saturdays and holidays. Pursuant to the LAMC, no construction is permitted on Sundays.

(iii) Haul Trucks

As with the Project, hauling activity for Alternative 5 is expected to occur during Phase II (Demolition). Up to 40 haul truckloads per day are anticipated on peak haul days during this phase, which would be the same under both the Project and Alternative 5. Haul truck trips during the demolition phase are expected to be relatively constant, and hauling hours are anticipated to be 7:00 AM to 3:00 PM. During the concrete pour phase, concrete trucks trips are assumed to occur between 7:00 AM and 5:00 PM. The preferred truck haul route would be Chalon Road to Bundy Drive to Sunset Boulevard to the I-405 Freeway. The preferred return route would be I-405 Freeway to Sunset Boulevard to Bundy Drive to Norman Place to Chalon Road to the MSMU driveway.

Table IV.K-7, *Construction Period Vehicle Trip Generation*, in the Draft EIR shows trips in PCEs anticipated by phase. Of these, some will be larger truck trips that may need to deviate from the inbound route (described above) of using Norman Place to Chalon Road to enter the Project Site. A portion of the larger trucks may need to utilize Bundy Drive to Chalon Road to enter and exit the Project Site. Of the totals trucks shown in Table IV.K-7, approximately 40 larger haul trucks are expected on a peak day during the demolition

phase, up to 50 larger trucks (delivery and equipment trucks) are expected on a peak day during the concrete pour phase, and up to seven larger trucks are expected on peak days under the other phases of construction.

A dedicated staging area would be located on the Project Site to ensure haul trucks would not park off-site. Trucks will not be staged curbside on Chalon Road. During the heaviest periods of hauling, if needed, staging could occur off-site at a designated truck off-site staging area, and the haul trucks would be radioed in from the staging area (refer to Project PDF TRAF-6 and Alternative 5 PDF TRAF-1).

(iv) *Equipment and Delivery Trucks*

In addition to haul trucks, as with the Project, Alternative 5 is expected to generate equipment and delivery trucks during each phase of construction. Materials could include plumbing supplies, electrical fixtures, and items used in furnishing the buildings. These materials would be delivered to the Site and stored on-site. Additionally, construction equipment would have to be delivered to the Project Site. This equipment could include cranes, bulldozers, excavators, and other large items of machinery. Most of the heavy equipment is expected to be transported to the Project Site on large trucks such as super 10's or other similar vehicles. Minimal delivery/equipment trucks are expected to be needed under the demolition and Site preparation stage of construction. Phase IV, concrete pouring, is expected to generate up to 60 equipment/delivery truckloads per day on peak activity days and Phase VII is expected to generate up to 20 equipment/delivery truckloads per day on peak activity days.

Similar to haul trucks accessing the Project Site, the majority of construction equipment and delivery trucks would travel from Sunset Boulevard to the Campus via Bundy Drive to Norman Place to Chalon Road and leave the Campus via Chalon Road and then south on Bundy Drive to Sunset Boulevard. However, some of the larger delivery truck trips may need to deviate from this inbound route of using Norman Place to Chalon Road to enter the Project Site. A portion of the larger delivery trucks may need to utilize Bundy Drive to Chalon Road to enter and exit the Project Site.

(v) *Construction Employees*

The number of construction workers would vary throughout the construction period with the building construction stage generating the highest number of trips for both the Project and Alternative 5. Phase VI, building construction, (framing, walls and finishes of the building), is expected to require a total of 100 construction workers on site during peak construction days.

(vi) *Parking during Construction*

Under both the Project and Alternative 5, it is expected that construction worker parking would be provided on-site or within the Campus (refer to Project PDF-TRAF-2 and Alternative 5 PDF-TRAF-2). MSMU provides a total of 561 parking spaces through various parking facilities on-Campus. For approximately 16 months during Alternative 5's

Construction Phases I through VI, approximately 232 spaces would be removed, leaving 329 spaces available on-Campus. Once new surface parking locations proposed as part of Alternative 5 (replacing 186 of the 232 removed spaces) are completed, construction workers would park in those replaced spaces. Construction workers parking on-site would travel from Sunset Boulevard to the Campus via Bundy Drive to Norman Place to Chalon Road and leave the Campus via Chalon Road and then south on Bundy Drive to Sunset Boulevard. Pursuant to Project PDF-TRAF-2 and Alternative 5 PDF-TRAF-2, Construction Parking Plan, no construction worker parking would be allowed on neighborhood streets.

(vii) *School Parking Locations*

During construction of Alternative 5, a maximum of 232 existing parking spaces will be unavailable. Under Alternative 5, MSMU would arrange for valet parking for some or all employees, students, and guests. Valet operations would enable vehicles to be stacked in parking lot aisles to maximize available space on Campus (refer to Project PDF-TRAF-2 and Alternative 5 PDF-TRAF-2). Pursuant to Alternative 5 PDF-TRAF-2, construction worker parking shall be entirely on Campus.

(viii) Implementation of Project Design Features and Mitigation Measures

As with the Project, Alternative 5 would incorporate design features, such as Alternative 5 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. Further, Alternative 5 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. As with the Project, 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).

In addition to Alternative 5 PDF-TRAF-1 and MM-TRAF-1, Alternative 5 would implement other PDFs to reduce the parking and traffic effects of Alternative 5 during construction. These include Alternative 5 PDF-TRAF-2 (Construction Parking Plan), that would allow for stacked parking or alternate parking location(s), and Alternative 5 PDF-TRAF-1 (or Project PDF-TRAF-1) that would 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.

Project PDF-TRAF-4 and Alternative 5 PDF-TRAF-1 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 Project PDF-TRAF-5 and Alternative 5 PDF-TRAF-1 would limit construction truck travel to Bundy Drive, Norman Place, and Chalon Drive only.

However, as with the Project, 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), as discussed in Section 12 (c)(i), *Intersection Capacity and Neighborhood Street Intrusion Criteria*, above.

Alternative 5 would incrementally reduce the scale of the Project's construction activity through reduced grading (20,524 cubic yards under the Project compared to 9,343 cubic yards under Alternative 5) and reduction in concrete pours (8,155 cubic yards under the 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.

(ix) Construction Impacts Conclusion

Truck trips associated with maximum pour days would be similar to those of the Project and, as with the 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 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 Project and Alternative 5; however, these impacts would be less under Alternative 5 because of the reduction in the duration of construction activity.

(b) Operation Traffic

(i) Alternative 5's Operational Traffic Impacts

Table III-5 *Existing (2016) Plus Alternative 5: Intersection Service Levels – School Year*, and **Table III-6**, *Existing (2016) Plus Alternative 5: Intersection Service Levels – Summer*, illustrate the effects on intersection volume/capacity of Alternative 5's cap on outside visitors during the peak hours, shown in Table III-5, and on maximum trips associated with summer camps (236 total daily trips). Compared to the Project which would limit total daily outside guests at Health & Wellness Speaker Series and Other Wellness/Sports Events (or a combination of these activities/events) to a total of 400, Alternative 5 would limit total daily outside guests at these events (or a combination of these events) to 310.

As shown in Table III-5 and Table III-6, Alternative 5 would reduce the significant and unavoidable impacts, under the Project, at three Study Area intersections under Existing (2016) plus Project Conditions (School Year) and two Study Area intersections under

Existing (2016) plus Project Conditions (Summer) conditions, to less than significant levels.

Table III-7, *Future Baseline (2020) Plus Alternative 5: Intersection Service Levels – School Year*, and **Table III-8**, *Future Baseline (2020) Plus Alternative 5: Intersection Service Levels – Summer*, show that trip caps resulting in reduced peak hour trips under Alternative 5 would reduce the Project's impacts to intersections during the school year and summer under future (2020) conditions to less than significant levels.

TABLE III-5
EXISTING (2016) PLUS ALTERNATIVE 5: INTERSECTION SERVICE LEVELS - SCHOOL YEAR

			Existing		Existing + Alt 5			
No.	**Intersection**	**Peak Hour**	**V/C**	**LOS**	**V/C**	**LOS**	**V/C Increase**	**Significant Impact?**
1	Cliffwood Ave & Sunset Blvd	AM	0.465	A	0.465	A	0.000	No
		5 -6 PM	0.252	A	0.252	A	0.000	No
		6 -7 PM	0.189	A	0.189	A	0.000	No
2	Kenter Ave & Sunset Blvd	AM	0.827	D	0.827	D	0.000	No
		5 -6 PM	0.527	A	0.527	A	0.000	No
		6 -7 PM	0.520	A	0.520	A	0.000	No
3	Bundy Dr & Sunset Blvd	AM	0.570	A	0.570	B	0.000	No
		5-6 PM	1.046	F	1.046	F	0.000	No
		6-7 PM	0.903	E	0.903	E	0.000	No
4	Saltair Ave & Sunset Blvd	AM	0.529	A	0.529	A	0.000	No
		5-6 PM	1.117	F	1.117	F	0.000	No
		6-7 PM	0.981	E	0.981	E	0.000	No
5	Barrington Ave & Sunset Blvd	AM	0.746	C	0.746	C	0.000	No
		5-6 PM	1.403	F	1.403	F	0.000	No
		6-7 PM	1.213	F	1.213	F	0.000	No
6	Church Ln & 1-405 SB Ramps	AM	0.489	A	0.489	A	0.000	No
		5-6 PM	0.699	B	0.699	C	0.000	No
		6-7 PM	0.664	B	0.664	B	0.000	No
7	Church Ln & Sunset Blvd	AM	0.727	C	0.727	C	0.000	No
		5-6 PM	0.701	C	0.701	C	0.000	No
		6-7 PM	0.672	B	0.672	B	0.000	No
8	1-405 NB Ramps & Sunset Blvd	AM	0.673	B	0.673	B	0.000	No
		5-6 PM	0.317	A	0.317	A	0.000	No
		6-7 PM	0.306	A	0.306	A	0.000	No

TABLE III-5
EXISTING (2016) PLUS ALTERNATIVE 5: INTERSECTION SERVICE LEVELS - SCHOOL YEAR

No.	Intersection	Peak Hour	Existing V/C	Existing LOS	Existing + Alt 5 V/C	Existing + Alt 5 LOS	V/C Increase	Significant Impact?
9	N Bundy Dr & San Vincente Blvd	AM	0.577	A	0.577	A	0.000	No
		5-6 PM	0.597	A	0.597	A	0.000	No
		6-7 PM	0.539	A	0.539	A	0.000	No
10	S Bundy Dr & San Vicente Blvd	AM	0.550	A	0.550	A	0.000	No
		5-6 PM	0.514	A	0.514	A	0.000	No
		6-7 PM	0.489	A	0.489	A	0.000	No
11	Bundy Dr & Wilshire Blvd	AM	0.696	B	0.696	B	0.000	No
		5-6 PM	0.718	C	0.718	C	0.000	No
		6-7 PM	0.666	B	0.666	B	0.000	No
12	Mandeville Canyon Road & Sunset Blvd	AM	0.869	D	0.869	D	0.000	No
		5-6 PM	0.371	A	0.371	A	0.000	No
		6-7 PM	0.339	A	0.339	A	0.000	No
13	Allenford Ave & Sunset Blvd	AM	0.607	B	0.607	B	0.002	No
		5-6 PM	0.518	A	0.518	A	0.000	No
		6-7 PM	0.473	A	0.473	A	0.000	No
14	26th Street & San Vicente Blvd	AM	0.738	C	0.738	C	0.000	No
		5-6 PM	0.773	C	0.773	C	0.000	No
		6-7 PM	0.772	C	0.772	C	0.000	No
			Delay (sec)	**LOS**	**Delay (sec)**	**LOS**		
14	26th Street & San Vicente Blvd	AM	47	D	47	D	0	No
		5-6 PM	49	D	49	D	0	No
		6-7 PM	48	D	48	D	0	No

NOTE: The City of Santa Monica intersection (Intersection No. 14 - 26th Street and San Vicente Boulevard), was analyzed according to the LADOT methodology to show the comparative change relative to the City of Los Angeles intersections (Intersections No. 1-13), as well as according to the City of Santa Monica's preferred Highway Capacity Manual 2000 (HCM) Operation Methodology.

SOURCE: Fehr & Peers Transportation Consultants, 2020.

TABLE III-6
EXISTING (2016) PLUS ALTERNATIVE 5: INTERSECTION SERVICE LEVELS - SUMMER

No.	Intersection	Peak Hour	Existing		Existing + Alt 5 Summer		V/C Increase	Significant Impact?
			V/C	LOS	V/C	LOS		
1	Cliffwood Ave & Sunset Blvd	AM	0.347	A	0.348	A	0.001	No
		3 -4 PM	0.414	A	0.414	A	0.000	No
		5 -6 PM	0.244	A	0.244	A	0.000	No
2	Kenter Ave & Sunset Blvd	AM	0.755	C	0.756	C	0.001	No
		3 -4 PM	0.732	C	0.733	C	0.001	No
		5 -6 PM	0.540	A	0.540	A	0.000	No
3	Bundy Dr & Sunset Blvd	AM	0.491	A	0.541	A	0.050	No
		3 -4 PM	0.659	B	0.685	B	0.026	No
		5 -6 PM	0.940	E	0.949	E	0.009	No
4	Saltair Ave & Sunset Blvd	AM	0.431	A	0.449	A	0.008	No
		3 -4 PM	0.726	C	0.730	C	0.004	No
		5 -6 PM	1.139	F	1.140	F	0.001	No
5	Barrington Ave & Sunset Blvd	AM	0.731	C	0.742	C	0.011	No
		3 -4 PM	0.907	E	0.916	E	0.009	No
		5 -6 PM	1.236	F	1.239	F	0.003	No
6	Church Ln & 1-405 SB Ramps	AM	0.456	A	0.468	A	0.012	No
		3 -4 PM	0.664	B	0.668	B	0.004	No
		5 -6 PM	0.687	B	0.688	B	0.001	No
7	Church Ln & Sunset Blvd	AM	0.742	C	0.762	C	0.020	No
		3 -4 PM	0.665	B	0.667	B	0.002	No
		5 -6 PM	0.633	B	0.634	B	0.001	No
8	1-405 NB Ramps & Sunset Blvd	AM	0.663	B	0.666	B	0.003	No
		3 -4 PM	0.373	A	0.376	A	0.003	No
		5 -6 PM	0.326	A	0.327	A	0.001	No
9	N Bundy Dr & San Vincente Blvd	AM	0.464	A	0.468	A	0.004	No
		3 -4 PM	0.586	A	0.588	A	0.002	No
		5 -6 PM	0.599	A	0.599	B	0.000	No
10	S Bundy Dr & San Vicente Blvd	AM	0.478	A	0.480	A	0.003	No
		3 -4 PM	0.547	A	0.548	A	0.001	No
		5 -6 PM	0.518	A	0.518	A	0.000	No

TABLE III-6
EXISTING (2016) PLUS ALTERNATIVE 5: INTERSECTION SERVICE LEVELS - SUMMER

No.	Intersection	Peak Hour	Existing		Existing + Alt 5 Summer		V/C Increase	Significant Impact?
			V/C	LOS	V/C	LOS		
11	Bundy Dr & Wilshire Blvd	AM	0.696	B	0.697	C	0.007	No
		3 -4 PM	0.668	B	0.669	B	0.001	No
		5 -6 PM	0.712	C	0.712	C	0.000	No
12	Mandeville Canyon Road & Sunset Blvd	AM	0.440	A	0.440	A	0.002	No
		3 -4 PM	0.445	A	0.446	A	0.001	No
		5 -6 PM	0.330	A	0.330	A	0.001	No
13	Allenford Ave & Sunset Blvd	AM	0.534	A	0.535	A	0.001	No
		3 -4 PM	0.611	B	0.611	B	0.000	No
		5 -6 PM	0.690	B	0.690	B	0.000	No
14	26th Street & San Vicente Blvd	AM	0.726	C	0.727	C	0.001	No
		3 -4 PM	0.761	C	0.761	C	0.000	No
		5 -6 PM	0.821	D	0.821	D	0.000	No
			Delay (sec)	LOS	Delay (sec)	LOS		
14	26th Street & San Vicente Blvd	AM	46	D	46	D	0	No
		3 -4 PM	47	D	47	D	0	No
		5 -6 PM	74	E	74	E	0	No

NOTE: The City of Santa Monica intersection (Intersection No. 14 - 26th Street and San Vicente Boulevard), was analyzed according to the LADOT methodology to show the comparative change relative to the City of Los Angeles intersections (Intersections No. 1-13), as well as according to the City of Santa Monica's preferred Highway Capacity Manual 2000 (HCM) Operation Methodology.

SOURCE: Fehr & Peers Transportation Consultants, 2020.

TABLE III-7
FUTURE BASELINE (2020) PLUS ALTERNATIVE 5: INTERSECTION SERVICE LEVELS - SCHOOL YEAR

No.	Intersection	Peak Hour	Future (2020) V/C	Future (2020) LOS	Future (2020) +Alt 5 V/C	Future (2020) +Alt 5 LOS	V/C Increase	Significant Impact?
1	Cliffwood Ave & Sunset Blvd	AM	0.501	A	0.501	A	0.000	No
		5-6 PM	0.278	A	0.278	A	0.000	No
		6-7 PM	0.214	A	0.214	A	0.000	No
2	Kenter Ave & Sunset Blvd	AM	0.887	D	0.887	D	0.000	No
		5-6 PM	0.624	B	0.624	B	0.000	No
		6-7 PM	0.605	B	0.605	B	0.000	No
3	Bundy Dr & Sunset Blvd	AM	0.629	B	0.629	B	0.000	No
		5-6 PM	1.146	F	1.146	F	0.000	No
		6-7 PM	0.997	E	0.997	E	0.000	No
4	Saltair Ave & Sunset Blvd	AM	0.595	A	0.595	A	0.000	No
		5-6 PM	1.223	F	1.223	F	0.000	No
		6-7 PM	1.076	F	1.076	F	0.000	No
5	Barrington Ave & Sunset Blvd	AM	0.829	D	0.829	D	0.000	No
		5-6 PM	1.517	F	1.517	F	0.000	No
		6-7 PM	1.329	F	1.329	F	0.000	No
6	Church Ln & 1-405 SB Ramps	AM	0.532	A	0.532	A	0.000	No
		5-6 PM	0.737	C	0.737	C	0.000	No
		6-7 PM	0.699	B	0.699	B	0.000	No
7	Church Ln & Sunset Blvd	AM	0.802	D	0.802	D	0.000	No
		5-6 PM	0.750	C	0.750	C	0.000	No
		6-7 PM	0.733	C	0.733	C	0.000	No
8	1-405 NB Ramps & Sunset Blvd	AM	0.766	C	0.766	C	0.000	No
		5-6 PM	0.340	A	0.340	A	0.000	No
		6-7 PM	0.342	A	0.342	A	0.000	No
9	N Bundy Dr & San Vincente Blvd	AM	0.675	B	0.675	B	0.000	No
		5-6 PM	0.694	B	0.694	B	0.000	No
		6-7 PM	0.635	B	0.635	B	0.000	No
10	S Bundy Dr & San Vicente Blvd	AM	0.642	B	0.642	B	0.000	No
		5-6 PM	0.619	B	0.619	B	0.000	No
		6-7 PM	0.592	A	0.592	A	0.000	No
11	Bundy Dr & Wilshire Blvd	AM	0.893	D	0.893	D	0.000	No
		5-6 PM	0.856	D	0.856	D	0.000	No
		6-7 PM	0.837	D	0.837	D	0.000	No

TABLE III-7
FUTURE BASELINE (2020) PLUS ALTERNATIVE 5: INTERSECTION SERVICE LEVELS - SCHOOL YEAR

No.	Intersection	Peak Hour	Future (2020) V/C	Future (2020) LOS	Future (2020) +Alt 5 V/C	Future (2020) +Alt 5 LOS	V/C Increase	Significant Impact?
12	Mandeville Canyon Road & Sunset Blvd	AM	0.920	E	0.920	E	0.000	No
		5-6 PM	0.400	A	0.400	A	0.000	No
		6-7 PM	0.369	A	0.369	A	0.000	No
13	Allenford Ave & Sunset Blvd	AM	0.647	B	0.647	B	0.000	No
		5-6 PM	0.555	A	0.555	A	0.000	No
		6-7 PM	0.508	A	0.508	A	0.000	No
14	26th Street & San Vicente Blvd	AM	0.799	C	0.799	C	0.000	No
		5-6 PM	0.837	D	0.837	D	0.000	No
		6-7 PM	0.836	D	0.836	D	0.000	No
			Delay (sec)	**LOS**	**Delay (sec)**	**LOS**		
14	26th Street & San Vicente Blvd	AM	61	E	61	E	0	No
		5-6 PM	51	D	51	D	0	No
		6-7 PM	51	D	51	D	0	No

SOURCE: Fehr & Peers Transportation Consultants, 2020.

TABLE III-8
FUTURE BASELINE (2020) PLUS ALTERNATIVE 5: INTERSECTION SERVICE LEVELS -SUMMER

No.	Intersection	Peak Hour	Future (2020) V/C	Future (2020) LOS	Future (2020) + Alt 5 Summer V/C	Future (2020) + Alt 5 Summer LOS	V/C Increase	Significant Impact?
1	Cliffwood Ave & Sunset Blvd	AM	0.379	A	0.379	A	0.000	No
		5-6 PM	0.448	A	0.448	A	0.000	No
		6-7 PM	0.271	A	0.271	A	0.000	No
2	Kenter Ave & Sunset Blvd	AM	0.867	D	0.867	D	0.002	No
		5-6 PM	0.838	D	0.840	D	0.000	No
		6-7 PM	0.626	B	0.626	B	0.001	No
3	Bundy Dr & Sunset Blvd	AM	0.547	A	0.597	A	0.050	No
		5-6 PM	0.726	C	0.752	C	0.026	No
		6-7 PM	1.031	F	1.039	F	0.008	No

TABLE III-8
FUTURE BASELINE (2020) PLUS ALTERNATIVE 5: INTERSECTION SERVICE LEVELS -SUMMER

No.	Intersection	Peak Hour	Future (2020) V/C	Future (2020) LOS	Future (2020) + Alt 5 Summer V/C	Future (2020) + Alt 5 Summer LOS	V/C Increase	Significant Impact?
4	Saltair Ave & Sunset Blvd	AM	0.494	A	0.511	A	0.017	No
		5-6 PM	0.794	C	0.798	C	0.004	No
		6-7 PM	1.237	F	1.239	F	0.002	No
5	Barrington Ave & Sunset Blvd	AM	0.805	D	0.816	D	0.011	No
		5-6 PM	1.002	F	1.011	F	0.009	No
		6-7 PM	1.337	F	1.339	F	0.002	No
6	Church Ln & 1-405 SB Ramps	AM	0.497	A	0.509	A	0.012	No
		5-6 PM	0.703	C	0.706	C	0.003	No
		6-7 PM	0.724	C	0.725	C	0.001	No
7	Church Ln & Sunset Blvd	AM	0.810	D	0.829	D	0.019	No
		5-6 PM	0.718	C	0.720	C	0.002	No
		6-7 PM	0.693	B	0.693	B	0.000	No
8	1-405 NB Ramps & Sunset Blvd	AM	0.755	C	0.759	C	0.004	No
		5-6 PM	0.400	A	0.405	A	0.005	No
		6-7 PM	0.350	A	0.351	A	0.001	No
9	N Bundy Dr & San Vincente Blvd	AM	0.560	A	0.564	A	0.019	No
		5-6 PM	0.685	B	0.687	B	0.003	No
		6-7 PM	0.696	B	0.696	B	0.002	No
10	S Bundy Dr & San Vicente Blvd	AM	0.567	A	0.569	A	0.004	No
		5-6 PM	0.654	B	0.655	B	0.002	No
		6-7 PM	0.621	B	0.621	B	0.000	No
11	Bundy Dr & Wilshire Blvd	AM	0.877	D	0.877	D	0.000	No
		5-6 PM	0.850	D	0.851	D	0.001	No
		6-7 PM	0.847	D	0.847	D	0.000	No
12	Mandeville Canyon Road & Sunset Blvd	AM	0.473	A	0.473	A	0.000	No
		5-6 PM	0.480	A	0.480	A	0.000	No
		6-7 PM	0.358	A	0.358	A	0.000	No
13	Allenford Ave & Sunset Blvd	AM	0.572	A	0.572	A	0.000	No
		5-6 PM	0.652	B	0.652	B	0.000	No
		6-7 PM	0.734	C	0.734	C	0.000	No

TABLE III-8
FUTURE BASELINE (2020) PLUS ALTERNATIVE 5: INTERSECTION SERVICE LEVELS -SUMMER

No.	Intersection	Peak Hour	Future (2020) V/C	Future (2020) LOS	Future (2020) + Alt 5 Summer V/C	Future (2020) + Alt 5 Summer LOS	V/C Increase	Significant Impact?
14	26th Street & San Vicente Blvd	AM	0.787	C	0.788	C	0.001	No
		5-6 PM	0.828	D	0.828	D	0.000	No
		6-7 PM	0.873	D	0.873	D	0.000	No
			Delay (sec)	**LOS**	**Delay (sec)**	**LOS**	**V/C Increase**	**Significant Impact?**
14	26th Street & San Vicente Blvd[a]	AM	53	D	54	D	1	No
		5-6 PM	48	D	48	D	0	No
		6-7 PM	0.870	F	0.870	F	0	No

NOTE: The City of Santa Monica intersection (Intersection No. 14 - 26th Street and San Vicente Boulevard), was analyzed according to the LADOT methodology to show the comparative change relative to the City of Los Angeles intersections (Intersections No. 1-13), as well as according to the City of Santa Monica's preferred Highway Capacity Manual 2000 (HCM) Operation Methodology.

SOURCE: Fehr & Peers Transportation Consultants, 2020.

As shown in **Table III-9**, *Existing (2016) Plus Alternative 5: Neighborhood Street Segments – School Year*, and **Table III-10**, *Existing (2016) Plus Alternative 5: Neighborhood Street Segments – Summer*, visitor and trip reductions under Alternative 5 would reduce impacts on neighborhood street segments during the school year and summer under existing (2016) conditions to less than significant levels.

Table III-11, *Future Baseline (2020) Plus Alternative 5: Neighborhood Street Segments – School Year*, and **Table III-12**, *Future Baseline (2020) Plus Alternative 5: Neighborhood Street Segments – Summer*, show that under Alternative 5, the three neighborhood street segments with significant and unavoidable impacts during the school year (under the Project), and the six neighborhood street segments with significant and unavoidable impacts during the summer (under the Project), would be reduced to less than significant levels.

TABLE III-9
EXISTING (2016) PLUS ALTERNATIVE 5: NEIGHBORHOOD STREET IMPACTS - SCHOOL YEAR

Street Segment	Weekday Two-Way Existing Base	With Alternative 5 Impact Analysis				
		School Year Alt. 5 Only	Existing plus Alt 5	Alt 5 % Increase	Impact Criteria[a]	Significant Impact?
A. Bundy Dr north of Norman Pl	2,052	155	2,207	7.0%	10%	NO
B. Chalon Rd east of Bundy Dr	1,206	155	1,361	11.4%	12%	NO
C. Chalon Rd west of N Norman Rd	1,147	155	1,302	11.9%	12%	NO
D. Norman Pl north of Bundy Dr	1,220	155	1,375	11.3%	12%	NO
E. Bundy Dr north of Saltair Ave	4,880	310	5,190	6.0%	8%	NO
F. Benmore Terrace Between Bundy Dr and Saltair Ave	1,765	16	1,781	0.9%	12%	NO
G. Bowling Green Wy north of Sunset Blvd	1,630	7	1,637	0.4%	12%	NO
H. Bundy Dr north of Sunset Blvd	3,143	179	3,322	5.4%	8%	NO
I. Saltair Ave north of Chaparal St	715	47	762	6.1%	120 Trips	NO
J. Barrington Ave north of Chaparal St	3,890	79	3,969	2.0%	8%	NO

[a] Analysis of neighborhood street segments is based on the City of Los Angeles impact criteria for residential street segments.

SOURCE: Fehr & Peers Transportation Consultants, 2020.

TABLE III-10
EXISTING (2016) PLUS ALTERNATIVE 5: NEIGHBORHOOD STREET IMPACTS - SUMMER

Street Segment	Weekday Two-Way Existing Base	With Alternative 5 Impact Analysis				
		Summer Alt 5 Only Trips	Existing plus Alt 5	Alt 5 % Increase	Impact Criteria[a]	Significant Impact?
A. Bundy Dr north of Norman Pl	1,244	118	1,362	9%	12%	NO
B. Chalon Rd east of Bundy Dr	524	118	642	18%	120 Trips	NO
C. Chalon Rd west of N Norman Rd	554	118	672	18%	120 Trips	NO
D. Norman Pl north of Bundy Dr	1,260	118	1,378	9%	12%	NO
E. Bundy Dr north of Saltair Ave	4,134	236	4,370	5%	8%	NO
F. Benmore Terrace Between Bundy Dr and Saltair Ave	1,340	12	1,352	1%	12%	NO
G. Bowling Green Wy north of Sunset Blvd	1,410	5	1,415	0%	12%	NO
H. Bundy Dr north of Sunset Blvd	2,160	136	2,296	6%	10%	NO
I. Saltair Ave north of Chaparal St	685	35	720	5%	120 Trips	NO
J. Barrington Ave north of Chaparal St	3,106	60	3,166	2%	8%	NO

[a] Analysis of neighborhood street segments is based on the City of Los Angeles impact criteria for residential street segments.

SOURCE: Fehr & Peers Transportation Consultants, 2020.

TABLE III-11
FUTURE BASELINE (2020) PLUS ALTERNATIVE 5: NEIGHBORHOOD STREET IMPACTS – SCHOOL YEAR

Street Segment	Weekday Two-Way Daily Volume		With Alternative 5 Impact Analysis				
	Existing Base	Cumulative Base	School Year Alt 5 Trips Only	Cumulative plus Alt 5	Project % Increase	Impact Criteria[a]	Significant Impact?
A. Bundy Dr north of Norman Pl	2,052	2,135	155	2,290	6.8%	10%	NO
B. Chalon Rd east of Bundy Dr	1,206	1,255	155	1,410	11.0%	12%	NO
C. Chalon Rd west of N Norman Rd	1,147	1,194	155	1,349	11.5%	12%	NO
D. Norman Pl north of Bundy Dr	1,220	1,270	155	1,425	10.9%	12%	NO
E. Bundy Dr north of Saltair Ave	4,880	5,078	310	5,388	5.8%	8%	NO
F. Benmore Terrace Between Bundy Dr and Saltair Ave	1,765	1,837	16	1,852	0.8%	12%	NO
G. Bowling Green Wy north of Sunset Blvd	1,630	1,696	7	1,703	0.4%	12%	NO
H. Bundy Dr north of Sunset Blvd	3,143	3,271	179	3,450	5.2%	8%	NO
I. Saltair Ave north of Chaparal St	715	744	47	791	5.9%	120 Trips	NO
J. Barrington Ave north of Chaparal St	3,890	4,048	79	4,127	1.9%	8%	NO

[a] Analysis of neighborhood street segments is based on the City of Los Angeles impact criteria for residential street segments.

SOURCE: Fehr & Peers Transportation Consultants, 2020.

TABLE III-12
FUTURE BASELINE (2020) PLUS ALTERNATIVE 5: NEIGHBORHOOD STREET IMPACTS - SUMMER

Street Segment	Weekday Two-Way Daily Volume		With Alternative 5 Impact Analysis				
	Existing Base	Cumulative Base	School Year Alt 5 Only	Cumulative plus Alt 5	Alt 5 % Increase	Impact Criteria[a]	Significant Impact?
A. Bundy Dr north of Norman Pl	1,244	1,295	118	1,413	8.4%	12%	NO
B. Chalon Rd east of Bundy Dr	524	545	118	663	17.8%	120 Trips	NO
C. Chalon Rd west of N Norman Rd	554	576	118	694	17.0%	120 Trips	NO
D. Norman Pl north of Bundy Dr	1,260	1,311	118	1,429	8.3%	12%	NO
E. Bundy Dr north of Saltair Ave	4,134	4,302	236	4,538	5.2%	8%	NO
F. Benmore Terrace Between Bundy Dr and Saltair Ave	1,340	1,394	12	1,406	0.8%	12%	NO
G. Bowling Green Wy north of Sunset Blvd	1,410	1,467	5	1,472	0.4%	12%	NO
H. Bundy Dr north of Sunset Blvd	2,160	2,248	136	2,384	5.7%	10%	NO
I. Saltair Ave north of Chaparal St	685	713	35	748	4.7%	120 Trips	NO
J. Barrington Ave north of Chaparal St	3,106	3,232	60	3,292	1.8%	8%	NO

[a] Analysis of neighborhood street segments is based on the City of Los Angeles impact criteria for residential street segments.

SOURCE: Fehr & Peers Transportation Consultants, 2020.

As shown in Tables III-5 through III-12, Alternative 5 would reduce the Project's significant and unavoidable traffic impacts on Study Area intersections and neighborhood street segments during operation to less than significant levels. Impacts associated with operation traffic would be less under Alternative 5 than under the Project.

(ii) Comparison of Alternative 5's Operational Traffic Impacts to the Project

Alternative 5 would generate less vehicle trips than the Project, and result in no significant operational traffic impacts, because Alternative 5 would eliminate peak hour outside guest vehicle trips for Health and Wellness Speaker Series, Other Wellness/Sports Activities

and Club Sports, and place caps on total daily outside guest vehicle trips (310 daily outside guest vehicle trips for Health and Wellness Speaker Series, Other Wellness/Sports Activities, and Club Sports, and 236 daily outside guest trips for Summer Sports Camps). These restrictions represent a substantial reduction in vehicle traffic compared to the Project, for which the Draft EIR's Traffic Study predicted 400 daily outside guest vehicle trips.

Table III-13, *Operation Traffic Impacts Comparison of the Project (School Year), and Alternative 5 New Wellness/Sports Events,* and **Table III-14**, *Comparison of the Project (Summer) and Alternative 5* compare the traffic impacts of Alternative 5 to the Project. Tables III-13 and III-14 evaluate the maximum through and left turn trips relative to the Sunset/Bundy intersection (the Control Intersection), which is the most impacted intersection in the area, and which would receive all vehicle traffic associated with the Project. As shown in Tables III-13 and III-14, Alternative 5's daily trip cap would result in no significant traffic impacts during operation.

(c) Freeway Traffic

As with the Project, Alternative 5 would generate fewer than 150 trips at any of the freeway segments. Alternative 5 would generate trips at the I-405/Church Lane and I-405/Sunset Boulevard ramps at levels that would not exceed LOS D or storage capacity of the ramps. Neither the Project nor Alternative 5 would generate transit trips beyond existing transit capacity. Impacts with respect to freeway traffic impacts would be less than significant under both the Project and Alternative 5; however, because Alternative 5 would generate incrementally less operation-related traffic, it would have less impact than the Project.

(d) Consistency with Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities

As with the Project, Alternative 5 would not conflict with multi-modal policies of the Brentwood-Pacific Palisades Community Plan. Because of the distance of the Project Site from existing bicycle routes or facilities in the area, neither the Project nor Alternative 5 would encroach into or cause the disuse or rerouting of any existing or planned bicycle routes or facilities in the area. Both the Project and Alternative 5 would improve on-Campus pedestrian access by consolidating existing surface parking lots and providing a dedicated pedestrian path to the Project Site. Both the Project and Alternative 5 would have less than significant and similar impacts with respect to applicable policies related to transit, bicycle, and pedestrian facilities.

TABLE III-13
OPERATION TRAFFIC IMPACTS COMPARISON OF THE PROJECT (SCHOOL YEAR) AND ALTERNATIVE 5 OTHER WELLNESS/SPORTS EVENTS

	Project			Alternative 5[b]		
	Inbound	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
Daily Vehicle Trips			400			310
MAXIMUM PEAK HOUR SOUTHBOUND THROUGH AT SUNSET/BUNDY (THE CONTROL INTERSECTION)						
Maximum Trips per hour in the 7:00-9:00 AM Peak Period	180	0	180	0	0	0
Significant Impact?		Yes			No	
Maximum Trips per hour in the 3:00-6:00 PM Peak Period	0	200	200	0	0	0
Significant Impact?		Yes			No	
Maximum 6:00-7:00 PM Trips	180	0	180	0	0	0
Significant Impact?		**Yes**			**No**	
MAXIMUM PEAK HOUR SOUTHBOUND LEFT TURNS AT SUNSET/BUNDY (THE CONTROL INTERSECTION)						
	Project			**Alternative 5**		
	Inbound	**Outbound**		**Inbound**	**Outbound**	
Maximum Trips per hour in the 7:00-9:00 AM Peak Period	180	0	180	0	0	0
Significant Impact?		**Yes**			**No**	
Maximum Trips per hour in the 3:00-6:00 PM peak period	0	200	200	0	0	0
Significant Impact?		**Yes**			**No**	
Maximum 6:00-7:00 PM Trips	180	0	180	0	0	0
Significant Impact?		**Yes**			**No**	

SOURCE: Fehr & Peers Transportation Consultants, 2020.

TABLE III-14
OPERATION TRAFFIC IMPACTS COMPARISON OF THE PROJECT (SUMMER) AND ALTERNATIVE 5 SUMMER CAMPS

	Project			Alternative 5[b]		
	Inbound	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
Maximum Daily Vehicle Trips			480			236
Significant Impact?		**Yes**			**No**	
Maximum Trips per hour in the 7:00-9:00 AM Peak Period	140	100	240	71	31	102
Significant Impact?		**Yes**			**No**	
Maximum Trips per hour in the 3:00-4:00 PM Peak Period	90	216	216	8	34	42
Significant Impact?		**Yes**			**No**	
Maximum 4:00-6:00 PM Trips	10	14	24	3	8	11
Significant Impact?		**No**			**No**	

SOURCE: Fehr & Peers Transportation Consultants, 2020.

(12) Tribal Cultural Resources

No known Tribal cultural resources have been identified within the Project Site or vicinity. Under Alternative 5 and the Project, 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 for the treatment of inadvertent Tribal cultural resource discoveries. Through compliance with the Condition of Approval for the treatment of inadvertent Tribal cultural resource discoveries under both the Project and Alternative 5, impacts with respect to Tribal cultural resources would be less than significant. However, because the scale of grading and construction would be incrementally reduced under Alternative 5, there is less of a likelihood that any Tribal cultural resources would be affected. Thus, Alternative 5 would have less impact with respect to Tribal cultural resources than the Project.

(13) Utilities

(a) Water Supply

(i) Construction

Construction activities would require water for soil watering (fugitive dust control), clean up, masonry, painting, and other activities. Construction would be temporary and intermittent and water demand would be partially off-set by the demolition of existing uses, including the swimming pool and the interim disuse of existing landscape irrigation. Because construction demand would largely be off-set by the cessation of existing demand, the difference in any construction demand increase between the Project and Alternative 5 would be miniscule. Construction activities associated with the Project or Alternative 5 would not require or result in the construction of new water facilities or the expansion of existing facilities. Impacts to water supply during construction activities would be less than significant under Alternative 5 and the Project. Alternative 5 would reduce the Project's scale of construction, including the demolition of the two-story facilities management building, extensive buttressing, and preparation of foundations for the two-story parking deck. As such, construction water demand impacts associated with Alternative 5 would be less than under the Project.

(ii) Operation

The type of event activity within the Wellness Pavilion under Alternative 5 would be similar to that of the Project. During operation, both the Project and Alternative 5 would generate an estimated maximum daily increase in operational water demand from events of approximately 0.69 acre-feet per year (AFY) of water. Subtracting the existing landscaping demand of 0.27 AFY, the Project would result in a total net increase of approximately 0.42 AFY compared to existing conditions. Although Alternative 5 would result in a smaller building, it would provide a swimming pool, showers, and drinking fountains and have similar attendance and building operation water demand levels to those of the Project. As with the Project, based on the City of Los Angeles Department of

Water and Power (LADWP's) projected surpluses as indicated in their 2015 Urban Water Management Plan (UWMP), the total water demand of the Project and 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. Neither the Project nor Alternative 5 would require or result in the need for new or expanded water entitlements, and impacts with respect to water supply would be less than significant and similar.

Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. With development of the Project or Alternative 5, MSMU would provide on-Campus infrastructure and pipe sizing to maintain appropriate water flows and pressure levels. Under existing conditions, the on- and off-Campus connecting water infrastructure is adequate to support peak daily water demand from the Campus. Water demand under the Project or Alternative 5 would not substantively change from existing typical daily conditions on Campus. In addition, new events anticipated under the Project or Alternative 5 would be of similar size as events that already occur on the Campus. However, because the frequency of Other Wellness/Sports Activities would be reduced under Alternative 5 from approximately 48 per year to 12 per year, the reduction would result in less water demand than under the Project. As the Project's Other Wellness/Sports Activities would result in demand of 0.24 acre-feet per year (AFY), Alternative 5 would reduce this demand by 75 percent or down to 0.6 AFY. Because daily peak water demand is not expected to substantially increase compared to current conditions, off-Campus water infrastructure upgrades to accommodate peak water demand would not be necessary. Therefore, water infrastructure needed during operation would be less than significant under both the Project and Alternative 5. However, overall demand on water would be incrementally less under Alternative 5 because of the reduced frequency of events.

(b) Solid Waste

The Project would result in approximately 10,513 tons of solid waste during construction activities. Of this total, 276 tons would be generated during demolition of the larger of the two Facilities Management Buildings (3,500 sf x 158 lbs/sf). Thus, because this building would be preserved under Alternative 5, and with a smaller Wellness Pavilion building (2,500 square feet smaller than the Project-generation factor of 4.34 lbs/square foot), assuming a negligible difference in waste generated from roads/hardscape, Alternative 5 would result in approximately 281 less tons of construction debris compared to the Project.

The construction and demolition (C&D) waste would be disposed of at the County's Azusa Land Reclamation Landfill or one of the inert debris engineered fill operations located in the County. The remaining capacity of the Azusa Land Reclamation Landfill is estimated at 52,750,160 cubic yards (29,671,965 tons) with a projected closure date of year 2046. Prior to diversion, the Project and Alternative 5 total solid waste disposal need during construction would represent approximately 0.04 and 0.03 percent, respectively, of the estimated remaining capacity at the Azusa Landfill. Both the Project and Alternative 5 would similarly comply with all applicable State and local statues and regulations related

to solid waste. While solid waste impacts during construction would be less than significant for the Project and Alternative 5, because Alternative 5 would generate a slightly smaller amount of construction-related solid waste, its impacts would be less than the Project.

New Project events and Summer Sports Camps would generate a net operational increase of approximately 28,300 pounds per year, or 14 tons per year. The estimated 14 tons per year represents an increase in solid waste generation due to the size and frequency of Campus events that may be held at the Wellness Pavilion, and 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. Both the Project and Alternative 5 would provide recycling opportunities on the Site in accordance with LAMC requirements. The Project's annual solid waste generation, not accounting for diversion, would be approximately 0.00014 percent of the County's 2015 annual waste generation of 9,457,378 tons per year and would account for less than 0.00001 percent of the remaining 114-million-ton capacity in the County's Class III landfills. The Project would be served by a County landfill with sufficient permitted capacity to accommodate solid waste disposal needs and impacts with respect to solid waste disposal. Impacts under the Project would be less than significant. Alternative 5 would provide for similar events as the Project but would substantially reduce the frequency of Other Wellness/Sports Activities from approximately 48 times per year under the Project to 12 per year under Alternative 5 (a 75 percent reduction). The Project's Other Wellness/Sports Activities would generate approximately 4.8 tons/year, while Alternative 5 would generate approximately 1.2 tons per year. Thus, the Project's 14 tons per year of total event related solid waste would be reduced to 10.4 tons per year under Alternative 5. Thus, impacts under Alternative 5 would be less than significant and incrementally less than under the Project.

(c) Energy Consumption

(i) Electricity and Natural Gas

The Project and Alternative 5 will consume electricity during construction and operation. The electrical demand would vary throughout the construction period based on the construction activities being conducted. Construction operations would not occur during the nighttime hour and, when not in use, electrical equipment would be powered off to avoid unnecessary energy consumption. For either the Project or Alternative 5, any electrical usage during construction would be offset during construction by the reduction in electrical demand associated with the demolition of the existing facility. Natural gas would not be consumed in substantial quantities during construction of the Project or Alternative 5.

The Project and Alternative 5 would increase demand for electricity resources, including for water supply, conveyance, distribution, and treatment in association with periodic events. The Project's estimated net operational electricity demand, including from water demand, is provided in Chapter VII, *Appendix F- Energy Analysis*, and in Appendix L,

Energy Worksheets, of the Draft EIR. As shown therein, the 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 Project would result in a net new consumption of electricity within the Site of 0.57 million kWh per year. The Project is projected to generate an annual demand for natural gas totaling approximately 0.62 million kBtu. As previously discussed, the Site currently consumes approximately 0.06 million kBtu of natural gas. As such, the Project would result in a net new consumption of natural gas within the Site of 0.56 million kBtu.

Both the Project and Alternative 5 would implement PDF-AQ-1 through PDF-AQ-8 to reduce demand on energy supplies, and would comply with or exceed the applicable provisions of Title 24 and the CalGreen Code in effect at the time of building permit issuance and will be designed similar to a LEED equivalent building. As specified in the Project Sustainability Features, the Project would be designed to include numerous energy saving features as well as waste reduction features that would allow the Project to comply with and exceed the Title 24 standards and achieve greater energy savings than required by state regulations. As such, the Project would minimize energy demand.

Although electricity demand for exterior security lighting and parking areas would be similar under both the Project and Alternative 5, Alternative 5 would incrementally reduce the floor area of the Wellness Pavilion from 38,000 square feet to 35,500 square feet, a reduction of approximately 6.6 percent. This reduction would potentially reduce heating and lighting demands. In addition, Alternative 5 would install solar collectors to further reduce natural gas and electricity demand for heating and cooling. With implementation of PDFs AQ-1 through AQ-8 and compliance with Title 24, the CalGreen Code, and LEED standards, neither the Project nor Alternative 5 would result in the inefficient, wasteful, and unnecessary consumption of energy. As such, impacts would be less than significant. However, because Alternative 5 is incrementally reduced in floor area and would implement on-site solar collectors, impacts on energy consumption would be less than under the Project.

(ii) Transportation Energy

During construction, fuel demands for on- and off-road vehicles would be an estimated average of 70,082 gallons of diesel fuel and 17,724 gallons of gasoline for each year of Project construction. Compliance with the anti-idling regulation and the use of cleaner construction equipment would reduce the annual average diesel fuel use. The Project and Alternative 5 utilize fuel efficient equipment consistent with state and federal regulations and would be consistent with and support the goals and benefits of the SCAG 2016 RTP/SCS. Both the Project and Alternative 5 would provide electric vehicle supply equipment (EVSE), pursuant to the CalGreen Code. Construction and operation of either the Project or Alternative 5 and unnecessary consumption of energy and impacts would be less than significant. However, because excavation, site preparation, and concrete hauling activities would be incrementally reduced under Alternative 5 due to reductions in grading volumes, reduction in soldier pile installation, and elimination of the concrete parking structure (refer to Table III-1, above), the use of off-road equipment and truck

trips would be reduced. In addition, Alternative 5 would reduce maximum vehicle trips during operation from a projected 400 trips per day to a maximum of 310 trips a day (refer to Table III-3, above) and would, thus, result in incrementally less demand on transportation energy resources. Impacts under Alternative 5 would be less than those of the Project.

e) Relationship of Alternative 5 to Project Objectives

Alternative 5 would provide for a similar type and physical size of use, with a reduction in floor area, compared to the Project. As such, 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 practice facility that would accommodate MSMU's club sports teams, while eliminating current team shuttle trips to and from the Campus for practices. 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 5 would be developed in a similar architectural style although in reduced scale compared to the 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 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 the 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 improve 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.

3. Environmentally Superior Alternative

The California CEQA Guidelines require the identification of an environmentally superior alternative to the proposed Project and, if the environmentally superior alternative is the "No Project/No Build Alternative," the identification of an environmentally superior alternative should be from among the remaining alternatives. Selection of an environmentally superior alternative is based on an evaluation of the extent to which the alternatives would reduce or eliminate the significant impacts associated with the Project, and on a comparison of the remaining environmental impacts of each alternative. **Table III-15,** *Comparison of Impacts Summary,* below compares Alternative 5 with the Project Alternatives evaluated in the Draft EIR, including the No Project/No Build Alternative (Alternative 1), the Reduced Intensity Alternative – 50 percent Floor Area Reduction Alternative (Alternative 2), the Alternate Construction Route Alternative (Alternative 3), and the Reduced Attendance Alternative (Alternative 4). As described in the Draft EIR, the prior alternatives reduced the Project's impacts by either reducing floor area or placing a limitation on visitors. The Alternate Construction Route Alternative (Alternative 3) was intended to reduce traffic noise on neighborhood streets. However, Alternative 3 was shown to not reduce truck noise impacts to less than significant levels and, subsequent to the Draft EIR analysis, was determined as an unavailable route for Project Site access.

Of the alternatives analyzed in the Draft EIR and in this Final EIR, the No Project/No Build Alternative would be considered the environmentally superior alternative because it would avoid the Project's significant and unavoidable construction noise and construction and operational traffic impacts, as well as the Project's less than significant impacts in other issue areas. However, because it is the No Project/No Build Alternative, the selection of another alternative is required.

Although each of the Project Alternatives analyzed in the Draft EIR would offer some degree of environmental benefit compared to the Project, Alternative 5 would result in the greatest reduction in environmental impacts. As with Alternative 4, Alternative 5 would reduce the Project's significant and unavoidable operation traffic impacts to less than significant levels. As with Alternative 4, Alternative 5 would also limit vehicle trips and, thus, reduce emissions and energy demand compared to the Project. However, Alternative 5 would have more trip restrictions and fewer events than Alternative 4 and thus would have fewer such impacts.

Alternative 4, which would have the same scale of development as the Project, would not reduce the scale of construction activity compared to the Project. Alternative 5, on the other hand, would eliminate the two-story concrete parking deck, incrementally reduce the Wellness Pavilion floor area, and shift the Wellness Pavilion to a more geologically stable part of the Project Site. As such, Alternative 5 would substantially reduce the concrete otherwise needed for foundations, walls and extensive buttressing. Alternative 2 would reduce the Wellness Pavilion floor area by 50 percent, but would not achieve the same reduction in the scale of concrete work as under Alternative 5. Because the

concrete pour phase generates the Project's significant and unavoidable construction noise and traffic impacts, Alternative 5 would reduce the duration of significant and unavoidable construction traffic and noise impacts compared to the other Alternatives. It is conservatively assumed, however, that maximum daily truck activity under Alternative 5 would be similar to that of the Project and construction traffic and noise impacts would remain significant and unavoidable. However, Alternative 5 anticipates fewer days during which these exceedances would occur.

The comparative reductions in impacts associated with all of the Alternatives is illustrated in Table III-15, below. As shown therein, Alternative 5, would reduce the Project's impacts over a greater range of environmental issues than other Project Alternatives and is, therefore, considered to be the Environmentally Superior Alternative.

TABLE III-15
COMPARISON OF IMPACTS SUMMARY

	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Intensity – 50% Floor Area Reduction	Alternative 3: Alternate Construction Route	Alternative 4: Reduced Event Alternative	Alternative 5:
A. Aesthetics/Visual Resources						
Views	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Scenic Resources	Less than Significant w/Mitigation	Less (No Impact)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)
Visual Character	Less than Significant	Greater (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Light and Glare	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
B. Air Quality						
Consistency with Air Quality Management Plan	Less than Significant w/Mitigation	Less (No Impact)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Less (Less than Significant)
Air Quality Standards Violation	Less than Significant w/Mitigation	Less (No Impact)	Less (Less than Significant \w Mitigation)	Less (Less than Significant \w Mitigation)	Less (Less than Significant\w Mitigation)	Similar (Less than Significant w/Mitigation)
Cumulatively Considerable Increase of Criteria Pollutant in Nonattainment Area	Less than Significant w/Mitigation	Less (No Impact)	Less (Less than Significant w/Mitigation)	Less (Less than Significant w/Mitigation)	Less (Less than Significant w/Mitigation)	Similar (Less than Significant)

TABLE III-15
COMPARISON OF IMPACTS SUMMARY

	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Intensity – 50% Floor Area Reduction	Alternative 3: Alternate Construction Route	Alternative 4: Reduced Event Alternative	Alternative 5:
Sensitive Receptors Exposure to Pollutant Concentrates	Less than Significant w/Mitigation	Less (No Impact)	Less (Less than Significant w/Mitigation)	Less (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Less (Less than Significant)
C. Biological Resources						
Special Status, Sensitive, or Candidate Species	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Riparian and Sensitive Natural Communities Habitat	No Impact	Less (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)
Wildlife Movement	Less than Significant w/Mitigation	Less (No Impact)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)
Local Policies and Ordinances	Less than Significant w/ Mitigation	Less (No Impact)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)
D. Cultural Resources						
Archaeological Resources	Less than Significant w/Mitigation	Less (No Impact)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Similar (Less than Significant w/Mitigation)	Less (Less than Significant)
Paleontological Resources	No Impact	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Similar (No Impact)	Less (No Impact)

TABLE III-15
COMPARISON OF IMPACTS SUMMARY

	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Intensity – 50% Floor Area Reduction	Alternative 3: Alternate Construction Route	Alternative 4: Reduced Event Alternative	Alternative 5:
Human Remains	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Historic Resources	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant w/Mitigation)
E. Energy						
Energy Consumption	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
E. Geology and Soils						
Exacerbation of Existing Environmental Conditions	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Soil Erosion	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Unstable Geologic Unit or Soils	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)

TABLE III-15
COMPARISON OF IMPACTS SUMMARY

	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Intensity – 50% Floor Area Reduction	Alternative 3: Alternate Construction Route	Alternative 4: Reduced Event Alternative	Alternative 5:
F. Greenhouse Gas Emissions						
GHG Generation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Consistency with GHG Reduction Plans, Policies, Regulations	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
G. Hydrology and Water Quality						
Consistency with Water Quality Standards	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Alteration of Drainage Patterns	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Stormwater Drainage System Capacity	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
H. Land Use and Planning						
Consistency with Adopted Plans and Policies	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

TABLE III-15
COMPARISON OF IMPACTS SUMMARY

	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Intensity – 50% Floor Area Reduction	Alternative 3: Alternate Construction Route	Alternative 4: Reduced Event Alternative	Alternative 5:
I. Noise						
Noise Levels in Excess of Established Standards						
Construction	Significant and Unavoidable w/Mitigation	Less (No Impact)	Less (Significant and Unavoidable w/Mitigation)	Less (Significant and Unavoidable w/Mitigation)	Less (Significant and Unavoidable w/Mitigation)	Less (Significant and Unavoidable w/Mitigation)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Construction Ground Noise and Vibration						
Structural Damage	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Human Annoyance[5]	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Operation Groundborne Vibration	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

[5] Project level impacts would be less than significant, but as discussed in Section (9)(b)(ii) above, human annoyance vibration impacts are conservatively considered to be cumulatively considerable and significant for both the Project and Alternative 5.

TABLE III-15
COMPARISON OF IMPACTS SUMMARY

	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Intensity – 50% Floor Area Reduction	Alternative 3: Alternate Construction Route	Alternative 4: Reduced Event Alternative	Alternative 5:
J. Public Services						
J.1 Fire Services						
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
J.2 Police Services						
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
K. Transportation and Traffic						
Consistency with Applicable plan, Ordinance or Policy Establishing Measures of Effectiveness for the Performance of the Circulation System						
Construction Traffic	Significant and Unavoidable w/Mitigation	Less (No Impact)	Less (Significant and Unavoidable w/Mitigation)	Less (Significant and Unavoidable w/Mitigation)	Similar (Significant and Unavoidable w/Mitigation)	Less (Significant and Unavoidable w/Mitigation)

TABLE III-15
COMPARISON OF IMPACTS SUMMARY

	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Intensity – 50% Floor Area Reduction	Alternative 3: Alternate Construction Route	Alternative 4: Reduced Event Alternative	Alternative 5:
Operation Traffic	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Less than Significant)	Less (Less than Significant)
Consistency with Applicable Congestion Management Program	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Consistency with Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
L. Tribal Cultural Resources						
	Less than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less than Significant)
M. Utilities						
Water Supply/Infrastructure	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)

TABLE III-15
COMPARISON OF IMPACTS SUMMARY

	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Reduced Intensity – 50% Floor Area Reduction	Alternative 3: Alternate Construction Route	Alternative 4: Reduced Event Alternative	Alternative 5:
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Solid Waste	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

SOURCE: ESA, 2021.

4. Other Revisions, Clarifications and Corrections

Additional revisions, clarifications, or corrections to the Draft EIR are listed under the respective EIR section heading, page number, subsection, and paragraph (if applicable). Deletions are shown with ~~strikethrough~~ and additions are shown with double underline. Revised or new text in the Draft EIR is as follows:

Executive Summary

1. Page S-2: Section 1, Project Description, paragraph 1, revise as follows:

The Project would not increase ~~the maximum~~ student enrollment ~~(2,244 students)~~ on the Campus~~, nor would it create any need for a future increase in the maximum student enrollment~~.

2. Page S-16: Section 5, Summary of Environmental Impacts, Table ES-1, column 2, revise PDF–AES-1 as follows:

PDF-AES-1: Outdoor lighting, including walkway security lighting, plaza lighting, and lighting for the ~~parking deck~~ 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.

3. Page S-17: Section 5, Summary of Environmental Impacts, Table ES-1, column 2, revised PDF-AQ-1 as follows:

The project shall comply with applicable CalGreen requirements regarding the number of EV Ready and EV Capable parking spaces. ~~include at least 20 percent of the total code required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE).~~ 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. ~~Of the 20 percent EV Ready, 5 percent of the total code required parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas.~~ When the application of the CalGreen requirements ~~either the 20 percent or 5 percent~~ 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.

4. Page S-17: Section 5, Summary of Environmental Impacts, Table ES-1, column 3, revised MM-AQ-1 as follows:

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.

5. Page S-23, Section 5, Summary of Environmental Impacts, Table ES-1, column 3, revise MM BIO-2 as follows:

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 ~~or the Advisory Agency~~. 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.

6. Page S-37 to S-40: Section 5, Summary of Environmental Impacts, Table ES-1, column 2 and 3, revise PDF-TRAF-1, PDF-TRAF-2, and MM-TRAF-1 as follows:

PDF-TRAF-1: Construction Traffic Management Plan. ~~The Project Applicant~~ 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 ~~reduce travel during peak travel periods~~ 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.

PDF-TRAF-2: Construction Parking Plan. ~~The Project Applicant~~ MSMU shall prepare a Construction Parking Plan prior to the issuance of a building permit ~~to commencement of construction~~ that identifies temporary parking locations for construction workers and for MSMU students, faculty/staff, and visitors and shall include the following elements as appropriate:

- ~~During the construction of the proposed parking deck,~~ 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.

- ~~During construction activities when MSMU students, faculty/staff, and visitors or construction worker parking cannot be accommodated on the Project Site, the plan shall identify alternate parking location(s) on Campus and the method of transportation to and from the Project Site for approval by the City 30 days before commencement of construction~~.
- ~~Construction workers shall park in designated areas on Campus or in available off-site parking facilities with~~ ~~n~~No construction worker parking will be allowed on ~~neighborhood~~ local residential streets. Construction workers shall all park on the Campus. ~~When construction worker parking is off site, a temporary shuttle would be operated for construction workers to and from the designated off-site parking location.~~
- 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.

MM-TRAF-1: During construction, ~~the~~ in each individual hour within the PM peak period (4 PM to 6 PM) ~~hour, when more than 37 outbound PCE vehicle are anticipated, implement an off-site parking program and shuttle for construction workers to the Chalon Campus that~~ allow~~s~~ a maximum of 37 outbound PCE vehicle trips and 6 inbound ~~and 6 outbound~~ PCE vehicle trips ~~during. the PM peak hour~~.

7. Page S-42: Section 5, Summary of Environmental Impacts, Table ES-1, column 2, revise PDF-TRAF-8 as follows:

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 ~~Summer Camps~~ 200 campers and 40 staff on a daily basis for Summer Sports Camps.

Chapter II, Project Description

1. Page II-12: Subsection c, Campus Enrollment and Staffing, paragraphs 1 and 2, revise as follows:

~~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 ¼ parking spaces for each student enrolled at Mount St. Mary's College."[6] 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.~~ Consolidating parking within the parking structure would make it easier and quicker to find parking in the northern portion of the Campus, improve parking access and availability for events at the proposed Wellness Pavilion.

2. Page II-34: Subsection e, Future Campus Events, paragraph 3, revise as follows:

As shown in Table II-4, of the existing events with potential changes, only two events (Homecoming and Athenian Day) would have the potential to result in an increased number of attendees upon operation of the Project. Attendance for these two events would be (up to a maximum of 350 attendees during Homecoming and up to 300 attendees during Athenian Day) within the existing range of attendees (approximately 50 to 450 people per event) permitted for existing External Events and Internal Events with Outside Traffic. No new Wellness Pavilion event would occur concurrently with any existing Campus events with outside guests.

3. Pages II-42 to II-43: Subsection 7, Project Design Features, Table II-5, column 3, revise PDF-AES-1 and PDF AQ-1 as follows:

PDF-AES-1: Outdoor lighting, including walkway security lighting, plaza lighting, and lighting for the ~~parking deck~~ 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.

> **PDF AQ-1:** The project shall comply with applicable CalGreen requirements regarding the number of EV Ready and EV Capable parking spaces. ~~include at least 20 percent of the total code required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE).~~ 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. ~~Of~~

6 City of Los Angeles Department of City Planning, City Plan Case No. 4072 CU, July 27, 1984.

~~the 20 percent EV Ready, 5 percent of the total code required parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas.~~ When the application of the CalGreen requirements ~~either the 20 percent or 5 percent~~ 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.

4. Page II-44 to II-46: Section 7, Project Design Features, Table II-5, column 3, revise PDF-TRAF-1 and PDF-TRAF-2 as follows:

PDF-TRAF-1: Construction Traffic Management Plan. ~~The Project Applicant~~ 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 ~~reduce travel during peak travel periods~~ 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.

PDF-TRAF-2: Construction Parking Plan. ~~The Project Applicant~~ MSMU shall prepare a Construction Parking Plan prior to the issuance of a building permit ~~to commencement of construction~~ that identifies temporary parking locations for construction workers and for MSMU students, faculty/staff, and visitors and shall include the following elements as appropriate:

- ~~During the construction of the proposed parking deck,~~ 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.
- ~~During construction activities when MSMU students, faculty/staff, and visitors or construction worker parking cannot be accommodated on the Project Site, the plan shall identify alternate parking location(s) on Campus and the method of transportation to and from the Project Site for approval by the City 30 days before commencement of construction~~.
- ~~Construction workers shall park in designated areas on Campus or in available off-site parking facilities with~~ ~~n~~No construction worker parking will be allowed on ~~neighborhood~~ local residential streets. Construction workers shall all park on the Campus. ~~When construction worker parking is off site, a temporary shuttle would be operated for construction workers to and from the designated off-site parking location.~~
- 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.

5. Page II-47: Section 7, Project Design Features, Table II-5, column 3, revise PDF-TRAF-8 as follows:

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 ~~Summer Camps~~ 200 campers and 40 staff on a daily basis for Summer Sports Camps.

Section IV.A, Aesthetics

1. Page IV.A-13: Subsection c, Project Design Features, revise PDF–AES-1 as follows:

PDF-AES-1: Outdoor lighting, including walkway security lighting, plaza lighting, and lighting for the ~~parking deck~~ 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.

Section IV.B, Air Quality

1. Page IV.B-6, Subsection (i), Air Quality Management Plan, add the following paragraph and footnote after 2nd full paragraph as follows:

Subsequent to publication of the Draft EIR, the 2016 AQMP was approved by USEPA effective October 31, 2019 for inclusion in the SIP.[6a]

[6a] Except for the reasonable further progress contingency measure requirement, for which the USEPA finalized a conditional approval.

2. Page IV.B-19, Section a), Methodology, subsection (1), Consistency with Air Quality Management Plan, add the following paragraph and footnote after 2nd paragraph as follows:

Subsequent to publication of the Draft EIR, the 2016 AQMP was approved by USEPA effective October 31, 2019 for inclusion in the SIP.[6a]

[27a] Except for the reasonable further progress contingency measure requirement, for which the USEPA finalized a conditional approval.

3. Page IV.B-27, Section c), Project Design Features, revise PDF AQ-1 as follows:

PDF AQ-1: ~~The project shall include at least 20 percent of the total code required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE).~~ 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. ~~Of the 20 percent EV Ready, 5 percent of the total code required parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas.~~ When the application of the ~~20 percent or 5 percent~~ 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.

4. Page IV.B-28, Threshold a), subsection (1), SCAQMD AQMP and SCAG 2016-2040 RTP/SCS Consistency, modify 1st full paragraph and add footnote as follows:

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, including the SCAQMD's 2012 AQMP and growth projections within the SCAG 2016–2040 RTP/SCS.[32a] In addition, the analysis below is also applicable to the 2016 AQMP, unless noted otherwise. In accordance with the procedures established in the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are required to be addressed in order to determine the Project's consistency with applicable SCAQMD and SCAG policies:

[32a] The 2020-2045 RTP/SCS was approved by SCAG on September 3, 2020 and certified by CARB on October 30, 2020. The Project's consistency with the 2020-2045 RTP/SCS is therefore analyzed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR. The 2016 AQMP relies on the 2016-2040 RTP/SCS. Therefore, this section does not discuss the Project's consistency with the 2020-2045 RTP/SCS with respect to Air Quality.

5. Page IV.B-31, modify footnote 33 as follows:

[33] SCAQMD, ~~2012 Air Quality Management Plan, 2013. http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan, accessed March 2017~~ 2016 Air Quality Management Plan.

http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15, accessed March 2021.

6. Page IV.B-31, Threshold a), subsection (1), SCAQMD AQMP and SCAG 2016-2040 RTP/SCS Consistency, add the following paragraph after the 3rd full paragraph as follows:

Based on the analysis above, the Project would not conflict with or obstruct the implementation of the 2012 AQMP, nor the 2016 AQMP.

7. Page IV.B-45, Section e), Cumulative Impacts, subsection (2), Operation, modify 2nd full paragraph as follows:

For purposes of the cumulative air quality analysis with respect to State CEQA Guidelines Section 15064(h)(3), the Project's cumulative air quality impacts are determined not to be significant based on its consistency with the SCAQMD's adopted 2012 AQMP and 2016 AQMP, as discussed under Threshold a above. The Project would not conflict with or obstruct implementation of the 2012 or 2016 AQMP and is also affirmatively consistent with the AQMP, as the Project has incorporated into its design appropriate control strategies set forth in the AQMP for achieving its emission reduction goals and the Project is consistent with the demographic and economic assumptions upon which the plan is based. Thus, cumulative impacts would be less than significant

8. Page IV.B-45, Section f), Mitigation Measures, revise MM AQ-1 as follows:

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.

Section IV.C, Biological Resources

1. Pages IV.C-37 to 38, Subsection 3, Project Impacts, Subsection f, Mitigation Measures, revise MM BIO-1 as follows:

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 ~~or the Advisory Agency~~. 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.

Section IV.F, Greenhouse Gas Emissions

1. Page IV.F-7, Subsection b, Regulatory Framework, Subsection 2, State, Subsection (e), Climate Change Scoping Plan, modify the first paragraph as follows:

CARB adopted the 2017 Climate Change Scoping Plan (2017 Scoping Plan) at a public meeting held in December 2017~~CARB was scheduled to consider the proposed scenario and alternatives and potential adoption of the 2017 Climate Change Scoping Plan Update in late June 2017; however, CARB has postponed this to an undetermined future date~~.[9]

[9] California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017~~Notice of Postponement - Public Meeting for the 2017 Climate Change Scoping Plan Update, June 13, 2017, https://www.arb.ca.gov/lispub/rss/displaypost.php?pno=10383. Accessed July 2017~~.

2. Page IV.F-10: Subsection b, Regulatory Framework, Subsection 2, State, Subsection (h), Executive Order S-01-07, modify the last sentence as follows:

The Court directed CARB to conduct an analysis of nitrogen dioxide impacts from biodiesel fuels and froze the carbon intensity targets for diesel and biodiesel fuel provisions at 2017 levels until CARB has completed this analysis~~, which CARB has indicated is expected to occur in 2018~~.[13] On March 6, 2018 CARB issued its Draft Supplemental Disclosure Discussion of Oxides of Nitrogen Potentially Caused by the Low Carbon Fuel Standard Regulation.[13a] CARB posted modifications to the amendments on August 13, 2018, with a public comment period through August 30, 2018. Final approval of regulatory changes from CARB's analysis of nitrogen dioxide impacts from biodiesel fuels was made on January 4, 2019.[13b] The LCFS was amended in September 2018 to require a reduction of at least 7.5 percent in the carbon intensity (CI) of California's

transportation fuels by 2020 and a 20-percent reduction in CI from a 2010 baseline by 2030.[7] The 2017 Climate Change Scoping Plan also calls for increasing the mandatory reduction in carbon intensity of transportation fuels from 10 percent to 18 percent by 2030.

[13a] California Air Resources Board, Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation.

[13b] California Air Resources Board, LCFS Rulemaking Documents, https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/lcfs-regulation. Accessed May 18, 2021.

3. Page IV.F-15: Subsection b, Regulatory Framework, Subsection 2, State, Subsection (k), Energy Sector, modify the last sentence of the first paragraph as follows:

The CalGreen Code was most recently updated in 2019~~2016~~ to include new mandatory measures for residential and nonresidential uses; the new measures took effect on January 1, 2020~~2017~~.[28]

[28] California Building Standards Commission, 2019 California Green Buildings Standards Code, Title 24, Part 11, https://codes.iccsafe.org/content/CGBC2019P3. Accessed May 18, 2021~~California Building Standards Commission (CBSC). 2017. CALGreen (Part 11 of Title 24). Available at http://www.bsc.ca.gov/Home/CALGreen.aspx. Accessed August 2017~~.

4. Page IV.F-19, Subsection b, Regulatory Framework, Subsection 3, Regional, add the following after the first partial paragraph:

On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS). The 2020-2045 RTP/SCS is an update to the 2016-2040 RTP/SCS. The core vision of the 2020-2045 RTP/SCS is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and to achieve a more sustainable growth pattern.[34a] Using growth forecasts and economic trends, the 2020-2045 RTP/SCS provides a vision for transportation throughout the region for the next 25 years by considering the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2020-2045 RTP/SCS describes how the region can attain the GHG emission-reduction targets set by CARB by achieving an 8 percent reduction in per capita transportation GHG emissions by 2020 and a 19 percent reduction in per capita transportation GHG emissions by 2035, as compared to 2005 per capita transportation GHG emissions.[34b]

7 CARB, LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm. Accessed August 8, 2019.

The 2020-2045 RTP/SCS is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and federal Clean Air Act requirements. The plan also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources.[34c] The goals of the 2020-2040 RTP/SCS that are applicable to the Project are outlined in Table IV.H-5 in Section IV.H, Land Use. (See Table IV.H-5 below).

The 2020-2045 RTP/SCS includes strategies to focus growth near destinations and mobility options, promote diverse housing choices, leverage technology innovations, and support implementation of sustainability policies.[34d] CARB has accepted the SCAG GHG quantification determination in the 2020-2045 RTP/SCS and it demonstrates achievement of the GHG emission reduction targets established by CARB.[34e]

Although there are GHG emission reduction targets for passenger vehicles set by CARB for 2045, the 2020-2045 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2045. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an additional 4.1-percent reduction in GHG from transportation-related sources in the ten years between 2035 and 2045, the 2020-2045 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[34f]

[34a] SCAG, 2020-2045 RTP/SCS, September 2020, page 5.

[34b] SCAG, 2020-2045 RTP/SCS, Resolution No. 20-624-1, September 2020, page xii.

[34c]SCAG, 2020-2045 RTP/SCS, September 2020, page 8.

[34d] SCAG, 2020-2045 RTP/SCS, September 2020, page 49.

[34e] CARB, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016.

[34f] SCAG, 2020-2045 RTP/SCS Public Health Technical Report, May 2020, page 53.

5. Page IV.F-21: Subsection b, Regulatory Framework, Subsection 4, Local, add the following:

(f) L.A.'s Green New Deal (Sustainable City pLAn 2019)

In April 2019, Mayor Eric Garcetti released L.A.'s Green New Deal, the four year update to the 2015 Sustainable City pLAn. Rather than an adopted plan, the Green New Deal is a mayoral initiative that consists of a program of actions designed to create sustainability-based performance targets through 2050 that advance economic, environmental, and

equity objectives. L.A.'s Green New Deal/Sustainable City pLAn is the first four-year update to the City's first Sustainable City pLAn that was released in 2015. It augments, expands, and elaborates in even more detail Los Angeles's vision for a sustainable future and addresses climate change with accelerated targets and new, aggressive goals.

While not a plan adopted solely to reduce GHG emissions, climate mitigation is one of eight explicit benefits that help define the strategies and goals of L.A.'s Green New Deal/Sustainable City pLAn. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/sqft in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.

- Ensure proportion of Angelenos living within 0.5 miles of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

6. Page IV.F-41: Modify the first paragraph and add the following table as follows:

As discussed in Table IV.F-7a, *Project Compliance with Applicable 2017 Climate Change Scoping Plan Actions and Strategies*, the Project would be compliant and would not conflict with applicable actions and strategies in the 2017 Climate Change Scoping Plan identified by CARB to reduce GHG emissions to achieve the 2030 reduction target. ~~While CARB is in the process of developing a framework for the 2030 reduction target in the Scoping Plan, the Project would not impede implementation of these potential reduction strategies identified by CARB.~~

TABLE IV.F-7a
PROJECT COMPLIANCE WITH APPLICABLE
2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Compliance Analysis
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California Renewable Portfolio Standard (RPS) program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.[a] Required measures include: • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. • Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.	CPUC, CEC, CARB	**Compliant.** The Project would use electricity provided by LADWP, which is required to meet the energy performance standard of 50 percent renewable energy by 2030, along with applicable GHG emissions reductions planning targets in its Strategic Long-Term Resource Plan. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. In 2019, LADWP provided 34.1 percent from renewable sources, exceeding the required target 33 percent by 2020 established under previous legislation.[b] As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under California Code of Regulations Title 24, Part 6 and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would meet or exceed the applicable requirements of Title 24, Part 6, as well as the California Green Building Standards Code in Title 24, Part 11 as adopted and amended in the City of Los Angeles Green Building Code. The Project would further support this action and strategy by incorporating energy efficiency measures as outlined in the Project's sustainability features in PDF AQ-2, PDF AQ-3, PDF AQ-4, PDF AQ-5.

Actions and Strategies	Responsible Party(ies)	Compliance Analysis
Implement Mobile Source Strategy (Cleaner Technology and Fuels): • At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Implementation of federal phase 2 standards for medium- and heavy-duty vehicles. • Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard. • Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030. • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	CARB, CalSTA, SGC, Caltrans, CEC, OPR, Local Agencies	**Compliant.** CARB approved the Advanced Clean Cars Program that includes Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. While this action does not directly apply to individual projects, the standards would apply to all vehicles purchased or used by students, staff, faculty, and visitors to the Project. Through the implementation of PDF-AQ-1, the Project would comply with CalGreen requirements regarding the number of EV Ready and EV Capable parking spaces to support ZEVs and PHEVs. As such, the Project would support compliance with this regulation. The Advanced Clean Truck Regulation has two components, a manufacturer sales requirement and a reporting requirement. The manufacturer component of the regulation requires manufacturers that certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales. The reporting component of the regulation requires large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations.[c] Because deliveries to the Campus, including the Wellness Pavilion, would be made by trucks subject to this regulation, the Project would benefit from these measures. CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under

Actions and Strategies	Responsible Party(ies)	Compliance Analysis
		the Advanced Clean Local Trucks (Last Mile Delivery) Program.[d] GHG emissions generated by transit trips by Project users, including students, faculty, staff, and outside guests, would be reduced under this regulation. GHG emissions generated by Project-related passenger, truck, and bus vehicular travel would benefit from the above regulations and programs, and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program, Advanced Clean Truck Regulation, and Innovative Clean Transit measure consistent with reduction of GHG emissions under SB 32. Mobile source GHG emissions provided in Table IV.F-5 of the Draft EIR conservatively do not specifically include the numeric reduction in mobile source GHG emissions from the above regulations as the CalEEMod model, which was utilized in the Draft EIR, does not yet fully account for these regulation or programs. SB 375 requires SCAG to direct the development of the RTP/SCS for the region, which is discussed in the Draft EIR. The Project would not conflict with the RTP/SCS goal to adapt to a changing climate and to support an integrated regional development pattern, as further discussed below in Table IV.H-5. Project would be constructed on an existing developed site within the Campus and would not require the extension of new roads, development of new land, or alteration of any access patterns that would change the region's development pattern or transportation network. On an annualized basis, the Project is anticipated to generate approximately 205 average daily weekday vehicle trips under a worst-case scenario, and on that basis, LADOT determined that the Project does not meet the threshold for a VMT analysis requirement. In addition, many of the visitors to the Wellness Pavilion are expected to come from the surrounding area since the facility is meant to be community-serving, leading to speaker series, activities, and summer camps closer to area residents. This, together with the overall modest increase in daily trips, would be consistent with the 2020-2045 RTP/SCS goal of reducing daily VMT per capita. As such, the Project would not conflict with the VMT reduction standards of the 2020-2045 RTP/SCS. Thus, the Project would be compliant with, and would not conflict with,

Actions and Strategies	Responsible Party(ies)	Compliance Analysis
		applicable 2020-2045 RTP/SCS actions and strategies to reduce GHG emissions.
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets).	CARB	**Compliant.** Under SB 375, CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, the CARB established targets for 2020 and 2035 for each region. As required under SB 375, the CARB is required to update regional GHG emissions targets every 8 years, which have been updated in 2018. As part of the 2018 updates, the CARB adopted a passenger vehicle related GHG reduction of 19 percent per capita for 2035 for the SCAG region. The Project would be consistent with SB 375 as it would not add vehicle trips on a daily basis. On an annualized basis, the Project is anticipated to generate approximately 205 average daily weekday vehicle trips under a worst-case scenario, and on that basis, LADOT determined that the Project does not meet the threshold for a VMT analysis requirement. In addition, many of the visitors to the Wellness Pavilion are expected to come from the surrounding area since the facility is meant to be community-serving for local area residents. As such, the Project would not conflict with the 2020-2045 RTP/SCS goal of reducing daily VMT per capita and proving local community serving uses in infill locations.
By 2019, adjust performance measures used to select and design transportation facilities. • Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	**Not Applicable.** The Project would not involve construction of transportation facilities. However, MSMU encourages emission reduction strategies at the Campus, including as carpools and rideshare, bicycle use through the provision of racks and showers, incentives for use of alternative travel modes, and parking for electric vehicles.
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	**Compliant.** The Project would support this policy through the implementation of PDF-AQ-1, requiring compliance with CalGreen requirements regarding the number of EV Ready and EV Capable parking spaces. As such, the Project would support compliance with this regulation.
Implement California Sustainable Freight Action Plan: • Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB,	**Not Applicable.** The Project land uses would not include freight transportation or warehousing. Therefore, the Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.

Actions and Strategies	Responsible Party(ies)	Compliance Analysis
• Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CalTrans, CEC, GoBiz	
Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.	CARB	**Compliant.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with LCFS. Mobile source GHG emissions provided in Table IV.F-5 were calculated using CalEEMod. However, CalEEMod does not include implementation of the LCFS into mobile source emission factors. Thus, Table IV.F-5 provides conservatively estimated GHG emissions. On September 27, 2018, CARB approved an amendment to the LCFS regulation to require a 20 percent reduction in carbon intensity from a 2010 baseline by 2030. Reductions in carbon intensity are phased in starting in 2019 with a reduction of 6.25 percent and increases by 1.25 percent each year. Thus, in 2021, LCFS emissions reductions are 8.75 percent reduced carbon intensity relative to the 2010 baseline. Project-related mobile source GHG emissions would be reduced accordingly, and would increase as LCFS compliance increases to 20 percent reduce carbon intensity by 2030 relative to the 2010 baseline year.
Implement the Short-Lived Climate Pollutant Strategy by 2030: • 40-percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50-percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Compliant.** Senate Bill 605 (SB 605), adopted in 2014, directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.[e] SB 1383 requires various agencies including CARB, California Department of Food and Agriculture (CDFA), the State Water Resources Board (SWRCB) to be responsible for adopting regulations to reduce GHG emissions. These regulations would be applicable to the Project. Therefore, the Project would comply with the

Actions and Strategies	Responsible Party(ies)	Compliance Analysis
		CARB SLCP Reduction Strategy, which limits the use of hydrofluorocarbons for refrigeration uses.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Compliant.** Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. The Project would be consistent with AB 341 which requires not less than 75 percent of solid waste generated to be source reduced through recycling, composting, or diversion. This reduction in solid waste generated by the Project would reduce overall GHG emissions. Compliance with AB 341 would also help achieve the goals of SB 1383.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Compliant.** Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions. Under the Cap-and-Trade program, entities such as power generation companies and natural gas processing plants would be required to limit or reduce GHG emissions. While the Project itself is not a regulated entity under the Cap-and-Trade Program, it would result in a reduction of GHG emissions associated with the Project's energy usage, since energy supplied to the Project would be from a regulated entity. As the Project would not impede the Program's progress, the Project is considered compliant.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink: • Protect land from conversion through conservation easements and other incentives. • Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity. • Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.	CNRA and departments within, CDFA, CalEPA, CARB	**Not Applicable.** This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.

Actions and Strategies	Responsible Party(ies)	Compliance Analysis
• Establish scenario projections to serve as the foundation for the Implementation Plan.		
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.	CARB	**Not Applicable.** This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Implement Forest Carbon Plan.	CNRA, CAL FIRE, CalEPA and departments within	**Not Applicable.** This regulatory program applies to state and federal forest land, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not Applicable.** Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.

[a] Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.
[b] LADWP, 2019 Power Content Label, Version October 2020, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-powercontentlabel. Accessed May 18, 2021.
[c] CARB, Advance Clean Cars, 2017 Midterm Review, https://ww2.arb.ca.gov/resources/documents/2017-midterm-review-report. Accessed May 18, 2021.
[d] CARB, Advanced Clean Local Trucks, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks. Accessed May 18, 2021.
[e] CARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, https://www.calrecycle.ca.gov/climate/slcp/. Accessed May 18, 2021.

SOURCE: ESA, 2021.

7. Page IV.F-47: Add the following subsection:

(c) SCAG's 2020-2045 RTP/SCS

Transportation-related GHG emissions would be the largest source of emissions from the Project. This finding is consistent with the findings in regional plans, including the 2020-2045 RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. At the regional level, the 2020-2045 RTP/SCS is an applicable plan adopted for the purpose of reducing GHG emissions.

The purpose of the 2020-2045 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. The 2020-2045 RTP/SCS seeks improved mobility and accessibility, which is defined as "the ability to reach desired destinations with relative

ease and within a reasonable time, using reasonably available transportation choices."[63a] The 2020-2045 RTP/SCS seeks to implement strategies that "alleviate development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation."[63b] The 2020-2045 RTP/SCS states that while "[t]ransportation emissions are most prevalent relative to all other sectors in California and specifically in the SCAG region," the RTP/SCS would focus "growth in existing urban regions and opportunity areas, where transit and infrastructure are already in place. In addition, the 2020-2045 RTP/SCS monitors progress in reducing per capita vehicle miles traveled (VMT), through the implementation of transportation investments and land use strategies outlined in the plan to gauge progress toward achieving GHG emissions reduction goals.[63c]

(i) Project Consistency with the RTP/SCS Daily Per Capita VMT

Under the 2020-2045 RTP/SCS, daily per capita VMT is projected to decrease in 2045 from 21.4 daily miles per capita in Los Angeles County in 2020 to 19.7 daily miles per capita in 2035.[63d] With respect to the Project, unlike an office or residential project that adds new daily vehicle trips as a result of workers driving to and from work or residents driving to and from their homes, the Project would not add vehicle trips on a daily basis. Instead, the Project would add 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 is held on Campus.

On an annualized basis, the Project is anticipated to generate approximately 205 average daily weekday vehicle trips under a worst-case scenario, and on that basis, LADOT determined that the Project does not meet the threshold for a VMT analysis requirement. In addition, many of the visitors to the Wellness Pavilion are expected to come from the surrounding area since the facility is meant to be community-serving, leading to speaker series, activities, and summer camps closer to area residents. This, together with the overall modest increase in daily trips, would be consistent with the 2020-2045 RTP/SCS goal of reducing daily VMT per capita. As such, the Project would not conflict with the VMT reduction standards of the 2020-2045 RTP/SCS.

(ii) Project Consistency with the Goals of the RTP/SCS

Generally, projects are considered to be consistent with applicable City and regional land use plans and regulations, such as SCAG's 2020-2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project's consistency in this regard is compared to the goals set forth in the 2020-2045 RTP/SCS in Table IV.H-5, in Section IV.H, Land Use. (See Table IV.H-5 below).

As shown in Table IV.H-5, the Project would not conflict with the applicable goals of the 2020-2045 RTP/SCS. The Project would implement high efficiency, low-e insulated glass

units that meet the State's Title 24 energy requirements and CalGreen requirements. Glazing would protect against direct sunlight with deep overhangs to reduce glare, and reduce solar radiation and heat gain. The Pavilion's single-ply roofing would reflect solar heat and reduce heat absorption into the building and reduce energy demand required for cooling. The Project would implement a high efficiency variable capacity air volume heating, ventilation, and air conditioning system. A minimum of 15 percent of the roof of the Wellness Pavilion would be solar ready.

As further shown in Table IV.H-5, the Project supports the RTP/SCS goal to encourage the use of low emission vehicles through the provision of electric vehicle (EV) ready stalls per CalGreen standards. Further, MSMU generally encourages emission reduction strategies for the Campus, all of which would apply to the Project, such as carpools and rideshare, commuting by bicycle through the provision of racks and showers, and incentives for use of alternative travel modes.

The Project would not conflict with the RTP/SCS goal that supports healthy and equitable communities. The Project would create the opportunity for new Summer Sports Camps, a Health and Wellness Speaker Series available to the community, and other activities or events that complement the purpose of the proposed Wellness Pavilion to encourage students and other users to adopt life-long healthy-living habits. The Wellness Pavilion would offer fitness programming that would serve the existing student body. Physical education classes would be offered to current students, and students could use the exercise spaces for workouts. Dedicated space would be available for student peer mentoring on wellness topics, and other health/wellness instruction would be offered (i.e., nutrition, first aid, etc.). MSMU would allow the surrounding community to have access to the swimming pool and other recreational facilities. Therefore, the Project would support the goal of healthy communities in a variety of ways.

The Project would not conflict with the RTP/SCS goal to adapt to a changing climate and to support an integrated regional development pattern. The Project would be constructed on an existing developed site within the Campus and would not require the extension of new roads, development of new land, or alteration of any access patterns that would change the region's development pattern or transportation network. The Project would support sustainability by incorporating drought tolerant, low maintenance plant species and varieties. Rainwater would be collected on the building roof where it would then drain to landscaped collection areas. The irrigation systems would be designed and maintained to promote water conservation and avoid water runoff, and overspray to non-irrigated areas, walks, roadways, or structures.

As discussed in the above analysis, the Project would not conflict with the goals of the 2020-2045 RTP/SCS that are potentially applicable to the Project. As a result, the Project would be consistent with, and would not conflict with, applicable 2020-2045 RTP/SCS actions and strategies to reduce GHG emissions.

[63a] SCAG, 2020-2045 RTP/SCS, September 2020, page 129.

[63b] SCAG, 2020-2045 RTP/SCS, September 2020, page 51.

[63c] SCAG, 2020-2045 RTP/SCS, September 2020, page 129.

[63d] SCAG, 2020-2045 RTP/SCS, September 2020 (Figure 5.1, Daily Vehicle Miles Traveled per Capita by County, page 129.)

8. Page IV.F-47: Subsection c, City of Los Angeles LA Green Plan and Sustainable City pLAn, revise subheading (c) as follows:

(c) City of Angeles, LA Green Plan, and Sustainable City PLAn/Green New Deal

9. Page IV.F-48: Subsection c, City of Los Angeles LA Green Plan and Sustainable City pLAn, revise the first full paragraph as follows:

Table IV.F-9, *Consistency of Project with City of Los Angeles LA Green Plan*, and **Table IV.F-10**, *Consistency of Project with City of Los Angeles Sustainable City pLAn/Green New Deal*, contains a list of GHG-reducing strategies applicable to the Project.

10. Page IV.F-50: Subsection c, City of Los Angeles LA Green Plan and Sustainable City pLAn, revise the first full paragraph as follows:

The consistency analysis shows the consistency of the Project with the City's applicable GHG emissions reduction plans, policies, and regulations, including the City's LA Green Plan and the City's Sustainable City pLAn/Green New Deal. As discussed in Table IV.F-9 and Table IV.F-10, the Project would implement Project Design Features and incorporate water conservation, energy conservation, tree-planting, and other features consistent with these plans. As shown in Table IV.F-10, the Project would be consistent with the Sustainable City pLAn/Green New Deal and would implement PDF-AQ-1, requiring the provision of electric vehicle (EV) ready stalls per CalGreen standards. The Project would also implement PDFs AQ-2, AQ-3, AQ-4, and AQ-5 to increase energy efficiency, and through a solid waste collection and recycling service would yield waste diversion results comparable to source separation and consistent with Citywide recycling targets. In addition, the Project would meet or exceed the Green Building Code requirements. Therefore, the Project would be consistent with the City's applicable plans, policies, or regulations for GHG emissions.

11. Page IV.F-51, revise the title of Table IV.F-10 as follows:

Table IV.F-10: "Consistency with City of Los Angeles Sustainable City pLAn/Green New Deal"

12. Page IV.F-55: Modify the third paragraph as follows:

Further, recent studies show that the State's existing and proposed regulatory framework can allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. According to the 2017 Scoping

Plan Update ~~(scheduled for consideration for adoption by CARB in late June 2017; however, CARB has postponed this to an undetermined future date[76])~~, reductions needed to achieve the 2030 target are expected to be achieved by targeting specific emission sectors, including those sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to Project-related GHG emissions.

[76] California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017~~Notice of Postponement - Public Meeting for the 2017 Climate Change Scoping Plan Update, June 13, 2017, https://www.arb.ca.gov/lispub/rss/displaypost.php?pno=10383. Accessed July 2017~~.

13. Page IV.F-57: Subsection e, Cumulative Impacts, revise the last sentence in paragraph 3 as follows:

Therefore, consistent with CEQA Guidelines Section 150464h(3), the City, as lead~~y~~ agency, has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: Climate Change Scoping Plan, SCAG's 2016 RTP/SCS, SCAG's 2020-2045 RTP/SCS, and the City's Green LA Plan, Sustainable City pLAn/Green New Deal, and Green Building Code.

Section IV.H, Land Use

1. Page IV.H-2: Subsection b, Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy, add the following paragraph after paragraph 1 as follows:

Adopted by SCAG on September 3, 2020, the 2020-2045 RTP/SCS or "Connect SoCal" builds on the long-range vision of the 2016 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. Connect SoCal references over 4,000 transportation projects—ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans and seek to reduce traffic bottlenecks, improve the efficiency of the region's network and expand mobility choices for everyone. Connect SoCal is supported by a combination of transportation and land use strategies that help the region achieve state greenhouse gas emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry and utilize resources more efficiently.

2. Page IV.H-44: Subsection a, SCAG's 2016 RTP/SCS, revise the subsection name and add the following text after paragraph 1 as follows:

(a) SCAG's 2016 and 2020 RTP/SCS

Table IV.H-4, *Comparison of the Project with Applicable Goals of the 2016 RTP/SCS*, compares the Project with applicable goals of the 2016 RTP/SCS. Based on the analysis presented in Table IV.H-4, the Project would be consistent with applicable 2016 RTP/SCS goals.

The Project is further compared to the goals of the 2020-2045 RTP/SCS, or "Connect SoCal" which builds on the long-range vision of the 2016 RTP/SCS, in Table IV.H-5, *Comparison of the Project to Applicable Goals of the 2020-2045 Regional Transportation Plan Intended to Avoid or Mitigate an Environmental Effect*, below.

TABLE IV.H-5
COMPARISON OF THE PROJECT TO APPLICABLE GOALS OF THE 2020–2045 REGIONAL TRANSPORTATION PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Goal	Would the Project Conflict?
Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict.** The Project would improve mobility, accessibility, and travel safety for people and goods during construction and operation. The implementation of a Construction Traffic Management Plan would require street closure information, detour plans, haul routes, and staging plans as necessary to the satisfaction of LADOT. During construction, the Project would provide appropriate temporary traffic controls, prohibited truck queuing, unrestricted access for school buses, bi-monthly construction management meetings with operators and contractors for Archer School for Girls and the Brentwood School to coordinate the periods of heaviest construction activity in order to avoid overlapping hauling activities. The Project would provide advance notification to LADOT, the Archer School for Girls, the Brentwood School, and St. Martin of Tour's 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 construction, MSMU would be required to 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 report non-compliance with the Construction Traffic Management Plan. During operation, to facilitate traffic controls on visitors, MSMU would be required to use 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 events, and provision of staff/signage to direct vehicles during events.

TABLE IV.H-5
COMPARISON OF THE PROJECT TO APPLICABLE GOALS OF THE 2020–2045 REGIONAL TRANSPORTATION PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Goal	Would the Project Conflict?
Increase person and goods movement and travel choices within the transportation system.	**No Conflict**. The Project would not conflict with policies to increase travel choices within the existing transportation system. The Project would continue MSMU's encouragement of the use of alternate transportation modes through transportation demand management (TDM) strategies (providing students with transit subsidies and shuttle improvements including the use of clean natural gas (CNG) fuel.
Reduce greenhouse gas emissions and improve air quality.	**No Conflict.** The Project would not conflict with policies to reduce greenhouse gas emissions and improve air quality. The Project would reduce reliance on electricity by harvesting natural light for the main spaces in the building through the use of large expanses of glass and skylights. Daylighting systems would coordinate the levels of artificial lighting with the availability of natural light entering the building by an automatic dimming control system. High efficiency, low-e insulated glass units that meet the State's Title 24 energy requirements and CalGreen requirements would be used for the building envelope. Glazing would protect against direct sunlight with deep overhangs to reduce glare, and reduce solar radiation and heat gain. The Pavilion's single-ply roofing would reflect solar heat and reduce heat absorption into the building and reduce energy demand required for cooling. The Project would implement high efficiency variable capacity variable air volume heating, ventilation, and air conditioning. A minimum of 15 percent of the roof of the Wellness Pavilion would be solar ready. The Project would support the use of low emission vehicles through the provision of electric vehicle (EV) ready stalls per CalGreen standards. Further, MSMU generally encourages emission reduction strategies for the Campus, all of which would apply to the Project, such as carpools and rideshare, commuting by bicycle through the provision of racks and showers, and incentives for use of alternative travel modes.
Support healthy and equitable communities	**No Conflict.** The Project would not conflict with goals that support healthy and equitable communities. The Project would create the opportunity for new Summer Sports Camps, a Health and Wellness Speaker Series available to the community, and other activities or events that complement the purpose of the proposed Wellness

TABLE IV.H-5
COMPARISON OF THE PROJECT TO APPLICABLE GOALS OF THE 2020–2045 REGIONAL TRANSPORTATION PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Goal	Would the Project Conflict?
	Pavilion to encourage life-long healthy-living habits. The Wellness Pavilion would offer fitness programming that would serve the existing student body. Physical education classes would be offered to current students, and students could use the exercise spaces for workouts. Dedicated space would be available for student peer mentoring on wellness topics, and other health/wellness classes would be held (i.e., nutrition, first aid, etc.). As in the past, MSMU would continue to allow the surrounding community to have access to the swimming pool and other recreational facilities. Therefore, the Project would support healthy communities in a variety of ways.
Adapt to changing climate and support an integrated regional development pattern and transportation network.	**No Conflict.** The Project would not conflict with the goal to adapt to changing climate and to support an integrated regional development pattern. The Project would be constructed on an existing developed site within the MSMU Campus and would not require the extension of new roads, development of new land, or alteration of any access patterns that would change the region's development pattern or transportation network. The Project would support sustainability by incorporating drought tolerant, low maintenance plant species and varieties. Rainwater would be collected on the building roof where it would then drain to landscaped collection areas. The irrigation systems would be designed and maintained to promote water conservation and avoid water runoff, and overspray to non-irrigated areas, walks, roadways, or structures.

Source: ESA, 2021

As shown in Table IV.H-5, the Project would not conflict with the 2020-2045 RTP/SCS to ensure travel safety, broaden travel choices, reduce greenhouse gas emissions and, as a gymnasium, athletic facility, and venue for health and wellness programs, would support healthy and equitable communities. In addition, because the Project would incorporate sustainability features in the building and landscaping design, including planting drought tolerant trees and shrubs and the capturing and re-using of rainwater, it would not conflict with the goal to address changing climate. Also, because the Project is located on an existing developed site (an infill location within the Campus), it would not require the extension of new roads, development of new land, or alteration of any access patterns that would change the region's urban development pattern or transportation network. Development of the Project Site would not preclude the ability to develop any of the over

4,000 transportation projects—ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges, within Connect SoCal. The Project would not result in increases in population or households and would have a minimal increase in employment (one new staff member). **Based on these considerations, the Project would not conflict with the 2020-2045 RTP/SCS transportation and land use strategies adopted for the purpose of avoiding or mitigating an environmental effect that help the region achieve state greenhouse gas emission reduction goals and federal Clean Air Act requirements, improve public health and roadway safety, support the movement of vital goods movement and to utilize resources more efficiently, such that a significant physical impact on the environment would occur. Impacts would be less than significant.**

Section IV.J.1 Fire Protection

1. Page IV.J.1-7: add the below subsection following Subsection (e), California Fire Services and Rescue Emergency Mutual Aid Plan, as follows:

(f) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services.

In *City of Hayward v. Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the City will comply with that provision to ensure that public safety services are provided.[8] The *Hayward* ruling also concluded that, "assuming the city continues to perform its obligations, there is no basis to conclude that a project will cause substantial adverse effects on human beings," and the "need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate."[9]

[8] City of Hayward v. Trustees of California State University (2015) 242 Cal. App. 4th 833, 847.
[9] City of Hayward v. Trustees of California State University (2015) 242 Cal. App. 4th 833, 847.

2. Page IV.J.1-17: Subsection 1, LAFD Fire Protection Facilities, Services, and Response Times, add the following after paragraph 2:

According to the LAFD, although response time can be considered when assessing the adequacy of fire protection services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and *the City of Hayward v. Trustees of California State University* (2015) ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services.

3. Page IV.J.1-22: Subsection c, Project Design Features, revise the 2nd to last sentence in paragraph 1 as follows:

PDF-TRAF-8 would 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 ~~Summer Camps~~ 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.

4. Page J.1-39: Section e, Cumulative Impacts, Subsection 2, Operation, revise paragraphs 4 and 5 as follows:

~~In addition, the LAFD has not indicated in correspondence with the Department of City Planning (see Appendix H of this Draft EIR) that it would expand Station 19 fire facilities. Furthermore, over time, the LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. If a new fire station, or the expansion, consolidation, or relocation of a station were determined to be warranted by LAFD, the Station 19 service area is highly developed, and the site of a fire station would likely be an infill lot that would be less than an acre in size.~~

~~Based on the above considerations, the addition of a new fire service facility, or the expansion, consolidation, or relocation of an existing facility, is not needed to maintain service, and the operation of the Project and related projects would not result in a cumulative impact related to the fire protection services threshold standard. As the Project in and of itself would not cause a significant impact to fire services and emergency medical services during operation, and the related projects operational activities would be subject to existing regulations (similar to the Project), cumulative operational impacts to fire and medical emergency services would be less than significant. There would be no need for a new or expansion of an existing fire facility.~~

5. Page J.1-39: Section e, Cumulative Impacts, Subsection 2, Operation, after paragraph 3, add the following:

With regard to cumulative impacts on fire protection, consistent with the *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, such facilities are anticipated to (1) occur where allowed under the designated land use, (2) be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) potentially qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts.[10] Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on fire protection and emergency medical services would be less than significant.

Section IV.J.2, Police Services

1. Page IV.J.2-1: Section 2, Subsection a, Regulatory Setting, add the following:

(1) State

(a) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection services, as well as other public safety services.

[10] Although an EIR was prepared for the construction of Fire Station 39, the EIR concluded there would be no significant impacts. See, Notice of Determination for Van Nuys Fire Station 39, at http://eng2.lacity.org/techdocs/emg/docs/vannuys_fs39/NOD_160701.pdf. Accessed December 2018.

In *City of Hayward v. Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[11] The *Hayward* ruling also concluded that, "assuming the city continues to perform its obligations, there is no basis to conclude that a project will cause substantial adverse effects on human beings," and the "need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate."[12]

2. Page IV.J.2-11: Subsection c, Project Design Features, Paragraph 1, revise the 2nd to last sentence as follows:

PDF-TRAF-8 would 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 ~~Summer Camps~~ 200 campers and 40 staff on a daily basis for Summer Sports Camps.

3. Page IV.J.2-21: Section e, Cumulative Impacts, Subsection 2, Operation, revise the 2nd and 3rd full paragraphs as follows:

~~The LAPD has not indicated that it would expand the WLA Community Station. Furthermore, over time, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. If a new police station, or the expansion, consolidation, or relocation of a station were determined to be warranted by LAPD, the WLA Community Station service area is highly developed, and the site of a police station would likely be an infill lot that would be less than an acre in size.~~

~~Based on the above considerations, the Project's contribution to cumulative impacts to police protection services would not be cumulative considerable and, as such cumulative impacts on police protection services would be less than significant and would not require new or expanded existing police facilities. As the Project in and of itself would not cause a significant impact to police services during operation, and the related projects operational activities would be subject to existing regulations (similar to the Project), cumulative operational impacts to police services would be less than significant. There would be no need for a new or expansion of an existing fire facility.~~

With regard to cumulative impacts on police protection, consistent with the *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate police protection services is

[11] City of Hayward v. Trustees of California State University (2015) 242 Cal. App. 4th 833, 847.
[12] Id.

the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAPD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities are anticipated to (1) occur where allowed under the designated land use, (2) be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) potentially qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection services would be less than significant.

Section IV.K, Transportation and Traffic

1. **Page IV.K-1: Section 1, Introduction, add the following after paragraph 1:**

In July 2019 (updated July 2020), the LADOT adopted Transportation Assessment Guidelines (TAG) and updated transportation thresholds consistent with Appendix G of the 2019 CEQA Guidelines. Per the TAG, the CEQA analysis is to include an assessment of whether or not the Project would result in: 1) potential conflicts with transportation-related plans, ordinances, or policies; 2) a substantial increase in vehicle miles traveled (VMT); or, 3) increased hazards due to a geometric design feature or incompatible use. In addition, in accordance with the City's CEQA Transportation Thresholds, an assessment of whether the Project would result in inadequate emergency access is included. With the exception of Threshold No. 2 (VMT), the topics in the TAG-required CEQA analyses for the Project were addressed as part of the analyses within Section IV.K, Transportation and Traffic, of the Draft EIR. With regard to VMT impacts associated with the Project, refer to the Transportation analysis in Appendix B, Appendix G Modifications, Subsection 2, Modifications to Appendix G of the CEQA Guidelines. As discussed therein, the Project's VMT impacts would be less than significant.

2. **Pages IV.K-37 and IV.K-38: Subsection c, Project Design Features, revise PDF-TRAF-1 as follows:**

PDF-TRAF-1: Construction Traffic Management Plan. ~~The Project Applicant~~ 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 ~~reduce travel during peak travel periods~~ 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.

3. Pages IV.K-38 and IV.K-39: Subsection c, Project Design Features, revise PDF-TRAF-2 as follows:

PDF-TRAF-2: Construction Parking Plan. ~~The Project Applicant~~ MSMU shall prepare a Construction Parking Plan prior to the issuance of a building permit ~~to commencement of construction~~ that identifies temporary parking locations for construction workers and for MSMU students, faculty/staff, and visitors and shall include the following elements as appropriate:

- ~~During the construction of the proposed parking deck,~~ 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.
- ~~During construction activities when MSMU students, faculty/staff, and visitors or construction worker parking cannot be accommodated on the Project Site, the plan shall identify alternate parking location(s) on Campus and the method of transportation to and from the Project Site for approval by the City 30 days before commencement of construction~~.
- ~~Construction workers shall park in designated areas on Campus or in available off-site parking facilities with~~ ~~n~~No construction worker parking will be allowed on ~~neighborhood~~ local residential streets. Construction workers shall all park on the Campus. ~~When construction worker parking is off site, a temporary shuttle would be operated for construction workers to and from the designated off-site parking location.~~
- 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.

4. Pages IV.K-39: Subsection c, Project Design Features, revise PDF-TRAF-8 as follows:

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 ~~Summer Camps~~ 200 campers and 40 staff on a daily basis for Summer Sports Camps.

5. Pages IV.K-47 to IV.K-48: Subsection iv, Parking during Construction, revise as follows:

Construction worker parking would be provided on-site or within the Campus (refer to PDF TRAF-2). MSMU provides a total of 561 parking spaces through various parking facilities on-Campus. For approximately 16 months during Phases I through VI of construction, approximately 226 spaces would be removed for the construction of the parking deck, leaving 335 spaces available on-Campus. Once the proposed Wellness Pavilion parking deck is completed, construction workers would park in the parking structure. Construction workers may only park~~ing~~ on-site, and would travel from Sunset Boulevard to the Campus via Bundy Drive to Norman Place to Chalon Road and leave the Campus via Chalon Road and then south on Bundy Drive to Sunset Boulevard. ~~If construction worker parking must be provided off-site, a temporary shuttle would be operated for construction workers to and from the designated off-site parking location.~~ As presented above in PDF-TRAF-2, Construction Parking Plan, no construction worker parking would be allowed on neighborhood streets.

6. Page IV.K-59: Subsection ix, Temporary Loss of On-Street Parking, revise paragraphs 2, 3 and 4 as follows:

Construction worker parking would be provided on Campus ~~on and off-site depending upon the stage of construction and the availability of only on-site parking~~. For approximately 16 months during Phases I through VI of construction, approximately 226 spaces would be removed for the construction of the parking deck, leaving 335 spaces available on-Campus. Once the proposed Wellness Pavilion parking deck is completed, construction workers ~~are~~ would park in the parking deck.

~~Off-street construction worker parking facilities could include existing parking facilities along Constitution Avenue, San Vicente Boulevard, or Wilshire Boulevard in the area. Under PDF-TRAF-1, when construction worker parking is off-site, a temporary shuttle would be operated for construction workers to and from the designated off-site parking location.~~

During construction, when the on-site parking capacity is insufficient to meet the school's parking demand, the school will arrange for valet parking for some or all of the employees, students, and guests on the Campus as outlined in PDF-TRAF-2. It is anticipated that employees, students, and guests would be able to park on-site in the new proposed Wellness Pavilion parking deck once it is completed and a temporary certificate of occupancy is granted by the City. With the implementation of PDF-TRAF-2 regarding valet services ~~and the use of off-site parking facilities and shuttle services~~, impacts with respect to on-street parking during construction would be less than significant.

7. Pages IV.K-59: Subsection 2, Operational Impacts, revise the 2nd sentence in paragraph 1 follows:

Under PDF-TRAF-8, MSMU would limit the total number of outside guests to 400 on a daily basis for new events such as the Other Wellness/Sports Events~~,~~ and ~~H~~Health and Wellness Speaker Series, and ~~Summer Camps~~ 200 campers and 40 staff on a daily basis for Summer Sports Camps.

8. Page IV.K-86: Subsection 1, Construction, revise paragraph 4 as follows:

As described previously, construction of the Project would require that 226 parking spaces be removed from the Project Site. As noted in PDF-TRAF-2, the Project would implement a Construction Parking Plan that would identify temporary parking locations for construction workers (only on Campus) and employees, valet service for students, faculty/staff, and visitors, and prohibit worker parking on adjacent streets. Therefore, the Project's impact to on-street parking would not be cumulatively considerable and would be less than significant.

9. Page IV.K-89, Subsection a, Mitigation Measures to Address Peak Hour Intersection Impacts, revise paragraph 1 as follows:

For peak construction activity periods, when intersection impacts were identified, mitigating the Project-related intersection impacts would require reducing the number of construction vehicle trips. The maximum vehicle trip generation allowable during the peak hours without incurring a significant intersection impact was identified. This level of vehicle trip generation ~~could potentially~~ can be accomplished through restrictions on the number of haul trucks~~, an off-site parking program and shuttle program for construction workers, or a combination thereof. MSMU currently operates a shuttle service, which could be extended or used to transport construction workers to/from off-site location(s), or a separate shuttle system could be implemented. Off-site parking locations could be identified where parking is available. The shuttle service would transport construction workers from the off-site parking locations to the Chalon Campus~~.

> **MM-TRAF-1:** During construction, ~~the~~ in each individual hour within the PM peak period (4 PM to 6 PM) ~~hour, when more than 37 outbound PCE vehicle are anticipated, implement an off-site parking program and shuttle for construction workers to the Chalon Campus that~~ allow~~s~~ a maximum of 37 outbound PCE vehicle trips and 6 inbound ~~and 6 outbound~~ PCE vehicle trips ~~during the PM peak hour~~.

Chapter V, Alternatives

1. Page V-21, Subsection b, Operational Traffic, revise the 2nd to last sentence in paragraph 2 as follows:

PDF-TRAF-7 would require a Campus Event Coordination Plan to provide for valet parking that would reduce congestion and street parking near the Project Site during large

events and PDF-TRAF-8 would 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 ~~Summer Camps~~200 campers and 40 staff on a daily basis for Summer Sports Camps, so that impacts would not exceed estimated impact levels.

2. Page V-66, Subsection 1, Description of the Alternative, revise paragraph 1 as follows:

Summer camps under the Project would have no limit on the existing maximum attendance of ~~400 outside guests~~ 200 campers and 40 staff on a daily basis for Summer Sports Camps. As discussed in the Traffic Report, Table 6 (see Appendix I of this Draft EIR), the Project's Summer Camp would generate up to 480 vehicle trips per day. Alternative 4 would place a limit on total daily vehicle trips for the camps at 236 daily vehicle trips.

3. Page V-91, Section 5, Subsection d, Summary of Operation Impacts, revise paragraph 1 as follows:

As shown in Tables V-4 through V-11, Alternative 4 would reduce the Project's operation significant and unavoidable traffic impacts on Study Area intersections and neighborhood street segments during operation to less than significant levels. In addition, as with the Project Alternative 4 would implement project design feature PDF-TRAF-7 to provide a Campus Event Coordination Plan. However, Alternative 4 would not implement PDF-TRAF-8 to limit 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 since it would impose a limitation of 310 guests on a daily basis. As such, impacts associated with operation traffic would be less under Alternative 4 than under the Project.

Appendix I – Transportation Impact Analysis

1. Page 62, Project Schedule of Construction Activity, revise construction schedule as follows[13]:

Construction of the Project is anticipated to begin in early 2018 and will be constructed in seven phases (some of which will overlap):

- Phase I – Site Preparation (One month)
- Phase II – Demolition (One & ½ months)
- Phase III –Grading (One & ½ months)
- Phase IV – Concrete Pouring (~~Six~~ Seven months)

[13] These revisions to the Transportation Impact Analysis construction schedule are consistent with the rest of the Draft EIR and do not change the overall construction duration of approximately 22 months, which includes some overlap between various phases. Further, the revisions do not affect the construction impact traffic analysis and conclusions included in the Transportation Impact Analysis or the Draft EIR.

- Phase V – Building Construction (Structural Steel) (Three months)
- Phase VI – Building Construction (Framing/Walls/Finishes) (~~Seven~~ Nine months)
- Phase VII – Paving (Six months)

2. Page 70, Table 21, MSMU Wellness Pavilion Construction Period Trip Generation – Passenger Car Equivalents, revise the Phase Duration column headings as follows[14]:

	Site Preparation	Demolition	Grading	Concrete Pouring	Building Constriction (Structural Steel)	Building Constriction (Framing/Walls /Finishes)	Site Concrete & Asphalt Paving
Phase Duration	1 month	1 ½ months	1 ½ months	~~6~~ 7 months	3 months	~~7~~ 9 months	6 months

[14] These revisions to the Transportation Impact Analysis construction schedule are consistent with the rest of the Draft EIR and do not change the overall construction duration of approximately 22 months, which includes some overlap between various phases. Further, the revisions do not affect the construction impact traffic analysis and conclusions included in the Transportation Impact Analysis or the Draft EIR. The construction period trip generation included in Table 21 includes daily and peak hour trips, which are not based on the duration of individual construction phases.