

III. CORRECTIONS AND ADDITIONS

1.0 INTRODUCTION

The following corrections and additions are set forth to update the Loyola Marymount University Master Plan Project Draft EIR. The Draft EIR is updated in response to (1) refinements to the Specific Plan as described and contained in **Appendix F-II, Specific Plan Documentation**, of this Final EIR, and (2) comments received during the 60-day public review period.

These Draft EIR errata are provided to clarify, refine, and provide supplemental information for the Proposed Loyola Marymount University Master Plan Project (Proposed Project). Changes may be corrections or clarifications to the text of the Draft EIR. Other changes clarify analysis in the Draft EIR based upon the information and concerns raised by commenters during the public review period.

None of the information contained in these EIR modifications constitutes significant new information or changes to the analysis or conclusions of the Draft EIR or requires recirculation of the Draft EIR. The *California Environmental Quality Act (CEQA) Guidelines*, Section 15088.5, states in part:

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

The changes to the Draft EIR included in these corrections and additions do not constitute “significant” new information or require recirculation of the Draft EIR because:

- No new significant environmental impact would result from the project or from a new or modified mitigation measure;
- There is no substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the identified significant impacts to a level of insignificance;
- No feasible project alternative or mitigation measure considerably different from others previously analyzed has been proposed or identified that would clearly lessen the significant environmental impacts of the project; and
- The Draft EIR is not fundamentally or basically inadequate or conclusory in nature such that meaningful public review and comment were precluded.

For simplicity, the EIR modifications contained in the following pages are in the same order as the information appears in the Draft EIR. Changes in text are signified by strikeout text (~~strikeout~~) where text has been removed and by underline text (underline) where text has been added. The applicable page numbers from the Draft EIR are also provided where necessary for easy reference.

2.0 CORRECTIONS AND ADDITIONS

Changes to the Draft EIR are listed below by section and page number.

Section I. Summary

The second sentence of the second to last paragraph on page I-7 has been revised as follows:

Approximately ~~3,261~~ 3,218 undergraduate students, or 60 percent of LMU’s undergraduate student enrollment, are housed on campus in approximately 16 residential buildings totaling approximately 942,000 gsf. Approximately 43 faculty/staff also live with the undergraduate students on campus.

The last sentence of the second paragraph on page I-8 has been revised as follows:

This would result in an increase of approximately 989 beds on campus, from approximately 3,261 beds to approximately 4,250 beds, some of which would be used by faculty/staff and visitors.

The last paragraph on page I-8 and continuing onto page I-9 has been revised as follows:

The Proposed Project proposes a number of potential enhancements to LMU’s existing athletic facilities. Proposed improvements to the existing Page Stadium may include replacement of the existing 600 seats

and addition of approximately ~~1,400~~ 900 seats, for a total of approximately ~~2,000~~ 1,500 seats; a new team clubhouse; new press box; increased size of concessions; and permanent nighttime illumination capability. The existing Sullivan Field may be retained as the primary varsity field for soccer and enhanced to meet LMU and spectator demand with an increase of approximately ~~1,300~~ 860 seats for a total of approximately ~~2,500~~ 2,000 seats; a changing room; restrooms; concession facilities; an audio system; and permanent nighttime illumination capability. The existing Smith Field may be retained as a softball field with additional seating for approximately 200 for a total of approximately 500 ~~400~~; a press box, and appropriate nighttime illumination; the adjacent existing Higgins Golf Center may also be illuminated. Improvements proposed for the existing University Pool include nighttime illumination, additional locker rooms, a team meeting room, and additional office space for coaches. The existing Leavey Field may be retained and enhanced with appropriate nighttime illumination.

The last sentence of the first paragraph on page I-10 has been revised as follows:

Proposed Project ~~goals~~ objectives for vehicular circulation include continuing to emphasize the campus entrance at LMU Drive and Lincoln Boulevard; clarification of the vehicular circulation routes between the campus academic core, William H. Hannon Library, and University Hall; traffic calming on LMU Drive and Ignatian Circle; strategic relocation of parking closer to the academic, residential, and athletic areas of campus; and the reduction of automobile-pedestrian interaction.

The last paragraph on page I-10 and continuing onto page I-11 has been revised as follows:

The Proposed Project imposes height controls at least as strict as those permitted under current zoning by establishing three Height Areas on LMU's campus. Height Area 1, which governs Hughes Campus, has a height limit of 139 feet above mean sea level. Height Area 2, which governs the core of Leavey Campus and Burns Campus, has a height limit of 75 feet above finished grade. Height Area 3, which governs the remaining portions of Leavey Campus and Burns Campus, ~~and~~ defines graduated height limits on Burns Campus through a series of setbacks from the campus boundaries along McConnell Avenue, W. 80th Street, and Fordham Road. No new buildings are proposed within 40 feet of the campus' southern or eastern boundaries.

The following Aesthetic Mitigation Measure has been revised on page I-18 as follows:

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

The following Light Mitigation Measure has been revised on page I-24 as follows:

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

The following Air Quality Mitigation Measures have been revised and added to pages I-29 and I-30:

MM-AQ-8: ~~LMU~~~~The Project Applicant~~ shall require all on-site ~~off-road~~ construction equipment to meet EPA Tier 2 or higher emissions standards according to the following: (Model Year 2001 or later) at a minimum. Construction equipment meeting Tier 3 and 4 emissions standards will be implemented when commercially available. This requirement will apply to any piece of equipment which is expected to operate on-site more than 15 days. In addition to meeting Tier 2 emissions standards, the Project Applicant shall use late model heavy-duty diesel-powered construction equipment with cooled exhaust gas recirculation at the project site.

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

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

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

~~MM-AQ-14 LMU shall require the contractor to provide temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow.~~

~~MM-AQ-15 LMU shall require the contractor to replace ground cover in disturbed areas as quickly as possible as permitted by the sequence of the Master Plan's project schedule.~~

The following Biological Resources Mitigation Measures have been revised on page I-36 as follows:

MM-BIO-1 Prior to any earthmoving activities during the breeding and nesting season ~~from March 1 through August 31~~, the Applicant shall have a survey conducted by a qualified biologist to determine if active nests for breeding birds are present within the area of potential influence of the species. This area of influences shall include the nest site as well as an appropriate buffer determined by the biologist based on field observations and the biology of the species. This survey shall be conducted within three (3) days before the clearing/grubbing. If nesting birds protected under the Migratory Bird Treaty Act or California Fish and Game Code are found, the breeding/nesting area(s) shall be protected according to the biologist's recommendation that include, but are not limited to, suitable buffer area around the nest, which shall not be disturbed until the young have fledged.

MM-BIO-2 Prior to any removal of trees ~~from during~~ the months of October ~~to through~~ February, the Applicant shall have ~~a full survey~~ conducted by a qualified biologist ~~a survey~~ to determine if monarch butterfly clusters are present ~~within the trees to be affected by removal, and the trees are providing overwintering habitat for monarch butterflies. If such overwintering habitat does not exist monarch butterfly clusters are not present, tree removal can proceed. If such overwintering habitat exists~~ Removal of trees occupied by monarch butterfly clusters during the months of October through February shall be prohibited unless it is determined by the City that such removal is necessary by reason of good forestry practice, disease of the tree, or safety considerations. Any such determinations, ~~including tree maintenance or trimming,~~ shall be accompanied by a written evaluation of the impacts of the proposed action on ~~habitat resources the monarch butterfly~~ by a qualified expert ~~on the monarch butterfly. Such report and investigations shall be arranged for by the City and paid for by the Applicant as part of environmental review.~~

~~Major c~~Construction activity within or on properties within 100 feet of any designated overwintering habitat trees occupied by monarch butterfly clusters shall be prohibited from between October to and February while when the monarch butterflies are present unless a qualified expert is present and determines that construction activities will not disturb the monarch butterfly cluster.

The following Archaeological Resources Mitigation Measure has been revised on page I-44 as follows:

MM-ARCH-4: If the archaeologist determines there is potential for damage to archaeological resources due to planned ground-disturbing activities, all ground-disturbing activities shall be monitored by the Proposed Project archaeologist and a Native American member of the Gabrieleno/Tongva Tribal community and mitigation for any potential adverse effects to archaeological resources from construction, as identified in Mitigation Measures ~~MM-ARCH-4~~MM-ARCH-5 through MM-ARCH-12 (below), shall be conducted.

The following Methane Mitigation Measure has been revised on page I-58 as follows:

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

The following Surface Water Quality and Hydrology Mitigation Measure has been added to page I-63:

MM-HWQ-8 LMU shall prepare and implement for individual projects on campus a Wet Weather Erosion Control Plan during between October 1 and April 15 in accordance with the requirements of Section 7002 of the Los Angeles Building Code.

Page I-70, the last sentence of the first paragraph has been revised as follows:

The highest ambient noise levels, 63.5 dB(A), were measured at the southern edge of Burns Campus, in proximity to Sullivan Soccer Field and ~~Lincoln~~ Loyola Boulevard.

The following Noise Project Design Features have been revised on pages I-73 and I-74 as follows:

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

PDF-NOISE-3 All speakers for ~~existing, to-be-improved,~~ modified and new outdoor audio systems shall be mounted to face ~~bleachers-spectator areas,~~ and be directed away from ~~nearby adjacent~~ residences, and ~~the settings shall be fixed by the manufacturers' representatives to ensure~~ be set to provide that sound levels from the systems do not exceed ~~the~~ off-campus ambient noise levels listed in Table IV.I-4 of the Draft EIR by 5 dB(A).

The following Noise Project Design Feature has been added to page I-74:

PDF-NOISE-6 No outdoor amplified sound system shall be installed or maintained on the LMU Campus within 150 feet of residential areas in the R1 zone, except within the Athletic Planning Area, where public address systems used in conjunction with athletic training and competitions may be used. However, emergency address broadcasts shall be exempted from these requirements.

The following Noise Mitigation Measure has been revised on page I-74 as follows:

MM-NOISE-1 All construction activity shall be conducted in accordance with Section 112.05 of the Los Angeles Municipal Code Noise Ordinance, which states that all technically feasible measures shall be implemented to reduce noise levels of construction equipment operating within 500 feet of residential areas in cases where noise levels exceed 75 dB(A) at 50 feet from the noise source. The Project applicant shall therefore require in contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:

- Two weeks prior to the commencement of construction of new buildings, notification must be provided to surrounding land uses within 500 feet of a Project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period;

The last paragraph on page I-80 has been revised as follows:

The related projects within the City of Los Angeles would increase the number of residents in the Pacific Division from 239,079 by adding approximately 16,350 residents to the Pacific Division service area

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

The following Fire Protection Mitigation Measure has been revised on page I-84 as follows:

MM-FIRE-4 Adequate vehicular access ways around all multi-story buildings shall be required by the Fire Department where buildings exceed ~~28 feet~~ two stories in height.

The following Transportation Mitigation Measure has been revised on page I-92 as follows:

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

The following Transportation Mitigation Measure has been revised on page I-93 as follows:

MM-TRAF-5 The Proposed Project shall add parking in phases with increases in the campus population, in conformance with the requirements of the proposed Specific Plan. The location of such additional parking shall be approved by the Department of Transportation.

The following Transportation Mitigation Measures have been added to page I-93:

~~MM-TRAF-6~~ Prior to pulling building permits for the new sports pavilion (i.e., the replacement facility for Gersten Pavilion), or the construction of more than 1000 additional seats (individually or cumulatively) at Page Stadium, Smith Softball Field, and/or Sullivan Field, the Applicant shall obtain approval from the Department of Transportation of a parking plan for the new sports pavilion or the new sports facility seating at Page Stadium, Smith

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

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

The following Water Project Design Feature starting on page I-97 has been revised as follows.

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

- Bathroom faucets – 1.5 gallons per minute (private), 0.5 gallon per minute (public),
- Self-closing faucets in public restrooms,
- Kitchen faucets – 1.5 gallons per minute,
- Pre-rinse kitchen spray head,
- Showerheads: no more than 1 showerhead per stall,
- Low-flow showerheads – 2.0 gallons per minute,
- High efficiency clothes washers – water savings factor of 5.0 or less (residential); water savings factor of 7.5 or less (residential),

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- High efficiency toilets – 1.28 gallons per flush or less, or dual flush,
- High efficiency/ultra low flow urinals – 0.125 to 0.5 gallon per flush,
- Energy Star dishwashers,
- Domestic water heating system located in close proximity to point(s) of use,
- Tankless and on-demand water heaters,
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers,
 - (Cooling towers to operate at minimum of 5.5 cycles of concentration)
- Water-saving pool filter,
- Rotating sprinkler nozzles – 0.5 gallon per minute,
- Micro-spray nozzles,
- Drip/subsurface irrigation (micro-irrigation) and bubbler irrigation,
- Weather based irrigation controller,
- Hydro-zoning plantings (grouping similar water needs plants together),
- Zoned irrigation,
- Drought-tolerant plants: 75 percent of new landscape plantings,
- Artificial turf (cost permitting),
- Landscaping contouring to minimize precipitation runoff,
- Infiltration planters (i.e., notched curb to allow runoff to flow into planted areas),
- Stormwater capture and infiltration of on campus sump,
- ~~Reclaimed water system for irrigation~~ Campus-wide reclaimed water irrigation,
- ~~On site hydrogen peroxide reclaimed water treatment~~
- ~~Convert~~ Cooling towers converted to 100 percent reclaimed water use, as permitted by law, and
- New buildings ~~shall designed to meet, at a minimum,~~ the U.S. Green Building Council's Leadership in Energy and Environmental Design® (LEED®) Certified level (or higher), or an equivalent criteria.

The first sentence of the second paragraph on page I-116 has been revised as follows:

Because Alternative 4 would not allow an increase in student housing square footage or the number of students housed on LMU's Westchester campus, it would prevent attainment of the Proposed Project's Key University ~~Goal~~ Objective U-3.

Section II. Project Description

On page II-2, footnote 6 has been revised as follows:

- ⁶ An enrollment of 6,868 FTE students translates to a headcount of approximately 7,555 students. The ratio of student headcount to student FTEs is relatively consistent. For example, in 2006, the ratio of student headcount number to student FTEs was 1.10 and in 2008, the ratio was 1.09. Therefore, assuming a conservative ratio of 1.10, the enrollment cap of ~~6,868~~ 7,800 FTEs would translate to a headcount of approximately ~~7,555~~ 8,580 students.

The following Project Objective headings on page II-4 are revised as shown:

Pedestrian and Vehicular Circulation ~~Goals~~ Objectives

Athletic and Open Space ~~Goals~~ Objectives

The second sentence of the second to last paragraph on page II-14 has been revised as follows:

Approximately ~~3,264~~ 3,218 undergraduate students and 43 faculty/staff are housed on campus in 16 residential buildings totaling approximately 942,000 gsf. ~~Approximately 15 LMU staff known as Student Housing Resident Directors live in these residence halls with the students.~~

The second full paragraph on page II-22 has been revised as follows:

The Proposed Project proposes improvements to several existing facilities. Proposed improvements to Page Stadium include replacement of the existing 600 seats and addition of approximately ~~1,400~~ 900 seats, for a total of approximately ~~2,000~~ 1,500 seats; a new team clubhouse; new press box; increased size of concessions; and permanent nighttime illumination capability. The existing Sullivan Field would be retained as the primary varsity field for soccer and would be enhanced to meet LMU and spectator demand with an increase of approximately ~~1,300~~ 860 seats, for a total of approximately ~~2,500~~ 2,000 seats; a changing room; restrooms; concession facilities; an audio system; and permanent nighttime illumination capability. The existing Smith Field would be retained as a softball field with additional seating for approximately ~~500~~ 200, for a total of approximately ~~700~~ 400 seats, a press box, and appropriate nighttime illumination; the adjacent existing Higgins Golf Center would also be illuminated. Improvements proposed for the existing University Pool include nighttime illumination, additional locker rooms, a team meeting room, and additional office space for coaches. The existing Leavey Field would be retained and enhanced with appropriate nighttime illumination.

The second full paragraph on page II-25 has been revised as follows:

The Proposed Project imposes height restrictions at least as strict as those permitted under current zoning by establishing three Height Areas on LMU’s campus. Height Area 1, which governs Hughes Campus, has a height limit of 139 feet above mean sea level. Height Area 2, which governs the core of Leavey Campus and Burns Campus, has a height limit of 75 feet above finished grade. Height Area 3, which governs the remaining portions of Leavey Campus and Burns Campus, ~~and~~ defines graduated height limits on Burns Campus through a series of setbacks from the campus boundaries along McConnell Avenue, W. 80th Street, and Fordham Road, as summarized in **Table II-2, Proposed Height Restrictions for Height Area 3 within the Burns Campus**. No new buildings are proposed within 40 feet of the campus’ southern or eastern boundaries. **Figure II-8, Proposed Height Areas**, illustrates the proposed height limitations and **Figure II-9, Proposed Campus Building Setbacks**, illustrates the 40-foot setback along the campus’s southern and eastern boundaries for new buildings and structures.

Table II-2 has been revised as follows:

Table II-2
Proposed Height Restrictions for Height Area 3 within the Burns Campus^a

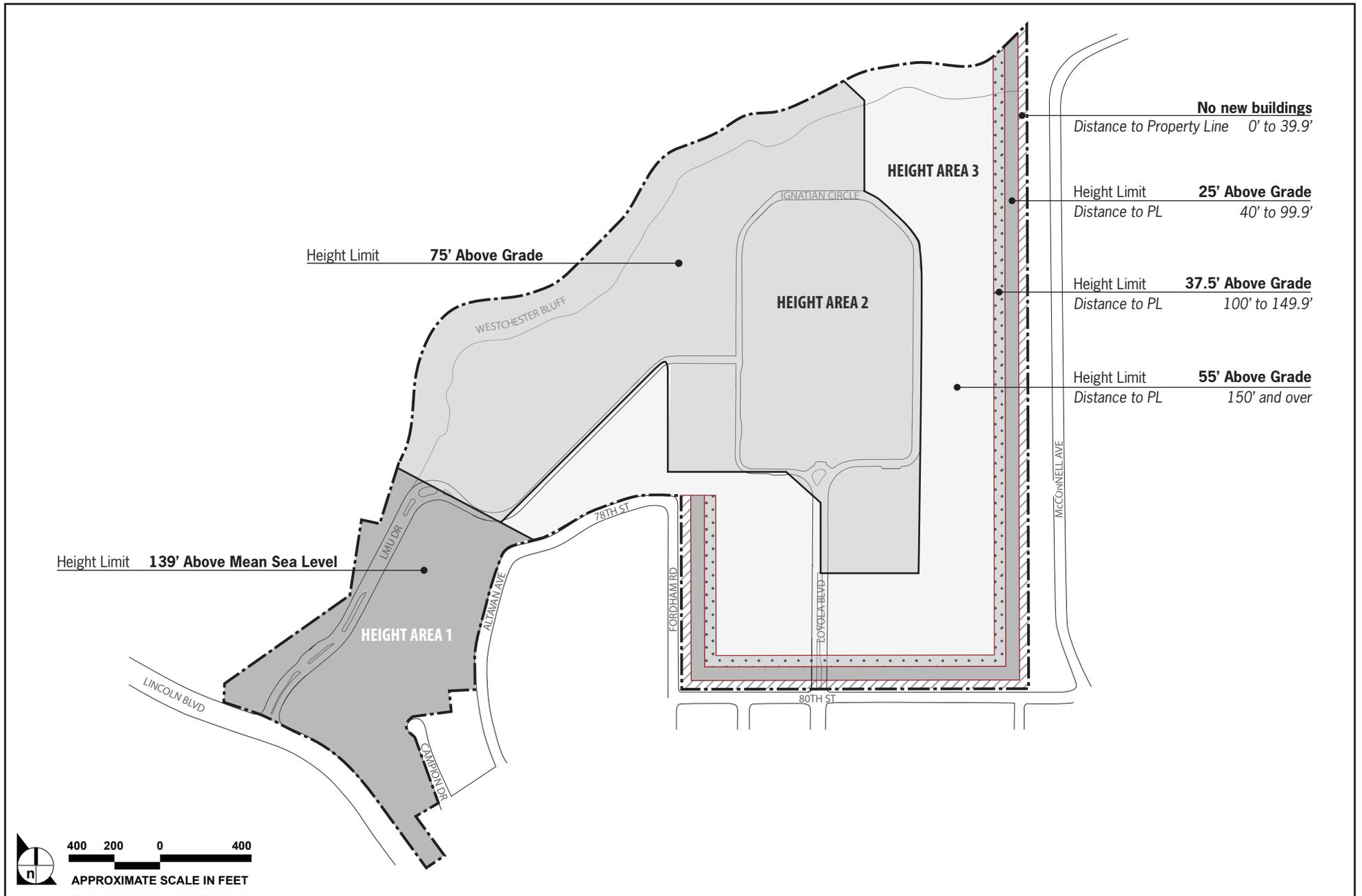
Distance from McConnell Avenue, W. 80 th Street, and Fordham Road Campus Boundaries (feet)	Height of New Buildings (feet above adjacent grade) ^a
Between 0 and 39.9	No new buildings
between 40 and 74.999 <u>9</u>	25
between 75 <u>100</u> and 149.9	37.5
150 and over	75 <u>55</u>

^a For ease of reference, a standard one-story building is 25 feet tall and a standard two-story building is 37.5 feet tall.

The last sentence of the first full paragraph on page II-24 has been revised as follows:

Proposed Project ~~goals~~ objectives for vehicular circulation include continuing to emphasize the campus entrance at LMU Drive and Lincoln Boulevard; clarification of the vehicular circulation routes between the campus academic core, William H. Hannon Library, and University Hall; traffic calming on LMU Drive and Ignatian Circle; strategic relocation of parking closer to the academic, residential, and athletic areas of campus (see **Parking**, below); and the reduction of automobile-pedestrian interaction (see **Pedestrian Circulation**, above).

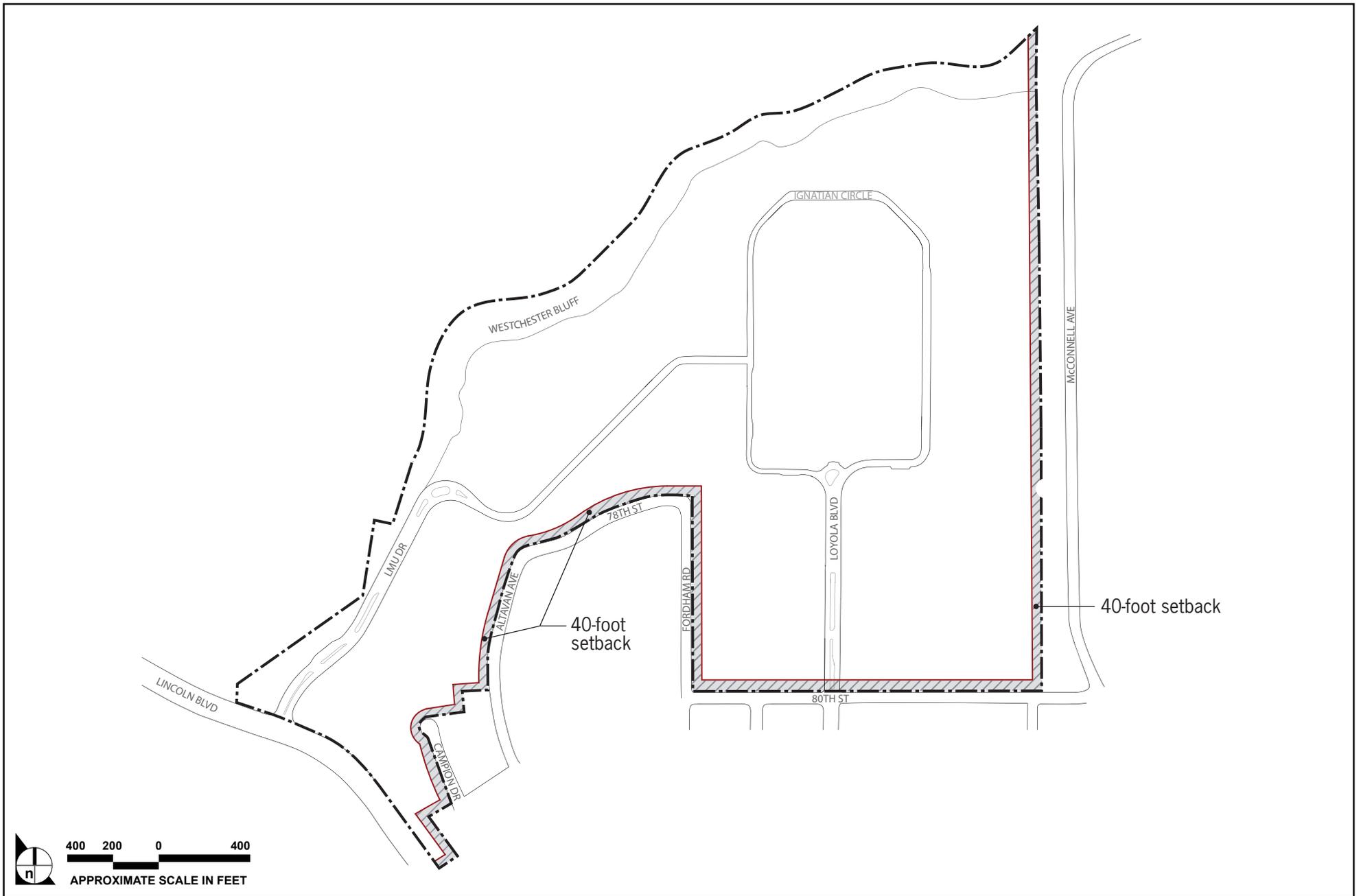
Figures II-8, Proposed Height Areas, and **II-9, Proposed Campus Building Setbacks**, have been revised as shown on the following pages:



SOURCE: Loyola Marymount University / DMJM Design | AECOM – February 2010

FIGURE II-8

Proposed Height Areas



SOURCE: Loyola Marymount University / DMJM Design | AECOM – February 2010

FIGURE II-9

Proposed Campus Building Setbacks

Section IV.A.1 Aesthetics and Views

The last paragraph on page IV.A.1-47 has been revised as follows:

The Proposed Project would maintain the existing scale of the campus by enforcing height restrictions that are at least as strict as those under current zoning. The proposed LMU Specific Plan would establish three Height Areas on the campus, as illustrated in **Figure II-8, Proposed Height Areas**, and a 40-foot setback along the campus’s eastern and southern boundaries for new buildings and structures, as illustrated in **Figure II-9, Proposed Campus Building Setbacks**. Height Area 1 corresponds to Hughes Campus, Height Area 2 corresponds to the core areas of the Leavey Campus and Burns Campus, and Height Area 3 corresponds to the remaining portions of the Leavey Campus and Burns Campus.

The first paragraph on page IV.A.1-48 has been revised as follows:

The building height limit on Hughes Campus, or Height Area 1, would be maintained at 139 feet above mean sea level. The building height limit within on Leavey Campus, or Height Area 2; would be restricted to maintained at 75 feet above grade. Within Burns Campus, or Height Area 3, the proposed LMU Specific Plan defines graduated height limits for the Burns Campus at varying distances from the campus property lines parallel to McConnell Avenue, W. 80th Street, and Fordham Road as summarized in **Table IV.A.1-1, Proposed Height Restrictions for Height Area 3 within the Burns Campus**, below. No new buildings are proposed within 39.9 feet of these boundaries campus property lines. Buildings proposed within 40 to ~~74.9~~ 99.9 feet of these boundaries have a height limit of 25 feet; buildings proposed within ~~75~~ 100 to 149.9 feet of these boundaries have a height limit of 37.5 feet; and buildings proposed 150 feet or more from these boundaries have a height limit of ~~75~~ 55 feet.

Table IV.A.1-1 has been revised as follows:

**Table IV.A.1-1
Proposed Height Restrictions for Height Area 3 within the Burns Campus^a**

Distance from McConnell Avenue, W. 80th Street, and Fordham Road Campus Boundaries (feet)	Height of New Buildings (feet above adjacent grade)^a
Between 0 and 39.9	No new buildings
between 40 and 74.9 99.9	25
between 75 100 and 149.9	37.5
150 and over	75 <u>55</u>

^a For ease of reference, a standard one-story building is 25 feet tall and a standard two-story building is 37.5 feet tall.

The final paragraph on page IV.A-56 has been revised as follows:

Furthermore, as previously described, the Specific Plan's proposed Height Areas would maintain a 39.9-foot-wide buffer along Burns Campus boundaries parallel to Fordham Road, W. 80th Street, and McConnell Avenue, within which no new buildings would be sited. Building heights would be limited to 25 feet within the next ~~35~~ 60 feet and to 37.5 feet within the following ~~75~~ 50 feet. This system ensures that taller buildings are set back from these boundaries, prohibits crowding of buildings near Burns Campus edge, and contributes open airspace to the foreground of residential viewsheds. Therefore, impacts to views from these roadways would be less than significant.

Section IV.A.2 Shading

The last paragraph on page IV.A.2-9 and continuing onto page IV.A.2-10 has been revised as follows:

The proposed LMU Specific Plan would institute height restrictions on campus that are at least as strict as those permitted under the current zoning. The proposed Specific Plan would establish three Height Areas on the campus, as illustrated in **Figure II-8, Proposed Height Areas**. Height Area 1 corresponds to Hughes Campus, Height Area 2 corresponds to the core of Leavey Campus and Burns Campus, and Height Area 3 corresponds to the remaining portions of Leavey Campus and Burns Campus.

The first full paragraph on page IV.A.2-10 has been revised as follows:

The building height limit on Hughes Campus, or Height Area 1, would be maintained at 139 feet above mean sea level. The building height limit ~~on Leavey Campus, or~~ Height Area 2, would be ~~maintained at~~ restricted to 75 feet above grade. Within ~~Burns Campus, or~~ Height Area 3, the proposed LMU Specific Plan defines graduated height limits for the Burns Campus at varying distances from the campus property lines parallel to McConnell Avenue, W. 80th Street, and Fordham Road as summarized in **Table IV.A.1-1, Proposed Height Restrictions for Height Area 3 within the Burns Campus**, below. No new buildings are proposed within 39.9 feet of these ~~boundaries~~ property lines. Buildings proposed within 40 to ~~74.9~~ 99.9 feet of these boundaries have a height limit of 25 feet; buildings proposed within ~~75~~ 100 to 149.9 feet of these boundaries have a height limit of 37.5 feet; and buildings proposed 150 feet or more from these boundaries have a height limit of ~~75~~ 55 feet. This system ensures that campus structures closest to the single-family residences along the Burns Campus boundary maintain lower building heights and concentrates the taller buildings to the interior core of the campus.

Table IV.A.2-1 has been revised as follows:

**Table IV.A.2-1
Proposed Height Restrictions for Height Area 3 Within the Burns Campus^a**

Distance from McConnell Avenue, W. 80 th Street, and Fordham Road Campus Boundaries (feet)	Height of New Buildings (feet above adjacent grade) ^a
Between 0 and 39.9	No new buildings
between 40 and 74.9 <u>99.9</u>	25
between 75 <u>100</u> and 149.9	37.5
150 and over	75 <u>55</u>

^a For ease of reference, a standard one-story building is 25 feet tall and a standard two-story building is 37.5 feet tall.

The second paragraph on page IV.A.2-11 has been revised as follows:

As previously stated, residences to the east of University Hall would not be shaded by any new structures since the Specific Plan would limit new buildings on ~~Hughes Campus Burns Campus~~ to a height of 139 feet above mean sea level, which is the elevation at-grade of residences to the east.

Section IV.A.1 Aesthetics and Views

The following mitigation measure has been revised as follows:

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

Section IV.A.3 Light and Glare

The following mitigation measure has been revised as follows:

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

Section IV.B.1 Air Quality

The paragraphs beginning at the bottom of page IV.B.1-38 through the end of page IV.B.1-39 have been revised as follows:

4.4.1.1 Phase 1 (July 2010–June 2016)

During Phase 1, excavation activity is anticipated to equal approximately 30 percent of the total excavated material of the Proposed Project. Building construction activity is also estimated to equal approximately 30 percent of the total building gross square footage of the Proposed Project. The disturbed area during grading operations is also estimated to equal 30 percent of the total campus area in acres. The maximum area ~~of construction activity over unpaved surfaces to be disturbed~~ on any given day is assumed to be 5 acres. As per URBEMIS2007 default assumptions, the asphalt paving area is estimated at 25 percent of the total disturbed area. Demolition of existing buildings is based on data provided by LMU. Demolition of hard surfaces during this phase is estimated to equal approximately 30 percent of the total hard surfaces to be demolished during construction of the Proposed Project.

4.4.1.2 Phase 2 (July 2016–June 2021)

During Phase 2, excavation activity is anticipated to equal approximately 25 percent of the total excavated material of the Proposed Project. Building construction activity is also estimated to equal approximately 25 percent of the total building gross square footage of the Proposed Project. The disturbed area during grading operations is also estimated to equal 25 percent of the total campus area in acres. The maximum area ~~to be disturbed~~ ~~of construction activity over unpaved surfaces~~ on any given day is assumed to be 5 acres. As per URBEMIS2007 default assumptions, the asphalt paving area is estimated at 25 percent of the total disturbed area. Demolition of existing buildings is based on data provided by LMU. Demolition of hard surfaces during this phase is estimated to equal approximately 25 percent of the total hard surfaces to be demolished during construction of the Proposed Project.

4.4.1.3 Phase 3 (July 2021–June 2026)

During Phase 3, excavation activity is anticipated to equal approximately 25 percent of the total excavated material of the Proposed Project. Building construction activity is also estimated to equal approximately 25 percent of the total building gross square footage of the Proposed Project. The disturbed area during grading operations is also estimated to equal 25 percent of the total campus area in acres. The maximum area ~~to be disturbed~~ ~~of construction activity over unpaved surfaces~~ on any given day is assumed to be 5 acres. As per URBEMIS2007 default assumptions, the asphalt paving area is estimated at 25 percent of the total disturbed area. Demolition of existing buildings is based on data provided by LMU. Demolition

of hard surfaces during this phase is estimated to equal approximately 25 percent of the total hard surfaces to be demolished during construction of the Proposed Project.

4.4.1.4 Phase 4 (July 2026–June 2030)

During Phase 4, excavation activity is anticipated to equal approximately 20 percent of the total excavated material of the Proposed Project. Building construction activity is also estimated to equal approximately 20 percent of the total building gross square footage of the Proposed Project. The disturbed area during grading operations is also estimated to equal 20 percent of the total campus area in acres. The maximum area ~~to be disturbed of construction activity over unpaved surfaces~~ on any given day is assumed to be 5 acres. As per URBEMIS2007 default assumptions, the asphalt paving area is estimated at 25 percent of the total disturbed area. Demolition of existing buildings is based on data provided by LMU. Demolition of hard surfaces during this phase is estimated to equal approximately 20 percent of the total hard surfaces to be demolished during construction of the Proposed Project.

Table IV.B.1-11 has been revised as follows:

**Table IV.B.1-11
Proposed Project Cancer Risks**

Receptor Type	Maximum Annual Average Diesel Particulate Matter Concentration (µg/m³)	Maximum Modeled Cancer Risk (per million)	Threshold (per million)	Significant Impact?
Residential	<u>0.017</u> 0.069	<u>5.4</u> 6.3	10	NO
Worker	<u>0.030</u> 0.069	<u>1.9</u> 2.2	10	NO
Student	<u>0.079</u> 0.097	<u>3.2</u> 3.9	10	NO

Source: Impact Sciences, Inc., (2009). See worksheet in *Appendix IV.B.1*.

The following Mitigation Measure on page IV.B.1-60 has been revised as follows:

MM-AQ-8: ~~LMU The Project Applicant shall require all on-site off-road construction equipment to meet EPA Tier 2 or higher emissions standards according to the following: (Model Year 2001 or later) at a minimum. Construction equipment meeting Tier 3 and 4 emissions standards will be implemented when commercially available. This requirement will apply to any piece of equipment which is expected to operate on-site more than 15 days.~~

~~In addition to meeting Tier 2 emissions standards, the Project Applicant shall use late model heavy-duty diesel-powered construction equipment with cooled exhaust gas recirculation at the project site.~~

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

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

The following Mitigation Measures have been added:

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

MM-AQ-14 LMU shall require the contractor to Provide temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow.

MM-AQ-15 LMU shall require the contractor to replace ground cover in disturbed areas as quickly as possible as permitted by the sequence of the Master Plan's project schedule.

Section IV.B.2 Biological Resources

The following Mitigation Measures have been revised as follows:

MM-BIO-1 Prior to any earthmoving activities during the breeding and nesting season ~~from March 1 through August 31~~, the Applicant shall have a survey conducted by a qualified biologist to determine if active nests for breeding birds are present within the area of potential influence of the species. This area of influences shall include the nest site as well as an appropriate buffer determined by the biologist based on field observations and the biology of the species. This survey shall be conducted within three (3) days before the clearing/grubbing. If nesting birds protected under the Migratory Bird Treaty Act or California Fish and Game Code are found, the breeding/nesting area(s) shall be protected according to the biologist's recommendation that include, but are not limited to, suitable buffer area around the nest, which shall not be disturbed until the young have fledged.

MM-BIO-2 Prior to any removal of trees ~~from during~~ the months of October ~~to through~~ February, the Applicant shall have ~~a full survey~~ conducted by a qualified biologist a survey to determine if monarch butterfly clusters are present within the trees to be effected by removal ~~and the trees are providing overwintering habitat for monarch butterflies. If such overwintering habitat does not exist monarch butterfly clusters are not present, tree removal can proceed. If such overwintering habitat exists~~ Removal of trees occupied by monarch butterfly clusters during the months of October through February shall be prohibited unless it is determined by the City that such removal is necessary by reason of good forestry practice, disease of the tree, or safety considerations. Any such determinations, including tree maintenance or trimming, shall be accompanied by a written evaluation of the impacts of the proposed action on habitat resources the monarch butterfly by a qualified expert on the monarch butterfly. Such report and investigations shall be arranged for by the City and paid for by the Applicant as part of environmental review.

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

The following Mitigation Measure on page IV.D.2-26 has been revised as follows:

MM-ARCH-4: If the archaeologist determines there is potential for damage to archaeological resources due to planned ground-disturbing activities, all ground-disturbing activities shall be monitored by the Proposed Project archaeologist and a Native American member of the Gabrieleno/Tongva Tribal community and mitigation for any potential adverse effects to archaeological resources from construction, as identified in Mitigation Measures ~~MM-ARCH-4~~MM-ARCH-5 through **MM-ARCH-12** (below), shall be conducted.

Section IV.D.3 Historic Resources

The second sentence of the sixth paragraph on page IV.D.3-19 has been revised as follows:

“This timeframe also marks the period during which Loyola University obtained full university status (obtained in 1930) and became one of several pioneer colleges and universities to locate in Los Angeles’ west side during the late 1920s and early ‘30s as anchor institutions for further surrounding development ~~in the Westchester area.~~”

The last full paragraph on page IV.D.3-25 has been revised as follows:

While typical groundborne vibration levels from construction activities very rarely reach levels that can damage structures, intensive vibration levels can be generated from pile drivers, large bulldozers, and other equipment used for earth excavation. ~~Pile drivers would not be used as part of the Proposed Project’s construction. If used on campus, pile drivers would be operated a minimum of 84 feet from Xavier Hall, St. Robert’s Hall, and Sacred Heart Chapel to avoid any potential damage to these resources, as required by PDE-NOISE-1.~~¹

Section IV.F Hazards

Mitigation Measure MM-HAZ-6 has been revised as follows:

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

¹ According to the Federal Transit Administration, the vibration threshold for buildings extremely susceptible to vibration damage is 0.12 peak particle velocity (PPV). In order to avoid damage to potential historic resources on campus, and conservatively assuming that the potential historic resources identified on campus are extremely susceptible to vibration damage, sonic pile drivers would need to operate a minimum distance of 84 feet from Xavier Hall, St. Robert’s Hall, and Sacred Heart Chapel in order to avoid vibration damage to those buildings.

Section IV.G Surface Water Hydrology and Water Quality

The following Mitigation Measure has been added:

~~MM-HWQ-8 LMU shall prepare and implement for individual projects on campus a Wet Weather Erosion Control Plan during between October 1 and April 15 in accordance with the requirements of Section 7002 of the Los Angeles Building Code.~~

Section IV.H Land Use

The second and third paragraphs on page IV.H-18 have been revised as follows:

The proposed LMU Specific Plan imposes height restrictions that are at least as strict as those permitted under the current zoning, through the establishment of height restrictions for the campus, as illustrated in **Figure II-8, Proposed Height Areas**. Height Area 1 corresponds to Hughes Campus, Height Area 2 corresponds to the core areas of the Leavey Campus and Burns Campus, and Height Area 3 corresponds to the remaining portions of the Leavey Campus and Burns Campus.

The building height limit on Hughes Campus, or Height Area 1, would be maintained at 139 feet above mean sea level), which is the approximate ground elevation of the adjacent residential neighborhood to the east and south and, therefore, buildings would not block views from these residential neighborhoods. The building height limit on ~~Leavey Campus, or~~ Height Area 2, would be restricted to 75 feet above grade. Within ~~Burns Campus, or~~ Height Area 3, the proposed Specific Plan defines graduated height limits for the Burns Campus according to a series of setbacks from the campus boundaries parallel to McConnell Avenue, W. 80th Street, and Fordham Road, as summarized in **Table IV.H-1, Proposed Height Restrictions for Height Area 3 within Burns Campus**, below. No new buildings are proposed within 39.9 feet of these boundaries.

Table IV.H-1 has been revised as follows:

**Table IV.H-1
Proposed Height Restrictions for Height Area 3 within Burns Campus^a**

Distance from McConnell Avenue, W. 80th Street, and Fordham Road Campus Boundaries (feet)	Height of New Buildings (feet above adjacent grade)^a
Between 0 and 39.9	No new buildings
between 40 and 74.9 <u>99.9</u>	25
between 75 <u>100</u> and 149.9	37.5
150 and over	75 <u>55</u>

^a For ease of reference, a standard one-story building is 25 feet tall and a standard two-story building is 37.5 feet tall.

The second full paragraph on page IV.H-44 has been revised as follows:

Additionally, the Proposed Project proposes establishment of a Specific Plan that would institute a more comprehensive set of development standards to maintain compatibility with surrounding land uses. These development standards include height and setback restrictions on the campus (see **Table IV.H-1**) that would prohibit the construction of new buildings within 39.9 feet of the campus's southern and eastern boundaries, ~~and would limit new building heights to no greater than 75 feet along buildings 75 feet or taller to the core of campus, and provide a series of tiered height setbacks along the Burns Campus property line.~~ The current building height limits on ~~the Hughes and Leavey Campuses~~ would be maintained.

Section IV.I Noise

The first paragraph on page IV.I-21 has been revised as follows:

All construction activities shall be conducted in accordance with Section 41.40 of the Los Angeles Municipal Code Noise Ordinance, which states that construction operations within 500 feet of a residential area shall be limited to the hours of 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM on Saturdays and holidays. In compliance with the Noise Ordinance, no construction activities within 500 feet of a residential area would occur on Sundays.

The last paragraph on page IV.I-30 has been revised as follows:

The highest ambient noise levels, 63.5 dB(A), were measured at the southern edge of Burns Campus, in proximity to Sullivan Soccer Field and ~~Lincoln~~ Loyola Boulevard.

The second paragraph on page IV.I-32 has been revised as follows:

Proposed improvements to Sullivan Field include an increase of ~~1,300~~ 860 seats for a total of approximately ~~2,500~~ 2,000 seats, an improved audio system, and permanent nighttime lighting. Proposed improvements to Page Baseball Stadium include the addition of up to ~~1,400~~ 900 seats, for a total of ~~2,000~~ 1,500 seats, and nighttime lighting. Under the Proposed Project, improvements to Smith Field would include additional seating for ~~500~~ 200 for a total of ~~700~~ 400 seats, and nighttime lighting.

The following Project Design Features have been revised as follows:

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

PDF-NOISE-3 All speakers for ~~existing, to-be-improved,~~ modified and new outdoor audio systems shall be mounted to face ~~bleachers-spectator areas,~~ and be directed away from ~~nearby adjacent~~ residences, and ~~the settings shall be fixed by the manufacturers' representatives to ensure~~ be set to provide that sound levels from the systems do not exceed ~~the~~ off-campus ambient noise levels listed in Table IV.I-4 of the Draft EIR by 5 dB(A).

The following Project Design Feature has been added:

PDF-NOISE-6 No outdoor amplified sound system shall be installed or maintained on the LMU Campus within 150 feet of residential areas in the R1 zone, except within the Athletic Planning Area, where public address systems used in conjunction with athletic training and competitions may be used. However, emergency address broadcasts shall be exempted from these requirements.

Mitigation Measure MM-Noise-1 has been revised on page IV.I-38 as follows:

MM-NOISE-1 All construction activity shall be conducted in accordance with Section 112.05 of the Los Angeles Municipal Code Noise Ordinance, which states that all technically feasible measures shall be implemented to reduce noise levels of construction equipment operating within 500 feet of residential areas in cases where noise levels exceed 75 dB(A) at 50 feet from the noise source. The Project applicant shall therefore require in contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:

- Two weeks prior to the commencement of construction of new buildings, notification must be provided to surrounding land uses within 500 feet of a Project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period;

Section IV.J.1 Police

The first paragraph on page IV.J.1-8 has been revised as follows:

The Department of Public Safety has a security booth located on LMU Drive approximately 100 feet from Lincoln Boulevard. The booth is manned by a Department of Public Safety officer 24 hours a day, 7 days a week. ~~Campus entry is routinely monitored and the LMU Drive gates are closed daily between the hours of 8:00 PM and 5:00 AM. During the times when the LMU Drive gate is closed, any person without an LMU One-Card (issued to students, faculty, staff, and some affiliates) is stopped at the gate, asked to provide specific information regarding their reason for entering campus, and checked in as a visitor by the Public Safety officer stationed at the security booth. Those people with an LMU One-Card may use the card to swipe open the gate arm. The Department of Public Safety officer posted at the security booth allows entry when permits are displayed on vehicles driven by students, faculty, and staff entering campus.~~ The officer posted at the security booth during typical business hours is informed of all expected campus activities each day. The officer assists visitors to the campus by providing a map indicating the location of their destination, issuing a guest pass, and recommending a parking area. ~~The gates on Loyola Boulevard and 80th Street are closed and locked at 11:00 PM every night, preventing any cars from entering or leaving the campus via Loyola Boulevard, and forcing all cars to enter and exit campus via LMU Drive, past the security booth. After 8:00 PM, when the gate is closed, all visitors must stop at the booth and provide the officer with specific information regarding their reason for entering campus.~~

The last paragraph on page IV.J.1-17 has been revised as follows:

As discussed in **Section III, General Description of Environmental Setting**, several related projects are proposed and/or planned within the LAPD's Pacific Division. The anticipated number of residents expected as a result of these related projects is summarized in **Table IV.J.1-3, Residential Related Projects - LAPD Pacific Division**. The related projects within the City of Los Angeles would increase the number of residents in the Pacific Division from 239,079 by adding approximately 16,350 residents to the Pacific Division service area during the course of Proposed Master Plan Project buildout. As previously discussed, there were approximately 0.027 crimes per resident in the LAPD's Pacific Division in 2007. Therefore, buildout of the related residential projects ~~within LAPD's Pacific Division's service area the City of Los Angeles~~ would result in an increase of approximately 441.5 crimes per year ~~within the Pacific Division service area~~. Combined with the 87 annual incidents that would result from an increase of 1,248 FTE students, faculty, and staff on the LMU campus, the cumulative increase in crimes would be 528.5 per year, or an increase of 8.1 percent above the 2007 rate of 6,505 crimes in the Pacific Division service area. This is not considered a substantial increase.

Section IV.J.2 Fire Protection and Emergency Medical Service

The last full paragraph on page IV.J.2-16 has been revised as follows:

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

The third paragraph on page IV.J.2-18 is revised as follows.

The Proposed Project would increase the number of FTE students from the Fall 2008 enrollment of approximately 6,868 FTE students to the previously approved 7,800 FTE students enrollment cap (an increase of approximately 932 FTE students) and would ~~provide beds on campus for approximately 75 percent of undergraduate students or 4,250 beds, an increase of add~~ approximately 989 beds over the existing 3,261 beds.

Mitigation Measure MM-FIRE-4 is revised as follows:

MM-FIRE-4 Adequate vehicular access ways around all multi-story buildings shall be required by the Fire Department where buildings exceed ~~28 feet~~ two stories in height.

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

Section IV.J.3 Recreation and Parks

The second full paragraph on page IV.J.3-6 has been revised as follows:

The majority of the facilities devoted to recreational and athletic instructional activities are concentrated in the southeast portion of Burns Campus, as shown in **Figure II-4, Loyola Marymount University Campus Map**, in **Section II, Project Description**. Most facilities are ~~intended to be~~ currently used year-round between approximately 6:00 AM and ~~10:00 PM dusk~~, seven days a week, except where noted. Recreational and athletic facilities are summarized below.

The following discussion on page IV.J.3-13 has been revised as follows:

George C. Page Stadium. Page Stadium would be retained under the Proposed Project. Proposed improvements include the replacement of the existing approximately 600 bleacher seats and addition of up to ~~1,400~~ 900 seats, for a total of approximately ~~2,000~~ 1,500 seats; a new team clubhouse; new press box; increased size of concessions; and nighttime lighting.

Sullivan Field. Under the Proposed Project, Sullivan Field would be retained as the primary varsity field for soccer and would be enhanced to meet spectator demand. Proposed improvements include an increase of approximately ~~1,300~~ 860 seats for a total of approximately ~~2,500~~ 2,000 seats; a changing room; restrooms; concession facilities; an audio system; and nighttime lighting.

Smith Softball Field. Under the Proposed Project, additional seating for approximately ~~500~~ 200, for a total of approximately ~~700~~ 400 seats, a press box, and nighttime lighting are proposed.

The third sentence of the second full paragraph on page IV.J.3-14 has been revised as follows:

~~At present,~~ As of Fall 2008, LMU provides on-campus housing for approximately 60 percent of undergraduate FTE students (or 3,218 undergraduates) and approximately 43 faculty staff in approximately 3,261 beds. The Proposed Project would add approximately 989 beds on campus for a total of 4,250 beds, which would house approximately ~~proposing housing up to~~ 75 percent of undergraduates and also provide housing for some faculty/staff FTE students by providing 4,250 beds on campus, an increase of 989 beds.

Section IV.K Transportation

The first sentence of the last paragraph on page IV.K-19 has been revised as follows:

The Proposed Project seeks to house an increased percentage of undergraduates on campus at buildout, increasing the residential population on campus from approximately 60 percent of undergraduates enrollment, or 3,261 beds, as of Fall 2008 to approximately 75 percent, or 4,250 beds, at buildout.

The following language on pages IV.K-47 through IV.K-48 has been revised as follows:

4.4.6.1 Resident ~~Student~~ Parking Demand Ratio

In Fall 2008, there were a total of approximately 3,261 FTE undergraduate residents ~~students~~ on campus (including 3,218 undergraduate students and 43 faculty/staff), and 58.3 percent of FTE undergraduate resident students had vehicles parked on campus. Based on the number of FTE undergraduate campus residents ~~students~~ and percentage of FTE undergraduate resident students parking on campus, the total resident parking demand is 1,901 spaces (3,261 FTE undergraduate residents ~~students~~ x 0.583 = 1,901). This analysis conservatively assumes that 100 percent of residential ~~student~~ vehicles would be parked on LMU's campus during peak utilization for campus parking.

4.4.6.2 Commuter Parking Demand Ratio

Commuter parking demand is the parking demand for all other segments of the campus population, including non-resident undergraduate students, graduate students, non-resident faculty/staff, and visitors. To determine commuter parking demand, the resident parking demand was subtracted from the total campus parking demand. As indicated in **Table IV.K-12**, the resident ~~student~~ parking demand of 1,901 spaces was subtracted from the total daytime peak parking demand of 3,843 spaces, resulting in an existing commuter parking demand of 1,942 spaces.

The commuter parking demand ratio of 0.381 was determined by dividing the commuter parking demand of 1,942 spaces by the total FTE commuter of 5,091.48. The total FTE commuter includes FTE undergraduate non-residential students and graduate students, and non-resident FTE faculty and staff.

4.4.6.3 Projected Parking Demand

In order to determine the parking demand associated with the future residential ~~student~~ population, the 0.583 FTE undergraduate resident ~~students~~ parking ratio was applied to the projected future 4,250 resident FTEs ~~students~~, yielding a parking demand of 2,478 spaces. In order to determine the parking demand associated with the future campus FTE commuter, the 0.381 commuter parking ratio was applied

to the projected future 5,350 campus FTE commuter, yielding a parking demand of 2,038 spaces. In total, the future peak parking demand of the Proposed Project would be 4,516 spaces during the daytime peak period.

Table IV.K-12 on page IV.K-48 has been revised as follows:

**Table IV.K-12
Campus Parking Demand Projections**

	Existing (2008)			Proposed Project Buildout (2030)		
	FTEs	Peak Parking ¹		FTEs	Peak Parking ¹	
		Ratio	Demand (Parking Spaces)		Ratio	Demand (Parking Spaces)
Residential Demand						
Undergrad Residential Students	3,218	0.583	1,901	4,200	0.583	2,478
Faculty/Staff Residents	43			50		
Total Residents	3,261			4,250		
Commuter Demand						
Undergrad Non-Residential Students	2,223.8	0.381	1,942	1,300	0.381	2,038
Graduate Students	2,180.8			1,250		
Faculty/Staff Non-Residents	1,441.08			1,750		
Total Commuter	1,484.08			1,800		
	5,091.48			5,350		
Projected Campus Peak Demand	8,352.48	0.460	3,843	9,600	0.470	4,516
Required Supply (demand plus 5%)	8,352.48	0.483	4,035	9,600	0.494	4,742

Source: Fehr & Peers Transportation Consultants, 2009.

Notes: Parking facilities should rarely exceed 95 percent occupancy, because it is difficult for parkers to locate remaining available parking spaces. Therefore, a parking supply that exceeds peak demand by 5 percent is required to accommodate parking demand.

¹ 58.3 percent of FTE residential students have registered personal vehicles on campus. This analysis assumes that all residential student vehicles would be parked during the daytime peak parking period.

The fourth and fifth paragraphs on page IV.K-53 and page IV.K-54 has been revised as follows:

4.5.2 Operational Mitigation Measures

To quantify the TDM effects of increasing the number of ~~undergraduate students living~~ residents on campus, a trip generation survey of the Del Rey parking facility was conducted in the Fall 2008 semester to assess the trip rates of ~~undergraduate residents~~ campus residents at LMU. Located in the northeast corner of campus adjacent to Parking Lot H, Del Rey is an underground parking facility with 169 parking spaces beneath the Del Rey dormitories. Due to the proximity to dorms, the vast majority of spaces in the structure are utilized by campus residents ~~in students~~. Because the cars that park in the Del Rey facility are primarily campus residents, the facility is an effective sample of trip characteristics of a campus resident. As described in further detail in **Appendix IV.K**, the trip generation study was used to derive trip generation rates for campus residents ~~in students~~ and a trip generation rate for all other commuters, both of which are shown in **Table IV.K-14**.

As shown in **Table IV.K-14**, the ~~undergraduate residential students~~ resident and commuter trip rates were applied to FTE students, faculty and staff at Proposed Project buildout to quantify the effects of increasing the number of FTE students, faculty and staff. Taking into account the increase in ~~undergraduate students living~~ residents on campus to 4,250 FTE ~~students~~, net new trips at Proposed Project buildout would drop to 98 AM peak hour trips, 164 PM peak hour trips, and 1,727 daily trips at Proposed Project buildout in 2030. Compared to trip generation estimates for the Proposed Project shown in **Table IV.K-5**, this is ~~a~~ 28 AM peak hour trips, 59 PM peak hour trips, and 813 daily trips fewer than projected to be generated by the Proposed Project if no increase in ~~residential students~~ residents was to occur. However, the net trip generation during the PM peak hour would still be greater than the interim threshold, 150 net new peak hour trips, at which the Proposed Project would result in significant impacts.

**Table IV.K-14
Proposed Project
Trip Generation with Residential Trip Rates**

	FTEs	Trip Rates			Total trips		
		AM	PM	Daily	AM	PM	Daily
<i>Master Plan Buildout</i>							
Resident Trip Generation							
Undergrad Residential Students	4,200 4,250	0.048	0.105	1.050	202	441	4,410
<u>Faculty/Staff Residents</u>	<u>50</u>				2	5	53
<i>Total Residents</i>	4,250				204	446	4,463
Commuter Trip Generation							
Undergrad Non-Residential Students	1,300 1,250	0.204	0.232	2.669	265	302	3,469
Graduate Students	2,300				469	534	6,139
<u>Faculty/Staff Non-Residents</u>	1,750 1,800				357	406	4,671
<i>Total Commuters</i>	5,350				1,091	1,242	14,279
Campus Total Trip Generation	9,600				1,295	1,688	18,742
Existing Campus FTEs	8,352.48				1,197	1,524	17,015
Net Trip Generation					98	164	1,727

Source: Fehr & Peers Transportation Consultants, 2009.

Using the rates developed in **Table IV.K-14**, a detailed analysis of TDM measures was conducted. The analysis of TDM measures determined that growth in the campus population up to 9,000 campus FTE students, faculty, and staff (without the addition of campus residential students) would not result in any Proposed Project-related intersection impacts. Beyond 9,000 campus FTE students, faculty, and staff, mitigation measures would need to be phased in as campus FTE students, faculty, and staff increase.

Mitigation Measure MM-TRAF-1 has been revised on page IV.K-52 as follows:

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

Mitigation Measure MM-TRAF-5 on page IV.K-55 has been revised as follows:

MM-TRAF-5 The Proposed Project shall add parking in phases with increases in the campus population, in conformance with the requirements of the proposed Specific Plan. The location of such additional parking shall be approved by the Department of Transportation.

The following Mitigation Measures have been added to page IV.K-55:

~~MM-TRAF-6~~ Prior to pulling building permits for the new sports pavilion (i.e., the replacement facility for Gersten Pavilion), or the construction of more than 1000 additional seats (individually or cumulatively) at Page Stadium, Smith Softball Field, and/or Sullivan Field, the Applicant shall obtain approval from the Department of Transportation of a parking plan for the new sports pavilion or the new sports facility seating at Page Stadium, Smith Softball Field, and/or Sullivan Field demonstrating sufficient parking availability for such new sports pavilion or new sports facility seating at Page Stadium, Smith Softball Field, and/or Sullivan Field. Parking for the new sports pavilion or new sports facility seating at Page Stadium, Smith Softball Field, and/or Sullivan Field may be met by demonstrating sufficient capacity through a shared use study of the then-existing parking demand, construction of new parking spaces, or a special event parking plan which may include valet/stacked parking and/or shuttle services from University Hall to other locations on campus, or shuttle services to and from off-site parking locations.

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

Section IV.L.1 Water

Project design feature PDF-1 has been revised as follows:

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

square feet of residential facilities, and 28,000 net new gross square feet of athletic indoor facilities on campus:

- Bathroom faucets – 1.5 gallons per minute (private), 0.5 gallon per minute (public),
- Self-closing faucets in public restrooms,
- Kitchen faucets – 1.5 gallons per minute,
- Pre-rinse kitchen spray head,
- Showerheads: no more than 1 showerhead per stall,
- Low-flow showerheads – 2.0 gallons per minute,
- High efficiency clothes washers – water savings factor of 5.0 or less (residential); water savings factor of 7.5 or less (residential),
- High efficiency toilets – 1.28 gallons per flush or less, or dual flush,
- High efficiency/ultra low flow urinals – 0.125 to 0.5 gallon per flush,
- Energy Star dishwashers,
- Domestic water heating system located in close proximity to point(s) of use,
- Tankless and on-demand water heaters,
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers,
 - (Cooling towers to operate at minimum of 5.5 cycles of concentration)
- Water-saving pool filter,
- Rotating sprinkler nozzles – 0.5 gallon per minute,
- Micro-spray nozzles,
- Drip/subsurface irrigation (micro-irrigation) and bubbler irrigation,
- Weather based irrigation controller,
- Hydro-zoning plantings (grouping similar water needs plants together),
- Zoned irrigation,
- Drought-tolerant plants: 75 percent of new landscape plantings,

- Artificial turf (cost permitting),
- Landscaping contouring to minimize precipitation runoff,
- Infiltration planters (i.e., notched curb to allow runoff to flow into planted areas),
- Stormwater capture and infiltration of on campus sump,
- ~~Reclaimed water system for irrigation~~ Campus-wide reclaimed water irrigation.
- ~~On site hydrogen peroxide reclaimed water treatment~~
- ~~Convert~~ Cooling towers to use 100 percent reclaimed water use, as permitted by law, and
- New buildings ~~shall~~ designed to meet, ~~at a minimum,~~ the U.S. Green Building Council's Leadership in Energy and Environmental Design® (LEED®) Certified level (or higher), or an equivalent criteria.

Section VI. Alternatives

The last sentence of the first paragraph on page VI-15 has been revised as follows:

Specifically, the Proposed Project would house 75 percent of the undergraduate population on campus, compared to 60 percent as of Fall 2008. ~~Since Fall 2008 enrollment was 5,441.8 FTE undergraduate students and the Proposed Project seeks to increase undergraduate enrollment to 5,500 FTE undergraduate students as part of an overall enrollment cap of 7,800 FTE students, this would increase the number of beds on campus from~~ The number of residents on campus would increase from 3,261 to 4,250, or 989 new beds (including beds for faculty and staff living in student residential buildings).

The second sentence of the third paragraph on page VI-52 has been revised as follows:

Therefore, LMU would continue to house the same number of ~~undergraduate students~~ residents on campus (in approximately 3,261 beds) as under existing conditions, with no increase in the number of beds or students housed on campus permitted.

The first sentence of the first full paragraph on page VI-67 has been revised as follows:

Residential uses on the LMU campus presently total approximately 942,000 gross square feet, within which LMU houses approximately 60 percent of its undergraduate enrollment ~~(3,261 beds).~~

The first sentence of the third paragraph on page VI-85 has been revised as follows:

Because Alternative 4 would not allow an increase in student housing square footage or the number of students housed on LMU's Westchester campus, it would prevent attainment of the Proposed Project's Key University ~~Goal~~ Objective U-3, ensuring the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved housing opportunities.

The last sentence of the first paragraph on page VI-87 has been revised as follows:

The total student residential square footage and number of residential ~~students~~ on campus would therefore remain unchanged from existing conditions (approximately 942,000 gross square feet and 3,261 beds for approximately 3,218 student residents and approximately 43 faculty/staff).

The second paragraph on page VI-87 has been revised as follows:

Under this alternative, the number of FTE students would be capped at 7,800 and FTE faculty/staff would increase to approximately 1,800, as under the Proposed Project. LMU could therefore continue to house the same number of residents on campus ~~percentage of its undergraduate student population~~ (approximately 3,261 residents), as under existing conditions, but would not be able to increase the number of students housed on campus as under the Proposed Project.

Draft EIR Appendices

The following Draft EIR Appendices have been revised or augmented and are provided as appendices to the Final EIR:

- Appendix F-II** Revised Proposed Draft Loyola Marymount University Specific Plan (~~January 2010~~) (June 2010)
- Appendix F-IV.B.1** Air Quality Data: Revised Health Risk Assessment (~~December 2009~~) (May 2010)
- Appendix F-IV.D.3** Updated Historic Resources Assessment (~~January 2010~~) (July 2010)
- Appendix F-IV.K** Updated Transportation Impact Analysis
- Appendix F-IV.L.2** Additional Wastewater Calculations (June 2010)