Appendix A

Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and NOP Comments

ESA

A-1 NOP

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

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INFORMATION
http://planning.lacity.org

August 4, 2016

NOTICE OF PREPARATION ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

CASE NO.: ENV- 2016-2319-EIR
PROJECT NAME: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
PROJECT APPLICANT: Mount Saint Mary's University (MSMU)
PROJECT LOCATION/ADDRESS: The 3.8-acre Project Site is located within Mount Saint Mary's University's Chalon campus located at 12001 Chalon Road, Los Angeles, CA 90049.
COMMUNITY PLANNING AREA: Brentwood – Pacific Palisades Community Plan Area
COUNCIL DISTRICT: 11 – Mike Bonin
DUE DATE FOR PUBLIC COMMENTS: 4:00 p.m., September 2, 2016
SCOPING MEETING: Tuesday, August 16, 2016. See more information below.

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082, once the Lead Agency decides an Environmental Impact Report (EIR) is required for a project, a Notice of Preparation (NOP) describing the project and its potential environmental effects shall be prepared. You are being notified of the City of Los Angeles' intent, as the Lead Agency, to prepare an EIR for this Project, which is located in an area of interest to you and/or the organization or agency you represent. This EIR will be prepared by outside consultants and submitted to the Department of City Planning, Major Projects and Environmental Analysis Section, for independent review and certification.

The Department of City Planning requests your comments as to the scope and content of the EIR. Comments must be submitted in writing pursuant to directions below. If you represent an agency, the City is seeking comments as to the scope and content of the environmental information in the document which is germane to your agency's statutory responsibilities in connection with the Project. Agencies will need to use the EIR when considering permits or other approvals for the Project.

A Scoping Meeting will be held to receive input from the public as to what areas the EIR should study. No decisions about the Project are made at the Scoping Meeting. The Project description, location, and the potential environmental effects identified thus far are set forth in this document.

Also included below are the date, time, and location of the Scoping Meeting that will be held in order to solicit input regarding the content of the Draft EIR.

The Scoping Meeting is in an open house format. THIS IS NOT THE REQUIRED PUBLIC HEARING FOR MUNICIPAL CODE ENTITLEMENT REQUESTS which will be scheduled after the completion of the EIR. The environmental file is available for review at the Department of City Planning, 200 North Spring Street, Room 750, Los Angeles, CA 90012. A copy of the Initial Study prepared for the Project is not attached but may be viewed online at http://planning.lacity.org by clicking on the "Environmental Review" tab, then "Notice of Preparation & Public Scoping Meetings".

PROJECT LOCATION: The 3.8-acre Project Site is located within the northern portion of Mount Saint Mary's University's Chalon campus located at 12001 Chalon Road, Los Angeles, CA 90049. The approximate 45-acre Campus is located along a ridge crest on the southern flank of the Santa Monica Mountains approximately one mile north of Sunset Boulevard and 0.3 mile west of the San Diego Freeway (I-405). The Campus is located within the City of Los Angeles Brentwood neighborhood. The developed portion of the Campus is bounded on the north, west and east by undeveloped open space, owned by MSMU. The Getty Center owns open space approximately 0.4 miles to the southwest, which abuts the Campus. Single-family residential uses along Bundy Drive are located to the west downward of a steep sloping open space area. Single-family residential uses are also located along Chalon Road south of the Campus. Immediately south and adjacent to the Campus is the Carondelet Center (accessed off Chalon Road), a large building that serves as the provincial headquarters for the Sisters of St. Joseph of Carondelet, a separate entity from MSMU. While this property is separate from MSMU property, access to the Campus is through the Carondelet property.

PROJECT DESCRIPTION: MSMU is proposing to construct a Wellness Pavilion within the Chalon campus to replace the existing outdated fitness and recreation facilities. The existing facilities at the Campus are limited to an approximately 1,100 square foot structure that houses a small collection of exercise equipment, along with an adjacent outdoor pool area, and two tennis courts. The Project would require demolition and removal of the existing pool, tennis courts, fitness trailer, facility maintenance offices, surface parking, and landscaping. The proposed Wellness Pavilion would be a two-story, approximately 38,000 square feet multiuse building, which would house a recreation and practice gymnasium, multipurpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e., lockers, showers, restrooms, equipment storage, and mechanical spaces). The Project would also include a new outdoor pool area, landscaped open space, and a new accessory parking deck immediately adjacent and to the north of the proposed Wellness Pavilion. The accessory parking deck would include parking at grade with one level above grade atop a concrete deck. A total of 279 parking spaces would be provided, compared to the existing 226 spaces, a net increase of 53 spaces. The additional 53 parking spaces would increase the number of parking spaces located on the Campus, reducing the number of student vehicles currently parking along Chalon Road.

The Project Site would be located entirely within existing developed areas of the Campus and would not include construction activities beyond the current Campus boundaries. The on-site fitness and recreation facility would primarily be used by MSMU's student body, staff and faculty, as well as provide a practice facility for MSMU's club sports teams (volleyball, basketball). Under the existing conditions, MSMU's volleyball team practices are held off-site and require the team to be shuttled to and from the off-site practice facilities. Due to the limitations of the existing facilities, the basketball team practices, which are anticipated to commence in late August 2016, would also be held off-site. However, upon completion of the

Project both team practices would be held on-site, eliminating the team shuttle trips to and from the Campus. The facility would not be used for intercollegiate competition.

The Project does not include a request to change the permitted enrollment limitations nor will it lead to increased student enrollment. Although the Project would result in an increase of 53 parking spaces, as part of the Project MSMU is volunteering a condition of approval specifying that these new net parking spaces may never be used to increase the student enrollment cap of 2,244 students. The focus of any future University growth is currently tied to the nontraditional programs, such as the Weekend/Evening College and Graduate programs, the online program, and the associate of arts program, which are all based at MSMU's Doheny campus located just south of Downtown Los Angeles. Student enrollment at the Chalon Campus is below the maximum student enrollment limitation and has no intention of taking steps to increase enrollment at the Chalon campus.

MSMU anticipates commencing construction as early as winter 2018, with construction activities occurring for approximately 22 months until fall 2019. Full use of the proposed Wellness Pavilion would occur upon completion of the construction activities.

REQUESTED PERMITS/APPROVALS: It is anticipated that approvals required for the Project would include, but may not be limited to, the following: 1) Plan Approval (Deemed-to-be-Approved) (Per LAMC § 12.24 M) and Determination to Permit a Building Height Modification (Per LAMC § 12.24 F). MSMU is requesting approval of the proposed Wellness Pavilion, outdoor pool area, landscaped open space, and accessory parking deck on the Chalon campus, where an Educational Institution is permitted as a deemed-approved conditional use, with a building height up to 42-feet, in lieu of the 30-foot maximum that would otherwise apply. 2) Zoning Administrator's Approval for Additional Grading in Hillside Area (Per LAMC § 12.24 X.28 (a)(5)): MSMU is requesting a Zoning Administrator's Approval to exceed the "by-right" maximum for non-exempt grading (under the Baseline Hillside Ordinance) on a site in the RE40 Zone. 3) Demolition Permits: Required to remove the existing on-site structures to allow for construction of the proposed buildings. 4) Construction permits, including building, grading, excavation, foundation, and associated permits. 5) Other approvals as needed.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services (Fire and Police Police), Recreation, Transportation/Traffic, and Utilities and Service Systems (Water and Solid Waste).

PUBLIC SCOPING MEETING: A public scoping meeting in **an open house format** will be held to receive public comment regarding the scope and content of the Project's environmental analysis to be included in the Draft EIR. City staff, environmental consultants and Project representatives will be available, but no formal presentation is scheduled. You may stop by at any time between 6:00 pm and 8:00 pm to view materials, ask questions, and provide comments. The Department of City Planning encourages all interested individuals and organizations to attend this meeting. The location, date, and time of the public scoping meeting for this Project are as follows:

Date: **Tuesday, August 16, 2016**

Time: **6:00 p.m. to 8:00 p.m.**
Arrive any time between 6:00 p.m. – 8:00 p.m. to speak one-on-one with City staff and Project consultants.

Location: MSMU Chalon Campus (Tennis Courts)
12001 Chalon Road
Los Angeles, CA 90049

A temporary tent structure will be set up on the tennis courts to host the Scoping Meeting. This location is within the proposed Wellness Pavilion Project Site. Directions to the Scoping Meeting from the entrance to the Chalon Campus off Chalon Road are as follows:

1. Proceed north on road to Security kiosk.
2. Check in with Security then proceed north on road.
3. Take third right, proceed east on road to end of street, turn left.
4. Park anywhere in Lots I and J.
5. Handicapped parking available in front of tennis courts and fitness center.

(See enclosed map for directions to the Scoping Meeting location within the Campus)

The enclosed materials reflect the scope of the project (subject to change). The Department of City Planning welcomes and will consider all written comments regarding potential environmental impacts of the project and issues to be addressed in the EIR. **Written comments must be submitted to this office by 4:00 p.m., September 2, 2016.** Written comments will also be accepted at the public scoping meeting described above.

Please direct your responses to:

Mail: Kathleen King
Major Projects - Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
ENV-2016-2319-EIR

Fax: (213) 978-4656

Email: kathleen.king@lacity.org

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. The scoping meeting facility and its parking are wheelchair accessible.

Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. Other services, such as translation between English and other languages, may also be provided upon request. To ensure availability or services, please make your request no later than 7 days prior to the scoping meeting by calling Darlene Navarrete at (213) 978-1332.

Como entidad cubierta bajo el Título II del Acto de los Americanos con Desabilidades, la Ciudad de Los Angeles no discrimina. La facilidad donde la junta se llevará a cabo y su estacionamiento son accesibles para sillas de ruedas.

Traductores de Lengua de Muestra, dispositivos de oído, u otras ayudas auxiliaries se pueden hacer disponibles si usted las pide en avance. Otros servicios, como traducción de Inglés a otros idiomas, también pueden hacerse disponibles si usted los pide en avance. Para asegurar

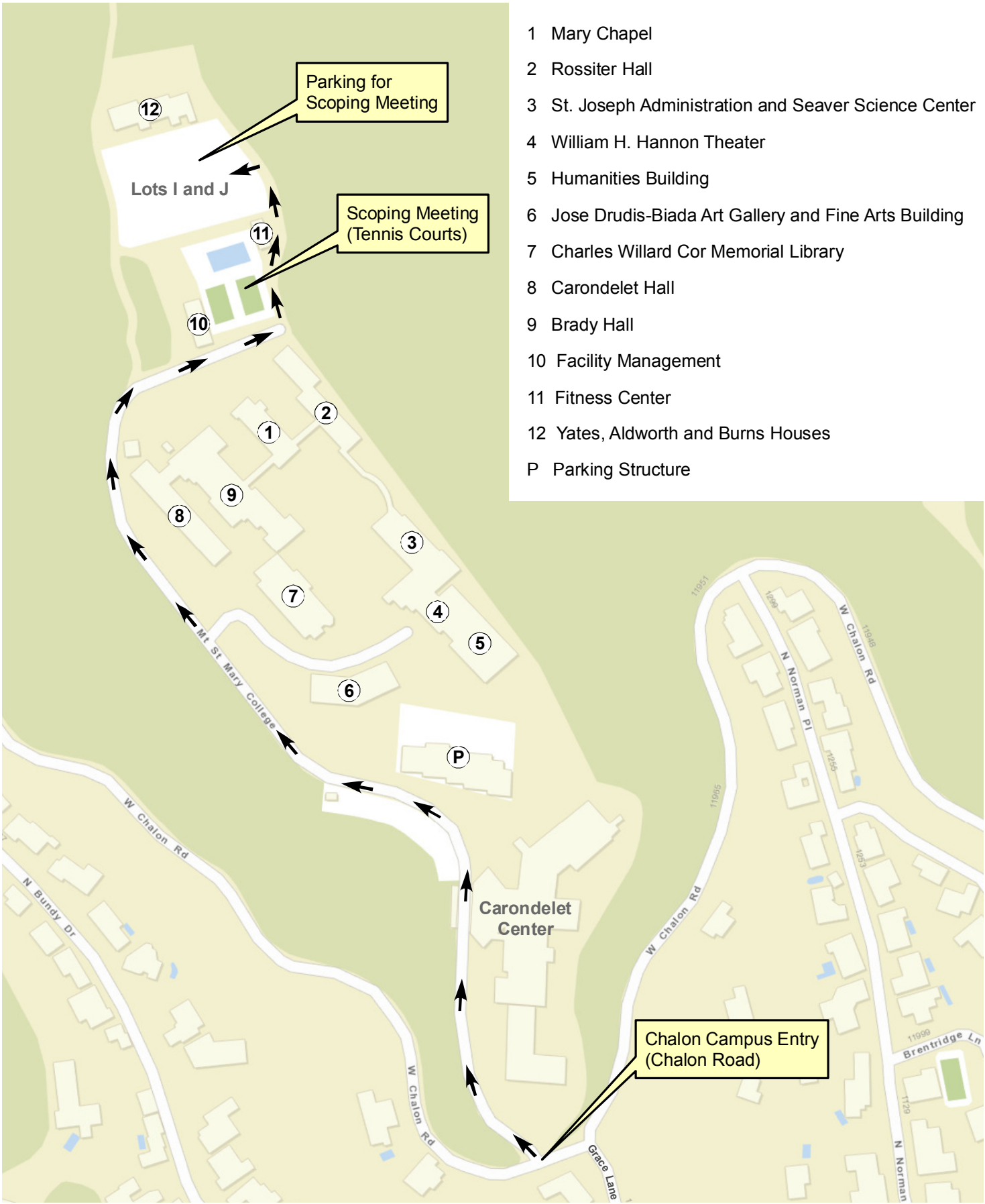
la disponibilidad de éstos servicios, por favor haga su petición al mínimo de siete días antes de la reunión, llamando a Darlene Navarrete a (213) 978-1332.

Vincent P. Bertoni, AICP
Director of Planning

Kathleen King
Planning Assistant
Major Projects

Enclosures

Scoping Meeting Map
Regional and Local Vicinity Map
Aerial View of Project Site
Site Plan
500-foot Radius Map



1 Mary Chapel
2 Rossiter Hall
3 St. Joseph Administration and Seaver Science Center
4 William H. Hannon Theater
5 Humanities Building
6 Jose Drudis-Biada Art Gallery and Fine Arts Building
7 Charles Willard Cor Memorial Library
8 Carondelet Hall
9 Brady Hall
10 Facility Management
11 Fitness Center
12 Yates, Aldworth and Burns Houses
P Parking Structure

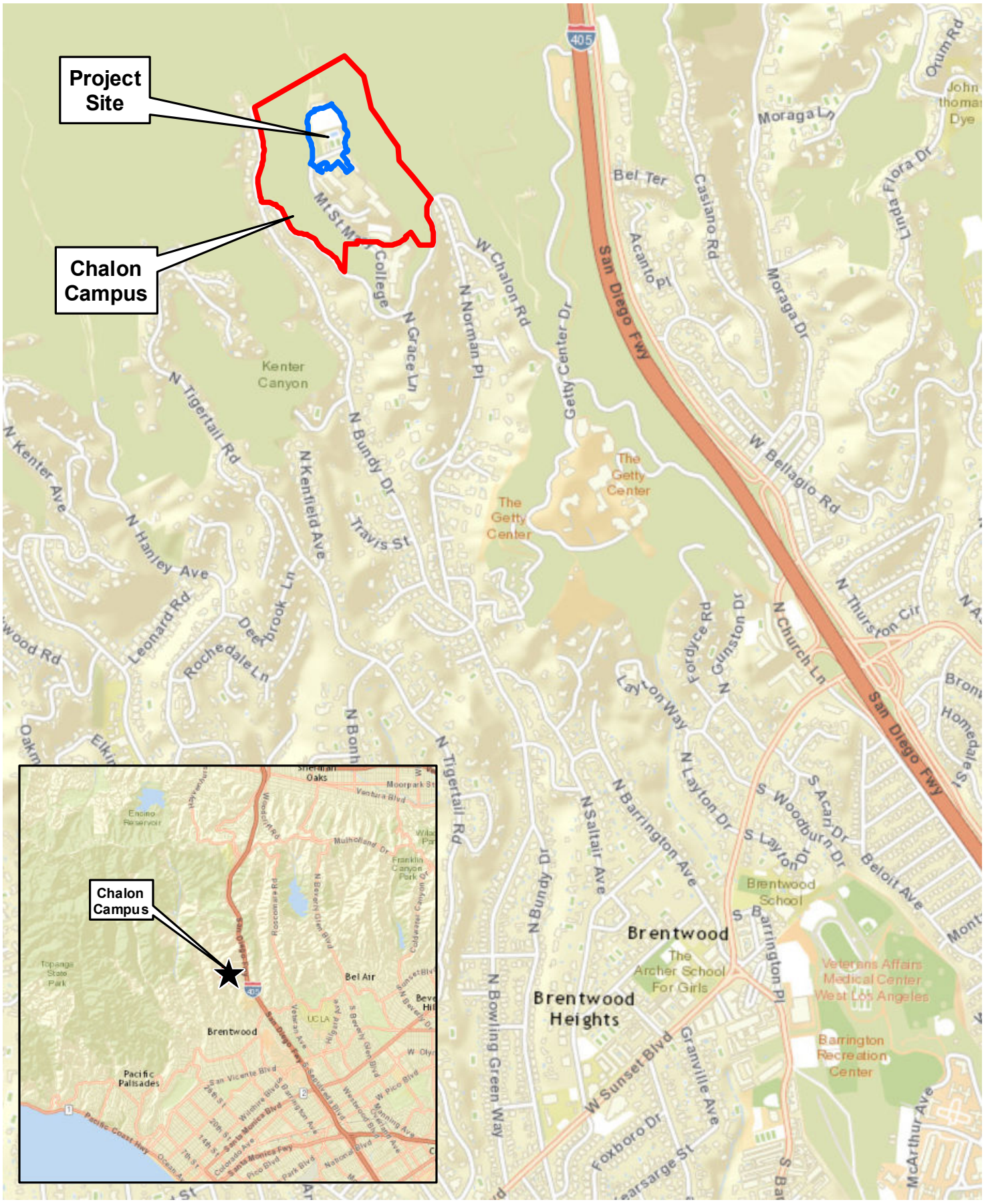
PCR

0 240 480 Feet

Scoping Meeting Map

Source: ESRI Street Map, 2009; PCR Services Corporation, 2016.

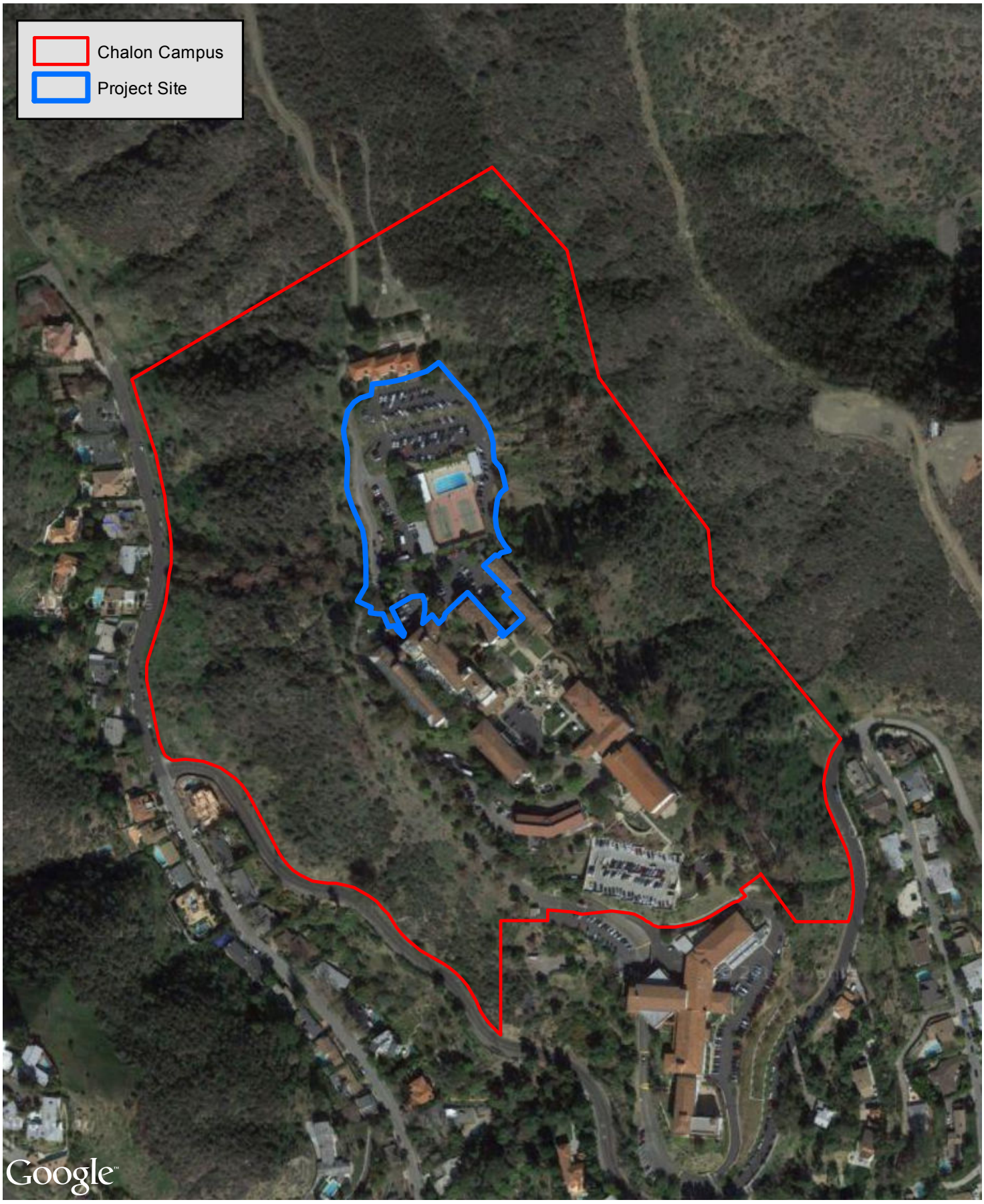
Source: ESRI Street Map, 2009; PCR Services Corporation, 2016.



Regional and Local Vicinity Map

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Source: ESRI Street Map, 2009; PCR Services Corporation, 2016.



PCR

N

0 300 600 Feet

Aerial View of Project Site

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Source: Google Maps, 2015 (Aerial); PCR Services Corporation, 2016.

PCR

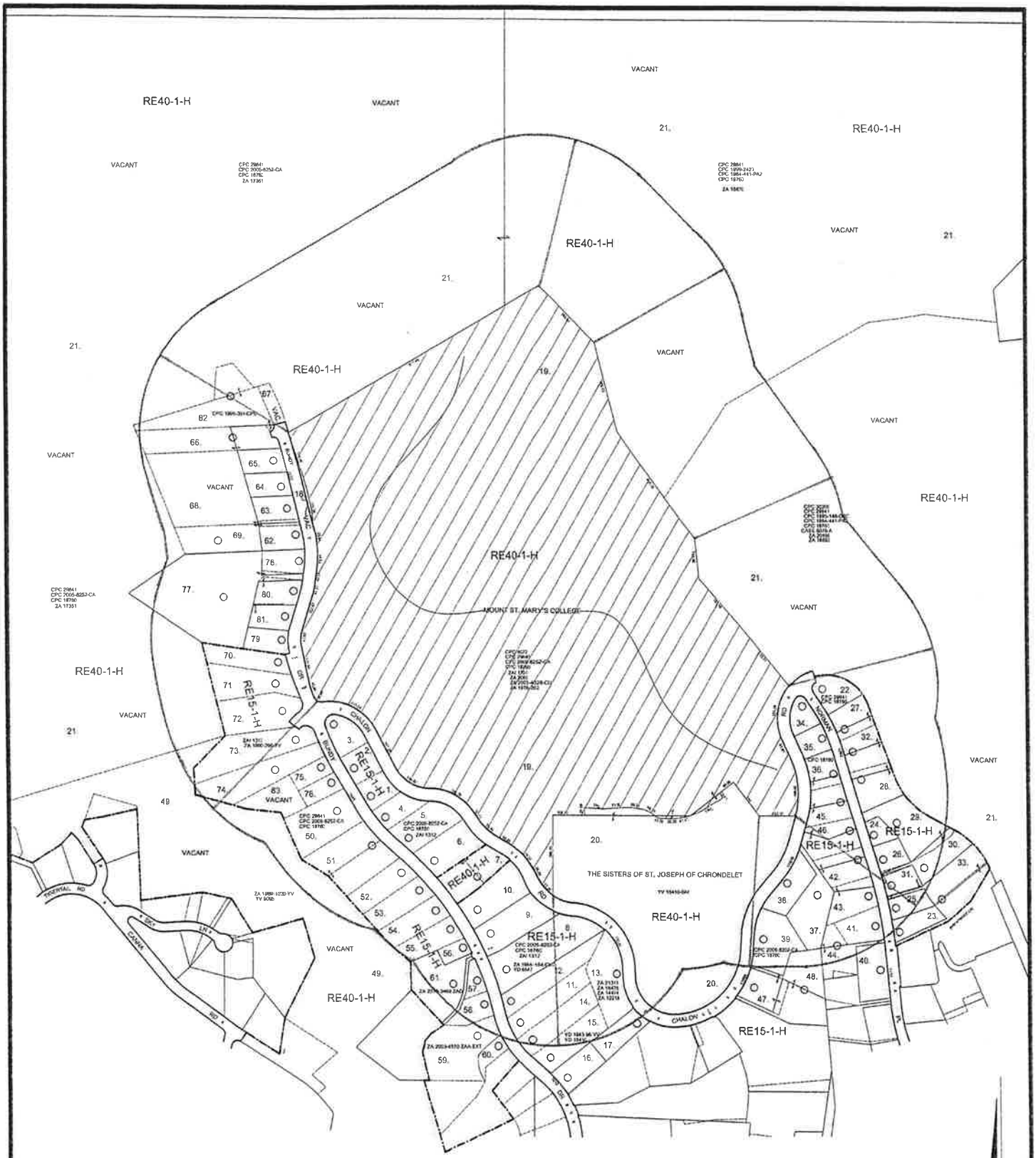
N

0 20 Feet

Site Plan

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Source: LPA, Inc., 2016.



2016-2319-EIR

C.D. 11
C.T. 2623.01
P.A. BRENTWOOD-PACIFIC PALISADES

LEGAL: PORTION OF LOTS A & B, PARCEL MAP NO. 4304. (SEE APPLICATION)

GC MAPPING SERVICE, INC.
3055 WEST VALLEY BOULEVARD
ALHAMBRA CA 91803
(626) 441-1080 FAX (626) 441-8850

45.39 NET AC.

CASE NO.
DATE: 07-22-2016
SCALE: 1" = 200'
USES FIELD
D.M. 141 B 141, 144 B 141, 141 B 137, 144 B 137
T.B. PAGE: 591 GRID: F-6, F-7

A-2 Initial Study

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

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INFORMATION
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INITIAL STUDY

BRENTWOOD – PACIFIC PALISADES COMMUNITY PLAN AREA

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Case Number: ENV-2016-2319-EIR

Project Location: Mount Saint Mary's University's Chalon Campus 12001 Chalon Road, Los Angeles, CA 90049
Council District: 11 – Mike Bonin
Project Description: Mount Saint Mary's University (MSMU), the Applicant, proposes to construct a Wellness Pavilion (the "Project") at its Chalon Campus ("Campus") to replace the existing outdated fitness, recreation, and wellness facilities located on the Campus. The existing fitness facilities are limited to an approximately 1,100 square foot ("SF") structure that houses a small collection of exercise equipment, along with an adjacent outdoor pool area and two tennis courts.

The 3.8-acre Project Site is located within a developed area of the northern portion of the 45-acre Campus in the same general area as the current fitness facilities. The Project would require the demolition and removal of the existing pool, tennis courts, fitness trailer, facility maintenance offices, surface parking, and landscaping. The Project involves the construction of the proposed Wellness Pavilion, a two-story, approximately 38,000 SF multiuse building, which would house a recreation and practice gymnasium, multipurpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e., lockers, showers, restrooms, equipment storage, and mechanical spaces). The Project would also include a new outdoor pool area, landscaped open space, and a new accessory parking deck immediately adjacent and to the north of the proposed multiuse building. The accessory parking deck would include parking at grade with one level above grade atop a concrete deck. A total of 279 parking spaces would be provided, compared to the existing 226 spaces, a net increase of 53 spaces. The additional 53 parking spaces would increase the number of parking spaces located on the Campus, reducing the number of student vehicles currently parking along Chalon Road.

The Project Site would be located entirely within existing developed areas of the Campus and would not include construction activities beyond the current Campus boundaries. The on-site fitness and recreation facility would primarily be used by MSMU's student body, staff and faculty, as well as

provide a practice facility for MSMU's club sports teams (volleyball, basketball). The facility would not be used for intercollegiate competition. If approved, construction of the Project is projected to begin as early as winter 2018, with construction activities continuing for approximately 22 months until fall 2019. Full use of the Project would occur upon completion of the construction activities.

The Applicant is requesting:

- **Plan Approval (Deemed-to-be-Approved) (Per LAMC § 12.24 M) and Determination to Permit a Building Height Modification (Per LAMC § 12.24 F)**: The City may grant a Plan Approval to allow new buildings to be erected on a portion of a lot that is currently permitted as a deemed-approved conditional use pursuant to LAMC Section 12.24 L. In addition, in connection with a Plan Approval for a deemed-approved conditional use, the City may permit buildings to exceed the applicable height standards. MSMU is requesting approval of the proposed Wellness Pavilion, outdoor pool area, landscaped open space, and accessory parking deck on the Chalon campus, where an Educational Institution is permitted as a deemed-approved conditional use, with a building height up to 42-feet, in lieu of the 30-foot maximum that would otherwise apply.

- **Zoning Administrator's Approval for Additional Grading in Hillside Area (Per LAMC § 12.24 X.28 (a)(5)):** MSMU is requesting a Zoning Administrator's Approval to exceed the "by-right" maximum for non-exempt grading (under the Baseline Hillside Ordinance) on a site in the RE40 Zone.

- **Demolition Permits:** Required to remove the existing on-site structures to allow for construction of the proposed buildings.

- **Construction permits, including building, grading, excavation, foundation, and associated permits.**

- **Other approvals as needed.**

Applicant:	Prepared By:	On Behalf of:
Mount Saint Mary's University 10 Chester Place Building 10, Third Floor Los Angeles, CA 90007	ESA PCR 2121 Alton Parkway, Suite 100 Irvine, CA 92606	City of Los Angeles Department of City Planning Major Projects Section

Table of Contents

Appendices

List of Figures

Page

List of Tables

Page

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	11 – Mike Bonin	August 4, 2016

RESPONSIBLE AGENCIES

City of Los Angeles Department of City Planning, Regional Water Quality Control Board, South Coast Air Quality Management District (SCAQMD), Los Angeles Board of Public Works, Los Angeles Building and Safety Department, Los Angeles Department of Water and Power (Board of Water and Power Commissioners), Los Angeles Cultural Heritage Commission, and Los Angeles Fire Department.

PROJECT TITLE/NO.	CASE NO.
Mount Saint Mary's University Chalon Campus Wellness Pavilion Project	ENV-2016-2319-EIR

PREVIOUS ACTIONS CASE NO.	
N/A	☐ DOES have significant changes from previous actions. ☒ DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:

Mount Saint Mary's University (MSMU), the Applicant, proposes to construct a Wellness Pavilion (the "Project") at its 45-acre Chalon campus ("Campus") to replace the existing outdated fitness facilities. The existing facilities at the Campus are limited to an approximately 1,100 square foot ("SF") structure that houses a small collection of exercise equipment, along with an adjacent outdoor pool area, and two tennis courts.

The 3.8-acre Project Site is located within a developed area of the northern portion of the Campus in the same general area as the current fitness facilities. Under the Project the existing pool, tennis courts, fitness trailer, facility maintenance offices, surface parking, and landscaping would be demolished and removed. In addition, the Project Site would be developed with the proposed Wellness Pavilion, a two-story, approximately 38,000 SF multi-use building, which would house a recreation and practice gymnasium, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e., lockers, showers, restrooms, equipment storage, and mechanical spaces). The Project would also include a new outdoor pool area, landscaped open space, and a new accessory parking deck immediately adjacent and to the north of the proposed Wellness Pavilion. The accessory parking deck would include parking at grade with one level above grade atop a concrete deck. A total of 279 parking spaces would be provided, compared to the existing 226 spaces, a net increase of 53 spaces. The additional 53 parking spaces would increase the number of parking spaces located on the Campus, reducing the number of student vehicles currently parking along Chalon Road.

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ENVIRONMENTAL SETTING:

From a broad perspective, the Campus appears as a classic hill-town, with red tile-roofed buildings perched at the top of a tall ridge. The Campus incorporates large open space areas surrounded by buildings that are, for the most part, of a Spanish Colonial Revival style. The existing Campus facilities are comprised of academic and administrative uses, residential uses, spiritual uses, recreational uses and campus operational uses including parking, facilities operations and maintenance. The Campus landscape is well-distributed, particularly in the central areas of the Campus, where the Circle and landscaped open space between the Humanities Building and the Mary Chapel form the centerpiece of the Campus. Arcaded walkways and hardscape patios provide a distinct setting for Campus events and activities within this central area of the Campus.

The existing buildings on the Campus that would be demolished and removed under the Project include the Facilities Management Buildings (approximately 4,970 SF total) and the Fitness Center (approximately 1,030 SF). The Facilities Management Buildings consist of a two- and one-story structure currently occupied by Campus facilities management staff. The current cardio and weight training facilities in the Fitness Center consist of a handful of free weights, three treadmills, one stair machine, two elliptical machines and a few strength-training machines. Unlike a majority of the Campus buildings, both the Facilities Management and Fitness Center buildings are vernacular and utilitarian in style and function, and are not of the Spanish Colonial Revival style. In addition, the pool and two tennis courts located between the Facilities Management and Fitness Center Buildings would be demolished and removed. Further, various landscaped areas, internal roads, and surface parking areas would be demolished and removed. Surface parking to be removed would include the following parking areas: Parking Lots E (4 stalls), Lot F (15 stalls), Lot G (19 stalls), G3 (9 + 13 = 22 stalls), Lot H (42 stalls), Lot I (76 stalls), and Lot J (48 stalls). Thus, the number of stalls to be removed would be 226 stalls.

Adjacent to the Project Site to the north is Building 12 (Yates, Aldworth, and Burns Houses) and an associated existing parking canopy (11 spaces). This 3-story residential building is the northernmost building on the Campus. This building was constructed in a Mediterranean Revival style, unlike the older Spanish Colonial Revival style buildings in the mid- and southern portions of the Campus. No changes would be made to Building 12 and/or the parking canopy as part of the Project.

South of the Project Site, the nearest buildings (from west to east) include: Building 8 (Carondelet Hall – 4 stories); Building 9 (Brady Hall -3 stories); Building 1 (Mary Chapel -2 stories with a low-pitched gable roof); and Building 2 (Rossiter Hall – 2 stories). These buildings vary in height, are multi-story, and are constructed in the Spanish Colonial Revival style. The buildings in the southern portion of the Campus support a variety of Campus uses.

PROJECT LOCATION:

The Project Site is located within Mount Saint Mary's University's Chalon campus located at 12001 Chalon Road, Los Angeles, CA 90049. The approximate 45-acre Campus is located along a ridge crest on the southern flank of the Santa Monica Mountains approximately one mile north of Sunset Boulevard and 0.3 miles west of the San Diego Freeway (I-405).

The Campus is located within the City of Los Angeles Brentwood neighborhood. The developed portion of the Campus is bounded on the north, west and east by undeveloped open space, owned by MSMU. The Getty Center owns open space approximately 0.4 miles to the southwest, which abuts the Campus. Single-family residential uses along Bundy Drive are located to the west downward of a steep sloping open space area. Single-family residential uses are also located along Chalon Road south of the Campus. Immediately south and adjacent to the Campus is the Carondelet Center (accessed off Chalon Road), a large building that serves as the provincial headquarters for the Sisters of St. Joseph of Carondelet, a separate entity from MSMU. While this property is separate from MSMU property, access to the Campus is through the Carondelet property.

The topography of the Campus slopes downward from north to south. The northern portion of the Campus is located at an elevation of approximately 1,150 feet above mean sea level (amsl), while the southern portion of the Campus is located at approximately 900 feet amsl. The Project Site topography varies from approximately 1,100 feet amsl in the northern portion to approximately 1,075 in the southern portion.

For further discussion see Project Description Attachment A.

PLANNING DISTRICT	STATUS:
Brentwood – Pacific Palisades Community Plan	☐ PRELIMINARY ☐ PROPOSED ☒ ADOPTED

EXISTING ZONING	MAX. DENSITY ZONING	
RE40-1-H	3:1 FAR	☒ DOES CONFORM TO PLAN
PLANNED LAND USE & ZONE Zoning = Remain as RE40-1-H Land Use = Remain as Minimum Residential	**MAX. DENSITY PLAN** --	☐ DOES NOT CONFORM TO PLAN
SURROUNDING LAND USES See above Setting Discussion and Attachment A, Project Description.	**PROJECT DENSITY** --	☐ NO DISTRICT PLAN

☞ **DETERMINATION (To be completed by Lead Agency)**

On the basis of this initial evaluation:

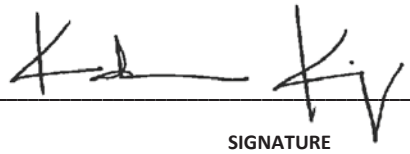
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



SIGNATURE

Assistant Planner

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).
5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
    1) Earlier Analysis Used. Identify and state where they are available for review.
    2) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    3) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
9) The explanation of each issue should identify:
    1) The significance criteria or threshold, if any, used to evaluate each question; and
    2) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☒ Aesthetics	☐ Hazards & Hazardous Materials	☒ Public Services
☐ Agriculture and Forestry Resources	☒ Hydrology/Water Quality	☒ Recreation
☒ Air Quality	☒ Land Use/Planning	☒ Transportation/Traffic
☒ Biological Resources	☐ Mineral Resources	☒ Utilities/Service Systems
☒ Cultural Resources	☒ Noise	☒ Mandatory Findings of Significance
☒ Geology/Soils	☐ Population/Housing	
☒ Greenhouse Gas Emissions		

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

☞ **BACKGROUND**

PROPONENT NAME	**PHONE NUMBER**
Mount Saint Mary's University Contact: Chris McAlary, Vice President Administration and Finance	(213) 477-2905

PROPONENT ADDRESS

Mount Saint Mary's University
10 Chester Place
Building 10, Third Floor
Los Angeles, CA 90007

AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
City of Los Angeles Department of City Planning	August 1, 2016

PROPOSAL NAME (If Applicable)

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

☞ **DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)**

PREPARED BY	**TITLE**	**TELEPHONE #**	**DATE**
Michael Harden **ESA PCR** **2121 Alton Parkway, Suite 100, Irvine, CA 92606**	**Principal Planner**	**(213) 694-3296**	**July 2016**

☞ **ENVIRONMENTAL IMPACTS** (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	☒	☐	☐	☐
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐
II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒
III. AIR QUALITY. Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	☒	☐	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?	☒	☐	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?	☒	☐	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?	☒	☐	☐	☐
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	☒	☐	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	☒	☐	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☒	☐	☐	☐
ii. Strong seismic ground shaking?	☒	☐	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv. Landslides?	☒	☐	☐	☐
b. Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☒	☐	☐	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☒	☐	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐
IX. HYDROLOGY AND WATER QUALITY. Would the project result in:				
a. Violate any water quality standards or waste discharge requirements?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☒	☐	☐	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site?	☒	☐	☐	☐
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☒	☐	☐	☐
f. Otherwise substantially degrade water quality?	☒	☐	☐	☐
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☒	☐
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other governmental services (including roads)?	☐	☐	☒	☐
XV. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐	☐
XVI. TRANSPORTATION/CIRCULATION. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e. Result in inadequate emergency access?	☐	☐	☒	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☒	☐	☐	☐
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☒	☐	☐	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☒	☐	☐	☐
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b. Does the project have impacts which are individually limited, but cumulatively considerable?("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☒	☐	☐	☐
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

ATTACHMENT A: PROJECT DESCRIPTION

A. INTRODUCTION

Mount Saint Mary's University (MSMU) is an independent, Catholic, liberal arts university with two campuses in the City of Los Angeles, California: the 15-acre Doheny Campus just north of the University of Southern California near downtown Los Angeles, which opened in 1962 on the historic Doheny family estate; and the 45-acre Chalon campus established in 1928 in the Brentwood neighborhood. Mount Saint Mary's is the only women's university in Los Angeles. A leading liberal arts institution with a total student enrolment of over 3,400, MSMU is known nationally for its research on gender equity, its innovative health and science programs, and its commitment to community service. In fall 2015, 1,561 students were enrolled at the Chalon campus.

The proposed Wellness Pavilion (the "Project") would be constructed on the Chalon campus ("Campus") and would replace the existing outdated fitness, recreation, and wellness facilities. The existing facilities are limited to an approximately 1,100 square foot ("SF") structure which houses a small collection of exercise equipment, along with an adjacent outdoor pool area, and two tennis courts.

The 3.8-acre Project Site is located within a developed area of the northern portion of the 45-acre Campus in the same general area as the current fitness facilities. The Project would require demolition and removal of the existing pool, tennis courts, fitness trailer, facility maintenance offices, surface parking, and landscaping. The Project involves the construction of the proposed Wellness Pavilion, a two-story, approximately 38,000 SF[1] multiuse building, which would house a recreation and practice gymnasium, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e., lockers, showers, restrooms, equipment storage, and mechanical spaces. The Project would also include a new outdoor pool area, landscaped open space, and a new accessory parking deck adjacent and to the north of the proposed Wellness Pavilion. The accessory parking deck would include parking at grade with one level above grade atop a concrete deck. A total of 279 parking spaces would be provided, compared to the existing 226 spaces, a net increase of 53 spaces. The additional 53 parking spaces would increase the number of parking spaces located on the Campus, reducing the number of vehicles currently parking along Chalon Road.

The on-site fitness and recreation facility would primarily be used by MSMU's student body, staff and faculty, as well as provide a practice facility for MSMU's club sports teams (volleyball, basketball). Under the existing conditions, MSMU's volleyball team practices are held off-site and require the team to be shuttled to and from the off-site practice facilities. Due to the limitations of the existing facilities, the basketball team practices, which are anticipated to commence in late August 2016, would also be held off-site. However, upon completion of the Project both team practices would be held on-site, eliminating the team shuttle trips to and from the Campus. The facility would not be used for intercollegiate competition.

[1] *The Wellness Pavilion's square footage represents the total floor area of the building, as calculated using the definition of "Floor Area" in Section 12.03 of the Los Angeles Municipal Code (LAMC) which excludes various facilities, including, but not limited to, basement storage, parking areas with associated driveways and ramps, and stairways and building-operating equipment.*

1. Project Information

Project Title: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Project Location: 12001 Chalon Road Los Angeles, CA 90049

Project Applicant: Mount Saint Mary's University

Lead Agency: City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

2. Organization of this Initial Study

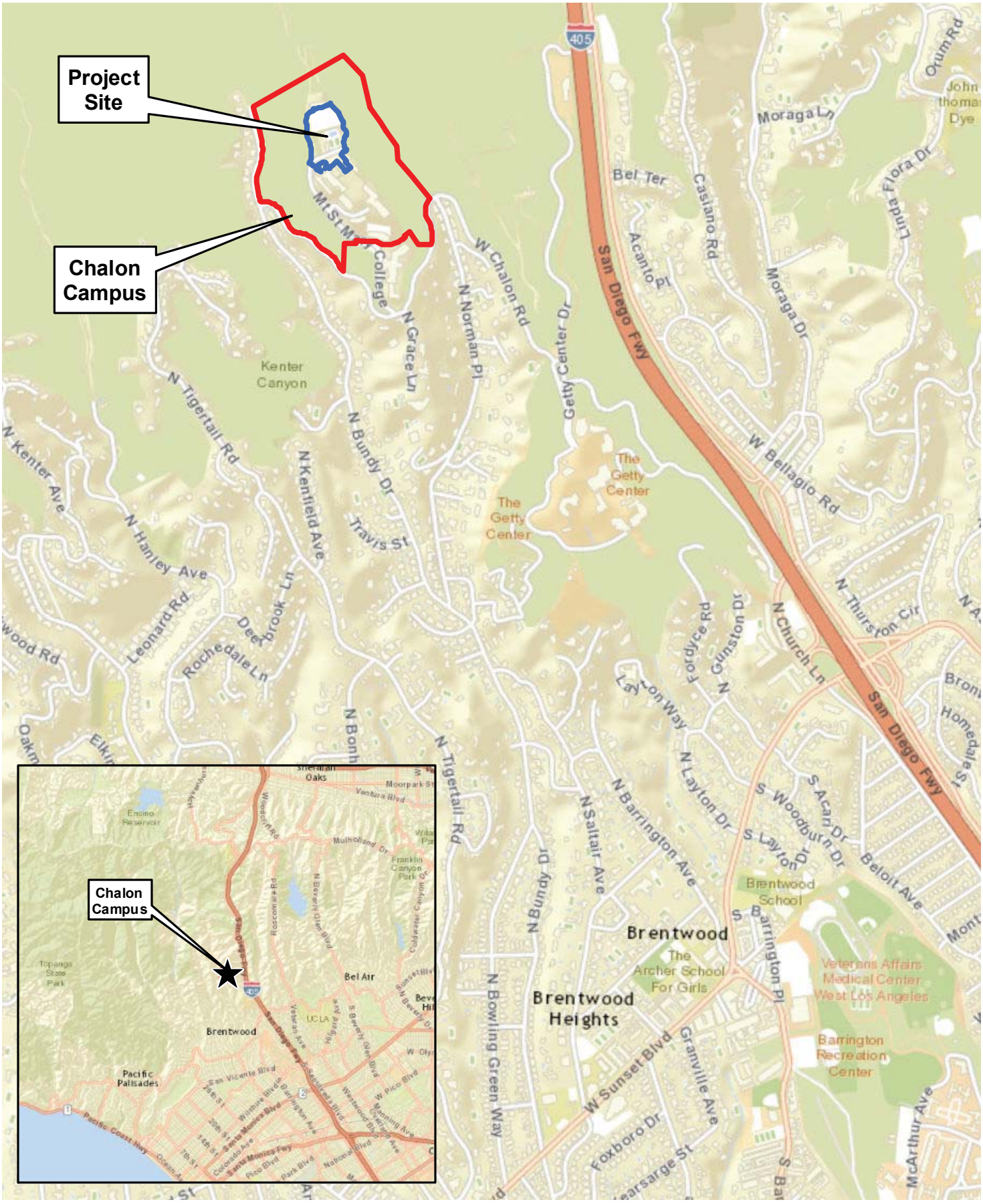
This initial study is organized into three sections as follows:

- Project Description/Introduction: This section provides introductory information such as the Project title, the Applicant and the lead agency for the Project as well as a detailed description of the environmental setting and the Project, including Project characteristics and environmental review requirements.
- Initial Study Checklist: This section contains the completed City of Los Angeles Initial Study Checklist.
- Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. Potentially significant effects identified in the Initial Study Checklist will be evaluated further in the EIR.

B. PROJECT LOCATION, ACCESS AND SURROUNDING USES

The 45-acre Campus is located along a ridge crest on the southern flank of the Santa Monica Mountains approximately one mile north of Sunset Boulevard and 0.3 mile west of the San Diego Freeway (I-405). Through an agreement with the Brentwood Homeowners Association and in order to divide traffic between the two streets leading directly to the Campus, the prescribed route for vehicle traffic traveling from Sunset Boulevard to the Campus is Norman Place to Chalon Road, while the prescribed route for traffic leaving the Campus is Chalon Road, south on Bundy Drive to Sunset Boulevard. **Figure A-1**, *Regional and Local Vicinity Map*, illustrates the location of the Campus from a regional and local perspective.

The Campus is located within the City of Los Angeles Brentwood neighborhood. The developed portion of the Campus is bounded on the north, west and east by undeveloped open space owned by MSMU. The Getty Center owns open space approximately 0.4 miles to the southwest, which abuts the Campus. Single-family residential uses along Bundy Drive are located to the west downward of the steep sloping open space area which supports the elevated Campus Site. Single-family residential uses are also located along Chalon Road south of the Campus. Immediately south and adjacent to the Campus is the Carondelet Center (accessed off Chalon Road), a large building that serves as the provincial headquarters for the Sisters of St. Joseph of Carondelet, a separate entity from MSMU. While this property is separate from MSMU property, access to the Campus is through the Carondelet property. **Figure A-2**, *Aerial View of Project Site*, shows an aerial view of the Campus, the Project Site, and surrounding land uses.



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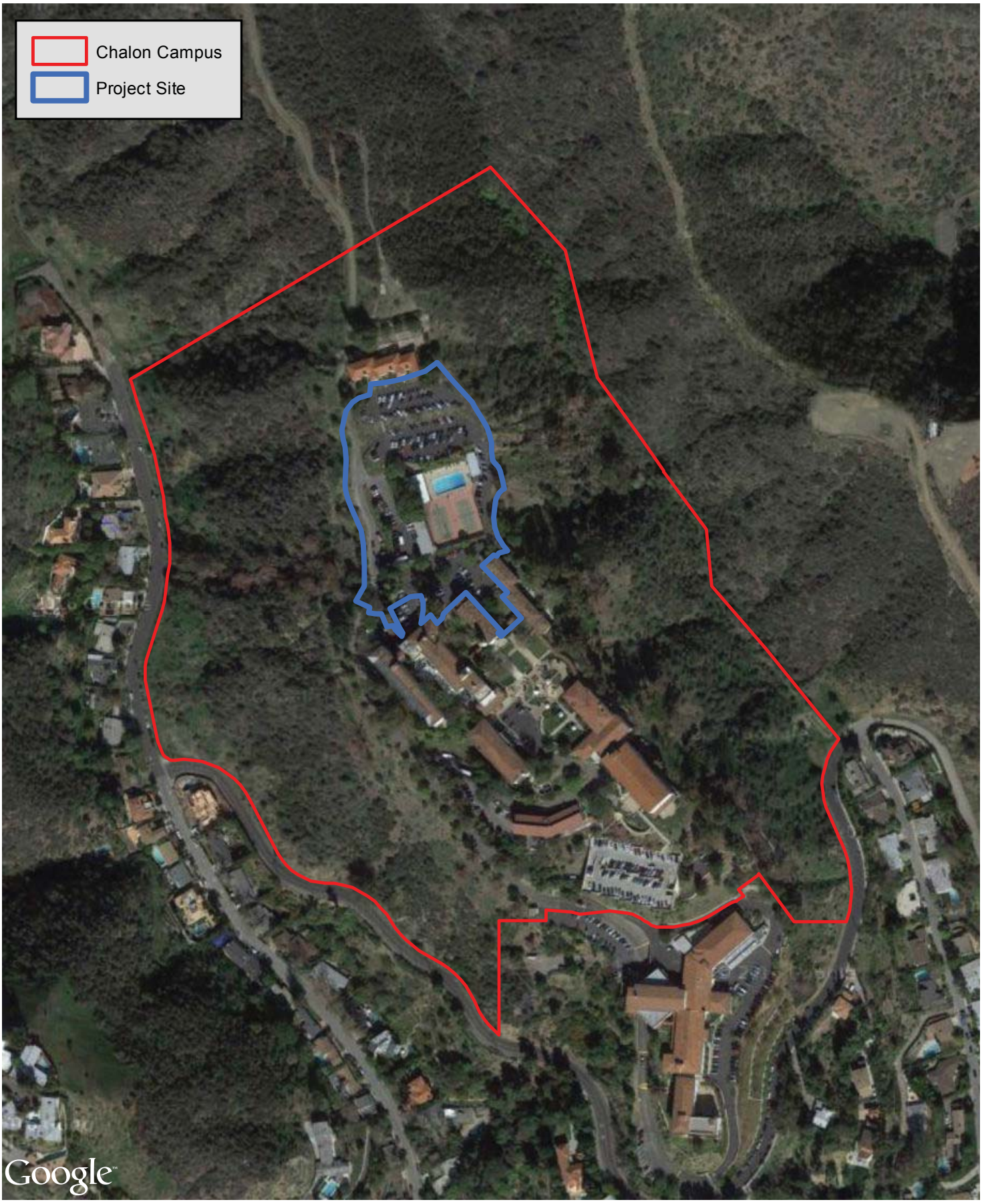
Regional and Local Vicinity Map

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Source: ESRI Street Map, 2009; PCR Services Corporation, 2016.

FIGURE

A-1



PCR

N

0 300 600 Feet

Aerial View of Project Site

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: Google Maps, 2015 (Aerial); PCR Services Corporation, 2016.

FIGURE
A-2

The topography of the Campus slopes downward from north to south. The northern portion of the Campus is located at an elevation of approximately 1,150 feet above mean sea level (amsl), while the southern portion of the Campus is located at approximately 900 feet amsl. The Project Site topography varies from approximately 1,100 feet amsl in the northern portion to approximately 1,075 in the southern portion.

C. EXISTING CONDITIONS

1. Campus Uses

From a broad perspective, the Campus appears as a classic hill-town, with red tile-roofed buildings perched at the top of a ridge crest. The Campus incorporates a variety of open spaces, plazas, courts and patios, surrounded by buildings and following the topographic conditions using a variety of retaining walls, grand stairs, colonnades, and terracing. **Figure A-3**, *Chalon Campus Existing Facilities and Uses*, shows the existing Campus and the current uses of its facilities, which comprise academic and administrative uses, residential uses, spiritual uses, recreational uses and Campus operational uses including parking, facilities operations and maintenance. The Campus landscape is well-distributed, particularly in the central area of the Campus, where the "Circle." An area consisting of landscaped open space areas and hardscape patios between the Humanities Building and the Mary Chapel, forms the centerpiece of the Campus and provides a distinct setting for Campus events and activities.

Adjacent to the Project Site to the north is Building 12 (Yates, Aldworth, and Burns Houses) and an associated existing parking canopy (11 spaces). This 3-story residential building is the northernmost building on the Campus. This building was constructed in a Mediterranean Revival style, unlike the older Spanish Colonial Revival style buildings in the mid- and southern portions of the Campus. No changes would be made to Building 12 and/or the parking canopy as part of the Project.

South of the Project Site, the nearest buildings (from west to east) include: Building 8 (Carondelet Hall – 4 stories); Building 9 (Brady Hall -3 stories); Building 1 (Mary Chapel -2 stories with a low-pitched gable roof); and Building 2 (Rossiter Hall – 2 stories). These buildings vary in height, are multi-story, and are constructed in the Spanish Colonial Revival style. The buildings in the southern portion of the Campus support a variety of Campus uses as listed in Figure A-3.

The Campus has been deemed eligible for the National Register and is listed in the California Register as a historic district at the local level for its association with a recognized architectural style and locally-known architects. The potential district consists of six contributing buildings: (1) Brady Hall; (2) Mary Chapel; (3) Rossiter Hall; (4) St. Joseph's Hall; (5) Charles Willard Coe Memorial Library; and (6) Carondelet Hall. Non-contributing buildings include the Chalon Fitness Center Facilities (located at the north end of the Campus, including the pool, tennis courts and gym), the Drudis-Biada Hall (2-story buildings completed in 1974 in the Modern Style) and the six-level parking structure. None of the buildings identified as contributing to the potential historic district would be modified or removed in connection with the Project.

2. Internal Circulation, Parking and Transit

Traffic must pass under the Carondelet Center building in order to enter the Campus itself. Within the Campus, the single roadway continues along the southwestern boundary, providing access to the existing parking structure and to the center of the Campus (the Circle) and continues northwest, where it divides into

two branches, to the right for entering traffic and to the left for existing traffic. Internal circulation within the Campus is shown on **Figure A-4**, *Chalon Campus Existing Vehicle Circulation and Parking Facilities*.

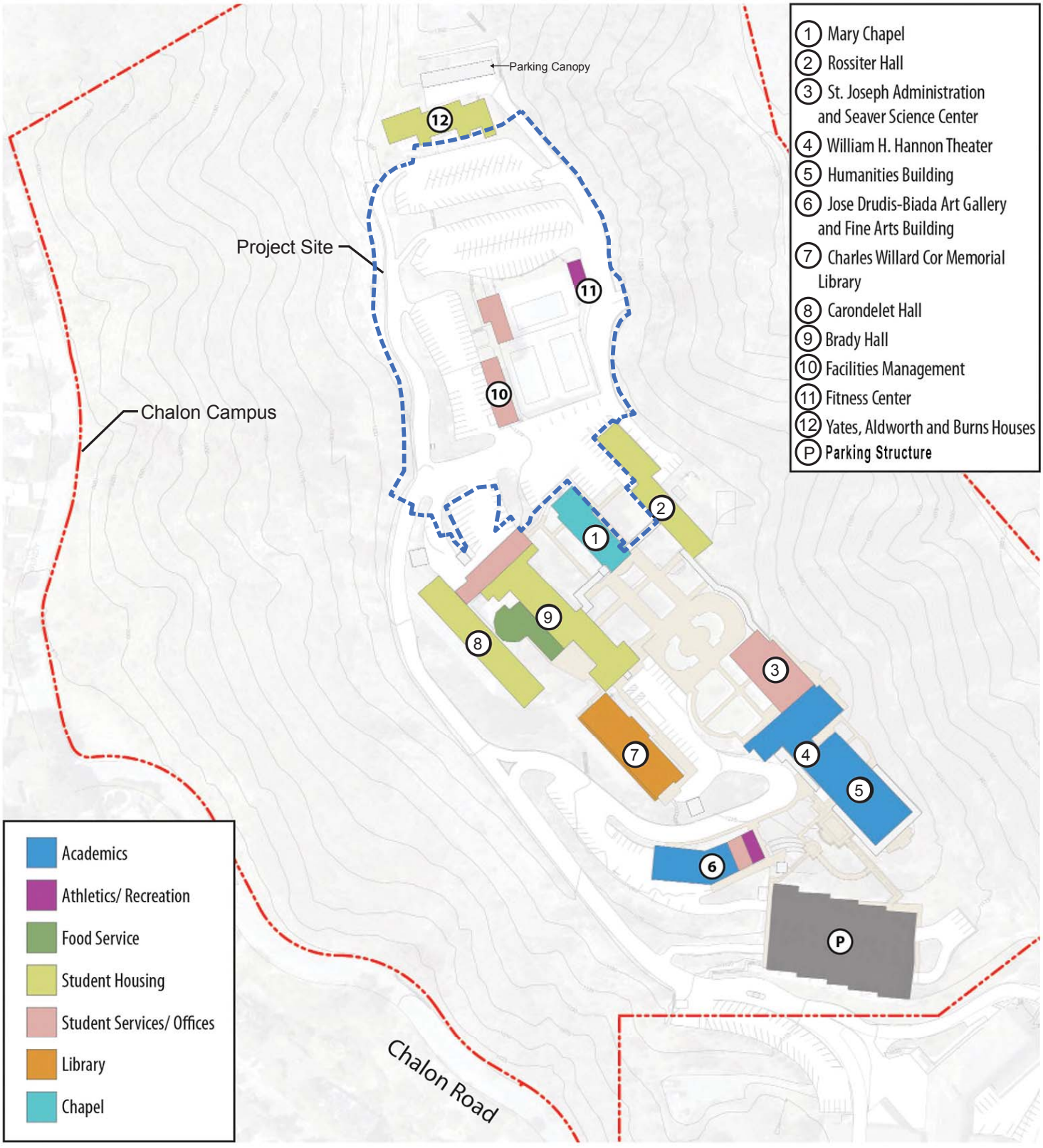
Surface parking lots and a parking structure (Lot A) provide on-site Campus parking, as shown in Figure A-4. A total of 561 parking spaces are provided on the Campus. Figure A-4 also presents an inventory of the existing on-Campus parking supply. The surface parking lots range in size from 5 to 76 spaces, with the parking structure providing 237 spaces. MSMU monitors the number of cars throughout the day and night, maintaining a daily/weekly parking log.

On-street parking is unrestricted on the surrounding local streets near the Campus. In addition to on-site Campus parking, Campus users currently park on Chalon Road along with non-Campus users, including residents and visitors. Approximately 107 parking spaces are located within a quarter mile walking distance from the Campus along Chalon Road.

To reduce parking impacts in the adjacent single-family neighborhood, MSMU has implemented transportation demand management (TDM) strategies, such as providing transit subsidies and shuttle improvements, to encourage the use of alternative modes of transportation. In addition, if events are scheduled for over 50 people during the day and could impact parking on the Campus, MSMU is required to provide valet parking for event attendees. This policy ensures attendee vehicles are housed on the Campus and not on the surrounding neighborhood streets.

The Campus is not served by public transportation; however, MSMU operates inter-campus shuttle service Monday through Friday that transports students, faculty and staff between the Chalon and the Doheny campuses. Shuttles depart hourly from the Chalon campus between 6:00 AM to 10:30 PM Monday to Thursdays, with hourly shuttles departing up to 5:00 PM on Fridays. Shuttles depart hourly from the Doheny Campus 5:25 AM to 9:30 PM Monday through Thursdays, with hourly shuttles departing up to 4:00 PM (besides at 3:00 PM) on Fridays. Also, shuttle services are available from Union Station to the Doheny Campus, which include 3 daily routes to/from the Doheny campus Monday through Friday. MSMU is also investigating the feasibility of operating shuttle service between the Chalon campus and Expo Line stations, which may result in a reduction of the number of inter-campus shuttle trips. Besides the inter-campus shuttles, MSMU's shuttle service also provides daily transit to local shopping and entertainment destinations in the Santa Monica and Westwood areas, with shuttles running Monday through Sunday.

MSMU also operates a "soft rideshare program." This program offers students, faculty and staff a monthly $50 transit subsidy, carpool program, free TAP card, a guaranteed ride home program, Enterprise Carshare Program, a website with transportation options, and park and rideshare information. In addition, MSMU students have access to ZimRide vehicles, an online carshare matching program. Riders can load their TAP card on the Doheny campus, and purchase a discount transit pass through Metro. MSMU shuttles pick up and drop off students, faculty and staff at the Metro bus stop located at Bundy Drive and Saltair Avenue, which affords them access to the Campus via public transportation. To ensure that riders access the stop by public transportation, they must register with Commuter Services and show proof of public transit use to access the shuttle.



PCR

N

0 200 Feet

Chalon Campus Exisitng Facilities and Uses

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

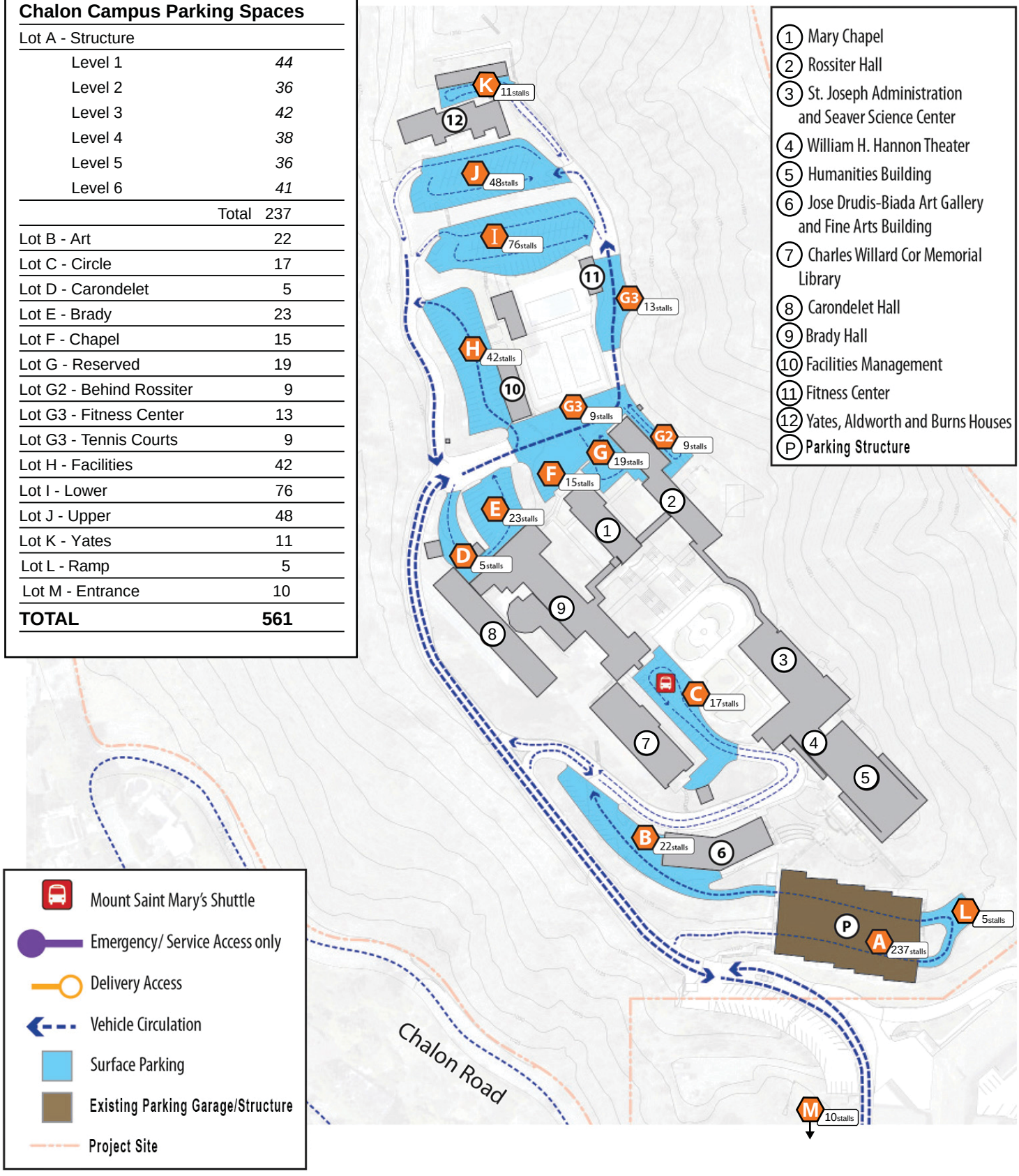
Source: Mount Saint Mary's University, 2016.

FIGURE

A-3

Chalon Campus Parking Spaces

Lot A - Structure		
	Level 1	*44*
	Level 2	*36*
	Level 3	*42*
	Level 4	*38*
	Level 5	*36*
	Level 6	*41*
	Total	237
Lot B - Art		22
Lot C - Circle		17
Lot D - Carondelet		5
Lot E - Brady		23
Lot F - Chapel		15
Lot G - Reserved		19
Lot G2 - Behind Rossiter		9
Lot G3 - Fitness Center		13
Lot G3 - Tennis Courts		9
Lot H - Facilities		42
Lot I - Lower		76
Lot J - Upper		48
Lot K - Yates		11
Lot L - Ramp		5
Lot M - Entrance		10
TOTAL		**561**



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N

0 200 Feet

Chalon Campus Existing Vehicle Circulation and Parking Facilities

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Source: Mount Saint Mary's University, 2016.

FIGURE

A-4

MSMU has implemented a number of other measures to help reduce traffic to the Chalon campus, which include, but are not limited to:

- Relocated all of the nontraditional programs, including the Physical Therapy, Accelerated Nursing and Weekend/Evening College program from the Chalon to the Doheny campus between 2006 and 2008 (reduction of approximately 400 students in all programs);
- Commencement ceremony moved from the Chalon campus beginning in 2007 (as of last year, when Commencement was held at Shrine Auditorium, venue held 6,000 students and families).
- Fall 2007, camera installed at MSMU's entrance at Chalon Road to monitor violations of the policy mandating the prescribed routes for traffic traveling to and from the Campus. Vehicles are not permitted to make a left turn when exiting or entering the Campus. Those in violation are fined $75.
- June 2008, MSMU paid for the installation of a traffic calming sign ($15,000 commitment). The sign was installed by the City near Bundy Drive and Benmore Terrace.
- As a result of concerns raised by neighbors in 2010, the policy on weddings and wedding receptions at the Campus was overhauled. Currently a minimal number of weddings, if any, are held each year. No receptions are permitted on the Campus. No weddings were held in 2015, and only one was held in 2014.
- Expansion of shuttle system to reduce the number of single-passenger cars traveling between the Doheny and Chalon campuses.

Currently, the shuttle parking space is located in front of the Library, in the Circle area. Pedestrians walking from the Circle area to buildings in the southern areas of the Campus frequently walk through vehicle areas and roadways (that lack a dedicated space for pedestrians) near the Library shuttle area, creating pedestrian-vehicular conflicts. Also, the pedestrian route leading to the academic portion of the Campus from the housing facilities located in the northern portion of the Campus, (Yates, Aldworth, and Burns Houses), proceeds along roadways and through parking lots, creating an unsafe situation.

3. Campus Enrollment and Staffing

MSMU grants degrees in Traditional Undergraduate, Non-Traditional Undergraduate and Graduate programs.[2] As of the fall of 2015, the total MSMU enrollment was 3,483; of these, 1,561 students were enrolled in the Traditional Undergraduate program centered on the Chalon campus. The remaining 1,922 students were enrolled in Non-Traditional Undergraduate and Graduate programs available online or at the Doheny campus. Academic programs held on Chalon campus or Doheny campus include the following:

Chalon Campus:

- Traditional undergraduate: baccalaureate program

Doheny Campus:

- Non-Traditional undergraduate Weekend/Evening College program

[2] *Traditional Undergraduate students are generally those who enroll in college immediately after graduation from high school, pursue their studies on a full-time basis, and complete their bachelor's degrees in 4 or 5 years at an age of typically 22 or 23. While there is no formal definition of a Non-Traditional Undergraduate student, these students are typically part-time students and often have not enrolled in college immediately after high school.*

- Graduate program
- Non-traditional undergraduate nursing programs (day/evening)
- Doctoral program for physical therapy
- Traditional undergraduate: associate of arts program
- MSMU Online

Per MSMU's current land use entitlement as a deemed approved conditional use, the Chalon campus' maximum enrollment is 2,244 students and is currently operating at approximately 70 percent of the Campus' enrollment cap. Specifically, MSMU's Chalon campus is allowed four students per parking space. With the existing 561 parking spaces, MSMU is therefore permitted a maximum enrollment of 2,244 students (561 x 4 = 2,244). The Project does not include a request to change the permitted enrollment limitations nor will it lead to increased student enrollment.[3] Although the Project would result in an increase of 53 parking spaces, as part of the Project MSMU is volunteering a condition of approval specifying that these new net parking spaces shall never be used to increase the student enrollment cap of 2,244 students. The focus of any future University growth is currently tied to the nontraditional programs, such as the Weekend/Evening College and Graduate programs, the online program, and the associate of arts program, which are all based at the Doheny campus. MSMU has consistently been below the maximum student enrollment cap and has no intention of taking steps to increase enrollment at the Chalon campus.

There are currently 176 staff members (administration, maintenance, executives, etc.) at the Chalon campus, many of whom oversee areas at both campuses. There are 63 full-time faculty (teachers) and 210 part-time faculty at Chalon campus.

4. Existing Campus Events

There are typically a number of events held on the Campus which draw visitors beyond the student body, staff and faculty already on Campus. For purposes of this analysis, events are defined as having over 50 people during the day and having potential to impact on-site Campus parking. The events are categorized as ""External Events" or "Internal Events with Outside Traffic." External Events consist of non-MSMU events for which MSMU rents out its facilities. Internal Events with Outside Traffic are MSMU-related events which include visitors in addition to the student body, staff and faculty already on Campus. Most recently, in 2015, the Campus hosted a total of 42 events, with 12 being External Events and 30 being Internal Events with Outside Traffic. In 2016, staff anticipates approximately 50 events will be held on the Campus. The majority of events take place in one of three locations on Campus which include: Campus Center, located on the 1st floor of the Humanities Building (up to approximately 350 attendees); Hannon Theater (350 seats); and the Circle, a centrally located outdoor plaza/gathering area.

The number of attendees at External Events and Internal Events with Outside Traffic varies depending on the type of event. Typically, the number of attendees ranges from approximately 50 to 450 people per event, with the following events notable exceptions.

Regarding Internal Events with Outside Traffic, the largest annual event is often Student Orientation (1,000 attendees) which is generally held over the course of an entire weekend. This is an event for newly-admitted students and their families. Other notable yearly Internal Events with Outside Traffic include Admitted

[3] *Upon completion and operation of the Project, MSMU would hire one additional staff member to act as the wellness manager.*

Students Day (300 attendees over a weekend – 2 days), Residence Move-In Days (500 attendees over a weekend - 2 days), Mary's Day (500 attendees, all-day weekend day – 1 day), Open House (500 attendees, all-day weekend day – 1 day).

Parking for all events is provided on the Campus. As described above, if events are scheduled for over 50 people during the day and could impact parking on the Campus, MSMU is required to provide valet parking. Valet parking is provided in Lot H and within the parking structure (Lot A). Because MSMU includes free valet parking with ticket purchases and/or RSVPs, which are required for all events and limited to a certain number, MSMU can ensure that valet parking is available on Campus for all events with 50 attendees or more. Further, at the end of large Campus events, Campus Security stations Community Relations Officers in the neighborhood around Bundy Drive and Saltair Avenue monitor traffic leaving Campus and remind event attendees to slow down while driving through the neighborhood.

Under the Project a limited number of changes to existing events would occur. The "Future Campus Events" subsection below provides a detailed discussion of the potential changes to existing events and potential new events that could occur with implementation of the Project. The Project's net increase of 53 parking spaces would further ensure that event parking is contained within the Campus.

5. On-Site Uses to be Removed and Demolished by Project

The existing buildings on the Campus that would be demolished and removed under the Project are Building(s) #10 (Facilities Management – approximately 4,970 SF total) and Building #11 (Fitness Center – approximately 1,030 SF), which are shown in Figure A-3. The Facilities Management Buildings include a one- and two-story structure currently occupied by Campus facilities management staff. Within the Facilities Management Buildings are two apartment units for Campus facilities management staff and facilities management office spaces. The current cardio and weight training facilities in the Fitness Center consist of a handful of free weights, three treadmills, one stair machine, two elliptical machines and a few strength training machines. Unlike most of the other Campus buildings, both the Facilities Management and Fitness Center buildings are vernacular and utilitarian in style and function and are not of the Spanish Colonial Revival style. Also, the pool and two tennis courts, located between the Facilities Management and Fitness Center Buildings would be removed. **Figure A-5**, *Existing Fitness Facilities to be Removed*, shows the existing fitness facilities to be removed by the Project.

In addition, internal roads and parking areas within the Project Site would be removed as part of the Project. Surface parking to be removed would include the following parking areas: Parking Lots E (4 stalls), Lot F (15 stalls), Lot G (19 stalls), G3 (9 + 13 = 22 stalls), Lot H (42 stalls), Lot I (76 stalls), and Lot J (48 stalls). Thus, the overall number of stalls to be removed would be 226 stalls. These stalls are illustrated on Figure A-4. Several landscaped areas would be removed as a result of the Project. Approximately 6,850 SF of area within the Project Site would not be impacted by the Project.

Below is a summary of the areas to be removed by the Project:

Facilities to be Removed by Project	Approximate Square Footage
Structures (building footprint)	4,300 SF
Pool and Deck	7,200 SF
Tennis Courts	13,500 SF
Parking Lots	64,900 SF
Roads	36,900 SF
Landscape	31,700 SF
Non-Impacted land within Project Site limits	6,850 SF
Total	**165,350 SF or 3.8 acres**

D. PLANNING AND ZONING

The Campus is located within the Brentwood – Pacific Palisades Community Plan Area in the City of Los Angeles. The Campus has a General Plan land use designation of Minimum Residential and is currently zoned RE40-1-H. "RE" stands for Residential Estate Zone, which is primarily intended for residential uses. The "H" indicates the Campus is located in the City's Hillside Area , with the "1" indicating Height District 1. Height District 1 in the RE40 Zone allows maximum building heights of up to 36 feet (roof slopes of 25% or greater) or 30 feet (roof slopes of less than 25%).

In the RE40 Zone, Educational Institutions, such as MSMU, are allowed pursuant to a conditional use permit (CUP). However, MSMU operates as a "deemed to be approved" conditional use because its use of the Chalon campus predates such CUP requirement. Per prior approvals consistent with the Chalon campus's deemed to be approved status, the construction of new buildings on the Chalon campus is allowed pursuant to a Plan Approval.

E. DESCRIPTION OF PROJECT

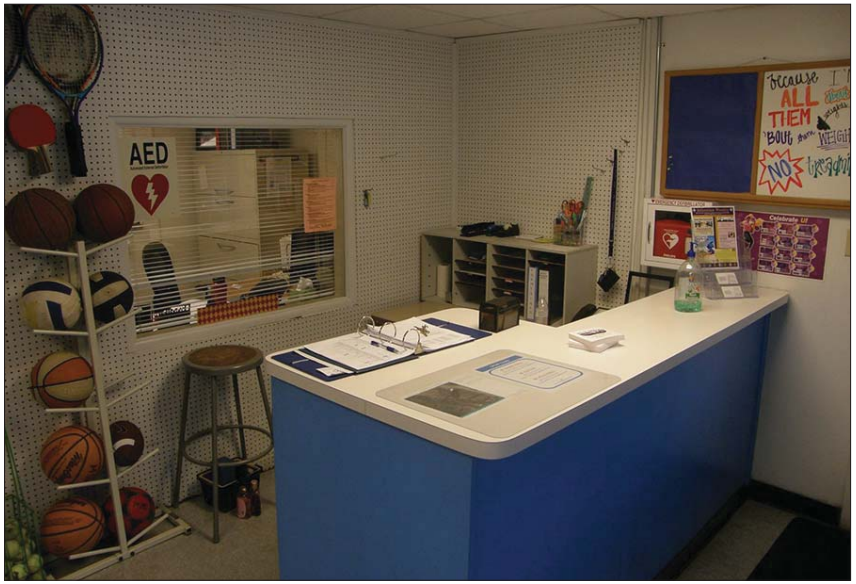
1. Wellness Pavilion Features

The Project would update the existing inadequate fitness, recreation, and wellness facilities for existing and future students. The proposed Wellness Pavilion would be an approximately 38,000 SF, 2-story facility located in the northern portion of the Campus. The proposed Wellness Pavilion, along with an accessory parking deck, roadway and landscape improvements would be located on approximately 3.8-acres within the Campus. The site plan for the proposed Wellness Pavilion is illustrated in **Figure A-6**, *Site Plan*. The 1st and 2nd floor plans are illustrated in **Figure A-7**, *1st Floor Plan*, and **Figure A-8**, *2nd Floor Plan*, respectively.

The Wellness Pavilion would include the following primary indoor features:[4]

[4] *SF shown for Wellness Pavilion features are approximations for planning purposes only. Additional support spaces such as locker rooms, showers, equipment storage rooms, laundry room, lobby, etc., as well as internal circulation spaces, account for the SF not shown as part of the primary indoor features.*

Exterior view of fitness center and pool.



Check in desk in fitness center.

Interior of fitness center.

Basketball court and tennis court.

PCR

Existing Fitness Facilities to be Removed

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: PCR Services Corporation, 2013.

FIGURE
A-5

PCR

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0 20 Feet

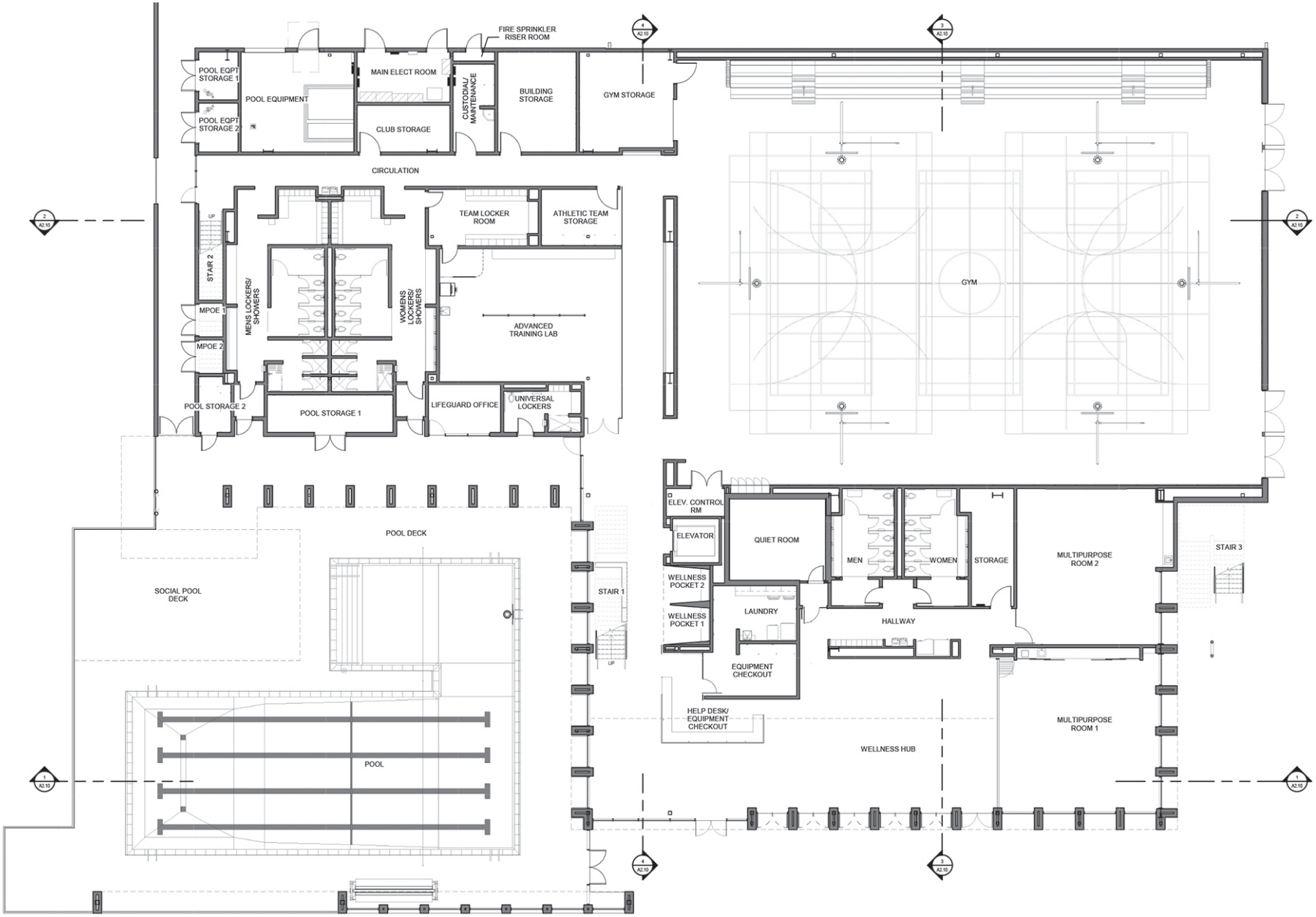
Site Plan

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Source: LPA, Inc., 2016.

FIGURE

A-6



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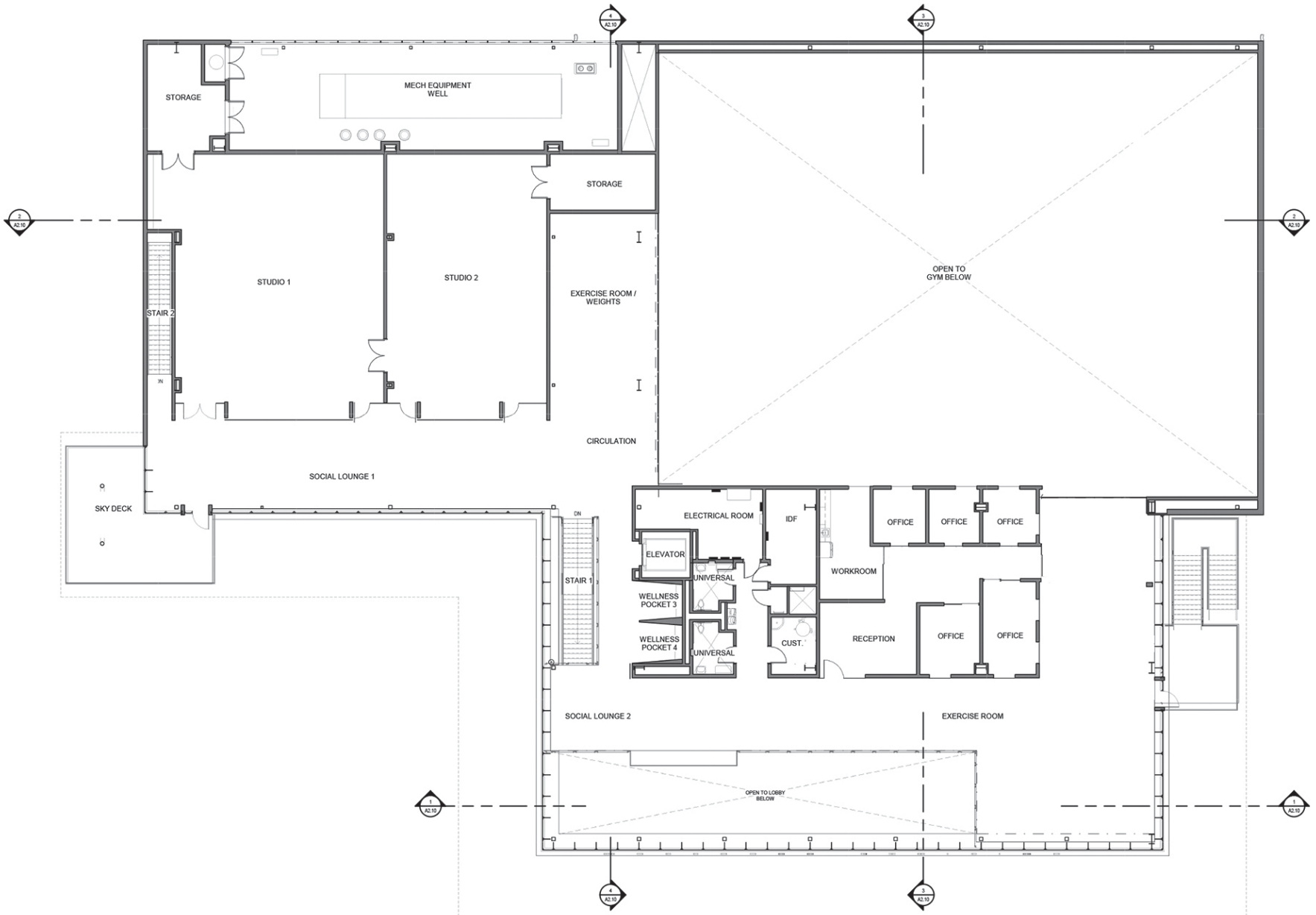
1st Floor Plan

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: LPA, Inc., 2016.

FIGURE
A-7



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2nd Floor Plan

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: LPA, Inc., 2016.

FIGURE
A-8

1st Floor

- Gymnasium (9,500 SF): To be used for recreational sports and team sport practice (no competition games), including basketball, volleyball, badminton and floor hockey. Located on 1st floor, but open to above (2nd floor).
- Physical Therapy Lab (950 SF): Up to four doctoral Physical Therapy students, under the supervision of a Licensed Physical Therapist, would be available for consultations with students, faculty and staff. They would assess flexibility, strength, cardiovascular health and balance, and develop customized 15-week health plans for the participants, with follow up sessions throughout the semester.
- Multi-Purpose Rooms (1,900 SF): Two rooms that can be used in different configurations for health education, first aid, nutrition, stress management, sleep management, meditation and mindfulness activities. Rooms also to be used for Campus-wide health expos during each semester.

2nd Floor

- Dance Studio (2,000 SF): Studio for 30 participants, sound system and large screen for video instruction, barres and mirrors. Dance practice space is in high demand by existing cultural clubs and organizations. This room along with the cycling studio listed below would also allow for an increased number of physical education classes, including Pilates, yoga, boot camp and self-defense courses.
- Cycling Studio (1,400 SF): Studio for 30 stationary bikes, sound system and screen for video instruction.
- Exercise Space (3,300 SF): Cardio machines and strength training equipment would be distributed throughout the 2nd floor open areas.
- Offices (1,000 SF): Office space for coaches, fitness and wellness staff. There would be one new wellness manager. All other new positions would be student support.

The existing pool and its associated deck area and services would be replaced as part of the Project. The outdoor pool area would include a pool of similar size compared to the existing pool (approximately 3,000 SF), with four non-competition lanes, plus a separate shallow water area for safety courses, swimming instruction and water therapy. Under the Project, the tennis courts would be removed and would not be replaced on the Campus. The existing Maintenance and Operations Facilities staff and offices, along with the two apartment units in the Facilities Management Buildings, would be permanently relocated to Brady Building located on the Campus.

2. Building Elevations, Sections and Renderings

The proposed Wellness Pavilion would be two stories with a maximum height of 42 feet. Building elevations from the north and west are illustrated in **Figure A-9**, *Building Elevations (North and West)*, and from the south and east in **Figure A-10**, *Building Elevations (South and East)*.[5]

[5] *The conceptual building elevations and sections illustrate a roof top height of 41 feet and 8 inches. However, roof-top projections/structures (i.e., fans, exhaust equipment, solar panels, etc.) could potentially extend up to maximum height of 45 feet.*

Building sections illustrating the proposed Wellness Pavilion and parking deck are shown in **Figure A-11**, *Building Sections.* The locations of the sections are shown in Figures A-7 and A-8 within the 1st and 2nd floor plans.

Figure A-12, *Proposed Northerly Aerial View*, illustrates the proposed Wellness Pavilion from a northerly view within the greater Campus area. **Figure A-13**, *Proposed Entry View*, illustrates the southern entry and motor court/drop off areas. **Figure A-14**, *Proposed Southwest Corner View*, illustrates the east-west roadway leading up to the motor court/drop off, along with the pool area and southwest corner of the proposed Wellness Pavilion. **Figure A-15**, *Proposed Easterly View*, illustrates the easterly pool area adjacent to the proposed Wellness Pavilion.

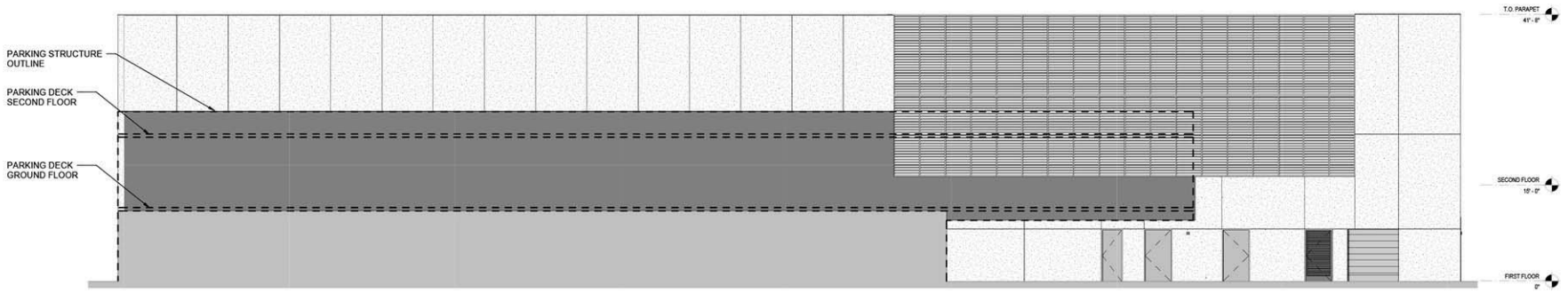
3. Project Architecture and Landscape Design

The Project would include the first building built on Campus in over 30 years. Its programming would be entirely dedicated to promoting and sustaining the health and wellness of the MSMU student, staff and faculty. The main driving force behind the building design is to "put wellness on display" creating a transparent and inviting environment that encourages students to adopt life-long healthy-living habits. The two-story building would be sited to create a visual and pedestrian connection between the existing Campus Quad and the upper Campus tier. The extensive use of glass would allow the wellness and fitness activities to be "on display" for individuals walking by, while offering panoramic views of the surrounding natural canyons, downtown Los Angeles and the Pacific Ocean.

The building massing is conceived as an "L" shape configuration, locating the recreation and pool in the "angle" of the "L" shape for optimal solar orientation (southwest). To the north, the adjacent accessory parking deck would take advantage of the steep grade to minimize its presence and visual impact on the Project Site. The first level of parking on grade would follow the natural site contours and minimize the need for excavation and its associated soil export. The upper deck level would be designed to match the existing grade of Parking Lot "J" giving visual and functional continuity to the existing lot and avoiding any increase in height over the established parking lot level. The layout would facilitate complete separation between vehicles and pedestrian circulation. To the west, Chalon Road would provide vehicular access to the drop off areas in front of the building, the service areas and the two levels of parking. To the east, students, faculty and staff would be able to exit the parking areas and circulate along a pedestrian paseo along the ridge line, connecting the proposed Wellness Pavilion and the rest of the Campus with the housing located on top of the hill.

The typical clay tile roof forms of older buildings were reinterpreted as an expansive ceiling (an "inverted" roof) that brings the texture and color found on the clay roofs inside the building. The butterfly roof form is intended to express the open nature of the building (pavilion), celebrate the distant views and to capture rain water in its valley. A waterspout element would redirect the water down a series of vegetated planter boxes to be cleaned before releasing it to the stormwater system.

The architecture form seeks to use simple materials with deep overhangs to protect the glazing areas on the east, west and south while skylights would bring natural light into the gym. Combined, the wall and roof glazing areas would harvest natural light, bringing it deep into the main spaces, reducing the demand on artificial lighting and, consequently, reducing energy consumption. All spaces contiguous with day-light



Exterior Elevation - North

Exterior Elevation - West

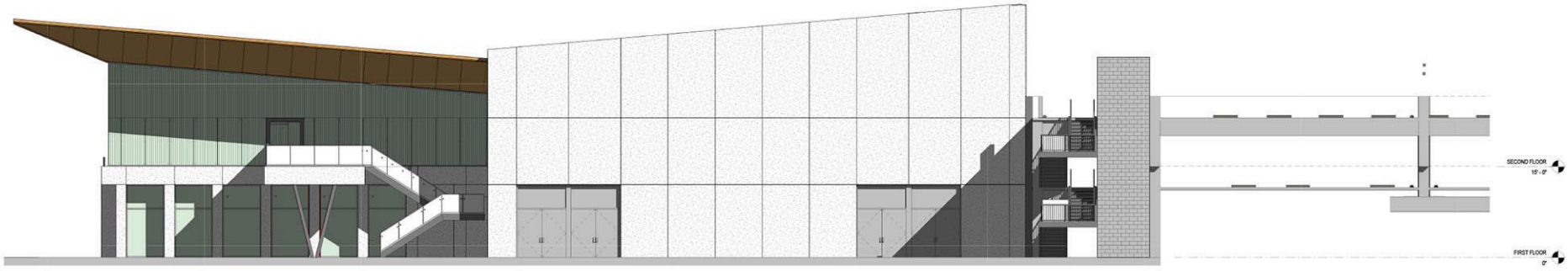
PCR

Building Elevations (North and West)

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: LPA, Inc., 2016.

FIGURE
A-9

Exterior Elevation - South



Exterior Elevation - East

PCR

Building Elevations (South and East)

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: LPA, Inc., 2016.

FIGURE
A-10

Note: Section locations are shown on Figures A-7 and A-8.

PCR

Building Sections

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: LPA, Inc., 2016.

FIGURE
A-11

PCR

Proposed Northerly Aerial View

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: LPA, Inc., 2016.

FIGURE
A-12

PCR

Proposed Entry View

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: LPA, Inc., 2016.

FIGURE
A-13

PCR

Proposed Southwest Corner View

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: LPA, Inc., 2016.

FIGURE
A-14

PCR

Proposed Easterly View

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Source: LPA, Inc., 2016.

FIGURE
A-15

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openings would include automatic dimming controls to ensure optimum energy performance. At the building base, a colonnade of columns and glazing brings the scale of the building down to human level. The colonnade element preserves the color, proportions and rhythm of the typical gothic arch colonnades found throughout Campus. The glazing infill panels would open to integrate the indoor and outdoor activities at the main plaza space.

The landscaping and passive spaces such as the Garden Walk, Wellness Promenade, and Campus Greens surrounding the proposed Wellness Pavilion would establish a new sense of arrival to the Campus and would create spaces for students and visitors to socialize and take in scenic views. The landscaping would also provide opportunities to introduce native and regional planting material and sustainable features.

Located on the upper part of Campus, the Project would use landscaping and open spaces to clearly define the boundaries between the Campus core and the Project Site. An existing parking lot directly to the north of Mary Chapel would be removed to make way for a pedestrian-friendly entry court connecting the Campus core and Project, enhancing pedestrian flow. The court would also feature landscaped areas directly to the north of Mary Chapel, creating a protective buffer between it and the new development.

Additionally, the parking area directly to the east of Mary Chapel would be replaced by a landscaped courtyard and pedestrian walkway (labeled as "Campus Green" on Figure A-6), continuing the existing landscape to the edge of the new development. Open areas within the Campus core would continue the character, plant selection and features of the existing Spanish revival landscape design. Outside the core area, the landscape design would preserve the overall established character, but transition to the use of a contemporary material and plant palette in order to respond to the programmatic, functional and sustainable requirements acting on the Project Site.

4. Parking and Access

As stated above, a total of 226 parking stalls would be displaced by the Project, including one (1) Americans with Disabilities Act (ADA) compliant space. The Project would consolidate parking that is currently located in various lots into one centralized location to improve way- finding and pedestrian safety. The new accessory parking deck would consist of an at-grade parking level with a cast in place concrete deck over it that would provide for a second level of parking. The total number of parking stalls provided in the new structure and adjacent service yard would be 279, including 7 ADA compliant spaces. Thus, there would be a net increase of 53 new parking spaces compared to exiting conditions. With the consolidation of previously scattered parking areas, parking on Campus is expected to be more convenient and easy to find, thereby helping to reduce the extent of off-Campus parking.

Under current conditions, the shuttle parking space is located in front of the Library, in the Circle area, resulting in pedestrian-vehicular conflicts. Also, students traversing through the Campus frequently walk through vehicle areas and roadways, creating pedestrian-vehicular conflicts. The proposed circulation systems and accessory parking deck would minimize such conflicts. Vehicles would enter the parking areas from the west and pedestrians would exit the structure to the Campus on the east side. A landscaped walkway would be provided on the eastern side of the structure, providing access to the main Campus areas to the south. This walkway would also be utilized by pedestrians going to/from the Yates, Aldworth, and

Burns Houses. As such, the circulation system would allow pedestrians to safely access the proposed Wellness Pavilion while enhancing the connectivity between the Campus core and the upper housing. In addition, a new elevator in the southeast corner of the parking area would connect the two parking levels as well as the proposed Wellness Pavilion level to support compliance with accessibility requirements. The proposed new shuttle stop would be located south of the proposed Wellness Pavilion, north of the Mary Chapel. The Project provides a vehicle turnaround/drop-off area within the motor court so that shuttles would not be required to reverse when exiting the motor court. In addition, other vehicles would be permitted to use the turnaround/drop off area for passenger drop/off or pick-up. The turnaround/drop-off area would be separated from surrounding pedestrian path ways by landscaped planters and/or bollards. The design of the turnaround/drop-off area would reduce potential conflicts between vehicles and pedestrians, while also eliminating the sound of the shuttle's back-up signal, which would otherwise disturb those in the Chapel and nearby areas.

5. Future Campus Events

Changes to Existing Events

As discussed under the Existing Conditions section above, the Campus currently hosts various events throughout the year. The addition of the proposed Wellness Pavilion would result in no changes, including the number of attendees, traffic, etc., to the vast majority of events on Campus, as the location of most events would not change and would continue to be hosted at the Campus Center, Hannon Theater and/or the Circle. Further, as discussed below, only a limited number of existing Internal Events with Outside Traffic may be affected by moving all or portions of an event to the proposed Wellness Pavilion, with some events having the potential for an increased attendance. External Events would not be affected.

Review of the 2015 events indicates the proposed Wellness Pavilion would result in changes to only a limited number of existing Internal Events with Outside Traffic. **Table A-1**, *Potentially Changed and New Campus Events/Activities*, summarizes the potential changes to existing events and future events/activities that could occur as a result of Project implementation. 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 due to the proposed Wellness Pavilion. Attendance for these two events would be (up to a maximum of 350 attendees during Homecoming) within the existing range of attendees (approximately 50 to 450 people per event) permitted for existing External Events and other Internal Events with Outside Traffic.

With the exception of Athenian Day, the pool deck is not used for events. During Athenian Day, students, faculty, staff, and alumni come together for a fun-filled day of mental and physical games. The new pool deck would be used in a similar manner for games and activities (i.e., relay races) as compared to existing conditions during this event. Otherwise, no anticipated changes in pool deck programming regarding existing events would occur.

Potential New Events/Activities

As shown in Table A-1, MSMU has identified three new sets of potential events/activities that could occur at the proposed Wellness Pavilion. First, the proposed Wellness Pavilion could potentially host external Summer Sports Camps. These camps could be made available to the community/public and/or

Table A-1

Potentially Changed and New Campus Events/Activities

Event Name		Frequency	Timing	Time of Day	Location	Description	Attendance: Students/ Faculty/Staff (S/F/S) + Outside Guests (OG)
Existing Events with Potential to Change							
Spring Convocation	*Existing*	Annually	January	8:00 a.m. -2:00 p.m. Weekday	CC, Circle	Internal meeting of faculty/staff prior to start of school year. Typically about 12-15 outside guests.	275 (SFS) + 25 (OG) 300
	With Project	No Change			Potentially move to Pavilion	No change	No Change
Nursing Panel	*Existing*	Annually	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	No Change			Potentially move to Pavilion	No change	No Change
Woman's Leadership Conference	*Existing*	Annually	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	No Change			CC, Circle, Classrooms, and possibly Pavilion	Potentially move some sessions to Pavilion.	No Change
Live at the Mount	*Existing*	8 Days Total	4 days Fall/ 4 days Spring	Weekday a.m.	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 Each Day (4x)

Table A-1 (continued)

Potentially Changed and New Campus Events/Activities

Event Name		Frequency	Timing	Time of Day	Location	Description	Attendance: Students/ Faculty/Staff (S/F/S) + Outside Guests (OG)
Live at the Mount (cont.)	*With Project*	No Change			Potentially move to Pavilion	No Change	No Change
Student Orientation	*Existing*	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	No Change			CC, Theater, Circle, Classrooms and potentially Pavilion	No Change	No Change
Existing Events with Potential for Increased Attendance							
Homecoming	*Existing*	Annually	October	2:00 -4:00 p.m. Weekend Day	CC, Circle, Classrooms	Students, faculty, staff and alums.	150 (SFS) +100 (OG) 250
	With Project	No Change			CC, Circle, Classrooms, and possibly Pavilion	Potentially more rooms for added health and wellness sessions in Pavilion.	200 (SFS) +150 (OG) 350
Athenian Day	*Existing*	Annually	Spring	8:00 a.m. -5:00 p.m. 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	No Change			Circle and possibly Pavilion	Would utilize new gym, pool, and fitness facilities in Pavilion.	200 (SFS) + 100 (OG) 300

Table A-1 (continued)

Potentially Changed and New Campus Events/Activities

Event Name		Frequency	Timing	Time of Day	Location	Description	Attendance: Students/ Faculty/Staff (S/F/S) + Outside Guests (OG)
Potential New Events/Activities							
Summer Sports Camps	*With Project*	Daily	Summer (over 12 weeks)	8:00 a.m. – 5:00 Daily	Pavilion	Camps could be made available to the community/public and/or students/ faculty/staff.	50-450 (All OG)
Health and Wellness Speaker Series	*With 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 complement MSMU Wellness Movement with periodic lectures from experts in health and wellness for students, faculty, staff and alums.	100-450 (½ SFS and ½ OG for each event)
Other Wellness/Sports Activities	*With 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)[2]

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 Summer Camps assumes approximately 200 campers (i.e., students), with a maximum attendance of 450 persons inclusive of instructors, parents/drivers, etc.*

[2] *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: MSMU, 2016.

students/faculty/staff. While it would be speculative to define the specific nature of these camps, the camps are expected to have attendees ranging from approximately 50 to 200 campers, with a maximum attendance up to 450 persons inclusive of instructors, parents/drivers, etc. Camps could be single-day or multi-day (i.e., week-long camp), whereby campers could arrive and stay the night in the dormitories. Camps could occur throughout the week during the summer over a 12-week period. All campers would have access to on-Campus parking. With no summer student sessions occurring at the Campus, the camps would not overlap with student school sessions.

Second, the Wellness Pavilion may support a Health and Wellness Speaker Series (approximately 8 total). The number of attendees could range from 50 to 200 students, and 50 to 250 outside attendees, for a maximum total of approximately 450 attendees. Student access/traffic would be similar compared to existing conditions, as most students would already be on Campus and/or could utilize the current Campus shuttle services. Outside attendees would drive to the events. Similar to existing events, free valet parking would be made available within the new accessory parking deck and in the existing parking structure, as necessary. The number of tickets sold would be limited such that no additional parking spillover would occur into the neighborhood.

Third, the Wellness Pavilion could be used for "Other Wellness/Sports Events/Activities" throughout the year on a periodic basis. Such activities could occur on a weekday or weekend day with times varying by event from morning to evening hours. These activities would be limited to no more than 4 times during any given month. Activities could include MSMU community or external rental activities, with all such activities being complementary and consistent with the purpose of the proposed Wellness Pavilion (i.e., health, wellness, and sports).

All new events/activities would be subject to the applicable Campus' existing free valet parking program and requirements, as described above, to ensure parking for all events/activities is provided on the Campus. Furthermore, MSMU would implement an Event Coordination Plan that would define the parameters of the valet parking program, monitor off-Campus parking during events, and provide staff/signage to direct traffic during events.

6. Utilities

The existing Los Angeles Department of Water and Power (LADWP) primary overhead power line traversing the Project Site east to west would be removed and replaced with a new underground primary service line. Four existing poles that currently traverse the proposed building footprint would be removed. The new underground service line would include manholes and service vaults to reconnect the existing buildings to the new underground primary service. The overhead power line continues in both east/west directions providing service to other areas off site that would need to be maintained. Additionally, the pole line supports aerial service from Time Warner Cable (TWC) and Verizon. These services would be relocated underground following the LADWP path. Campus cable/telephone service originates from a service drop on the pole next to the tennis courts and would be replaced by underground service vaults, one for each system.

7. Lighting and Signage

Existing Project Site lighting serving the buildings, tennis courts and parking field within the Project Site would be removed. New lighting would be provided in compliance with the current Title 24 energy code and

LEED requirements. Light fixtures would meet the required 'BUG' rating for back-light, up-light and glare, as well as any local lighting ordinances.

Further, the Project will be required to incorporate lighting design specifications to meet City standards as outlined in the Section 93.0117 of the Los Angeles Municipal Code (LAMC).

The Project would be located within the interior of the existing Campus, which is already developed with lighting appropriate for an educational institution. The general topography of the Campus – located on a ridge-top – and the surrounding area, limits external views of the northern parts of the Campus, where the Project would be located. The natural geography would limit light and glare impacts. Nevertheless, Project lighting would be installed to minimize impacts to the surrounding site and adjacent residential uses. For instance, pole lights intended for area lighting would be set back away from the canyon edges, directed downward to the areas to be lit, and would incorporate "house side shields" where necessary and practical. Exterior lighting would be comprised of building mounted lights, pool deck lights, interior building lights visible through glass/windows, pathway lighting, tree up-lighting, parking field lighting and street lighting. Pedestrian areas would be well lit for security.

Arrival signage would be pin mounted to walls and be illuminated by up-lighting situated in the landscape areas. Building signage would be cast metal sign letters mounted on a bottom rail and installed above the main entry point of the Pavilion.

8. Site Security

The Campus would continue to maintain a 24-hour/seven-day security program to ensure the safety of its students, faculty, staff, and visitors. A key component of Campus security is its security staff and patrol program. Security Staff, consisting of a Watch Commander, Patrol Officer, Main Gate Officer and Community Relations Officer provide continuous round-the clock security protection. Patrols are conducted at random times during each of three, 8 hour shifts. Watch Commanders are responsible for conducting vehicle patrols both on Campus and in the immediate surrounding area at random times. Duties of security personnel also include, but are not limited to, assisting students and visitors with Project Site access and circulation; monitoring entrances and exits of buildings; monitoring fire/life/safety systems; and patrolling the Campus, responding to Campus emergencies as well as regular non-emergency calls for service.

In addition, access to the Campus is monitored 24/7 at the single entrance controlled gate to the Campus. Blue emergency phones are located around the Campus, and will be placed at the proposed Wellness Pavilion and accessory parking deck. Radio Frequency Identification (RFID) tags are installed on all exterior doors of each building including sliding glass doors. These act as check-in points for the patrol officers. That is, patrol officers scan their RFID security equipment on the tags and security logs are then generated within a computer base to track the timing of security patrols. Cameras will be installed around the proposed Wellness Pavilion perimeter and at the main entry, capturing ingress and egress. Additionally, cameras will be installed within the accessory parking deck and stair well. The Project design would also include lighting of entry-ways, walkway areas and courtyard areas for Project Site security purposes.

9. Fire Protection

A fully automatic code compliant fire alarm system with voice evacuation will be installed in the proposed Wellness Pavilion. The new panel would annunciate building fire alarm status to the existing onsite command center. The building would be fitted with a complete hydraulically calculated automatic sprinkler system in accordance with the requirements of the National Fire Protection Association (NFPA) 13.[6] The main access road leading to the auto drop off in front of the proposed Wellness Pavilion would double as the emergency access road for fire protection service. The fire protection coverage for the proposed Wellness Pavilion would be comprised of fire road access on the north, west, south sides, and hose pull spanning on the east side. Fire hydrants would be located throughout the site as required per the Fire Code of the LAMC and California Fire Code (CFC).

10. Sustainability Features

The Project would be designed to meet the California Green Building Standards (CALGreen) Code as adopted and amended by the City of Los Angeles through the incorporation of green building techniques and other sustainability features, including those within the City of Los Angeles Green Building Code, where applicable. MSMU's desire is to deliver a state of the art, energy efficient, low maintenance facility that has an impact on the student's health in a positive way. The Project is being designed to obtain LEED Certification and will exceed California's stringent Title 24 energy requirements. Some of the Project's key design features that would contribute to energy efficiencies include:

Site

- Storm water collection and treatment would occur on-site before any water is delivered to the sewer system. Rainwater would be collected on the building roof where it would then drain to landscaped collection areas. Additionally, rainwater from parking areas would also drain to the landscape areas for treatment and release.
- Sustainable landscape features within the Project Site include irrigations systems that would be designed and maintained to promote water conservation and avoid water runoff, and overspray to non-irrigated areas, walks, roadways, or structures.
- The plant palette would include regional drought tolerant, low maintenance plant species and varieties.
- Electric vehicle charging stations would be provided in the new accessory parking deck adjacent to the proposed Wellness Pavilion.
- Long term bike parking stalls will be provided on-site.

Building

- Natural light would be harvested for the main spaces in the building using 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.

[6] *NFPA 13 is the industry benchmark for design and installation of automatic fire sprinkler systems. NFPA 13 addresses sprinkler system design approaches, system installation, and component options to prevent fire deaths and property loss.*

- High efficiency, low-e insulated glass units would be used for the building envelope. Glazing would be protected from direct sunlight with deep overhangs to mitigate glare, and reduce solar radiation and heat gain.
- The use of materials with recycled content and from rapidly-renewable sources would be implemented throughout the Project.
- Low VOC levels would be specified for paints, coatings, adhesives, caulking, carpeting, resilient flooring and engineered wood.
- Reduction of heat island effect with single ply roofing.
- High efficiency variable capacity variable air volume HVAC system.
- Installation of low flow and sensor-activated plumbing fixtures would reduce water use and wastewater in restrooms and showers.
- Installation of high efficiency water heater with high recovery rates to service showers.
- Installation of an integrated sink systems including faucet, soap and hand dryer would reduce the use of paper hand towels.
- Water bottle filling stations would be provided, reducing waste from disposal of water bottles.

11. Anticipated Construction Schedule and Activities

MSMU anticipates commencing construction as early as winter 2018, with construction activities continuing for approximately 22 months until fall 2019. Full use of the Project would occur upon completion of the construction activities.

All construction activities would be conducted entirely within the Campus. Temporarily displaced parking would be accommodated by valet parking provided in the existing on Campus parking structure. In addition, construction workers would be directed to park on Campus. Construction staging, laydown, and construction worker parking would not require lane closures and/or sidewalk closures. Accordingly, neighborhood access and parking would not be affected. Construction hours would be consistent with the City of Los Angeles construction requirements, occurring from 7:00 AM to 5:00 PM Monday through Friday; and 8:00 AM to 6:00 PM Saturdays.

Construction-related vehicles and workers would access the Project Site using local streets in the same manner as existing Campus traffic. Vehicles driving to the Project Site would travel from Sunset Boulevard, to Bundy Drive to Norman Place to Chalon Road. Vehicles leaving the Campus would travel on Chalon Road and continue south on Bundy Drive, to Sunset Boulevard. Because graded soils would be balanced on-site, as discussed below, no haul route permit is required as there would be no haul trucks accessing the Project Site.

Grading for the Project would require approximately 7,715 cubic yards of cut and approximately 9,825 cubic yards of fill of soils within the Project Site. Soils would be balanced on-site such that no soils would be imported or exported during construction activities.

Prior to the commencement of construction, a Construction Management Plan would be developed by the Project contractor in consultation with the Project's traffic and/or civil engineer and approved by the City of

Los Angeles Department of Public Works prior to issuance of any Project demolition, grading or excavation permits. The Construction Management Plan would also be reviewed and approved by the Fire and Police Departments, as appropriate. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and would include, but not be limited to, the following elements:

- The name and telephone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations;
- An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the Project Site, and maps showing access to and within the Project Site and to adjacent properties;
- Scheduling of construction-related deliveries, worker trips, etc., so as to occur outside the commuter peak hours to the extent feasible;
- Provide measures to ensure that construction-related vehicles use the specified access route;
- Schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on surrounding streets;
- Establish requirements for loading/unloading and storage of materials on the Project Site; and
- During construction activities, ensure construction worker parking is available on the Campus. Prohibit construction worker parking on residential streets.

F. NECESSARY APPROVALS

It is anticipated that approvals required for the Project would include, but may not be limited to, the following:

- **Plan Approval (Deemed-to-be-Approved) (Per LAMC § 12.24 M) and Determination to Permit a Building Height Modification (Per LAMC § 12.24 F)**: The City may grant a Plan Approval to allow new buildings to be erected on a portion of a lot that is currently permitted as a deemed-approved conditional use pursuant to LAMC Section 12.24 L. In addition, in connection with a Plan Approval for a deemed-approved conditional use, the City may permit buildings to exceed the applicable height standards. MSMU is requesting approval of the proposed Wellness Pavilion, outdoor pool area, landscaped open space, and accessory parking deck on the Chalon campus, where an Educational Institution is permitted as a deemed-approved conditional use, with a building height up to 42-feet, in lieu of the 30-foot maximum that would otherwise apply.
- **Zoning Administrator's Approval for Additional Grading in Hillside Area (Per LAMC § 12.24 X.28 (a)(5)):** MSMU is requesting a Zoning Administrator's Approval to exceed the "by-right" maximum for non-exempt grading (under the Baseline Hillside Ordinance) on a site in the RE40 Zone.

- **Demolition Permits:** Required to remove the existing on-site structures to allow for construction of the proposed buildings.
- **Construction permits, including building, grading, excavation, foundation, and associated permits.**
- **Other approvals as needed.**

ATTACHMENT B: EXPLANATION OF CHECKLIST DETERMINATIONS

The following provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below indicate those issues that are expected to be addressed in the Environmental Impact Report (EIR) and demonstrate why other issues will not result in a potentially significant environmental impact and thus do not need to be addressed further in the EIR. The questions with responses that indicate a "Potentially Significant Impact" do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in the EIR with conclusions of impact significance reached as part of the analysis within that future document. For each issue to be analyzed in the EIR, the EIR will include a description of the existing conditions, applicable regulatory framework/requirements, significance thresholds, impact analysis, mitigation measures (if necessary), and level of significance before and after mitigation, as applicable.

I. AESTHETICS

Would the project:

a. Have a substantial adverse effect on a scenic vista?

Potentially Significant Impact. A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. Scenic vistas are generally associated with public vantages. A significant impact may occur if the Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially alters a view of a scenic vista.

The Campus is located along a ridge crest on the southern flank of the Santa Monica Mountains approximately one mile north of Sunset Boulevard and 0.3 miles west of the San Diego Freeway (I-405). Many of the older Spanish Colonial Revival style Campus buildings, as well as the landscaped areas contribute to the visual setting of the Campus. In addition, undeveloped open space areas located on the nearby hillsides and steep slopes further positively characterize the greater Campus visual landscape near the Project Site.

Because of the varying topography within the Campus and surrounding areas, views of the Project Site from the surrounding areas are limited. The Project would remove existing landscaping, including trees that contribute to the visual setting of the Campus. However, unlike most of the other Campus buildings, the buildings that would be demolished and removed under the Project are vernacular and utilitarian in style and function, and are not of the Spanish Colonial Revival style. Nonetheless, the Project would alter the visual conditions on the Project Site and could alter views from scenic vistas in the vicinity of the Campus. Therefore, this issue will be analyzed further in the EIR. The EIR will include an analysis of the Project's potential to block or otherwise alter an existing recognized scenic vista or valued publicly available view.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Potentially Significant Impact. Views of the Project Site are not visible from any designated state scenic highways. The nearest freeway to the Project Site, I-405, is not a designated scenic highway. While Sunset Boulevard, (located approximately one mile south of the Project Site), is designated as a Scenic Major Highway II in the Brentwood-Pacific Palisades Community Plan and a Scenic Highway in the City of Los Angeles Mobility Plan 2035 and, the Project Site is not visible from Sunset Boulevard.

Although the Project Site is not visible from a designated scenic highway, the Campus does include a number of older Spanish Colonial Revival style buildings, which are preliminary identified as potential historic resources. The buildings that would be demolished and removed under the Project are vernacular and utilitarian in style and function, and are not of the Spanish Colonial Revival style. However, indirect impacts could occur to the potential historic buildings as a result of Project implementation. The Project would also remove a number of on-site trees that contribute to the visual setting of the Campus. Therefore, this issue will be further analyzed in the EIR. The EIR will include an analysis of the Project's potential to substantially damage scenic resources.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact. The existing visual character of the Project Site is characterized by surface parking areas, several one- and two-story utilitarian buildings, a swimming pool area and tennis courts, along with ornamental landscaping, including a number of mature trees. The greater Campus setting includes a number of older Spanish Colonial Revival style buildings and open space/landscaped plaza areas that contribute to the visual setting of the Campus. The Campus is within the Brentwood neighborhood. The developed portion of the Campus is bounded on the north, west and east by undeveloped open space, which is owned by MSMU. Single-family residential uses along Bundy Drive are located to the west downward of the steep sloping open space area that supports the elevated Campus Site. Immediately south and adjacent to the Campus is the Carondelet Center (accessed off Chalon Road), a large building that serves as the provincial headquarters for the Sisters of St. Joseph of Carondelet, a separate entity from MSMU. South of the Carondelet Center are single-family residential uses located along Chalon Road. Beyond the Campus and adjacent opens spaces areas, the setting to the south and west largely consists of single-family residential uses.

The Project would replace the existing on-site uses with the proposed Wellness Pavilion, a new accessory parking deck, internal roadway and landscape/pedestrian improvements, and a new outdoor swimming pool. Thus, the Project would alter the visual character of the Project Site and its surroundings. Therefore, this issue will be analyzed further in the EIR. The EIR will include an analysis of the Project's potential to substantially degrade the existing visual character and/or quality of the Project Site and its surroundings.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Potentially Significant Impact. The analysis of a Project's potential shade/shadow impacts focuses on changes in shading conditions for those off-site uses and activities that are dependent on access to natural

light. Facilities and operations sensitive to the effects of shading include: routinely usable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Potential shading impacts could result when shadow-sensitive uses are located to the north, northwest, or northeast of new structures.

Existing on-Campus residential structures and associated surface parking lots are located north of the Project Site. However, the on-Campus areas north of the proposed parking deck would be at a higher elevation and as such, would not be shaded by the parking deck. Also, given that the proposed Wellness Pavilion facility would be over 250 feet south of the on-Campus residential structures to the north, the residential structures would not be shaded by the proposed Wellness Pavilion. Open space areas are located directly to the west and east of the Project Site. Because the adjacent open space areas are located directly east and west of the Project Site, shadows from the proposed Wellness Pavilion and parking deck would be limited in size and duration, which would not significantly affect the function of these areas. Shadows created by the proposed Wellness Pavilion and parking deck would not impact any of the surrounding single-family residential uses. Thus, shadow impacts would be less than significant. Further analysis of shadow impacts in the EIR is not required.

The Project Site, similar to the greater Campus, currently includes lighting for parking, security, wayfinding and building operations. The surrounding open space areas are generally devoid of lighting. The nearby single-family uses and roadway street lighting include lighting typical of such settings. Traffic on local streets also contribute to overall ambient artificial light levels in the area. The Project would introduce new sources of nighttime illumination for architectural highlighting, parking, signage and security purposes, which may be visible from some nearby off-site vantages; thereby contributing to the lighting conditions in the area. In addition, the Project would introduce new building surface materials to the Project Site. Therefore, an analysis of the potential for the Project to create new sources of substantial light or glare which would adversely affect day or nighttime views in the area will be analyzed further in the EIR. The EIR light and glare analysis will identify light- and glare-sensitive uses and describe potential new light and glare sources that may be introduced by the Project.

II. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown in the General Plan Land Use Map for the Brentwood-Pacific Palisades Community Plan or maps prepared pursuant to the Farmland Mapping and Monitoring Program.[1],[2] In addition, no agricultural or other related activities currently occur on the Project Site or within the Project vicinity. Therefore, no impacts to farmland would occur and no mitigation measures would be required. Further analysis of this issue is not required in the EIR.

b. Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. The Campus is located within the Brentwood – Pacific Palisades Community Plan Area in the City of Los Angeles. The Campus has a General Plan land use designation of Minimum Residential and is currently zoned RE40-1-H. "RE" stands for Residential Estate uses, which, in addition to allowing residential uses, conditionally permits educational institutions. The "H" indicates the Campus is located in a hillside location, with the "1" indicating Height District 1. Agricultural uses are not permitted within the land use or zoning designations, and the Project Site is not under a Williamson Act contract. Further, no agricultural zoning is present in the immediate surrounding area, and no nearby lands are enrolled under the Williamson Act. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Further analysis of this issue is not required in the EIR.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As described in Response No. II.b, the Campus has a General Plan land use designation of Minimum Residential and is currently zoned RE40-1-H. Further, the surrounding areas of the Campus are not designated for forest land or timberland production use. Therefore, the Project would not conflict with existing zoning, or cause the rezoning of forest land, timberland, or timberland production land. Further analysis of this issue is not required in the EIR.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest

[1] *City of Los Angeles, City Planning Department. General Plan Land Use Map (as of September 02, 2006), Brentwood-Pacific Palisades Community Plan. Available at: http://planning.lacity.org/complan/pdf/btwcptxt.pdf; accessed April 5, 2016.*

[2] *State of California Department of Conservation, California Important Farmland Finder, http://maps.conservation.ca.gov/ciff/ciff.html, accessed June 2016.*

resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[3] Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[4] The Project Site is currently developed and no forest lands exist within the Campus. Project development would not cause a loss of forest land. Further analysis of this issue is not required in the EIR.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

No Impact. No agricultural resources or operations currently exist on or near the Project Site or Campus. Therefore, the Project would not involve changes in the existing environment that would result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Further analysis of this issue is not required in the EIR.

III. AIR QUALITY

The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

Would the project:

a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?

Potentially Significant Impact. The Project Site is located within the approximate 6,700 square mile South Coast Air Basin (Basin). The SCAQMD together with the Southern California Association of Governments (SCAG) is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current Air Quality Management Plan (AQMP) was adopted December 7, 2012 and contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. SCAQMD staff is in the process of developing the 2016 AQMP, which is a comprehensive and integrated Plan primarily focused on addressing the ozone (O_3) and $PM_{2.5}$ standards (PM = particulate matter). The Project would contribute to regional and local air emissions during construction and operation. The extent to which emissions could affect implementation of the AQMP will be addressed in the EIR. The EIR will evaluate the Project's consistency with the SCAQMD's AQMP in accordance with the procedures established in the SCAQMD's CEQA Air Quality Handbook. Also, the EIR will provide an assessment of the Project's consistency with the City's General Plan Air Quality Element policies which are applicable to the Project.

With regard to the Project's consistency with the Congestion Management Program (CMP) administered by the Metropolitan Transportation Authority (Metro), see Response No. XVI.b, *Transportation/Circulation*, below.

[3] *California Public Resources Code Section 12220(g)*

[4] *California Public Resources Code Section 4526*

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. As indicated in Response No. III.a above, the Project Site is located within the Basin, which is characterized by relatively poor air quality. State and Federal air quality standards are often exceeded in many parts of the Basin, including Los Angeles County. The Basin is currently in non-attainment for O_3, $PM_{10,}$ and $PM_{2.5}$ for Federal and State air quality standards. The Project would contribute to regional and local air emissions during construction and operation. The extent to which emissions could violate air quality standards or contribute substantially to an existing or projected air quality violation will be addressed in the EIR. The EIR will analyze construction impacts to sensitive receptors from the Project's daily maximum construction emissions using the SCAQMD's localized significance thresholds (LSTs) screening methodology. Also, the EIR will analyze the potential for emissions of air toxics during construction and their associated potential impacts. The EIR's operational analysis will forecast daily local and regional emissions from mobile and stationary sources that would occur during long-term Project operations to determine if they exceed applicable SCAQMD quantitative impact thresholds. The analysis will also address criteria pollutants (i.e., pollutants for which ambient air quality standards have been established).

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM10, and PM2.5) under an applicable Federal or State ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

Potentially Significant Impact. Construction and operation of the Project would result in an increase of criteria pollutants, including O_3, PM_{10}, and $PM_{2.5.}$ As discussed above, the Basin is currently in non-attainment of Federal and State air quality standards for O_3, PM_{10}, and $PM_{2.5}$. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact when combined with other existing and future emission sources in the Project area. Therefore, this issue will be analyzed further in the EIR. The EIR's cumulative air quality analysis will be conducted in accordance with the procedures established by the SCAQMD and address the degree to which the Project would or would not result in a cumulatively considerable net increase of any criteria pollutant, including those for which the Basin is classified as non-attainment under an applicable Federal or State ambient air quality standard.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The Project Site is located on the Chalon campus which is adjacent to single-family residential uses (sensitive receptors). Single-family uses are located at varying distances from the Project Site. In addition, the Project Site is located on a school campus, which is considered as a sensitive receptor. Construction activities and operation of the proposed Wellness Pavilion could increase air emissions above current levels, thereby potentially affecting nearby sensitive receptors. Therefore, this issue will be analyzed further in the EIR. As previously described, Project impacts associated with pollutant concentrations will be analyzed for the period of Project construction, as well as long-term operations. The analysis will address concentrations of both criteria pollutants and toxic air contaminants.

e. Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. The Project involves the development of a fitness and recreation facility, an accessory parking deck, a pool, and landscaped areas on an existing college campus. The Project would not introduce any major odor-producing uses that would have the potential to affect a substantial number of people. Odors associated with Project operation would be generated by on-site by waste generation and storage (i.e., trash bins) and the use of certain cleaning agents, all of which would be typical of surrounding urban land uses. In addition, activities and materials associated with construction would be typical of construction projects of similar type and size. Any odors generated during construction of the Project would be localized and temporary in nature, and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402.[5] Impacts with regard to odors would be less than significant. Further analysis of this issue is not required in the EIR.

IV. BIOLOGICAL RESOURCES

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact. While the Project Site is currently developed and is not in a location that supports habitat for candidate, sensitive, or special status species, the open space areas along the slopes adjacent to the Project Site consist of undeveloped vegetated hillside areas. These areas could be subject to indirect impacts during Project construction and direct impacts as a result of fuel modification activities required for operation of the proposed Wellness Pavilion. Therefore, potential impacts to candidate, sensitive, and special status species will be analyzed in the EIR. The EIR will evaluate such potential impacts based on a records search of biological resources databases and a field investigation to identify existing and potential species that could be impacted by the Project. The analysis will determine the extent to which the Project may directly affect any biological resources, or result in significant indirect effects due to noise, lighting, and other factors.

[5] *SCAQMD Rule 402 states, "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."*

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact. As discussed in Response No. IV.a above, while the Project Site is currently developed and does not support riparian habitat or other sensitive natural communities, the open space areas along the slopes adjacent to the Project Site consist of undeveloped vegetated hillside areas. While no riparian habitat exists on the slopes, a biological resources assessment will be conducted to determine the extent to which any sensitive natural community could be directly impacted due to fuel modification activities or otherwise be indirectly impacted by the Project. The EIR will analyze impacts based on a records search of biological resources databases and a field investigation to identify any sensitive natural community that could be impacted by the Project. The analysis will determine the extent to which the Project may directly affect any sensitive natural community.

c. Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is currently developed and the open space areas along the slopes adjacent to the Project do not contain wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have an adverse effect on Federally protected wetlands. Further analysis of this issue is not required in the EIR.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Potentially Significant Impact. As the Project Site is fully developed, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity. However, because the Project Site includes a number of mature trees, the Site could support nesting or migratory birds. The extent to which birds or other wildlife could be impacted by the Project will be further evaluated in the EIR. The EIR will identify what type of wildlife may use the Project Site for nesting or migratory purposes. The analysis will also determine the extent to which the Project may directly affect nesting sites, or result in significant indirect effects due to noise, lighting and other factors.

e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Potentially Significant Impact. Under the Project, areas of the Project Site would be re-landscaped and mature trees located on the Site would be removed. A Tree Report is being prepared for the Project that will identify the number and types of trees located on the Project Site. The results of the Tree Report will be incorporated into the EIR along with a determination of whether the Project has the potential to conflict with

local policies or ordinances protecting biological resources, such as the City's Protected Tree Ordinance No. 177,404 (Chapter IV, Article 6 of the Los Angeles Municipal Code (LAMC)). If protected trees are identified on the Project Site or could otherwise be impacted by the Project, the impacted trees will be identified and an assessment of Project consistency with the applicable policies or ordinances will be provided.

f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan?

No Impact. Based on a review of applicable conservation plan databases, the Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan.[6],[7],[8] The nearest Sensitive Ecological Area (SEA) is 1.5 miles to the west of the Project Site.[9] Therefore, the Project would not conflict with the provisions of any adopted conservation plan. Further analysis of this issue is not required in the EIR.

V. CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?

Potentially Significant Impact. A portion of the Campus has been deemed eligible for the National Register and is listed in the California Register as a historic district at the local level for its association with a recognized architectural style and locally-known architects. Many of the older Spanish Colonial Revival style Campus buildings contribute to the potential district, which consists of six contributing buildings: (1) Brady Hall; (2) Mary Chapel; (3) Rossiter Hall; (4) St. Joseph's Hall; (5) Charles Willard Coe Memorial Library; and (6) Carondelet Hall. Non-contributing buildings include the Chalon Fitness Center Facilities (located at the north end of the Campus, including the pool, tennis courts and gym), the Drudis-Biada Hall (2-story buildings completed in 1974 in the Modern Style) and the six-level parking structure. None of the buildings identified as contributing to the potential historic district would be modified or removed in connection with the Project. Thus, no direct historic impacts would occur with Project implementation. However, the proposed Wellness Pavilion and associated improvements would alter the setting of the Project Site which makes up a portion of the greater Campus. Thus, the Project's potential for indirect impacts on historic resources and the potential historic district will be further evaluated in the EIR. The EIR will analyze such impacts based on a records search of historical resources databases and a field investigation to identify historic resources that could be impacted by the Project.

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[6] *California Regional Conservation Plans, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline. Accessed July 17, 2016.*

[7] *U.S. Fish & Wildlife Service, Habitat Conservation Plans – Region 8, http://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP. Accessed July 17, 2016.*

[8] *U.S. Fish & Wildlife Service Carlsbad Office - Habitat Conservation Plan Documents - https://www.fws.gov/carlsbad/hcps/HCP_Docs.html. Accessed July 17, 2016.*

[9] *Los Angeles County website. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. Accessed July 17, 2016.*

b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within a previously developed area of the Campus and has been subject to prior grading and development activities. Thus, it is likely that surficial archaeological resources that may have existed at one time have been previously disturbed. Nonetheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources. The EIR will analyze such impacts based on a records search of archaeological resources databases to identify any archaeological resources that could be impacted by the Project. The analysis will determine the extent to which the Project may directly affect any known or unknown resources.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, as the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading and excavation to greater depths, which would have the potential to disturb undiscovered paleontological resources that may exist on the Project Site. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources. The EIR will analyze such impacts based on a records search of paleontological resources databases to identify any paleontological resources that could be impacted by the Project. The analysis will determine the extent to which the Project could directly affect any known or unknown resources.

d. Disturb any human remains, including those interred outside of formal cemeteries?

Potentially Significant Impact. As discussed above, the Project Site is located within a previously developed area of the Campus and has been subject to grading and development. No known traditional burial sites have been preliminarily identified on-site. Notwithstanding, as the Project would require excavation to greater depths than compared to previous grading and excavation activities, the potential for discovery of human remains exists. Thus, further analysis of this issue in the EIR is required. The EIR will analyze such impacts based on a records search of historical and archaeological resources databases to identify any unknown human remains sites that could be impacted by the Project. The analysis will determine the extent to which the Project may directly affect any known or unknown human remains.

VI. GEOLOGY AND SOILS

Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Potentially Significant Impact. Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults may be designated as Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards for regulating development adjacent to active faults. In addition, the City designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential.

Per the City's available seismic hazard data, the Project Site is not located within an Earthquake Fault Zone pursuant to the Alquist-Priolo Earthquake Fault Zoning Act, and no known active faults cross the Project Site.[10] Nonetheless, a site-specific preliminary geotechnical study is being prepared for the Project. The results of the site-specific preliminary geotechnical study will be presented in the EIR.

ii. Strong seismic ground shaking?

Potentially Significant Impact. The Project Site is located within the seismically active Southern California area and within a few miles of several active faults and fault systems, including the nearby Santa Monica Fault. Thus, the Project Site would be subject to shaking during earthquake events. The level of ground shaking experienced at the Project Site would be dependent on several factors, including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology. While the Project design would comply with State and City regulations, due to the Project Site being located in a seismically active region, people and structures could be exposed to strong seismic ground shaking. Therefore, further analysis of this issue in the EIR is required. The EIR analysis will identify the potential for seismic ground shaking and take into consideration potential impacts to the Project as well as the Project's compliance with seismic safety regulatory requirements.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. A shallow groundwater table, the presence of loose to medium dense sand

[10] *City of Los Angeles Zimas website. Seismic hazard data for parcels located at 12001 W Chalon Road and 1588 N Bundy Drive. Accessed June 5, 2016.*

and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. The Project Site is located in a liquefaction hazard zone as mapped by the City of Los Angeles.[11] A site-specific preliminary geotechnical study is being prepared for the Project Site that will fully assess the potential for seismic-related ground failure, including liquefaction. The results of the geotechnical study will be included in the EIR. The EIR analysis will identify the potential for ground failure to occur on the Project Site.

iv. Landslides?

Potentially Significant Impact. The topography of the Campus slopes downward from north to south. The northern portion of the Campus is located at an elevation of approximately 1,150 feet above mean sea level (amsl), while the southern portion of the Campus is located at approximately 900 feet amsl. The topography of the Project Site varies from approximately 1,100 feet amsl in the northern portion to approximately 1,075 in the southern portion. Undeveloped steep sloping open space areas are located east and west of the Project Site. The Project Site is located in a landslide hazard zone as mapped by the City of Los Angeles.[12] Therefore, there is potential for landslides to occur at the Project Site. A site-specific preliminary geotechnical study is being prepared for the Project Site that will fully assess the potential for landslides. The results of the preliminary geotechnical study will be included in the EIR and will identify the potential for landslides to occur on the Project Site.

b. Result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact. The Project would require grading and excavation, with soils proposed to be balanced on-site (*i.e.*, no export). Grading, excavation and other construction activities associated with the Project have the potential to result in soil erosion. In addition, the change in on-site drainage patterns resulting from the Project could also result in limited soil erosion. Thus, as discussed further in Response No. IX.c, *Hydrology and Water Quality*, below, the potential for soil erosion resulting from construction and operation of the Project will be analyzed further in the EIR.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Potentially Significant Impact. As discussed in Response Nos. VI.a.iii-iv, above, liquefaction and landslide hazards will be further analyzed in the EIR. The potential for these issues and for impacts associated with lateral spreading, subsidence, liquefaction and collapse will be evaluated in a site-specific preliminary geotechnical study being prepared for the Project. The results of the preliminary geotechnical study will be included in the EIR.

[11] *City of Los Angeles Zimas website. Seismic hazard data for parcels located at 12001 W Chalon Road and 1588 N Bundy Drive. Accessed June 5, 2016.*

[12] *Ibid.*

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Potentially Significant Impact. Expansive soils are typically associated with fine-grained clay soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The soils lying below the Project Site will be identified and evaluated in a preliminary geotechnical study prepared for the Project. The results will be included in the EIR.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project Site is located in on a developed Campus. The Project would connect to existing wastewater infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur. Further analysis of this issue is not required in the EIR.

VII. GREENHOUSE GAS EMISSIONS

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Construction and operation of the Project may increase greenhouse gas (GHG) emissions, which have the potential to either individually or cumulatively result in significant impacts on the environment. Therefore, this issue will be further evaluated in the EIR. The EIR analysis will include a quantitative assessment of Project-generated GHG emissions resulting from construction equipment, vehicle trips, electricity and natural gas usage, and water conveyance. Relevant Project features that reduce GHG emissions, such as green building design, will also be discussed.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. The Project would be required to comply with the City's Green Building Code pursuant to Chapter IX, Article 9, of the LAMC. In conformance with these requirements, the Project would be designed to reduce GHG emissions through various energy conservation measures. In addition, the Project would implement applicable energy conservation measures to reduce GHG emissions, such as those described in the California Air Resources Board AB 32 Scoping Plan, which describes the approaches California will take to achieve the goal of reducing GHG emissions to 1990 levels by 2020. Project design features proposed to achieve consistency with these and other applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions will be disclosed and further evaluated in the EIR.

VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the Project Site.

As discussed in detail under Response No. VIII.b, below, the Phase I Environmental Site Assessment (ESA) revealed the presence of lead-based paints (LBPs) and asbestos-containing materials (ACMs) in the existing on-site buildings. Accordingly, comprehensive surveys of the existing buildings prior to demolition will be required in accordance with applicable regulations—including requirements per the National Emissions Standards for Hazardous Air Pollutants standards, SCAQMD Rule 1403, and California Division of Occupation Safety and Health (Cal/OSHA)—to verify the presence of these materials. Because LBPs and ACMs are present in the on-site buildings, remediation or abatement of these materials in accordance with all applicable regulations and standards is required before building demolition commences. Adherence with the State and Federal regulations would reduce risks associated with LBPs and ACMs to acceptable levels and associated impacts would be less than significant. In addition, as discussed under Response No. VIII.b, to ensure polychlorinated biphenyls (PCBs) are properly disposed of, a PCB survey to identify and assist with compliance to applicable state and federal rules and regulations governing PCB removal and disposal would be required. Adherence with applicable regulatory requirements would reduce risks associated with PCBs to acceptable levels and associated impacts would be less than significant. Because these activities would be short-term and cease with Project completion, construction activities would, therefore, not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

Operation of the proposed Wellness Pavilion would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, neither construction nor operation of the Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Further analysis of this issue is not required in the EIR.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The Project would involve the demolition of all existing on-site buildings and related improvements and the development of the proposed Wellness Pavilion, along with accessory parking and infrastructure, landscape improvements, all of which would not involve the routine use, storage,

transport, or disposal of notable quantities of hazardous materials. Hazardous materials to be used in association with operation of the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. In addition, as discussed in Response No. VIII.d, below, the Project Site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Thus, operation of the Project would not create a significant risk of exposure to hazardous materials towards the public or the environment.

Project construction would not involve the use of hazardous materials in substantial amounts such that a measurable risk to on-site workers or off-site residents would result from temporary construction activities. However, short-term demolition and grading activities, including excavation, could expose construction workers or the public to unknown hazardous materials in site soil and/or groundwater should such materials be present. To address this potential risk, a Phase I ESA was prepared for the Project Site by Citadel Environmental Services, Inc. (Citadel) in June 2016 (the ESA is included as Appendix A to this Initial Study). The purpose of the Phase I ESA was to review past and present land use practices and to evaluate the presence, or likely presence, of any hazardous substances or petroleum products that have been discharged into the property's structure, ground, groundwater, or surface water. This assessment included the review of current and readily available information regarding past and current land use for indications of the manufacture, generation, use, storage and/or disposal of hazardous substances at the Project Site. In addition, a Site visit was conducted to observe the existing Project Site conditions, as well as, a records search of hazardous materials regulatory databases.

The investigation revealed no evidence of recognized environmental conditions (RECs) in connection with the Project Site or adjacent properties that would create a significant hazard to the public or the environment, as further discussed below:

Records Search/Field Reconnaissance Results

Based on a review of historical and present records, Site interviews and Site reconnaissance, sufficient information was collected and evaluated for the Project Site to determine if a REC, historical recognized environmental condition (HREC), controlled recognized environmental condition (CREC), or a de minimis condition exists. Based on these reviews, no RECs are present or are likely to be present based on current occupancies and Project Site use. None of the regulatory agency database records indicated historic releases of hazardous substances have occurred at the Project Site or on the adjacent Campus. The full report provided by Environmental Data Resources (EDR) can be found in Appendix L of the Phase I ESA.

The Project Site does appear on several databases, including the HazNet, Resource Conservation and Recovery Act-Small Quantity Generators (RCRA-SQGs), Facility Index System (FINDS), and Enforcement and Compliance History Online (ECHO) lists. This is associated with MSMU's maintenance of an EPA generator's number for disposal of hazardous and regulated materials. The Campus' RCRA-small quantities generator status largely applies to the adjacent Campus areas because of the disposal of construction materials (e.g. light ballasts) and of laboratory chemicals associated with the fine arts and chemistry programs; however, a portion of the construction waste may be associated with the Project Site. Also, the inclusion of the Campus on the Historical Underground Storage Tank (HIST UST), California Facility Inventory Database Underground Storage Tank (CA FID UST) lists is associated with a former gasoline UST that was located near the Boiler-

Room Building adjacent to Brady Hall. This former UST is located south of the Project Site. The inclusion of the Project Site or Campus on the above lists does not alone constitute a REC. Because no conditions have occurred on the Campus which presented a significant hazard to the public or the environment involving the release of hazardous materials into the environment, no RECs were found based on the records search and field reconnaissance results.

Methane

The Project Site is not located within the City of Los Angeles Methane Zone or Methane Buffer Zone recognized by the Los Angeles Department of Building and Safety (LADBS).[13] Also, according to the Phase I ESA, no oil or natural gas wells are located on or adjacent to the Project Site. Thus, no methane hazards are anticipated at the Project Site.

Lead-Based Paint (LBP) & Asbestos-Containing Materials (ACMs)

The Project would involve the demolition and removal of all existing on-site structures. Ellis Environmental Management, Inc. performed a pre-demolition asbestos survey for the three on-site buildings: the Fitness Center, Pool House, and Facilities Maintenance Building. The survey is included as an appendix to the ESA. ASCMs were identified in the Fitness Center and Facilities Maintenance Building. Floor tiles in the Fitness Center were identified as non-friable ACM. Roof penetration mastic and exterior window putty for the Facilities Maintenance Building were identified as non-friable ACBM. If released into the environment, these materials could pose a significant hazard to construction workers or the public. However, prior to the issuance of any permit for the demolition of existing on-site buildings and structures, copies of comprehensive ACMs surveys of the buildings would be provided to LADBS for review and approval. Further, all ACMs would be abated in compliance with the SCAQMD's Rule 1403 during standard construction practices. SCAQMD Rule 1403 incorporates the requirements of the federal asbestos requirements found in National Emission Standards for Hazardous Air Pollutants (NESHAP), found in the Code of Federal Regulations (CFR) Title 40, Part 61, Subpart M. Compliance with the applicable regulatory requirements would ensure impacts associated with ACM are less than significant.

Ellis Environmental Management, Inc. also performed a pre-demolition lead survey for the same three on-site buildings (see appendix of ESA for copy of survey). Lead-based paint was identified on some building surfaces in the woodshop (pool building) and on the Facilities Building. Ceramic tiles at the Project Site were tested for lead, and were not found to contain elevated lead concentrations. Prior to issuance of any permit for the demolition of existing on-site buildings or structures, copies of comprehensive LBP materials surveys would be provided to LADBS for review and approval. All LBP materials would be handled and disposed of pursuant to applicable OSHA regulations during standard construction practices. Further, LBP is regulated in accordance with California Code of Regulations, Title 8 – Section 1532.1 and Title 17 – Sections 35022 and 35038, pertaining to construction sites. In addition, 15 U.S.C. Section 260, of the Federal Toxics Control Act, would apply to the analysis of LBP in on-site structures. Included in these regulations are requirements for surveys, control measures, removal measures, and handling and disposal techniques. All building demolition activities would comply with these regulations, which would ensure impacts associated with LBP are less than significant.

[13] *City of Los Angeles Zimas website. http://zimas.lacity.org/. Accessed July 19, 2016.*

Polychlorinated Biphenyls (PCBs)

Typical sources of PCBs include electrical transformer cooling oils, fluorescent light fixture ballasts and hydraulic oil. In 1976, the Unites States Environmental Protection Agency (US EPA) banned the manufacture and sale of PCB-containing transformers. Prior to this date, transformers were frequently filled with a dielectric fluid containing PCB-laden oil. By 1985, the US EPA required that commercial property owners with transformers containing more than 500 parts per million (ppm) PCBs must register the transformer with the local fire department, provide exterior labeling, and remove combustible materials within 16 feet (40 Code of Federal Regulations 761.30: "Fire Rule").

Three pole-mounted transformers were identified in the southern part of the Project Site. These transformers appeared to be intact with no observed signs of leakage. No pad-mounted transformers were observed during Project Site reconnaissance; however, an electrical transformer is located in the northeastern part of the Project Site. Based on the location of this transformer, it appears to be associated with the faculty/student residences at the north end of the Project Site and may be re-located underground.

MSMU has a facilities maintenance plan in place for handling the identification and proper disposal of electric light ballasts and fluorescent lights. As part of standard construction practices and per the facilities maintenance plan, electric transformers, electrical panels and related equipment would be inspected prior to disposal to evaluate the construction date and whether the equipment may contain PCBs or PCB-impregnated paper. Any PCB containing materials would be properly disposed of in accordance with applicable state and/or federal regulations during standard construction practices. In California, PCBs are regulated by both state and federal rules under the Resource Conservation and Recovery Act (RCRA) and the Toxic Substances Control Act (TSCA). 40 CFR Parts 750 and 76, Disposal of PCBs, provides techniques for disposal of PCBs. Also, California Code of Regulations (CCR), Title 22, Division 4.5, Chapter 42, Requirements for Management of Fluorescent Light Ballasts which Contain PCBs, provides disposal requirements. Adherence with applicable regulatory requirements would reduce risks associated with PCBs to acceptable levels and associated impacts would be less than significant.

Radioactive Man-Made Materials

Radioactive materials are often found in self-luminescent tritium exit signs located in public and private buildings. While these do not constitute a recognized environmental condition, the exit signs must be properly identified to ensure proper handling and disposal practices. During Project construction, MSMU would implement a management plan to ensure proper handling and disposal whenever such signs are damaged, replaced, or removed. The exit signs would be evaluated for potential radioactive materials and, if such materials are identified, proper procedures would be implemented for handling and disposal prior to building renovation or demolition in accordance with applicable local, State and/or Federal regulations. Thus, impacts would be less than significant.

Radon Gas

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The US EPA has prepared a map to assist federal, state, and local organizations

to target their resources and to implement radon-resistant building codes.[14] The map divides the country into three Radon Zones, according to the table below:

EPA Radon Zones

EPA Zones	**Average Predicted Radon Levels**	**Potential**
Zone 1	*Exceed 4.0 pCi/L*	*Highest*
Zone 2	*Between 2.0 and 4.0 pCi/L*	*Moderate*
Zone 3	*Less than 2.0 pCi/L*	*Low*

It is important to note that the US EPA has found homes with elevated levels of radon in all three zones, and the US EPA recommends site-specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not conducted as part of the ESA. However, review of the US EPA Map of Radon Zones places the Project Site in Zone 2. Based upon the radon zone classification and the fact that the Project does not include any residential structures, radon is not considered to be a significant environmental concern. Nonetheless, site-specific radon testing would be performed by MSMU prior to building construction to evaluate the future building structures potential for radon accumulation. Design features would be implemented, as necessary, to minimize radon accumulation and ensuring radon does not present a significant hazard to the public or the environment. Therefore, impacts would be less than significant.

Adjacent Campus Facilities/Tanks

A Boiler-Room Building is located near Parking Lot D and Brady Hall, adjacent to the Project Site. Several large boiler tanks, powered by natural gas, were observed in the boiler building, along with associated equipment, motors, and piping. No aboveground storage tanks (ASTs) or signs of underground storage tanks (USTs) were observed during the Site reconnaissance. The boilers were in working condition at the time of the Project Site reconnaissance. Minor staining was observed in the boiler room building, and the concrete floor of the boiler room showed signs of deterioration from age and use of boiler chemicals.

A diesel emergency generator is also located adjacent to Parking Lot D near Brady Hall. This generator includes a reservoir for storing diesel fuel. The emergency generator is re-supplied with diesel as needed by an outside vendor and additional diesel is not stored on the Project Site. The generator appears to be intact with no observed signs of historic leakage.

According to the Phase I ESA, a gasoline UST was removed near Brady Hall approximately 15 to 20 years ago. The UST was located in Parking Lot D, near the Boiler-Room Building. No evidence of historic UST leakage was observed or noted in the environmental databases reviewed. As discussed below, the former tank also would not present a vapor encroachment concern for the Project.

None of the above facilities would be impacted by the Project. Therefore, the adjacent Campus facilities/tanks are not considered to be a significant environmental concern.

[14] *US EPA website, Radon Zones Map. http://www2.epa.gov/radon/find-information-about-local-radon-zones-and-radon-programs#radonmap. Accessed June 6, 2016.*

Vapor Encroachment Concerns

According to ASTM E2600-15, the goal of conducting a vapor encroachment screening on a parcel of property is to identify a vapor encroachment condition (VEC). A VEC is the presence or likely presence of chemicals of concern vapors in the subsurface of the target property caused by the release of vapors from contaminated soil or groundwater or both either on or near the target property as identified by Tier 1 or Tier 2 procedures. The purpose of Tier 1 is to conduct a screen using Phase I ESA-type information to determine if a VEC exists at the target property. If the Tier 1 screen cannot rule out the possibility of a VEC existing at the target property, then a Tier 2 screen can be conducted. Tier 2 applies numeric screening criteria to existing or newly collected soil, soil gas, and/or groundwater testing results to evaluate whether or not a VEC can be ruled out.

As part of the Phase I ESA, Citadel reviewed information provided by Environmental Data Resources (EDR) regarding nearby properties to evaluate the potential for on-site vapor encroachment concerns from off-site sources. According to documents provided by EDR, no historical releases of petroleum products from leaking underground storage tanks (LUST) or historical releases of other volatile organic compounds occurred within a one-mile radius of the Project Site. MSMU maintains limited amounts of chemicals on-site for academic chemistry and fine arts use; however, no releases of these chemicals to the subsurface have been suspected or reported to date. A former gasoline UST was located south of the Project Site near Brady Hall and Parking Lot D. The precise risk/level of vapor intrusion from potential historic leakage from the former gasoline UST at its off-site location cannot be fully evaluated without a review of environmental documents concerning the UST removal; however, gasoline generally does not pose a significant risk for vapor intrusion due to natural attenuation (biodegradation). In addition, no reports of a LUST were found in the database records in the environmental databases reviewed. Further, field reconnaissance indicated no signs of leakage from the former gasoline storage tank. In consideration of the above factors and given that the former tank site would not be impacted by the Project and its distance from the proposed Wellness Pavilion, a VEC can be ruled out.

Conclusion

Based on the above, with implementation of the applicable regulatory requirements, impacts to the public or the environment resulting from the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant. Further analysis of this issue is not required in the EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The Project Site is located on the Mount Saint Mary's University Campus. No other existing or proposed schools are located within one-quarter mile of the Project Site. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Any emissions from the use of such materials would be minimal and localized to the Project Site. Further, as discussed in Response No. VIII.b, Project demolition activities could involve the removal of ACM, LBPs and PCBs. However, any such removal would occur in adherence standard regulatory requirements and would be localized to the Project Site. Further, existing adjacent Campus facilities are sufficient distance from the

Project Site to preclude impacts from these materials during Project demolition activities. Adherence with the applicable regulatory requirements would reduce risks associated with LBPs, ACMs and PCBs to acceptable levels and associated impacts would be less than significant.

During operation of the Project, the limited quantities of hazardous materials, in compliance with all prescribed handling procedures of hazardous materials, would not pose a risk to the Campus and its students, staff, faculty and visitors. Furthermore, operation of the proposed Wellness Pavilion would not cause hazardous substance emissions or generate hazardous waste. As such, the Project would result in less than significant impacts regarding hazardous materials at any existing or proposed schools within a one-quarter mile radius of the Project Site. Further analysis of this issue is not required in the EIR.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. GeoTracker is the State Water Resources Control Board's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's databased includes list of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board.

Based on a recent review of the above referenced databases and a Phase I ESA, the Project Site is not identified as a hazardous materials site.[15],[16],[17] In addition, no off-site facilities were listed on the databases reviewed that would appear to present an environmental concern for the Project Site.

Based on the above, impacts with regard to listing as a hazardous materials site would be less than significant. Further analysis of this issue is not required in the EIR.

[15] *Department of Toxic Substances Control, Envirostor Database at http://www.envirostor.dtsc.ca.gov/public, accessed June 6, 2015.*

[16] *State Water Resources Control Board, GeoTracker Database at https://geotracker.waterboards.ca.gov/, accessed June 6, 2016.*

[17] *CalEPA's List of Active CDO and CAO sites; online at http://www.calepa.ca.gov/SiteCleanup/CorteseList/, accessed June 6, 2016.*

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project Site is not within an airport land use plan and it is not within two miles of a public use airport. The nearest airport is the Santa Monica Airport located approximately five miles south of the Project Site. Therefore, the Project would not result in an airport-related safety hazard for people residing or working in the Project area, and no impact would occur in this regard. Further analysis of this issue is not required in the EIR.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?

No Impact. There are no private airstrips in the vicinity of the Project Site and the Project Site is not located within a designated airport hazard area. Therefore, the Project would not result in airport-related safety hazards for the people residing or working in the area. No impact would occur in this regard and no further analysis is required in the EIR.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located on the Mount Saint Mary's University Campus and is served by an existing roadway network. Construction activities for the Project would be confined on-site. While construction-related vehicles traveling to/from the Project Site would be necessary, traffic flow and access would be maintained throughout the course of construction activities. Furthermore, in accordance with City requirements, the Project would develop a Construction Management Plan, which includes designation of a construction vehicle route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity, but would not result in modifications to access from the streets that surround the Project Site. Emergency access to the Project Site, Campus and surrounding area would continue to be provided from local streets, including Chalon Road, similar to existing conditions. None of the roadways that border the Campus are designated by the City as emergency or disaster routes.[18] Nonetheless, the Project is required to provide adequate emergency access and to comply with Los Angeles Fire Department (LAFD) access requirements. Subject to review and approval of Project Site access and circulation plans by the LAFD, the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Since the Project would not cause an impediment along the City's designated emergency evacuation routes, and the proposed Wellness Pavilion would not impair implementation of the City's emergency response plan, the Project would have a less than significant impact with respect to these issues. No further analysis of this issue is required in the EIR.

[18] *City of Los Angeles General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H November 26, 1996.*

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less Than Significant Impact. The Project Site is located within a previously developed area on the Mount Saint Mary's University Campus and is adjacent to steep, undeveloped hillsides. The Project Site and Campus are located within a City-designated Very High Fire Hazard Severity Zone (VHFHSZ).[19] Accordingly, MSMU must comply with the applicable Brush Clearance (Fuel Modification) requirements of the Fire Code. MSMU currently implements fuel modification brush clearance adjacent to the existing structures and facilities within the Project Site consistent with the Fire Code VHFHSZ requirements. The Project would replace the older, existing on-site building/structures with a modern facility constructed to current Fire Code building standards and safety requirements, including smoke/fire alarms, fully sprinklered indoor spaces, and irrigated landscaped areas, which would serve to reduce potential hazards related to structure fires. Further, MSMU would continue to comply with brush clearance requirements as required by the Fire Code under Project operations. Based on the developed nature of the Project Site and the brush clearing requirements to be implemented on the adjacent hillsides, as well as the building standards and fire safety features to be included as part of the Project, impacts in this regard would be less than significant. Further analysis of this issue is not required in the EIR.

IX. HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Potentially Significant Impact. Construction of the Project would require earthwork activities, including excavation and grading of the Project Site. During precipitation events in particular, construction activities associated with the Project would have the potential to result in minor soil erosion during grading and soil stockpiling, subsequent siltation, and conveyance of other pollutants into municipal storm drains. The Project would be required to comply with the conditions of the City's General Construction Permit, issued by the Los Angeles Regional Water Quality Control Board (RWQCB), including the preparation and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) for construction activities. The SWPPP requires that all potential on-site stormwater pollution sources are addressed through the implementation of applicable stormwater quality Best Management Practices (BMPs), including BMPs to minimize erosion and sedimentation and the generation and transport of other construction-related pollutants.

In addition, given the improvements proposed as part of the Project, associated water quality impacts could occur during Project operation. During operation, the Project would be required to incorporate BMPs and drainage features to capture and treat runoff per the applicable provisions of the City's Standard Urban Stormwater Management Plan (SUSMP) permit requirements, Low Impact Development (LID) Ordinance, and Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494). While the Project would be required to include design features and comply with applicable regulations to

[19] *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles.*

avoid significant impacts to water quality standards and waste discharge requirements, it is recommended that water quality impacts be analyzed further in the EIR. The EIR analysis will confirm whether potentially significant impacts would be avoided through compliance with applicable regulatory requirements or addressed through implementation of Project design features or mitigation measures.

b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?

Less Than Significant Impact. Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including groundwater. In 2009 – 2010 LADWP had an available water supply of roughly 550,000 acre-feet (AF), with approximately 14 percent coming from local groundwater.[20] Groundwater levels in the City of Los Angeles are maintained through an active process via spreading grounds and recharge basins. Although open spaces do allow for seepage of water into smaller unconfined aquifers, the larger groundwater sources within the City of Los Angeles are actively recharged and supply the City with its water supply.

Since the Project Site is currently developed and pervious areas are limited to ornamental landscaped areas, it does not currently support a substantial opportunity for recharge of groundwater. The extent of groundwater recharge under the Project would be roughly similar to the existing Project Site's historic contribution to recharge as there would be minimal change to the total impervious area on the Project Site. Furthermore, the small size of the Project Site limits its potential to substantially contribute to recharge of groundwater sources. Therefore, impacts due to interference with groundwater recharge would be less than significant. No further analysis of this issue is required in the EIR.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Potentially Significant Impact. Construction of the Project would temporarily alter the existing drainage pattern of the Project Site, particularly during excavation and grading activities. If a precipitation event were to occur during these activities, exposed sediments may be carried off-site and into the local storm drain system, thus increasing siltation. As discussed under Response No. IX.a, the Project would be required to prepare a SWPPP that includes BMPs that minimize erosion and sedimentation and the generation and transport of other construction-related pollutants. In addition, the change in on-site drainage patterns resulting from the Project could also result in limited soil erosion. A preliminary hydrology analysis is being prepared for the Project to evaluate the change in drainage patterns that would occur with Project implementation. The results of the preliminary hydrology analysis will be included in the EIR. The EIR analysis will determine the Project's consistency with applicable drainage requirements in the City's SUSMP, LID Ordinance and Stormwater and Urban Runoff Pollution Control regulations (Ordinance Nos. 172,176 and

[20] *City of Los Angeles Department of Water and Power. "2010 Urban Water Management Plan." Adopted May 3, 2011,*

No. 173,494). The EIR analysis will confirm whether potentially significant impacts would be avoided through compliance with applicable regulatory requirements or addressed through implementation of Project design features or mitigation measures.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?

Potentially Significant Impact. While the Project Site is under construction, the rate and amount of surface runoff generated at the Project Site would fluctuate. However, because the construction period is temporary and an on-site storm drain system would be constructed in conjunction with the development, the potential for flooding during construction would be less than significant. The Project Site has been graded and developed, with the topography of the Campus sloping downward from north to south. The northern portion of the Campus is located at an elevation of approximately 1,150 amsl, while the southern portion of the Campus is located at approximately 900 feet amsl. The Project Site topography varies from approximately 1,100 feet amsl in the northern portion to approximately 1,075 in the southern portion. Changes in Project run-off would be minimal and the Project would implement drainage features pursuant to the City's Low Impact Development Ordinance, which provides for storm water retention to avoid flooding. Nevertheless, the Project would alter the drainage pattern of the Project Site and would need to demonstrate a design that links Project Site drainage to the local drainage network so as not to adversely affect flooding conditions. Therefore, as discussed in Response No. IX.c, above, a preliminary hydrology analysis is being prepared for the Project to evaluate the change in drainage patterns that would occur with Project implementation. The results of the preliminary hydrology analysis will be included in the EIR. The EIR analysis will determine the Project's consistency with applicable drainage requirements in the City's SUSMP, LID Ordinance and Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494). The EIR analysis will confirm whether potentially significant impacts would be avoided through compliance with applicable regulatory requirements or addressed through implementation of Project design features or mitigation measures.

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact. A significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level that exceeds the capacity of the storm drain system serving the Project Site. A significant impact would also occur if the Project would substantially increase the probability that polluted runoff water would reach the storm drain system or increase polluted runoff. As discussed in Responses Nos. VIII.c-d, above, operation of the Project would alter on-site drainage patterns which could potentially result in flooding issues and additional sources of polluted runoff. A preliminary hydrology analysis is being prepared for the Project to evaluate the change in drainage patterns that would occur with Project implementation. The results of the preliminary hydrology analysis will be included in the EIR. The EIR analysis will include an evaluation of potential impacts to the stormwater drainage systems serving the Project Site. The EIR analysis will confirm whether potentially significant impacts would be avoided through compliance with applicable regulatory requirements or addressed through implementation of Project design features or mitigation measures.

f. Otherwise substantially degrade water quality?

Potentially Significant Impact. As stated in Response No. IX.a, above, construction activities associated with the Project have the potential to result in minor soil erosion during grading and soil stockpiling, and could result in subsequent siltation and conveyance of other pollutants into municipal storm drains. In addition, given the improvements proposed as part of the Project, associated water quality impacts could occur during operation of the Project. Thus, this issue will be analyzed further in the EIR. The EIR analysis will confirm whether potentially significant impacts would be avoided through compliance with applicable regulatory requirements or addressed through implementation of Project design features and/or mitigation measures.

g. Place housing within a 100-year flood plain as mapped on Federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map?

No Impact. The Project Site and adjoining properties are not located within the 100-year or 500-year flood zone.[21] The Project Site is not located in a 100-year or 500-year flood zone as delineated by the City.[22] Since the Project Site is not located within a 100-year floodplain, no impact would occur. Further analysis of this issue is not required in the EIR.

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

No Impact. As discussed in Response No. IX.g above, the Project Site is not located within a FEMA-designated or City-designated 100-year flood zone or floodplain. Therefore, development of the Project would not result in the construction of structures that would impede or redirect flood flows within a 100-year flood plain. No impact would occur and further analysis of this issue is not required in the EIR.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. As discussed in Response No. IX.g above, the Project Site is not located within a FEMA-designated or City-designated 100-year flood zone or plain. Further, given the Project Site's elevated location along a ridge crest on the southern flank of the Santa Monica Mountains, the Project Site is not located within a potential inundation area. In addition, the Project Site is located over approximately two miles from the nearest mapped potential inundation area located southwest of Sunset Boulevard, generally within the site of the Riviera Country Club.[23] Therefore, the Project would not expose people or structures to risk of loss or injury associated with failure of a levee or dam. Further analysis of this issue is not required in the EIR.

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[21] *Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map No. 06037C1580F.*

[22] *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit F – 100-Year & 500-Year Flood Plains in the City of Los Angeles.*

[23] *City of Los Angeles Department of City Planning, Safety Element of the General Plan, Exhibit G: "Inundation and Tsunami Hazard Areas," March 1994.*

j. Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity.

As discussed under Response No. IX.i, the Project Site is not located within a potential inundation area and is over approximately two miles from the nearest mapped potential inundation area located southwest of Sunset Boulevard, generally within the site of the Riviera Country Club. Further, the Project Site is located approximately 4.5 miles inland from the Pacific Ocean and, therefore, would not be subject to a tsunami. As the Project Site is located along a ridge crest, the Site is not susceptible to mudflows, and the Project characteristics (e.g., development of a fitness facility) would not create potential for mudflows. Therefore, impacts with respect to seiches, tsunamis, and mudflows would be less than significant. Further analysis of this issue is not required in the EIR.

X. LAND USE AND PLANNING

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located within a previously developed area of the Campus and would replace the existing buildings with the proposed Wellness Pavilion and associated improvements. As such, the Project would not physically divide an established community. Impacts would be less than significant and further analysis of this issue in the EIR is not required.

b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The Campus is located within the Brentwood – Pacific Palisades Community Plan Area in the City of Los Angeles. The Campus has a General Plan land use designation of Minimum Residential and is currently zoned RE40-1-H. "RE" stands for Residential Estate Zone, which is primarily intended for residential uses, and where educational institutions are conditionally permitted. The "H" indicates the Campus is located in the City's Hillside Area, with the "1" indicating Height District 1. Height District 1 in the RE40 zone allows maximum building heights of up to 36 feet (roof slopes of 25% or greater) or 30 feet (roof slopes of less than 25%).

The anticipated approvals required for the Project include, but may not be limited to: 1) Plan Approval (Deemed-to-be-Approved) (Per LAMC § 12.24 M) to allow new buildings to be erected on a portion of a lot that is currently permitted under a deemed-approved conditional use permit; 2) Determination to Permit a Building Height Modification (Per LAMC § 12.24 F); 3) Zoning Administrator's Approval for Additional Grading in Hillside Area (Per LAMC § 12.24 X.28 (a)(5)); 4) Demolition Permits; 5) Construction permits,

including building, grading, excavation, foundation, and associated permits; and (6) other approvals, discretionary or ministerial, that may be necessary in order to execute and implement the Project. See Attachment A, Project Description, for further details of the requested approvals. The EIR will provide further analysis of the Project's consistency with the City's General Plan, LAMC and other applicable land use plans, policies, and regulations. The EIR analysis will determine if the Project and its associated approvals would conflict with an applicable land use plan, policy, and/or regulation.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As discussed in Section IV, *Biological Resources*, above, the Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, the Project would not conflict with the provisions of any adopted conservation plan. Further analysis of this issue is not required in the EIR.

XI. MINERAL RESOURCES

Would the project:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Less Than Significant Impact (a-b). With regard to both Items XI.a and XI.b, the Project Site is not designated by the City of Los Angeles as an area containing significant mineral deposits, nor is the Project Site designated as an existing mineral resource extraction area by the State of California.[24] Additionally, the Campus has a General Plan land use designation of Minimum Residential and is currently zoned RE40-1-H, and is not classified as a mineral extraction site. Therefore, it is unlikely that mineral resources would be discovered during construction and grading activities associated with the Project. Thus, Project implementation is not anticipated to result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. Less than significant impacts to mineral resources would occur. Further analysis of this issue is not required in the EIR.

[24] *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure GS-1 and California Department of Conservation, Division of Mines and Geology/U.S. Geologic Survey, Minerals Yearbook: The Mineral Industry of California, 2001.*

XII. NOISE

Would the project:

a. Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Construction of the Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, loaders, etc.) that would generate noise on a short-term basis. Additionally, operation of the Project may increase existing noise levels as a result of Project-related traffic, heating, ventilating, and air conditioning (HVAC) systems, and operational activities on the Project Site, etc. The extent of noise impacts to nearby sensitive uses (i.e., residential uses) will require further analysis in the EIR. The EIR will analyze construction impacts to sensitive receptors from the Project's daily maximum construction noise levels and comparing these construction-related noise levels to ambient noise levels (i.e., noise levels without construction noise) based on applicable City Noise thresholds. Also, maximum operational and associated traffic noise levels will be forecasted. These noise levels will be compared to ambient noise levels based on applicable City Noise thresholds. The analysis will determine the extent to which the Project may affect nearby sensitive uses near the Project area.

b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project may generate groundborne vibration and noise due to Project Site grading, clearing activities, and transport of construction equipment. As such, the Project would have the potential to expose people to, or generate, excessive groundborne vibration and noise levels during short-term construction activities. Therefore, this issue will be analyzed further in the EIR. The EIR's vibration analysis will take into consideration the potential for the Project to cause groundborne vibration at nearby buildings located on the Campus and sensitive receptors, as applicable.

The Project's proposed Wellness Pavilion uses would generate groundborne vibration and noise levels similar to existing conditions, which are not perceptible off-site uses. As such, operation of the Project would not have the potential to expose people to excessive groundborne vibration or noise. Therefore, no further analysis of operational groundborne vibration or noise in the EIR is required.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. As discussed in Response No. XII.a, operation of the Project may increase existing noise levels as a result of Project-related traffic, HVAC systems, and human activities on the Project Site. Therefore, the potential impacts associated with a permanent increase in ambient noise levels will be analyzed further in the EIR. The EIR analysis will estimate noise levels from the Project at off-site sensitive receptors. These estimates will take into account existing and future on-site noise sources, including building equipment and vehicular noise. The analysis will determine the extent to which the Project may affect nearby sensitive uses near the Project area.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. As discussed in Response No. XII.a, construction of the Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, loaders, etc.) that would generate noise on a short-term basis. Therefore, the potential impacts associated with a temporary or periodic increase in ambient noise levels will be further analyzed in the EIR. The EIR analysis will identify existing noise levels at representative noise-sensitive receptor locations in the Project vicinity and evaluate the effect of the Project noise sources at these locations.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located within an airport land use plan or within two miles of an airport. The nearest airport is the Santa Monica Airport located approximately five miles south of the Project Site. Therefore, the Project would not expose people to excessive noise levels associated with airport use. Further analysis of this issue is not required in the EIR.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. As stated above, the nearest airport is the Santa Monica Airport located approximately five miles south of the Project Site. As such, the Project is not within the vicinity of a private airstrip and would not expose people residing or working in the area to excessive noise levels. No impacts would occur, and further analysis of this issue is not required in the EIR.

XIII. POPULATION AND HOUSING

Would the project:

a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. Construction of the Project would create temporary construction-related jobs. Nevertheless the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate as a consequence of working on the Project. Therefore, no new permanent residents would be generated during construction of the Project. Moreover, the Project does not entail the extension of roads and/or other infrastructure.

The Project addresses the lack of adequate fitness facilities on the existing Campus through development of the Wellness Pavilion. The Project does not include development of residential units and would not increase enrollment at the Campus. Potential impacts associated with population growth would be less than significant. No further analysis of this topic in the EIR is required.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

No Impact (b-c). The Facilities Management Buildings include two apartment units for Campus facilities management staff. The existing apartment units and offices would be relocated to the Brady Building located on the Campus. Accordingly, no people would be displaced by the Project and construction of replacement housing would not be required. No further analysis of this issue is required in the EIR.

XIV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire Protection?

Potentially Significant Impact. The Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services in the City of Los Angeles. The closest fire station to the Project Site, Fire Station No. 19, located at 12229 West Sunset Boulevard in the City of Los Angeles, is approximately 2.7 miles (driving distance) from the Site. As the Project would alter development on the Project Site, impacts to fire protection and emergency services could be potentially significant. Therefore, potential impacts to fire protection and emergency medical services will be analyzed further in the EIR.

The EIR analysis will include an identification of: the locations, number of service personnel, equipment and response times for the fire stations currently serving the Project Site; Fire Code and requirements applicable to the Project; and proposed fire suppression or fire safety design features of the Project. The analysis will evaluate the adequacy of existing fire stations and personnel to provide service to the Project during operation, and whether the Project would result in the need for new or expanded facilities.

b. Police Protection?

Potentially Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services in the City of Los Angeles. The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The Project Site is located in the West Bureau of the LAPD, which serves the communities of Hollywood, Wilshire, Pacific and West Los Angeles, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.

The closest police station to the Project Site is The West Los Angeles Community Police Station is the closest station to the Project Site. The Station is located at 1663 Butler Avenue in Los Angeles, approximately 4.5 miles (driving distance) from the Site. As the Project would alter development and activities on the Project Site, demand on LAPD police protection services could increase. Therefore, the potential impacts associated with police protection services will be analyzed further in the EIR.

The EIR analysis will include an identification of: the locations, number of service personnel, equipment and response times for the police stations currently serving the Project Site; local and regional officer-to-resident ratios and crimes per capita; and design features that would reduce the Project's demand for police services. The analysis will evaluate the adequacy of existing police stations and personnel to provide service to the Project during operation, and whether the Project would result in the need for new or expanded facilities.

c. Schools?

No Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). As discussed previously, the Project does not propose the development of residential units and would not increase the student population. Therefore, direct impacts on demand for classroom space within LAUSD or any other surrounding school districts would not occur. Any potential indirect impact on public school facilities resulting from new faculty or staff needed to maintain and operate the proposed Wellness Pavilion would be inconsequential. Furthermore, the Project would provide for permanent, upgraded, and expanded school wellness and recreation facilities. As such, the Project would not result in the need for new or altered school facilities and no adverse impacts would occur. Further analysis of this issue is not required in the EIR.

d. Parks?

No Impact. The Los Angeles Department of Recreation and Parks (LADRP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City of Los Angeles. The Project does not propose the development of residential uses, which typically generate a direct demand for parks. Further, the Project would not increase student enrollment. In addition, the Project would include the development of a Wellness Pavilion that would include a recreation and practice gymnasium, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios. The Project also includes a new outdoor pool area. These facilities would increase the recreational opportunities available on the Campus for students, faculty and staff and would reduce the need for students to use off-site facilities. As implementation of the Project would not generate new demand for existing parks or require the development of new parks in the adjacent vicinity, no impact on parks within the Project vicinity would occur. Further analysis of this issue is not required in the EIR.

e. Other governmental services (including roads)?

Less Than Significant Impact. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. The three closest public libraries to the Project Site are the Brentwood Branch Library located at 11820 San Vicente Boulevard, the Westwood Library located at 1246 Glendon Avenue and the West Los Angeles Regional Library located at 11360 Santa Monica Boulevard. In addition, a school library is located on the Campus and available to students, faculty, and staff. The existing library would continue to accommodate the demand for library services subsequent to implementation of the Project, particularly as the Project does not propose the development of residential units and would not increase Campus

enrollment. No other public services would be materially impacted by the Project. The Project Site would continue to be served by the existing road network, and would not require additional government services for the operation and maintenance of these roads. Therefore, the Project would result in a less than significant impact on other governmental services. Further analysis of other governmental services is not required in the EIR.

XV. RECREATION

Would the project:

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The Project would include new and expanded recreation facilities. These facilities would increase recreational opportunities available on the Campus and reduce the need for students to use off-site facilities. Implementation of the Project would not increase the use of existing parks, thus the Project would not result in the physical deterioration of parks facilities. No impacts would occur and further analysis of this issue is not required in the EIR.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Potentially Significant Impact. The Project would include the development of new and expanded recreational facilities on the Project Site. Construction of these facilities would occur within the existing Campus footprint, in an area that has already been previously developed as part of the existing Campus. The physical impacts associated with hazards and hazardous materials, mineral resources, population and housing, schools, parks, libraries, wastewater, solid waste resulting from the Project have been evaluated throughout this Initial Study and were determined to be less than significant. Furthermore, the physical impacts associated with aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, noise, police and fire protection, transportation/circulation and water resulting from the Project will be further analyzed in the EIR. Thus, as the physical impacts of the new recreational facilities will be evaluated throughout the EIR, this issue would not be individually evaluated in the EIR.

The proposed development would include an outdoor courtyard space, a pool deck, and a roof garden that would provide outdoor recreation space and amenities for students, faculty and staff. These Project features have been incorporated into the overall Project design. Therefore, construction of these recreational facilities as part of the Project and the resulting physical effects on the environment are assessed within this Initial Study. Any issues within this Initial Study that are noted as potentially significant will be analyzed further in the EIR.

XVI. TRANSPORTATION/CIRCULATION

Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact. Construction of the Project would result in a temporary increase in traffic due to construction-related truck trips and worker vehicle trips. Therefore, traffic impacts during construction could also adversely affect the street system. Thus this topic will be analyzed further in the EIR. With regard to construction activities, the EIR analysis will: (1) describe existing vehicle and pedestrian (i.e., sidewalks, crosswalks, etc.) circulation patterns around the Project Site and along the likely routes used by construction-related vehicles; (2) forecast the number of construction vehicle and construction worker trips; and (3) analyze potential construction-related impacts to travel lanes, sidewalks, bicycle lanes/paths, turning lanes, and parking.

The Project does not propose development of residential units and would not increase student enrollment at the Campus. Nonetheless, development of the proposed Wellness Pavilion could increase vehicle trips to and from the Campus due to an increase in the number of events taking place at the Campus, as well as an increase in the number of attendees attending a number of the existing events (See Attachment A, *Project Description*). With regard to Project operations, the EIR analysis will address the Project's potential impacts on local streets, intersections, freeways and transit systems serving the Project area. The traffic analysis will provide a quantitative intersection level of service and street segment impact analysis based on LADOT methodologies and in accordance with CEQA, as necessary. The EIR analysis will also analyze parking impacts and whether potential parking impacts could occur on neighborhood streets within adjacent residential neighborhoods, as necessary.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact. The Congestion Management Program (CMP) is a state-mandated program enacted by the state legislature to address the impacts that urban congestion has on local communities and the region as a whole. Metro is the local agency responsible for implementing the requirements of the CMP. New projects located in the City of Los Angeles must comply with the requirements set forth in the Metro's CMP. These requirements include the provision that all freeway segments where a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated CMP intersections where a project could add 50 or more trips during either peak hour. Development of the proposed Wellness Pavilion has the potential to affect the street system due to changes

to existing events as well as potential new events that could occur at the proposed Wellness Pavilion, which could potentially increase vehicle trips to a freeway segment or CMP intersection. Thus, this issue will be analyzed further in the EIR. The EIR analysis will identify CMP intersections and freeway segment monitoring locations that could be affected by the Project, and analyze potential Project impacts on CMP facilities in accordance with current CMP methodologies.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The nearest airport is the Santa Monica Airport located approximately five miles south of the Project Site. As such, the Project would not result in a change in air traffic patterns including increases in traffic levels or changes in location that would result in substantial safety risks. No impact would occur and further analysis of this issue is not required in the EIR.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The roadways immediately adjacent to the Project Site are within the existing Campus roadway network. Access to the Campus is provided from Chalon Road, which is part of an established roadway network within the adjacent single-family residential neighborhood. The roadways within the neighborhood do curve and consist of various unsigned and stop-sign controlled intersections leading to and from the Campus. The Project is not proposing any changes to the roadway network off Campus.

The existing shuttle parking space is in front of the Library, in the Circle area. Those walking from the Circle area to buildings in the southern areas of the Campus frequently walk through vehicle areas and roadways near the Library shuttle area, thereby creating pedestrian-vehicular conflicts. Also, the pedestrian route leading to the academic portion of the Campus from the housing facilities in the northern portions of the Campus (Yates, Aldworth, and Burns Houses) proceeds along roadways and through parking lots, creating a hazardous pedestrian environment. The Project's proposed circulation systems and accessory parking deck would minimize such conflicts. Vehicles would enter the parking areas from the west and pedestrians would exit the structure to the Campus from the east. A landscaped walkway would be provided on the eastern side of the structure to access the main Campus areas to the south. This walkway would also be utilized by pedestrians going to/from the Yates, Aldworth, and Burns Houses. As such, the proposed circulation system would allow students to safely access the proposed Wellness Pavilion while enhancing the connectivity between the Campus core and the upper dormitories.

The proposed new shuttle stop would be added south of the proposed Wellness Pavilion, north of the Mary Chapel. The Project would provide a vehicle turnaround/drop-off area within the motor court so that shuttles would no longer be required to reverse when existing the shuttle pick-up drop-off area. This turnaround/drop off area could also be used by other vehicles for passenger drop=off or pick-up. The drop-off area would be separated from surrounding pedestrian pathways by landscaped planters and/or bollards. The design of the turnaround/drop-off area would reduce potential conflicts between vehicles and pedestrians, while also eliminating the sound of the shuttle's back-up signal, which would otherwise disturb those in the Chapel and nearby areas.

Considering the above factors, the potential for hazardous conditions would decrease, compared to existing conditions, under the Project. Therefore, the Project would result in no impacts regarding hazardous design features and incompatible uses. Further analysis of this issue is not required in the EIR.

e. Result in inadequate emergency access?

Less Than Significant Impact. The Project Site is located on a developed Campus served by an existing roadway network. Construction activities for the Project would be confined on-site. While construction-related vehicles would travel to and from the Project Site, traffic flow and access would be maintained throughout the course of construction activities. Furthermore, in accordance with City requirements, the Applicant would be required to develop and submit a Construction Management Plan, which includes designation of a construction vehicle route. This would ensure that adequate emergency access is maintained during construction. Therefore, construction of the Project is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity, but would not result in modifications to access from the streets that surround the Project Site. Emergency access to the Project Site, Campus and surrounding area would continue to be provided from local streets, including Chalon Road, similar to existing conditions. The Project is required to provide adequate emergency access and to comply with LAFD and LAPD access requirements. Subject to review and approval of Project Site access and circulation plans by the LAFD and LAPD, the Project would provide adequate emergency access. Further, the additional parking spaces included as part of the Project, would reduce the number of students parking along the local roadways, providing emergency responders with a less congested route. The Project would have a less than significant impact with respect to emergency access. Further analysis of this issue is not required in the EIR.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact. The Project would be constructed and operated in compliance with adopted policies, plans, and programs supporting alternative transportation that apply to the Project Site. Further, MSMU has implemented transportation demand management (TDM) strategies to encourage alternative modes choices such as subsidies and shuttle improvements, which are described in Attachment A, *Project Description*. In addition, MSMU is required to provide valet parking for all events with 50 attendees or more, to ensure parking is contained on the Campus and attendees do not park on neighborhood streets. Notwithstanding, this issue will be analyzed further in the EIR.

XVII. UTILITIES AND SERVICES SYSTEMS

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. LA Sanitation (LASAN) provides wastewater services for the Project Site. Wastewater generated by the Project would be treated at the Hyperion Water Reclamation Plant (HWRP).

On average 275 million gallons of wastewater enters the HWRP on a dry weather day. Because the amount of wastewater entering HWRP can double on rainy days, HWRP was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day (MGD) and peak wet weather flow of 800 MGD.[25] HWRP effluent is required to meet the Los Angeles Regional Water Quality Control Board's (RWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollutant Discharge Elimination System (NPDES) Permit. Accordingly, HWRP effluent that is discharged into Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.

The Project addresses the lack of adequate fitness facilities on the Campus through development of the proposed Wellness Pavilion. It does not include development of residential units and would not increase student enrollment at the Campus. The proposed Wellness Pavilion would primarily be used by students, faculty, and staff already on the Campus.

Currently there are a number of events held on the Campus which draw visitors beyond the student body, staff, and faculty. The number of attendees at External Events and Internal Events with Outside Traffic varies depending on the type of event. As discussed in Attachment A, *Project Description*, the proposed Wellness Pavilion could result in changes to several annual events typically held at the Campus, with potential for new events/activities that currently do not occur on the Campus. These events would be held periodically throughout the year, with many events attended by students, faculty, and staff already on the Campus, as well as events involving outside guests. Of the events described in Table A-1, *Potentially Changed and New Campus Events/Activities*, the "Potential New Events/Activities" generally would result in the largest increase in outside guests. The "Other Wellness/Sports Activities" events could attract approximately 400 outside guests on a typical school day.

As stated above, the existing design capacity of HWRP is 400 MGD, and it currently processes an average flow of 275 MGD. With the Project's added 0.019 MGD[26] of wastewater, the HWRP average flow would be approximately 275.019 MGD. Thus, HWRP has sufficient capacity to treat wastewater flows from the Project (including events with the largest number of attendees).

During the Summer Sports Camps, up to 450 outside guests may attend. However, these events would occur in the summer when school is not in session. Thus, daily wastewater generation during these events would be less than on a typical school day. Also, similar to the "Other Wellness/Sports Activities" events, attendees would likely reside in the City of Los Angeles and would not be considered new sources of wastewater within the HWRP service area. Further, as the Project would include new and expanded recreational facilities, discharge of hazardous materials into the sewer system would not occur under the Project.

Construction of the Project would also include all necessary on- and off-site sewer pipe improvements to adequately convey flows through the City's sewer system. As previously discussed, the Project would not generate sewer flows that would jeopardize the ability of the HWRP to operate within its established

[25] *LASAN website. Overview of Hyperion Water Reclamation Plant. Accessed June 3, 2016. https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1acdgk9dsc_4&_afrLoop=2721637050798774#!*

[26] *Refer to Table B-1 for projected wastewater generation; 0.019 reflects net wastewater flows.*

wastewater treatment requirements. As a result, the Project would not exceed the requirements of the LARWQCB and a less than significant impact would result. Further analysis of this issue is not required in trhe EIR.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. Wastewater. With regard to wastewater treatment, as discussed under Response No. XVII.a, the Project's net increase in wastewater generation would not exceed the treatment capacity of the HWRP and a less than significant impact would result.

A sewer infrastructure assessment is included in the Wastewater Technical Memo prepared by KPFF, dated June 28, 2016 (included in Appendix B of this Initial Study).

A sewer capacity study was conducted at two of the sewer manholes serving the Campus. One of the studied sewer manholes is located in a parking area on Campus, west of Grace Lane/Carondelet Center. This manhole was chosen because it allows for the observation of the behavior and capacity of the upstream 6" sewer pipe, and the downstream 8" sewer pipe.

The upstream 6" sewer pipe's maximum flow observed is 112.85 gallons per minute GPM and the average flow observed is 53.32 GPM. The maximum velocity observed is 4.98 feet per second (FPS) and the average velocity observed is 3.37 FPS. The maximum level observed within this pipe is 1.62 inches (in).

The second manhole is located at the intersection of Chalon Road and MSMU's private access road (Grace Lane). This location was chosen as it allows for the observation of the behavior and capacity at the connection to the public sewer main. The upstream sewer pipe size is 8" and downstream the public sewer main is 8". The maximum flow observed is 165.07 GPM and the average flow observed is 67.89 GPM. The maximum velocity observed is 7.30 FPS and the average velocity observed is 4.45 FPS.

Sewer generation factors from the City of Los Angeles Department of Public Works Bureau of Engineering (BOE) were used to determine future wastewater flows during operation of the Project. **Table B-1**, *Wastewater Generation*, includes the existing (without Project) and future (with Project) wastewater flows. As shown, 1,123 GPD, with a peak demand of 2.4 GPM of wastewater is currently generated at the Project Site.

The proposed conditions considers the amount of wastewater generation during the largest new event with outside guests during the school year. Under the Project, on an event day (worse-case scenario) wastewater flow from the Project Site would be 18,595 GPD, with a peak demand of 38.7 GPM.[27] As discussed in Response XVIIa above, the HWRP has adequate capacity to process the Project's projected wastewater flows.

[27] *Reflects net wastewater flows.*

Table B-1

Wastewater Generation

Facility Description	Building SF	SGF[a] in GPD	GPD	GPM x 3[b]
Existing Conditions				
Facilities Management Building	4,970	0.15GPD/SF	745	1.6
Fitness Center	1,030	0.25GPD/SF	258	0.5
Swimming Pool	Process Flow	Process Flow	120	0.3
Total			**1,123**	**2.4**
Proposed Conditions				
Gymnasium	9,500	0.25 GPD/SF	2,375	5.0
Offices	1,000	0.15 GPD/SF	150	0.3
Dance Studio	2,000	0.080 GPD/SF	160	0.3
Multi-Purpose Rooms/Phys. Therapy Lab[c]	2,850	0.25 GPD/SF	713	1.5
Other Facility Spaces[d,e]	18,250	0.8 GPD/SF	14,600	30.4
Swimming Pool: Commercial with Backwash	Process Flow	Process Flow	120	0.3
Sub-Total			**18,118**	**37.8**
Proposed Conditions (Largest New Events w/ Outside Guests + During School Year)				
Other Wellness/Sports Activities (400 Outside Guests)	400 Outside Guests	4 GPD/ Occupant[f]	**1,600**	**3.3**
Total Proposed Conditions			**19,718**	**41.1**

Notes
SF = square feet
GPD = gallons per day
GPM = gallons per minute

[a] *Sewer Generation Factors per the Department Public Works, Bureau of Engineering.*
[b] *Peaking factor of 3 to determine the peak demand.*
[c] *Assumes generation factor equivalent to Medical Office category*
[d] *Assumes generation factor for Health Club/Spa category. Health club/spa includes "lobby area, workout floors, aerobic rooms, swimming pools, sauna, locker rooms, showers, and restrooms. If a health club/spa has a gymnasium facility, use the gymnasium rate for that portion. Gymnasiums include basketball courts, volleyball courts, and any other large open space with low occupancy density."*
[e] *Support spaces such as equipment rooms, storage spaces, electrical rooms, stairways which are anticipated to total approximately 4,400 SF would not generate wastewater and are excluded from the proposed conditions.*
[f] *Assumes generation factor equivalent to Community Center category for Outside Guests.*

Source: KPFF, 2016.

The Project would not include development of residential units, would not increase student enrollment at the Campus, and would primarily serve students, faculty, and staff already on the Campus. As such, during non-event days, wastewater generated under the proposed conditions by the students, faculty, and/or staff at the Project Site would be relatively similar to that which would otherwise be generated off the Project Site but still within the greater Campus by those same students, faculty and/or staff.

According to the sewer capacity analysis, a PVC pipe with a slope of 8 percent, a diameter of 6", and a normal depth of 3", maintains a design capacity of 462 GPM. The availability of additional capacity can be attributed

to the steep average slope of the Campus in the north to south direction. The average slope is within the range of 8-12 percent, creating large flow velocities within the existing sewer pipes. Thus, based on the design capacity and current average flow of 165.07 GPM of wastewater, the PVC pipe could process an additional 296 GPM of wastewater per day. With the Project's added 38.7 GPM,[28] the average flow would be approximately 203.77 GPM.

Any minor increase or shift in wastewater generated by the Project under the proposed conditions, during an event day or not, would be well within the available capacity of the sewer lines serving the Project Site and the greater Campus. Further, based on the capacities observed at the lines along Chalon Road, in consideration of the Project-related wastewater flows, it is anticipated that the downstream lines/facilities would adequately convey flows from the Campus under the proposed conditions.

Based on the above, the Project would result in a less than significant impact with respect to wastewater conveyance and treatment facilities. Further analysis of this issue is not required in the EIR.

Potentially Significant Impact. Water. As discussed in Response No. XVII.d, below, water supply impacts will be further evaluated in the EIR. Based on the total water demand generated by the Project, upon consideration of water conservation features to be implemented by the Project, further analysis of water conveyance infrastructure in the EIR will be provided. The location, condition and capacity of water conveyance lines will also be evaluated to determine whether adequate capacity is available to accommodate the required fire flows and domestic water demand generated by the Project.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. The Project would include new on-site stormwater drainage facilities that would be constructed in accordance with applicable regulatory requirements. In accordance with current regulatory requirements, post development runoff volume would not exceed that of the predevelopment condition. The hydrology/drainage analysis will be included in the EIR to demonstrate the Project's compliance with applicable stormwater runoff requirements. Environmental impacts associated with development of the Project, including on-site drainage facilities have been evaluated throughout this Initial Study document and will be assessed in the EIR.

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Potentially Significant Impact. Although the Project does not include development of residential units, would not increase student enrollment at the Campus, and would primarily serve students, faculty and staff already on the Campus, there is the potential for an increase in water demand at the Campus due to events and changes in landscaping. Therefore, while it is not anticipated that the Project would result in a substantial increase in water demand, this issue will be analyzed further in the EIR. The Los Angeles

[28] *Reflects the net wastewater flow.*

Department of Water and Power (LADWP) supplies water to the Project Site. The EIR analysis will calculate the Project's total water demand based on the Project's individual components, and will assess LADWP's ability to serve the Project based on LADWP's water supply commitments and the available capacity of LADWP infrastructure. The analysis will also discuss the Project consistency with water supply projections contained in the City's Urban Water Management Plan (UWMP).

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As indicated under Response No. XVII.a, the Project would not exceed the treatment capacity of the HWRP. Specifically, the Project's projected wastewater generation represents a negligible percentage of the remaining available capacity at the HWRP. Further, as discussed under response No. XVII.b, the local wastewater conveyance infrastructure would adequately serve wastewater generated by the Project. Therefore, the Project would have a less than significant impact with respect to wastewater treatment capacity. No further analysis of this issue is required in the EIR.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Potentially Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. LASAN has the responsibility to develop plans and strategies to manage and coordinate the solid waste generation in the City and to address the disposal needs of the City as a whole. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial and industrial properties. Solid waste management includes solid waste source reduction, recycling, composting, transformation and disposal. The City does not own or operate any landfill facilities. The majority of the solid waste generated within the City is disposed of at Los Angeles County landfills.

The California Integrated Waste Management Act of 1989, also known as Assembly Bill 939, mandates jurisdictions to meet a diversion goal of 50 percent by 2000 and thereafter. In addition, each county is required to prepare and administer a Countywide Integrated Waste Management Plan (CoIWMP). This plan is comprised of the county's and the cities' solid waste reduction planning documents plus an Integrated Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element (CSE). For Los Angeles County, the County's Department of Public Works (Public Works) is responsible for preparing and administering the Summary Plan and the CSE. These documents were approved by the County, a majority of the cities within the County containing a majority of the cities' population, the County Board of Supervisors, and the California Department of Resources Recycling and Recovery (CalRecycle). The Summary Plan, approved by CalRecycle on June 23, 1999, describes the steps to be taken by local agencies, acting independently and in concert, to achieve the mandated state diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County.

In December 2015, the County of Los Angeles Department of Public Works released the 2014 CoIWMP (the most recent available).[29] As indicated therein, the remaining disposal capacity for the County's Class III landfills is estimated at approximately 112 million tons as of December 31, 2014. In addition to in-County landfills, out-of-County disposal facilities are also available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the CoIWMP, the County anticipates that future Class III disposal needs can be adequately met through 2029 through some combination of the following strategies (Scenarios II through VII of the 2014 Annual Report): increased waste reduction and diversion efforts, development of alternative technologies, supporting exportation of waste to out-of-County facilities, utilizing the waste-by-Rail system to the Mesquite Regional landfill, and if found to be environmentally sound and technically feasible, expansion of in-County landfills.

Construction Impacts

Construction of the Project would require grading and excavation of the Project Site, as well as construction of proposed Project features. Each of these activities would generate demolition waste, including but not limited to soil, asphalt, wood, paper, glass, plastic, and metals. As discussed in Attachment A, *Project Description*, soil associated with the excavation and grading activities would be balanced on the Project Site. Thus, no soil import or export will be required.

Construction materials will be disposed of at one of the unclassified inert landfills available to the City of Los Angeles, such as the Azusa Land Reclamation Facility, which has an estimated remaining capacity of approximately 52,750,160 cubic yards (29,671,965 tons) with a projected closure date of year 2046.[30] As a result, Project excavation and construction would account for only an incremental small fraction of the available capacity of the Azusa Land Reclamation Facility, and construction waste would not exceed the existing capacity of this facility. Construction and demolition debris generated by the Project would be consistent with City recycling regulations. These regulations require the Applicant to contract with a waste disposal company that recycles construction and/or demolition debris, as well as to provide temporary waste separation bins during Project construction. On March 5, 2010, the City Council approved the Construction and Demolition Waste Recycling Ordinance, which requires all mixed construction and demolition generated within City limits be taken to City-certified construction and demolition waste processors. This recycling policy became effective as of January 1, 2011. Project construction would be required to achieve a minimum 50 percent diversion rate under Assembly Bill 939.[31] Because construction waste would not exceed the capacity of existing disposal facilities and would be further reduced by recycling, impacts would be less than significant. Further analysis of construction solid waste impacts is not required in the EIR.

29 *County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan: 2014 Annual Report. December 2015. Available at: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=3473&hp=yes&type=PDF. Accessed May 2, 2016.*

30 *Azusa Land Reclamation Fact Sheet, prepared by Waste Management, 2014, https://www.wmsolutions.com/pdf/factsheet/Azusa_Land_Reclamation.pdf, accessed June 2016.*

31 *Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (Assembly Bill 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 requires each city or county plan to include an implementation schedule which shows diversion of 50 percent of all solid waste by January 1, 2000.*

Operational Impacts

Although the Project does not include development of residential units, would not increase student enrollment at the Campus, and would primarily serve students, faculty and staff already on the Campus, there is the potential for an increase in solid waste demand at the Campus due to the increase in events with the Project. Therefore, while it is not anticipated that the Project would result in a substantial increase in solid waste generation, this issue will be analyzed further in the EIR. The EIR analysis will discuss the capacity and any service limitations/constraints at existing landfills serving the Project Site; quantify the amount of solid waste generated by Project operational activities; and compare the Project's potential solid waste generation to the capacity of the landfills serving the Project Site, while accounting for compliance with regulatory requirements.

g. Comply with Federal, State, and local statutes and regulations related to solid waste?

Potentially Significant Impact. As discussed in Response No. XVII.f, there are a number of state, county and city plans and policies that address the availability of sufficient landfill capacity and the diversion/recycling of waste debris. Furthermore, as stated in Response No. XVII.f, the Project would increase the number of events on the Campus. The Project's waste generation and consistency with plans and policies to increase diversion of wastes will be evaluated in an EIR. The EIR will compare the Project's potential solid waste generation to the capacity of the landfills serving the Project Site, while accounting for compliance with regulatory requirements.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As discussed within this Initial Study, the Project may result in environmental impacts that have the potential to degrade the quality of environment. These environmental impacts include potential impacts related to Aesthetics, Air Quality, Biological Resources, Cultural Resources (Historical, Archaeological and Paleontological Resources), Geology and Soils, Greenhouse Gases, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services (fire and police), Recreation, Transportation/Circulation, and Utilities and Service Systems (water and solid waste). An EIR will be prepared to analyze and document these potentially significant impacts.

Given the size and scale of the Project and Project Site, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Nonetheless, as discussed previously in Section IV, *Biological Resources*, the EIR will provide

an assessment of impacts to biological resources, including sensitive plant and animal species. Also, a cultural resources assessment will be provided in the EIR that will fully analyze impacts to historical, archaeological and paleontological resources, which would include examples of the major periods of California history or prehistory.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the Project alone. The Project vicinity includes other past, current, and/or probable future projects whose development would contribute to potentially significant cumulative impacts in conjunction with the Project. Cumulative impacts associated with the issues determined to be less than significant within this Initial Study are discussed below. For each of the issues determined to be potentially significant within this Initial Study as identified in the above responses, cumulative impacts will be analyzed in the EIR.

With regard to cumulative impacts for the issues of agricultural resources and mineral resources, the Project Site is located in a developed setting and like the Project, other developments occurring in the local Project area are anticipated to primarily occur on previously disturbed, urbanized land. Regardless, the Project Site does not contain these resources and therefore could not contribute to a cumulative effect. Further analysis of these issues is not required in the EIR.

With regards to hazards and hazardous materials impacts, this issue area would be fully addressed through compliance with existing regulations and implementation of site-specific technical analysis or studies (i.e., hazardous materials assessment, etc.) for each related project (including site-specific mitigation for each related project) such that less than significant cumulative impacts would occur with related projects. In other words, impacts with regards to this issue area would be limited to the Project Site and would not be increased when viewed in conjunction with the related projects. Further analysis of this issue is not required in the EIR.

With regards to population and housing, the Project would result in a less than significant impact regarding population growth. While cumulative projects in combination with the Project would contribute to population growth, the Project does not propose the development of residential units and would not change student enrollment. Based on these factors, cumulative impacts in this regard would be less than significant.

The Project would result in less than significant impacts regarding wastewater infrastructure and treatment facilities. The Project proposes to develop a Wellness Pavilion to address the lack of adequate fitness facilities for existing students. The Wellness Pavilion would be consistent with the current General Plan designation for the Project Site (acknowledging that discretionary approvals are being sought for the Project) and as such, would not substantially conflict with any applicable anticipated demand/generation

forecasts for the Project Site by the utility providers. Any increased demand for utility service regarding wastewater generation would be minimal. Although the Project and related projects would, to a degree, share urban infrastructure such as wastewater, during the approval process for each related project, utility system capacity and the ability to serve the respective projects must be demonstrated. As the service providers conduct on-going evaluations to ensure facilities are adequate to serve the forecasted growth of the community, cumulative impacts regarding wastewater are concluded to be less than significant.

c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As discussed in this Initial Study, the Project may result in potentially significant environmental impacts associated with Aesthetics, Air Quality, Biological Resources, Cultural Resources (Historical, Archaeological and Paleontological Resources), Geology and Soils, Greenhouse Gases, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services (fire and police), Recreation, Transportation/Circulation, and Utilities and Service Systems (water). These impacts could have potentially adverse effects on human beings, and further analysis of these impacts will be analyzed in the EIR.

Appendix A

Phase I Environmental Site Assessment

CITADEL ENVIRONMENTAL SERVICES, INC.

assess
resolve
strengthen

PRIVILEGED AND CONFIDENTIAL

May 27, 2016,
Revised June 20, 2016

Rick Torkelson
MOUNT SAINT MARY'S UNIVERSITY
10 South Chester Place
Los Angeles, California 90007

Re: CITADEL Project No. 3010.1001.0
Phase I Environmental Site Assessment Report
Chalon Campus – Wellness Pavilion Project
12001 Chalon Road
Los Angeles, California 90049

Dear Mr. Torkelson:

Enclosed please find Citadel Environmental Services, Inc.'s Phase I Environmental Site Assessment Report for the above-referenced location.

The Phase I Environmental Site Assessment Report was conducted for Mount Saint Mary's University, in accordance with Citadel's Proposal 3010.1001.P, dated April 19, 2016, and a mutually agreed upon scope of work.

If after your review you have any questions or require additional information, please do not hesitate to telephone me at the Citadel Office in Glendale at (818) 246-2707.

Sincerely,
CITADEL ENVIRONMENTAL SERVICES, INC.

Mark Drollinger, M. Eng., CSP, CHMM, EiT
Director, Environmental Geology and Engineering

Enclosure

CITADEL ENVIRONMENTAL SERVICES, INC.

assess
resolve
strengthen

Mount Saint Mary's University
10 South Chester Place
Los Angeles, California 90007

Phase I Environmental Site Assessment Report

May 27, 2016,
Revised June 20, 2016

Citadel Project Number 3010.1001.0

Chalon Campus – Wellness Pavilion Project
12001 Chalon Road
Los Angeles, California 90049

www.citadelenvironmental.com

Table of Contents

APPENDICES:

A	Figures
B	Photographs
C	Asbestos/Lead Survey Reports
D	Historical Aerial Photographs
E	Historical Building Permits
F	Sanborn Map Report
G	Historical City Directories
H	Historical Topographic Maps
I	SCAQMD FINDS Equipment List
J	Environmental Lien Search and Title Report
K	Vapor Encroachment Report
L	Environmental Data Resources Radius Map Report

EXECUTIVE SUMMARY

Project Summary

Client Name/User:	Mount Saint Mary's University	**Property Visit Date:**	May 25, 2016
Client Contact:	Jerry Sherman	**Construction Date:**	c. 1935-1980
Phone Number:	(310) 710-1384	**No. Buildings/No. Units:**	Three
Email Address:	jerryshermanarchitect@gmail.com	**No. of Stories:**	One- and Two Stories
Property Name:	Chalon Campus – Wellness Pavilion Project	**Bldg. Square Footage:**	1,100, 1,613 and 4,751 SF
Property Address:	12001 Chalon Road	**Property Acreage:**	Approximately 4 acres
Property City, State, Zip:	Los Angeles, California 90049	**Property Use:**	Recreational, Facility Maintenance & Offices, College Campus
Property Identification:	Portion of APN 4429-003-033	**Property History:**	Vacant prior to development by university
Other Improvements:	Basketball & Tennis Courts, Pool		

SUMMARY OF FINDINGS

	No Further Action	Recognized Environmental Conditions	Non-ASTM Scope Considerations	Proposed Action	Refer to Section
Site Description	X				2.2
Adjacent Properties	X				2.3
Historical Review	X				5.0
Previous Reports	X				5.6
Regulatory Review	X				6.0
Vapor Encroachment	X				5.12
USTs/ASTs	X				4.1
PCBs	X				4.5
Chemicals/Hazardous Materials/Raw Materials			X		4.2
ACMs/ACCMs			X	Abatement prior to demolition	4.3
Methane			X		4.13
Radon			X	Survey recommended	4.12
Lead-Based Paint			X	Abatement prior to demolition	4.4
Lead in Drinking Water			X		4.4
Other	X				4.0

Citadel Environmental Services, Inc. (Citadel) was contracted by Mount Saint Mary's University (Client) to perform a Phase I Environmental Site Assessment (Phase I ESA) of the Chalon Campus – Wellness Pavilion Project located at 12001 Chalon Road, in the City of Los Angeles, Los Angeles County, California; hereinafter referred to as the "Site."

According to the County of Los Angeles' Assessor's Parcel Maps, the Site is located within the parcel that is legally identified as Assessor's Parcel Number (APN) 4429-003-033. The Site occupies

approximately 10% of the parcel and is located in the northcentral area of the parcel. The Site consists of that portion of the Mount Saint Mary's University campus which is currently used for parking and for recreational and facilities management purposes. The Site includes three buildings for general use (i.e. Fitness Center, Pool House, and Facilities Management Building), tennis and basketball courts, a pool, and enclosures for facilities management materials and equipment.

The initial purchase of 36 acres of land for the Mount Saint Mary's University Chalon campus was made in 1928. Classes began at the campus by 1929, and about 20 years later, the University purchased an additional 20 acres for the Chalon campus.

A review of historical sources showed that the Site was developed with one small structure in 1938, which was no longer present by 1952. Tennis courts were present in the west and south parts of the Site by 1947. The pool and bath house were present by 1949, and the fitness building was present circa 1952. A building was present in the location of the current facilities management building in the 1960s, and the current facilities management building was present by 1980. The paved parking areas were developed between 1967 and 1970.

Restricted-access areas are present in the southern part of the Site for facilities management use. Several small enclosures house the electrical equipment, trash, and other plant management materials and equipment. Stationary equipment at the Site includes an air compressor, trash compactor, emergency generator, pool water heater, and electrical transformers.

Nearby properties in the site vicinity are occupied by vacant land or used for residences. Citadel reviewed information provided by Environmental Data Resources (EDR) regarding nearby properties to evaluate for potential on-Site vapor encroachment concerns from off-site sources. According to documents provided by EDR, the only facility within a one-mile radius of the site identified on environmental databases is the Mount Saint Mary's University campus. No historical releases of hazardous or regulated substances have been reported at Mount Saint Mary's University. The University maintains an EPA identification number for disposal of hazardous waste from off-site activities. A former underground storage tank (UST) was reportedly removed from the university approximately 15 to 20 years ago. The location of the former UST is not within the Site boundaries. Environmental documents for the removal of the UST were not available for review prior to completion of this report; however, Mount Saint Mary's University does not appear on environmental databases for leaking USTs.

RECOGNIZED ENVIRONMENTAL CONDITIONS

According to American Society for Testing and Materials (ASTM) Standard of Practice E1527-13, recognized environmental conditions (REC) fall under three specific categories when evaluating a site or properties within the site vicinity. These categories are defined below.

A recognized environmental condition, or REC, means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.

A controlled recognized environmental condition, or CREC, is a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to

remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

An historical recognized environmental condition, or HREC, is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

According to ASTM E2600-15, the goal of conducting a vapor encroachment screening on a parcel of property is to identify a vapor encroachment condition (VEC), which is the presence or likely presence of chemicals of concern vapors in the subsurface of the target property caused by the release of vapors from contaminated soil or groundwater or both either on or near the target property as identified by Tier 1 or Tier 2 procedures. The purpose of Tier 1 is to conduct a screen using Phase I ESA-type information to determine if a VEC exists at the target property. If the Tier 1 screen cannot rule out the possibility of a VEC existing at the target property, then a Tier 2 screen can be conducted. Tier 2 applies numeric screening criteria to existing or newly collected soil, soil gas, and/or groundwater testing results to evaluate whether or not a VEC can be ruled out. Tier 2 has two data collective components: non-invasive and invasive.

Based on our review of these databases, reported release incidents that would represent RECs in connection with the Site or a source of a release that would be likely to contribute to a vapor intrusion condition were not identified. The risk of vapor intrusion from potential historic leakage from the former gasoline UST cannot be fully evaluated without a review of environmental documents concerning the UST removal; however, the former UST is not located at the Site and gasoline generally does not pose a significant risk for vapor intrusion due to natural attenuation (biodegradation). A VEC for the Site from off-site sources can be ruled out. Based on these reviews, no RECs, CRECs, or HRECs are present or likely to be present based on current occupancies and Site use.

NON-ASTM SCOPE CONSIDERATIONS

The three currently occupied Site buildings were reportedly constructed in 1935, 1950, and 1980, 1915, prior to bans using asbestos-containing building materials (ACBMs), polychlorinated biphenyls (PCBs) in electrical equipment, and lead-based paint came into effect. An asbestos/lead survey was performed for these three buildings, and ACBM and lead-based paint were identified. Additional structures, such as the equipment enclosures, were not included in the reviewed asbestos/lead surveys. Surveys should be performed in these areas prior to structure renovation or demolition.

The California Bureau of Mines and Geology and California Department of Public Health (CADPH) participated in the United States EPA's State Radon Survey, a Federal survey to measure levels of indoor radon in all states. Based on the results of this survey, CADPH predicted that approximately 0.5% of homes in Region 9 would have radon concentrations over the EPA action level of 4.0 picoCuries per liter (pCi/L).

The Federal EPA Radon Zone for Los Angeles County is Zone 2, which indicates an average indoor concentration greater than or equal to 2.0 pCi/L of air and less than or equal to 4.0 pCi/L. In a survey, 167 tests were performed in the zip code 90049 for the presence of radon. Of these, fourteen were found to contain radon in excess of 4 pCi/L. Site-specific radon values were not available and were not a part of this ASTM Phase I ESA. According to California Department of Conservation (Churchill, 2005), the site is located in an area with a moderate potential for indoor

radon levels above 4 pCi/L, and testing of buildings located on the Santa Monica Slate is recommended.

The Site is not located within the City of Los Angeles Methane Buffer Zone recognized by the LADBS.

1.0 INTRODUCTION

Citadel Environmental Services, Inc. (Citadel) was contracted by Mount Saint Mary's University (Client) to perform a Phase I Environmental Site Assessment (Phase I ESA) of the Chalon Campus – Wellness Pavilion Project located at 12001 Chalon Road, in the City of Los Angeles, Los Angeles County, California; hereinafter referred to as the "Site."

1.1 PURPOSE

The purpose of the Phase I ESA was to review past and present land use practices and to evaluate the presence, or likely presence, of any hazardous substances or petroleum products that have been discharged into the property's structure, ground, groundwater, or surface water. This qualitative assessment was accomplished by review of current and readily available information regarding past and current land use for indications of the manufacture, generation, use, storage and/or disposal of hazardous substances at the Site. A Site visit was also conducted to observe existing Site conditions. This report provides the results of the Phase I ESA performed.

1.2 INVOLVED PARTIES

The involved party(s) in this study, to the best of our knowledge, is Mount Saint Mary's University.

Citadel understands that this Phase I ESA is being requested in conjunction with the creation of an Environmental Impact Report for Mount Saint Mary's University. Citadel recognizes that this report is to be used exclusively by Mount Saint Mary's University and its successors, lenders, and assigns. It is a report upon which Mount Saint Mary's University and its successors, lenders, and assigns, can rely.

This assessment and report were prepared on behalf of and for the exclusive use of Mount Saint Mary's University, their lenders and assigns (Client) solely for its use and reliance, subject to the terms and conditions agreed upon between Citadel and the Client.

1.3 SCOPE OF SERVICES

This Phase I ESA was conducted in accordance with the American Society for Testing and Materials (ASTM) Standard of Practice E1527-13 and the standards of care and diligence normally practiced by recognized consulting firms in performing services of a similar nature.

The scope of services for this assessment consisted of the following:

- Performed a Site inspection to verify current Site conditions, and check for visible evidence of previously disposed and/or currently present hazardous waste, surface contamination, underground and above ground storage tanks (USTs/ASTs), suspect polychlorinated biphenyls (PCBs), and other potential environmental hazards.

- Conducted a visual survey of the adjacent properties and the immediate vicinity to determine if any nearby sites posed a significant environmental threat to the Site.

- Reviewed currently and readily available documents, including maps, aerial photographs, governmental databases of known hazardous waste sites and underground tanks, other consultant reports (if any), fire insurance maps, and other accessible records.

- Reviewed results from a search of available current land title records for environmental cleanup liens and other activity and use limitations, such as engineering controls and institutional controls.

- Consulted with appropriate governmental agencies having jurisdiction relative to past history of the property, complaints or incidents in the immediate area, and permits that may have been issued.

- Prepared a Phase I report, inclusive of our findings and recommendations, with applicable illustrations and documentation.

The scope of services outlined above is generally considered sufficient to properly assess the Site based on the data search, reasonably ascertainable documents, and Site inspection.

2.0 GENERAL SITE CHARACTERISTICS

2.1 LOCATION

The irregularly shaped Site is located approximately 0.5 mile west of the State Route 110 Freeway, locally referred to as the San Diego Freeway, within the Brentwood-Pacific Palisades area. The Site is bounded by steep undeveloped slopes to the east and west, and by developed parts of the Mount Saint Mary's University campus to the north and south. The general Site vicinity is occupied by vacant, undeveloped land and residential properties to the south. The Santa Monica Mountains National Recreation Area borders the northern edge of the Mount Saint Mary's University campus, less than 0.1-mile north of the Site.

According to the U.S. Geological Survey (USGS) Beverly Hills Quadrangle (7.5 Minute Series), dated 2012, the Site elevation ranges from approximately 1,080 to 1,140 feet above mean sea level (AMSL) and appears to slope to the south. The Site is located at approximate coordinates of 34° 5' 10.520" North Latitude and 118° 28 58.85" West Longitude.

A Site Location Map identified as Figure 1 is included in Appendix A.

2.2 SITE DESCRIPTION

According to the County of Los Angeles' Assessor's Parcel Maps, the Site is a portion of the parcel that is legally identified as Assessor's Parcel Number (APN) 4429-003-033. The Site occupies approximately 10% of the parcel and is located in the northcentral area of the parcel. The Site consists of the part of the Mount Saint Mary's University campus which is currently used for parking and for recreational and facilities management purposes. Information regarding construction dates and square footage was provided by the client. The site includes three buildings for general use:

- The 1,100 SF single-story Fitness Center constructed in 1935 is used as a fitness room and office for the recreational facilities.
- The 1,613 SF single-story Pool House (also called the bathhouse) constructed in 1950 is used for recreational equipment storage, restrooms, and changing rooms. Pool-water heating equipment is located adjacent to the northern building exterior. A restricted-area workshop is located along the west side of the building for facilities maintenance use.
- The 4,751 SF two-story Facilities Maintenance Building was constructed in 1980. The first floor houses offices for campus events, security, and plant management, and the second floor houses offices for grounds, housekeeping, staff housing, and transportation management.

Restricted-access areas are present in the southern part of the Site for facilities management use. Several small enclosures house the electrical equipment, trash, and other plant management materials and equipment. Stationary equipment at the Site includes an air compressor, trash compactor, emergency generator, pool water heater, and electrical transformers. The equipment appeared to generally be intact, in operational condition, and significant staining was not observed.

A Site Plan is included as Figure 2 in Appendix A. Select photographs of the Site and vicinity are included in Appendix B.

2.3 ADJACENT PROPERTIES

The adjoining properties on all sides of the Site are occupied by other parts of the Mount Saint Mary's University campus. Student and faculty housing (Yates, Aldsworth, and Burns Houses) is located to the north. The Boiler-Room Building, student housing (Rossiter Hall, Brady Hall, and Carondelet Hall), Mary Chapel, and the multi-purpose student activities/dining room/bookstore building (Brady Hall) are located south of the Site. The adjoining properties to the east and west are undeveloped slopes owned by Mount Saint Mary's University and are largely covered with native vegetation.

2.4 UTILITIES

Water, sewer, and electrical service is supplied to the Site by the Los Angeles Department of Water and Power. Natural gas service is supplied by the Southern California Gas Company. General rubbish (non-hazardous) is removed from the Site on a regular basis by private waste disposal services (Consolidated Disposal).

3.0 ENVIRONMENTAL SETTING

3.1 PHYSICAL SITE CHARACTERISTICS

Based upon the National American Datum (NAD) of 1983, the Site elevation ranges from approximately 1,080 to 1,140 feet AMSL. The Site is located along the top of a crest within the Santa Monica Mountains. Topography on the Site has been developed into terraces for buildings and parking areas. Locally, topography slopes to the east, west, and south. Regional topography in the area of the Site appears to slope to the south. Surface drainage in this part of the Santa Monica Mountains is generally south; however, local drainage may be restricted east and west of the Site within closed depressions.

3.2 GEOLOGIC CONDITIONS AND SOILS

The Site is situated within the Transverse Ranges Geomorphic Province, an east-west trending series of steep mountain ranges and valleys. The Site is shown on the Geologic Map of the Beverly Hills and Van Nuys (South ½) Quadrangles, Los Angeles, California (Dibblee and Ehrenspeck, 1991) as being underlain by Santa Monica Slate bedrock.

According to the United States Department of Agriculture, Soil Conservation Service, the soil in the Site vicinity is classified as Urban. Surface soils at the site likely consist of graded material, potentially with imported fill or with fill derived from the Site. Historically, soils reports have been generated

prior to building at the Site (Los Angeles Department of Building and Safety website); however, these reports were not reviewed as part of the current investigation.

3.3 GROUNDWATER/HYDROGEOLOGICAL CONDITIONS

The Site is located within the watershed area for the Los Angeles Basin, and storm water runoff from the site vicinity may shed off the slopes to the adjacent valleys within the Santa Monica Mountains. Storm water from the Site may drain to the county storm drain system. According to the California Department of Conservation, historic accumulations of groundwater beneath the Site have not been recorded (DMG, 1998). Perched groundwater may be seasonally present beneath the site; however, no known groundwater aquifers are present beneath the Site.

According to the Los Angeles County Department of Public Works website, the nearest wells in the site vicinity are located approximately 1.25 miles to the east, along Mandeville Canyon Road. These wells are inactive and have not been gauged for groundwater since the 1950s. No public water supply wells are located within a mile of the Site.

Citadel reviewed the Geotracker database of sites that have had releases of fuels, solvents, or other material into the soil and groundwater to obtain information regarding depth to first ground water in the Site vicinity. This database is maintained by the California Regional Water Quality Control Board. No facilities listed in the Geotracker database are located within a one-mile radius of the Site.

3.4 WETLANDS AND FLOOD ZONE

Citadel reviewed information for the presence of wetlands and flood zone areas at the Site and within ½-mile from the Site. Information from the National Wetlands Inventory (NWI) database provided by the United States Fish and Wildlife Service, and Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (FEMA) were provided by EDR.

Based on information obtained by EDR and reviewed by Citadel:

- According to the NWI database, the valleys approximately 0.1 mile east and west of the site are listed in the National Wetland Inventory.
- The Site and adjoining properties are not located within the 100-year or 500-year flood zone, per FEMA Flood Insurance Rate Map No. number 06037C1580F.

4.0 SITE RECONNAISSANCE

Citadel representative Ms. Rachel Fischer conducted the Phase I ESA reconnaissance on May 25, 2016. Ms. Fisher met with Mr. John Deeb the Facilities Manager for Mount Saint Mary's University. The Site reconnaissance consisted of a visual inspection of the Site. A perimeter survey of the surrounding properties was also performed at that time. Mr. Drollinger served as the Project Manager and reviewed this Phase I ESA. Findings from the Site inspection, research and perimeter survey are presented below.

On May 25, 2016, school was not in session; however, the recreational and maintenance facilities and parking lot areas were in use. Copies of site photographs taken during the site reconnaissance are provided as Appendix B.

4.1 ON-SITE STORAGE TANKS

A diesel emergency generator was observed in the southwest part of the Site. This generator includes a reservoir for storing diesel fuel. It was operational but not in use at the time of the Site reconnaissance; according to Mr. Deeb, the emergency generator is re-supplied with diesel as needed by an outside vendor and additional diesel is not stored on Site. The generator appeared to be intact with no obvious signs of historic leakage.

According to Mr. Deeb, a gasoline underground storage tank (UST) was removed near the Site approximately 15 to 20 years ago. The UST was located in parking lot D, near the Boiler-Room Building. No closure records or other written environmental data were available for review.

4.2 IDENTIFIED HAZARDOUS MATERIALS

Citadel inspected the Site for current chemical and hazardous waste storage and handling practices.

- According to Mr. Deeb, pool chemicals are stored in the pool house area.
- According to Mr. Deeb, building maintenance and grounds keeping chemicals are stored elsewhere on the university campus. Relatively small amounts of janitorial supplies are stored in designated areas on the Site.
- According to Mr. Deeb, fluorescent light ballasts are occasionally removed at the university and are handled as hazardous waste.

Citadel did not observe significant quantities of hazardous or regulated materials being stored on Site.

4.3 ASBESTOS-CONTAINING MATERIALS

On behalf of Mount Saint Mary's University, Ellis Environmental Management, Inc. performed a pre-demolition asbestos survey for three on-site buildings: Fitness Center, Pool House, and Facilities Maintenance Building. The survey reports identify asbestos-containing building materials (ACBM) in two of the buildings. Floor tiles in the Fitness Center (aka gym building) were identified as non-friable ACBM. Roof penetration mastic and exterior window putty for the Facilities Maintenance Building were identified as non-friable ACBM. Copies of the asbestos survey reports are included in Appendix C.

If the equipment enclosures are slated for demolition, an additional asbestos survey should be performed (if not previously done) so that appropriate measures can be taken to abate asbestos-containing materials.

4.4 LEAD PAINTS

On behalf of Mount Saint Mary's University, Ellis Environmental Management, Inc. performed a pre-demolition lead survey for three on-site buildings: Fitness Center, Pool House, and Facilities Maintenance Building. Lead-based paint was identified on some building surfaces in the woodshop (pool building) and on the facilities building. Ceramic tiles at the site were tested for lead, and were not found to contain elevated lead concentrations. Copies of the lead survey reports are included in Appendix C.

If the small enclosures with painted surfaces are slated for demolition, additional lead surveys should be performed (if not already done) so that proper measures can be taken to abate lead-containing materials.

4.5 POLYCHLORINATED BIPHENYLS

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts and hydraulic oil. In 1976, the U.S. EPA banned the manufacture and sale of PCB-containing transformers. Prior to this date, transformers were frequently filled with a dielectric fluid containing PCB-laden oil. By 1985, the US EPA required that commercial property owners with transformers containing more than 500 parts per million (ppm) PCBs must register the transformer with the local fire department, provide exterior labeling, and remove combustible materials within 16 feet (40 Code of Federal Regulations 761.30: "Fire Rule").

Three pole-mounted transformers were identified in the southern part of the Site. These transformers appeared to be intact with no obvious signs of leakage. No pad-mounted transformers were observed during Site reconnaissance; however, the demolition plan provided by the client indicates that an electrical transformer is located in the northeastern part of the site. Based on the location of this transformer, Citadel assumes that it is associated with the faculty/student residences at the north end of the Site and may be located underground.

According to Mr. Deeb, Mount Saint Mary's University has a facilities maintenance plan in place for handling the identification and proper disposal of electric light ballasts and fluorescent lights. Citadel recommends that electric transformers, electrical panels and related equipment should be inspected prior to disposal to evaluate the construction date and whether the equipment may contain PCBs or PCB-impregnated paper.

4.6 RADIOACTIVE MAN-MADE MATERIALS

Many public and private office buildings in the United States have self-luminescent tritium exit signs that contain radioactive materials. While these do not constitute a recognized environmental condition, the exit signs must be properly identified to ensure proper handling and disposal practices. Citadel recommends that the client be aware of whether such exit signs are present within the Site building and institute a management plan to ensure proper handling and disposal whenever such signs are damaged, replaced, or removed. Citadel recommends that exit signs in the buildings be evaluated for potential radioactive materials and, if such materials are identified, that proper procedures be implemented for handling and disposal prior to building renovation or demolition.

4.7 PITS, PONDS, AND LAGOONS

No pits, ponds, or lagoons were visually observed during the Site reconnaissance or reported to be historically present at the Site.

4.8 SEPTIC TANKS AND CESSPOOLS

No septic tanks or cesspools were visually observed during the Site reconnaissance or reported to have been historically present on the Site. According to Mr. Deeb, the university has been connected to the sanitary sewer system since construction in the 1930s.

4.9 WELLS, CISTERNS AND SUMPS

No wells, cisterns or sumps were visually observed during the Site reconnaissance or reported to have been historically present on the Site.

4.10 WASTEWATER INTERCEPTORS / GREASE INTERCEPTORS

No wastewater or grease interceptors were visually observed during the Site reconnaissance or reported to be historically present at the Site.

4.11 DRINKING WATER

The Site is supplied with municipal drinking water by the Los Angeles Department of Power and Water.

4.12 RADON

The California Bureau of Mines and Geology and California Department of Public Health (CADPH) participated in the United States EPA's State Radon Survey, a Federal survey to measure levels of indoor radon in all states. Based on the results of this survey, CADPH predicted that approximately 0.5% of homes in Region 9 would have radon concentrations over the EPA action level of 4.0 picoCuries per liter (pCi/L).

The Federal EPA Radon Zone for Los Angeles County is Zone 2, which indicates an average indoor concentration greater than or equal to 2.0 pCi/L of air and less than or equal to 4.0 pCi/L. In a survey, 167 tests were performed in the zip code 90049 for the presence of radon. Of these, fourteen were found to contain radon in excess of 4 pCi/L. According to California Department of Conservation (Churchill, 2005), the Site is located in an area with a moderate potential for indoor radon levels above 4 pCi/L and testing of buildings located on the Santa Monica Slate is recommended. Testing for the potential for radon accumulation was not performed as part of this ASTM Phase I ESA. Site-specific radon values were not available and were not a part of this ASTM Phase I ESA.

4.13 METHANE

In March, 2004, Ordinance Number 175790 was adopted into the Los Angeles Municipal Code (Section 91.106.4.1 and Division 71, Chapter IX) to establish city wide methane mitigation requirements, and included updated construction standards to control methane intrusion into buildings. This ordinance established defined geographic areas as Methane Zones and Methane Buffer Zones, which relate to specific assessment and mitigation requirements per area, and set forth a standard of assessment and mitigation in the planning stages of all new construction in these areas.

The Site is not located within the City of Los Angeles Methane Zone or Methane Buffer Zone recognized by the LADBS.

5.0 SITE HISTORY

The purpose of the records review is to obtain and review reasonably ascertainable/standard sources that will help identify recognized environmental conditions in connection with the property. Reasonably ascertainable records from standard sources is (1) information that is publicly available, (2) information that is obtainable from its source within reasonable time and cost constraints, and (3) information that is practically reviewable.

Reasonable time and cost means that the information will be provided by the source within 20 calendar days of receiving a written, telephone, or in-person request at no more than a nominal cost intended to cover the source's cost of retrieving and duplicating the information. Information that can only be reviewed by a visit to the source is reasonably ascertainable if the visit is permitted by the source within 20 days of request.

To investigate the history of the Site, Citadel reviewed select historic aerial photographs, building permits, city directories, and Sanborn Fire Insurance Maps provided by EDR. In addition, Citadel reviewed client-supplied information, and oil and gas maps, and Citadel interviewed selected individuals regarding historic Site use. Citadel's reviews of these reports and interviews are discussed below.

5.1 HISTORICAL AERIAL PHOTOGRAPHS

Historical aerial photographs of the Site and vicinity were obtained from EDR to ascertain historical land uses and to identify any evidence of hazardous material generation or storage. Sixteen aerial photographs dating from 1928 to 2012 were reviewed. No pits, sumps or above ground tanks were observed at the Site in any of these reviewed aerial photographs. Below are brief descriptions of additional observations made from the aerial photographs of the Site and vicinity.

1928 Aerial Photograph

The Site appears to be undeveloped, vacant land. Chalon Road appears to be present south of the Site as an unpaved road. Adjacent properties also appear to be vacant and fallow.

1938 Aerial Photograph

A small structure appears to be present in the northeast part of the Site, and grading or other land disturbance was present in the southern part of the Site. Buildings associated with the university campus had been developed south of the Site, and additional areas may have been undergoing grading for development. Adjacent properties to the north, east, and west appear to have remained undeveloped.

1947 and 1952 Aerial Photographs

By 1947, a tennis court was present west of the current pool location, and additional tennis or basketball courts were present to the south on the Site. Additional residential development had occurred in the greater site vicinity. By 1952, the swimming pool, fitness center building and bath house had been constructed on Site. The small structure in the northeast part of the Site was no longer present. Adjacent property to the north, east and west remained undeveloped.

1964, 1967, 1970, and 1977 Aerial Photographs

By 1964, the tennis court in the west part of the site had been replaced by a parking lot. A larger building or awning was located in the current vicinity of the facilities management building. Offsite to the west, N. Bundy Drive had been extended northward and was developed with residences.

By 1967, a building was present in the location of the current facilities management building, and by 1970, the asphalt-paved parking areas had been developed in the northern and western parts of the Site. Additional development had occurred south of the Site on the university campus from 1964 to 1977. Adjacent property to the north, east and west remained undeveloped.

1981 Aerial Photograph

Three square structures appear to be present in the western part of the Site in 1981; these may be the three temporary structures listed in building permit records. Subsequent photos do not show these structures, and otherwise, land use of the Site remained the same as before.

1989, 1995, 2002, 2005, 2009, 2010, and 2012 Aerial Photographs

By 1989, additional residential housing for the university campus had been developed on the adjoining property to the north. No other significant changes in land use appear to have occurred on the Site or adjoining properties during this time, although additional construction had taken place on the university campus. Adjacent property to the east and west remained undeveloped.

Copies of the Aerial Photographs can be found in Appendix D. Note that the Site boundaries shown on the historic photographs are approximate and may be not be accurately located on some of the photographs.

5.2 HISTORIC BUILDING PERMITS

EDR provides a listing of building permits for the Site and adjoining properties, if available. Citadel also reviewed on-line building permits for the addresses of 1588 N. Bundy Drive and 12001 Chalon Road with the City of Los Angeles Building Department. The address of 1588 N. Bundy Drive was used for installation of a cell phone tower in 1981, and no other permits were obtained for that address.

Historical records in the building department files include structures present on the Site, as well as those elsewhere on the Mount Saint Mary's University campus. As the university has undergone multiple phases of construction and renovation, some of the structures on the Site were not specifically identified within these files, and the earliest permit for construction at 12001 Chalon Road, which is dated 1930, is for the foundation for a residence hall (off Site). Citadel was able to identify the permits and/or certificates of occupancy (CO) for the following on-site structures:

- Bath house for pool (CO 1949)(CO for bath house addition 1952)
- Recreation office (1952) (This permit identifies three tennis courts, pool, and bath house as existing; proposed building located east of pool)
- Water tank and retaining wall (1984)(Location shown on map)
- Mechanical building (location not shown) (1995)
- Retaining wall and concrete pad for generator (location not shown) (2010)

A copy of the EDR Building Permit Report and select historical building permits are included as Appendix E.

5.3 HISTORICAL SANBORN FIRE INSURANCE MAPS

Citadel requested that EDR review its collection of Sanborn Fire Insurance Maps for potential coverage of the Site and vicinity. According to EDR, Sanborn Maps are not available for the Site vicinity. A lack of map coverage is typical for properties that were located in areas without dense urbanization or that were developed after the late 1950s.

A copy of the EDR Sanborn Insurance Map Report is included as Appendix F.

5.4 CITY PARCEL PROFILE REPORT

Citadel reviewed the on-line parcel profile report from the City of Los Angeles interactive database, NavigateLA. The report indicates that 1588 N. Bundy Drive is an alias address for property located at 12001 Chalon Road.

5.5 HISTORICAL CITY DIRECTORIES

City directories were researched by EDR in order to identify previous Site tenants and/or neighboring properties with a potential for hazardous materials generation and/or storage. EDR researched city directory listings from 1920 through 2013 (non-inclusive) and provided their search results to Citadel for review. Results of the city directory search confirm that the Site, adjacent property, and selected nearby properties have been used for university and residential purposes.

A copy of the EDR City Directories report is included as Appendix G.

5.6 CLIENT-SUPPLIED ENVIRONMENTAL INFORMATION

Citadel was provided with copies of the asbestos/lead survey reports. Mr. Jerry Sherman partially completed a questionnaire. Citadel was not provided with any other environmental reports or information pertaining to the Site by the Client.

5.7 HISTORICAL TOPOGRAPHIC MAPS

Historical topographic maps were provided by EDR in order to identify natural features and changes in development over a long period of time. The topographic maps provides the user with a regional view of changes to the Site and vicinity that other historical databases such as aerial photographs may not provide.

EDR provided topographic maps dating from 1900 through 2012 (non-inclusive) for review.

1894 (Los Angeles), 1896 (Santa Monica), 1898 (Santa Monica), 1900 (Pasadena), 1902 (Santa Monica), 1921 (Santa Monica), and 1925 (Sawtelle) Topographic Maps

The Site, adjacent properties, and nearby properties appear to be void of structures. The nearest roads appear to be present in Sepulveda and Mandeville Canyons and in the canyon approximately 0.5 mile south of the Site. Blue-line streams appear to be present in the canyon adjacent to N. Bundy Road and in the canyon east of the Site, and they appear to flow south of the site vicinity, towards the Los Angeles Plain.

1934 (Sawtelle) Topographic Map

The Site remained undeveloped and void of structures. By 1934, a single building (Brady Hall) was present on the adjacent, university property to the south, and the topography in this area had been altered for university campus development. Chalon Road and Bundy Drive had been established in the greater site vicinity. Scattered residential development was present approximately 0.5-mile south of the Site.

1950 (Beverly Hills) Topographic Map

A small structure was present in the southwestern part of the Site. Additional buildings had been developed on the university campus, south of the Site. The Mount Saint Mary's fire road had been established north of the Site.

1966 (Beverly Hills), 1972 (Beverly Hills), 1981 (Beverly Hills), and 1995 (Beverly Hills) Topographic Maps

The topographic maps show that the Facilities Management building was present in the west part of the Site. Additional development was present on the university campus south of the Site. Additional residential development was present along N. Bundy Drive, which had been extended northward, west of the Site.

2012 (Beverly Hills) Topographic Map

Structures are not shown on this map.

Copies of the historical topographic maps provided by EDR are included as Appendix H. Note that the Site boundaries shown on these maps are approximate and may be not be accurately located.

5.8 HISTORIC OIL AND GAS MAPS

Citadel reviewed information available on-line through the California Department of Conservation's website. The Division of Oil, Gas & Geothermal Resources (DOGGR) Online Mapping System (DOMS) does not show the presence of oil or natural gas wells within a one-mile radius of the Site.

5.9 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT – FIND DATABASE

Citadel reviewed information available on-line through the South Coast Air Quality Management District's Facility Information Detail (FIND) database. Mount Saint Mary's University was listed with three facility ID numbers. Facility ID number 44785 was listed as a duplicate. Facility ID number 129076 was listed as inactive and was listed as having two notices to comply issued in 2001 and 2002, and one notice of violation which was closed in 2003. The regulatory issue involved with these notices was operation of a fire pump without a permit to operate and failure to register the boilers.

Facility ID number 131195 was listed as being active and was not listed as being out of compliance or having been issued notices of violation. The equipment listed for the facility includes seven boilers and three internal combustion engines for diesel emergency generators. A copy of the SCAQMD equipment list is provided in Appendix I. The permit status was listed as active for the three generators. One of these generators is located in the southwest corner of the Site; the other

two generators are located on the adjacent university campus. The boilers may be located in the Boiler-Room Building south-southwest of the Site or other areas of the university campus.

5.10 INTERVIEWS

Citadel interviewed Mr. John Deeb during the Site reconnaissance. A User Questionnaire was sent to Mr. Jerry Sherman of Jerry Sherman Architect. The questionnaire was partially completed with additional information provided by Mr. Deeb during the Site reconnaissance and follow up communication.

5.11 ENVIRONMENTAL LIEN

Citadel contracted with EDR to perform an Environmental Lien Search for the Site. The Environmental Lien Search report reviewed did not identify any current environmental liens or other activity and use limitations (AUL) for the Site.

The California Department of Toxic Substances Control and the Regional Water Quality Control Board have the authority to issue AULs for hazardous waste sites. However, neither the EnviroStor (DTSC) nor Geotracker (RWQCB) websites list the Site as a current or historic hazardous waste cleanup site.

A copy of the lien search and title report can be found in Appendix J.

5.12 VAPOR ENCROACHMENT CONCERNS

Citadel reviewed information provided by Environmental Data Resources (EDR) regarding nearby properties to evaluate for potential on-Site vapor encroachment concerns from off-site sources. According to documents provided by EDR, no historical releases of petroleum products from leaking underground storage tanks (LUST) or historical releases of other volatile organic compounds occurred within a one-mile radius of the Site. Mount Saint Mary's University maintains limited amounts of chemicals on-site for academic chemistry and fine arts use; however, no releases of these chemicals to the subsurface have been suspected or reported to date. A former gasoline UST was located south-southwest of the Site and releases of gasoline to the subsurface are not noted in the databases. Based on this information and that gasoline readily degrades over time, a vapor encroachment condition (VEC) can be ruled out.

A copy of the vapor encroachment report provided by EDR is included as Appendix K.

5.13 SUMMARY OF SITE HISTORY

According to the Mount Saint Mary's University website, 36 acres of land for the Chalon campus was purchased in 1928, from the Rodeo Land and Water Co. Classes began at the campus by 1929, and about 20 years later, the University purchased an additional 20 acres for the Chalon campus. Nearby properties in the site vicinity are occupied by vacant land or used for residences.

A review of historical sources showed that the Site was developed with one small structure in 1938, which was no longer present by 1952. Tennis courts were present in the west and south parts of the Site by 1947. The pool and bath house were present by 1949, and the fitness building was present circa 1952. A building was present in the location of the current facilities management

building in the 1960s, and the current facilities management building was present by 1980. The paved parking areas were developed between 1967 and 1970.

Based on a review of historical and present records, site interviews and Site reconnaissance, Citadel believes that sufficient information was collected and evaluated for the Site to determine if a recognized environmental condition (REC), historical recognized environmental condition (REC), controlled recognized environmental condition (CREC), or a de minimis condition exists. Based on these reviews, no CRECs, HRECs, or RECs are present or likely to be present based on current occupancies and Site use.

6.0 REGULATORY AGENCY REVIEW

6.1 DATABASE REVIEW

As part of the Phase I ESA, Citadel utilized EDR of Milford Connecticut, as an information source for regulatory agency database records.

The following summary of the database information is divided into two columns. The first column lists sites as identified and located by EDR within the specified distance of the Site. The second column lists orphan sites, which could not be located by EDR due to incomplete and/or inaccurate address information included in the USEPA/state databases, which Citadel identified as potentially lying within the search distance.

Although locations of the orphan sites are frequently unknown, Citadel attempts to evaluate the potential adverse environmental impact that these facilities may have on the Site. This evaluation consists of reviewing street names in an effort to learn whether the street on which the Site is located lies within the search distance of the subject property, a drive-by view of surrounding properties during the Site visit, and evaluating the Site type and information provided by government agencies. No orphan sites were identified by EDR as potentially being located within the identified search distance.

Database	Radius	No. of Plottable Sites	Orphan
National Priorities List	1 mile	0	0
RCRA Corrective Action Treatment/Storage/Disposal (TSD) Facilities (CORRACTS)	1 mile	0	0
Delisted National Priorities List	1 mile	0	0
CERCLIS Sites	½ mile	0	0
CERCLIS No Further Remedial Action Planned (NFRAP) Sites	½ mile	0	0
RCRA Non-Corrective Action TSD Facilities	½ mile	0	0
State/Tribal Voluntary Cleanup Sites	½ mile	0	0
State/Tribal Leaking Registered Storage Tank Sites	½ mile	0	0
State/Tribal Brownfield Sites/CERCLIS Equivalent	1 mile	0	0
Historic CORTESE List	½ mile	0	0

Database	Radius	No. of Plottable Sites	Orphan
State/Tribal Solid Waste Landfill Sites/Facilities	½ mile	0	0
Federal/State/Tribal Engineering Controls Registries	½ mile	0	0
Federal/State/Tribal Institutional Controls Registries	½ mile	0	0
RCRA Large Quantity Generators	¼ mile	0	0
RCRA Small Quantity Generators	¼ mile	1	0
RCRA Non Generators	¼ mile	0	0
State/Tribal/Local Registered Storage Tank Sites	¼ mile	1	0
HIST UST	¼ mile	1	0
CA FID UST	¼ mile	1	0
SWEEPS UST	¼ mile	1	0
Facility Index System (FINDS)	Site	1	0
HAZNET	Site	1	0

The above-listed databases refer to the Site and adjacent university campus. None of these listings indicate historic releases of hazardous substances have occurred at the Site or on the adjacent university campus. A brief discussion of these database listings is included following the table. The full report provided by EDR and reviewed by Citadel can be found in Appendix L.

EDR Listing of Site and Adjoining Properties[1]

Facility Name	Facility Address	Distance From Site	Database Reference
Mount Saint Mary's College/Chalon Campus	12001 Chalon Road, Los Angeles, CA	Target Property/ Adjacent Campus	HAZNET RCRA-SQG HIST UST CA FID UST SWEEPS UST FINDS ECHO

During the Site reconnaissance, Citadel made an attempt to identify whether these database listings refer to the Site or to other parts of the Mount Saint Mary's University campus. The inclusion of the Site on the HazNet, RCRA-SQG, FINDS, and ECHO lists is associated with the Mount Saint Mary's University maintenance of an EPA generator's number for disposal of hazardous and regulated materials. According to Mr. Deeb, the RCRA-small quantities generator status largely applies to the adjacent university campus because of the disposal of construction materials (e.g. light ballasts) and of laboratory chemicals associated with the fine arts and chemistry programs; however, a portion of the construction waste may be associated with the Site.

[1] Distance and direction from Site assigned by EDR. Actual distance and direction from the Site boundary may vary.

The inclusion of the Site on the HIST UST and CA FID UST listings is associated with a former gasoline UST that was located south-southwest of the Site, near the off-Site Boiler-Room Building. The location of the former UST is not within the Site boundaries. Additional details are provided in the EDR Radius Map Report in Appendix L.

6.2 GEOTRACKER DATABASE

The GeoTracker Database is the California State Water Resources Control Board's (SWRCB) Internet-accessible database system used by the SWRCB, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. The database does not identify any such facilities within a one-mile radius of the Site.

7.0 DATA GAPS

A data gap is a lack of or inability to obtain information despite good faith efforts to gather such information. A data failure is a failure to achieve the historical research objectives even after reviewing the standard historical sources that are reasonably ascertainable and likely to be useful.

The following data gaps have been identified during the course of this investigation:

- A User Questionnaire was sent to Mr. Jerry Sherman of Jerry Sherman Architect; the Questionnaire was returned to Citadel partially completed. Additional information missing from the Questionnaire was verbally provided to Citadel by Mr. Deeb during the Site reconnaissance.
- Additional governmental agencies, such as the Los Angeles Fire Department (LAFD), that are not included in the EDR Radius Map report may maintain information regarding environmental conditions at the Site and nearby facilities. A request for hazardous materials and UST information has been sent to the LAFD. At the time report finalization, the LAFD had not yet responded. It is possible that the LAFD approved case closure for the UST removal but did not maintain those records.

With regard to these data gaps, Citadel believes that the most significant potential sources for on-site contamination have been identified during the current investigation.

8.0 FINDINGS

Citadel Environmental Services, Inc. (Citadel) was contracted by Mount Saint Mary's University (Client) to perform a Phase I Environmental Site Assessment (Phase I ESA) of the Chalon Campus – Wellness Pavilion Project located at 12001 Chalon Road, in the City of Los Angeles, Los Angeles County, California; hereinafter referred to as the "Site."

According to the County of Los Angeles' Assessor's Parcel Maps, the Site is located within the parcel that is legally identified as Assessor's Parcel Number (APN) 4429-003-033. The Site occupies approximately 10% of the parcel and is located in the northcentral area of the parcel. The Site consists of the part of the Mount Saint Mary's University campus which is currently used for parking and for recreational and facilities management purposes. The Site includes three buildings for

general use (i.e. Fitness Center, Pool House, and Facilities Management Building), tennis and basketball courts, a pool, and enclosures for facilities management materials and equipment.

The initial purchase of 36 acres of land for the Mount Saint Mary's University Chalon campus was made in 1928. Classes began at the campus by 1929, and about 20 years later, the University purchased an additional 20 acres for the Chalon campus.

A review of historical sources showed that the Site was developed with one small structure in 1938, which was no longer present by 1952. Tennis courts were present in the west and south parts of the Site by 1947. The pool and bath house were present by 1949, and the fitness building was present circa 1952. A building was present in the location of the current facilities management building in the 1960s, and the current facilities management building was present by 1980. The paved parking areas were developed between 1967 and 1970.

Restricted-access areas are present in the southern part of the Site for facilities management use. Several small enclosures house the electrical equipment, trash, and other plant management materials and equipment. Stationary equipment at the Site includes an air compressor, trash compactor, emergency generator, pool water heater, and electrical transformers.

Nearby properties in the site vicinity are occupied by vacant land or used for residences. Citadel reviewed information provided by EDR regarding nearby properties to evaluate for potential on-Site vapor encroachment concerns from off-site sources. According to documents provided by EDR, the only facility within a one-mile radius of the site identified on environmental databases is the Mount Saint Mary's University campus. No historical releases of hazardous or regulated substances have been reported at Mount Saint Mary's University. The university maintains an EPA identification number for disposal of hazardous waste from off-site activities. A former underground storage tank (UST) was reportedly removed from the university approximately 15 to 20 years ago. The location of the former UST is not within the Site boundaries. Environmental documents for the removal of the UST were not available for review prior to completion of this report; however, Mount Saint Mary's University does not appear on environmental databases for leaking USTs.

At the time of the Site reconnaissance, the Site was in use for recreational and facility management purposes.

Citadel reviewed information provided by EDR regarding nearby properties to evaluate for potential on-site vapor encroachment concerns from off-site sources. According to documents provided by EDR, the only facility with significant environmental concerns within a one-mile radius of the Site is Mount Saint Mary's University. A former gasoline UST was located south-southwest of the Site and releases of gasoline to the subsurface are not noted in the databases. Based on the reviewed data and that gasoline readily degrades over time, a vapor encroachment condition can be ruled out.

9.0 CONCLUSIONS AND RECOMMENDATIONS

According to ASTM Standard of Practice E1527-13, recognized environmental conditions (REC) fall under three specific categories when evaluating a site or properties within the site vicinity. These categories are defined below.

A recognized environmental condition, or REC, means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under

conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.

A controlled recognized environmental condition, or CREC, is a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

An historical recognized environmental condition, or HREC, is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

According to ASTM E2600-15, the goal of conducting a vapor encroachment screening on a parcel of property is to identify a vapor encroachment condition (VEC), which is the presence or likely presence of chemicals of concern vapors in the subsurface of the target property caused by the release of vapors from contaminated soil or groundwater or both either on or near the target property as identified by Tier 1 or Tier 2 procedures. The purpose of Tier 1 is to conduct a screen using Phase I ESA-type information to determine if a VEC exists at the target property. If the Tier 1 screen cannot rule out the possibility of a VEC existing at the target property, then a Tier 2 screen can be conducted. Tier 2 applies numeric screening criteria to existing or newly collected soil, soil gas, and/or groundwater testing results to evaluate whether or not a VEC can be rules out. Tier 2 has two data collective components: non-invasive and invasive.

Based on our review of these databases, reported release incidents that would represent RECs in connection with the Site or a source of a release that would be likely to contribute to a vapor intrusion condition were not identified. The risk of vapor intrusion from potential historic leakage from the former gasoline UST cannot be fully evaluated without a review of environmental documents concerning the UST removal; however, the former UST is not located at the Site and gasoline generally does not pose a significant risk for vapor intrusion due to natural attenuation (biodegradation). A VEC for the Site from off-site sources can be ruled out. Based on these reviews, no RECs, CRECs, or HRECs are present or likely to be present based on current occupancies and Site use.

Structures on the Site were constructed prior to the bans on ACBMs, PCBs, and lead-based paint. Asbestos and lead-based paint were identified in some of the on-site buildings; asbestos and lead surveys should be performed for the small enclosures within the proposed project area if these structures are slated for renovation or demolition. Where identified, asbestos and lead should be abated prior to structure renovation or demolition to ensure proper disposal and worker safety.

Radon may be an issue of concern for the site. A site survey for radon should be performed to evaluate this risk and/or future building structures should be designed to eliminate the potential for radon accumulation.

10.0 LIMITATIONS

The information and opinions rendered in this report are exclusively for use by the Client. Citadel Environmental Services, Inc. will not distribute this report without the Client's written consent, except as may be required by law or court order. The recommendations expressed in this report took into consideration the purpose and scope of this limited assignment. We accept responsibility for the competent performance of our duties in executing the assignment and preparing this report in accordance with the normal standards of our profession, but disclaim any responsibility for consequential damages resulting from inaccuracies in information provided by the Client, federal, state, county, or local regulatory agencies.

11.0 REFERENCES

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12.0 PROFESSIONAL CERTIFICATION

Citadel has completed a Phase I Environmental Site Assessment (ESA) of the Chalon Campus – Wellness Pavilion Project located at 12001 Chalon Road, in the City of Los Angeles, Los Angeles County, California. The Phase I ESA was performed at the Client's request in accordance with the American Society for Testing and Materials (ASTM) Standard of Practice E1527-2013 and the standards of care and diligence normally practiced by recognized consulting firms in performing services of a similar nature.

The independent conclusions represent our professional judgment based on information and data available to Citadel during the course of this project. Information regarding historical and present operations, conditions and test data provided by the Client or their representative, is assumed to be correct and complete. The conclusions presented by this Phase I ESA are based on information provided to Citadel and from observations and perceived conditions existing on the date of the site reconnaissance.

In expressing the opinions stated in this report, Citadel has exercised the degree of skill and care ordinarily exercised by a reasonable prudent environmental professional. Documentation provided by the Client, Client-designated representatives, interested third-parties, or from the public domain, and referenced in preparation of the Phase I ESA report, have been assimilated with the understanding that Citadel assumes no responsibility or liability for their accuracy.

Report Prepared by:

Rachel Fischer
Staff Geologist

Report Reviewed by:

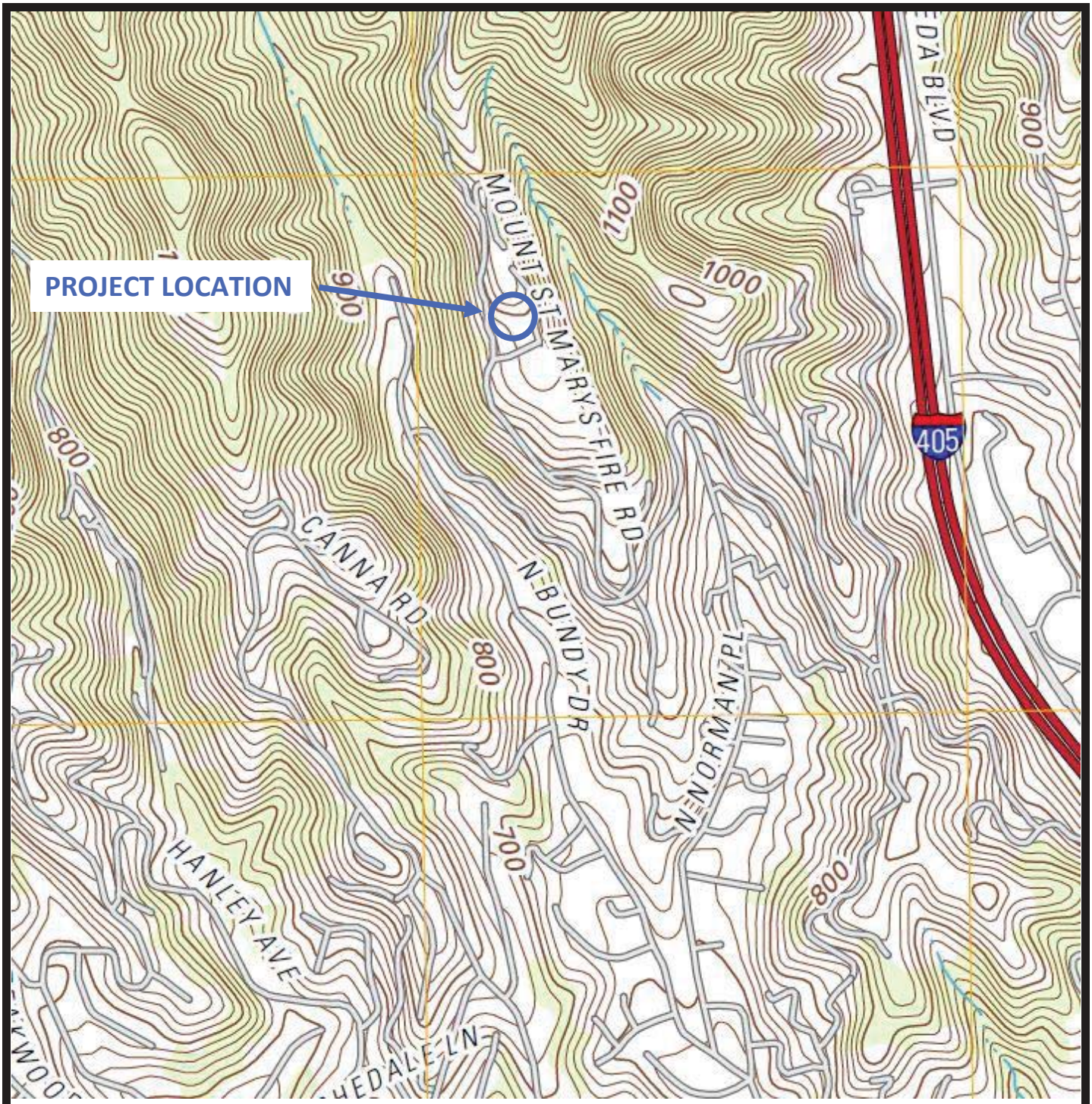
Mark Drollinger, M. Eng., CSP, CHMM, EiT
Director, Environmental Geology and Engineering

I declare that to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined by the final All Appropriate Inquiry (AAI) Rule published in 40 CFR Part 312.10 (November 1, 2013). I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting described in this Phase I ESA. I have developed and performed the AAI in conformance with the standard and care of this Rule.

Mark Drollinger, M. Eng., CSP, CHMM, EiT
Director, Environmental Geology and Engineering

CITADEL
ENVIRONMENTAL SERVICES, INC.

Appendix A
Figures



N

Not to Scale

Source: USGS, Beverly Hills Quadrangle, 2012, 7.5 Minute Series

CITADEL ENVIRONMENTAL SERVICES, INC.

MOUNT SAINT MARY'S UNIVERSITY

Chalon Campus – Wellness Pavilion Project
12001 Chalon road
Los Angeles, California

Figure 1

PROJECT NO.: 3010.1001.0

DATE: JUNE 2016

Location Map

N

Not to Scale

Source: Google Earth

CITADEL ENVIRONMENTAL SERVICES, INC.

MOUNT SAINT MARY'S UNIVERSITY

Chalon Campus – Wellness Pavilion Project
12001 Chalon road
Los Angeles, California

Figure 2

PROJECT NO.: 33010.1001.0

DATE: JUNE 2016

Site Map

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Appendix B
Photographs

PHOTO LOG

PHOTO 1: View of Fitness Center and pool, looking east.

PHOTO 2: View of the Pool House and pool, looking west. Note that access to the pool equipment area is via the gate to the right of the building.

PHOTO LOG

PHOTO 3: Looking toward the workshop area of the Pool House (behind green fence).

PHOTO 4: Looking southeast across parking lot H at Facilities Maintenance Building. Note that the left edge of this photo overlaps with the right edge of Photo 3.

PHOTO LOG

PHOTO 5: View of trash compactor, air compressor enclosure, and three pole-mounted transformers in the southern part of the Site. Parking lot H is located at Photo left.

PHOTO 6: View of air compressor in enclosure shown in Photo 5.

PHOTO LOG

PHOTO 7: Looking south at parking lot D and Brady Hall. Emergency generator and Paint Room/ Emergency Supply Room are at the photo left. The Boiler-Room Building is at the photo right, behind cars. The former UST was located near where the white vans are parked.

PHOTO 8: View of emergency generator looking east.

PHOTO LOG

PHOTO 9: View of the Paint Room & Emergency Supply Room.

PHOTOS 10: Looking south across Site from uppermost parking lot.
Pool House roof is visible in photo center.

CITADEL
ENVIRONMENTAL SERVICES, INC.

Appendix C
Asbestos/Lead Survey Reports

Ellis Environmental Management, Inc.

430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
Tel: (310) 544 1837
Fax: (310) 544 2167

September 9, 2015

Mr. John Deeb
Mount Saint Mary's University
12001 Chalon Drive
Los Angeles, CA 90049

Pre-Demolition Asbestos/Lead Survey

Fitness Center/Pool Building
Mount Saint Mary's University

Executive Summary

On August 28, 2015, Ellis Environmental Management, Inc. (Ellis) conducted bulk sampling at the subject site, a 1 story 1,100 s.f. fitness center built in 1935 and a 1,672 s.f. pool building built in 1950. Sampling and analyses were conducted for the following potential contaminants:

1. Asbestos in Building Materials. Asbestos (>1%) was identified in speckled grey 12" x 12" floor tiles located in the gym building. These materials were assessed as "non-friable" (unable to be crushed using normal hand pressure) on the date of inspection.
2. Lead in Painted Surfaces. Results indicated significant lead present in exterior white paint throughout and interior white paint in the woodshop. Lead based paint also present on the training room door/window trim. Paint must be stabilized (remove loose and flaking) by an abatement contractor prior to demolition.
3. Lead in Ceramic Tile. Results indicated no elevated concentrations of lead present in any ceramic tiles. Pre-demolition abatement will not be required.

The structures are currently occupied. **Room 107 in the fitness center was locked** at the time of sampling and was therefore not included in this survey. 12" x 12" speckled grey asbestos containing floor tiles appear to continue into this room.

Background

Asbestos-containing materials and lead-based paints have been widely used in the construction of public and commercial buildings since the 1930's. Insulation and fireproofing in more than 750,000 buildings in this country contain some quantity of asbestos. Lead paint was widely applied up until circa 1978, when concentrations of lead in paint began to be reduced.

In their normal state, most types of asbestos-containing building materials are unlikely to release airborne fibers. When broken up or disturbed improperly, however, asbestos fibers may become

airborne. Inhalation exposures to high levels of asbestos over long periods and/or ingestion of lead-based paint are associated with an increased incidence of cancer, respiratory, liver and other diseases. Any activity that could disturb asbestos materials or lead-based paint should be undertaken with care and in accordance with applicable law.

Methodology

Samples were collected by Ryan Davidson, Max Yourman and Lina Sok, EPA course-certified building inspectors employed by Ellis. All samples were collected under the direction of Duane Behrens, CAC #92-0226 and DOHS Cert. #7914.

1. Asbestos Bulk 40CFR Part 763, Subpart F, Appendix A. (AHERA Final Rule). Results expressed in percent of measured area.
2. Lead Paint. Flame AAS SW 846 3050 B/7000B. Results expressed in % by wt.
2. Lead. TTLC (ceramic tile), results expressed in mg/kg.

Inaccessible Areas

This is an operating fitness center/pool building. Not all walls and carpet could be demolished to gain complete visual access. There is a chance that additional suspect materials (flooring under carpet, pipe insulation in walls, original ceilings above newer hard lids, asbestos-cement piping under the slab, etc.) will be exposed during demolition. During demolition activities, exposed materials not identified in this report should be analyzed for asbestos prior to disturbance.

Results

Refer also to the attached laboratory reports.

Asbestos

Asbestos (>1%) was detected in:

1. 12" x 12" grey speckled floor tiles. Quantity = App. 300 s.f. Condition = non-friable, intact

12" x 12" speckled grey floor tile

The above materials were assessed as "non-friable" (unable to be crushed using normal hand pressure) and were both in good condition and slightly damaged at the time of inspection. Where required, removal will be performed by a state-licensed abatement contractor under the requirements and guidelines of California Title 8 Section 1529 and SCAQMD Rule 1403.

No asbestos was detected in samples collected from:

1. wallboard/joint compound,
2. 2'x2' ceiling tiles,
3. Cove base/mastics
4. roofing felts,
5. stucco
6. window putty
7. restroom flooring

Lead

Lead-Based paint(≥0.06%) was detected in:

1. White eave paint – exterior (0.28%). Condition = damaged, flaking
2. White window paint – exterior (2.0%). Condition = damaged, flaking
3. White rafter paint – exterior (0.17%). Condition = damaged, flaking
4. White wooden door paint (0.18%). Condition = damaged, flaking
5. Blue training room door/window trim paint(3.1%) = damaged, flaking
6. White interior woodshop paint (0.14%) = damaged, flaking


White interior paint, door paint

Disturbance of lead-containing materials is regulated under California Title 8 Section 1532.1.

Recommendations

Asbestos

Asbestos was detected only in 12" floor tiles in the gym reception area. Notification to employees and occupants regarding the presence and location of asbestos materials is required under California

Health and Safety Code 25914 and 25915. Removal of asbestos materials is required prior to demolition, as regulated under California Title 8 1529, 29CFR 1926.1101, South Coast Air Quality Management District (SCAQMD) Rule 1403, and others.

Lead

Lead was identified in all exterior white paint, interior woodshop paint, and blue training room paint. Stabilize damaged (peeling and flaking) paint prior to demolition. Profile remaining construction waste for lead. Removal will be performed by lead-certified workers following 5-day CDPH notification, under Cal. Title 8 S1532.1. Drum and profile all waste prior to transport and disposal. When profiling, do not mix potential lead-containing waste with any other materials (e.g. paper suits).

This report is not intended as an endorsement or rejection of the means and methods used in the handling of potentially hazardous materials. Ellis is a privately-held company and is not affiliated with any financial institution or other corporate entity. Ellis is retained as an independent contractor to provide objective, impartial investigatory or analytical service regarding environmentally regulated hazardous or toxic materials. This report is not an endorsement or rejection of any specific methods used in handling or transport of potentially hazardous chemicals. Ellis provides independent testing for indoor air contaminants and other potentially hazardous materials. The company and its employees are certified and licensed to practice in the State of California. Retained laboratories are accredited by the EPA (AREAL), NIOSH (AIHA), and the California Air Resources Board (CARB).

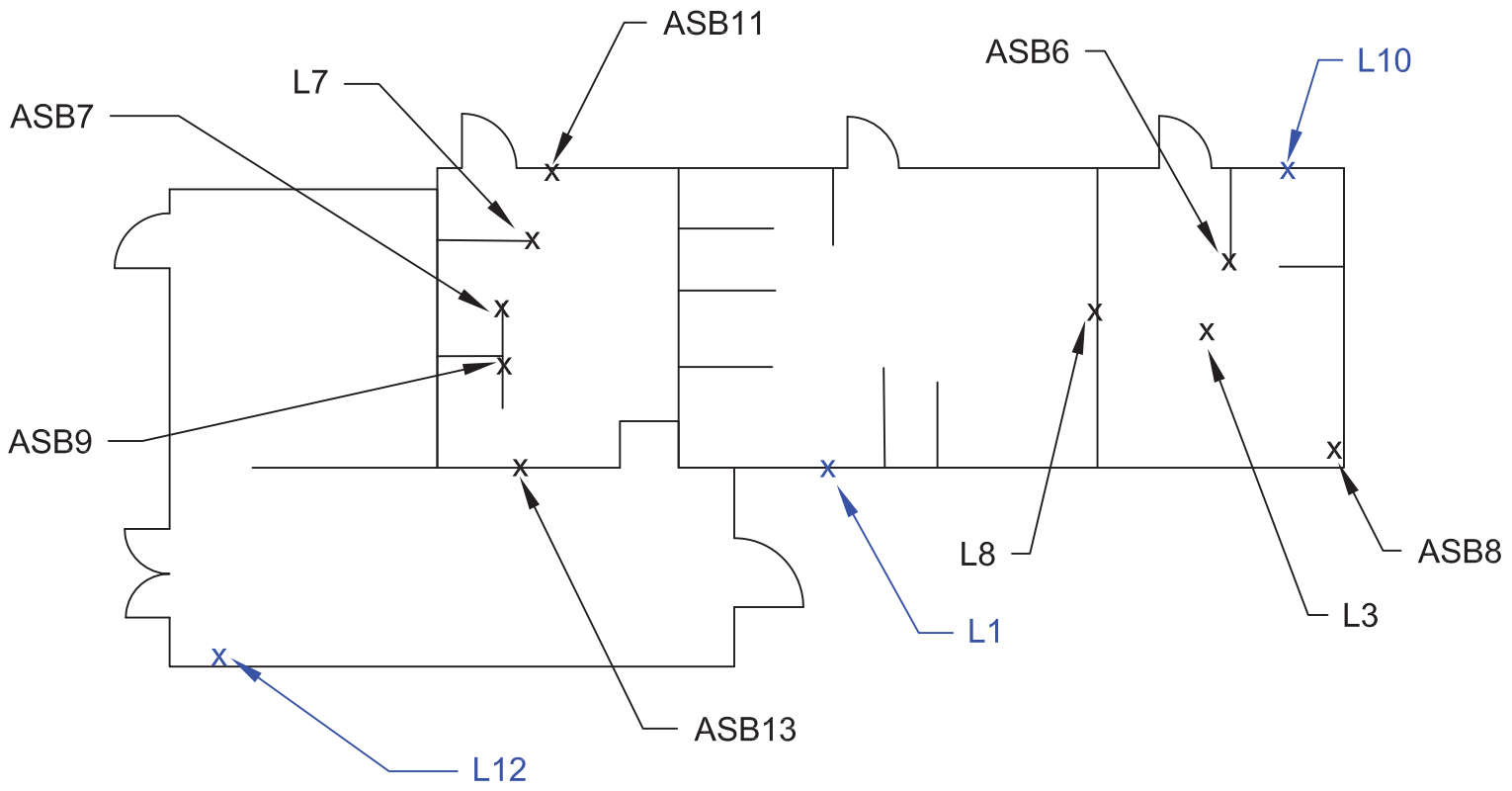
Respectfully,

Duane E. Behrens
President
CAL/OSHA Cert. #92-0226
DOHS Cert. #7914

cc 15-333

Attachment A

Sample Location Drawings



Key

x = Lead-Based/Lead Containing Paint

x = Asbestos Containing Material

Figure 1: Sample Locations Interior Samples Pool House/Woodshop

Firm Name and Address

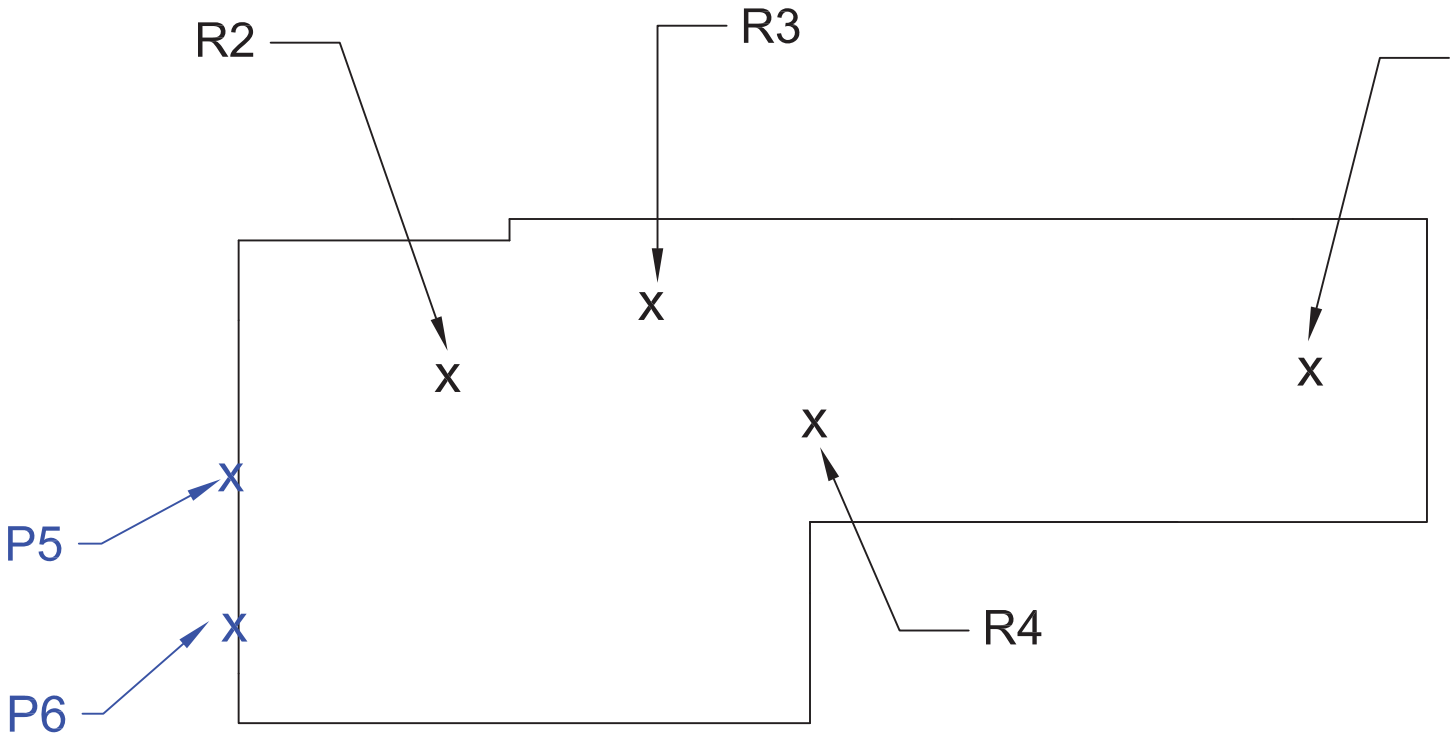
Ellis Environmental Mgmt, Inc.
430 Silver Spur Rd., Suite 201
Rancho Palos Verdes, CA 90275

Client Name and Address

Mount Saint Mary's University
12001 Chalon Road
Los Angeles, CA 90049

Project #	Sheet
15-333	1 of 4
Date: 08/28/2015	

Ellis



Key

x = Lead-Based/Lead Containing Paint

x = Asbestos Containing Material

N

Figure 2: Sample Locations Exterior and Roof Pool House/Woodshop

Firm Name and Address

Ellis Environmental Mgmt, Inc.
430 Silver Spur Rd., Suite 201
Rancho Palos Verdes, CA 90275

Client Name and Address

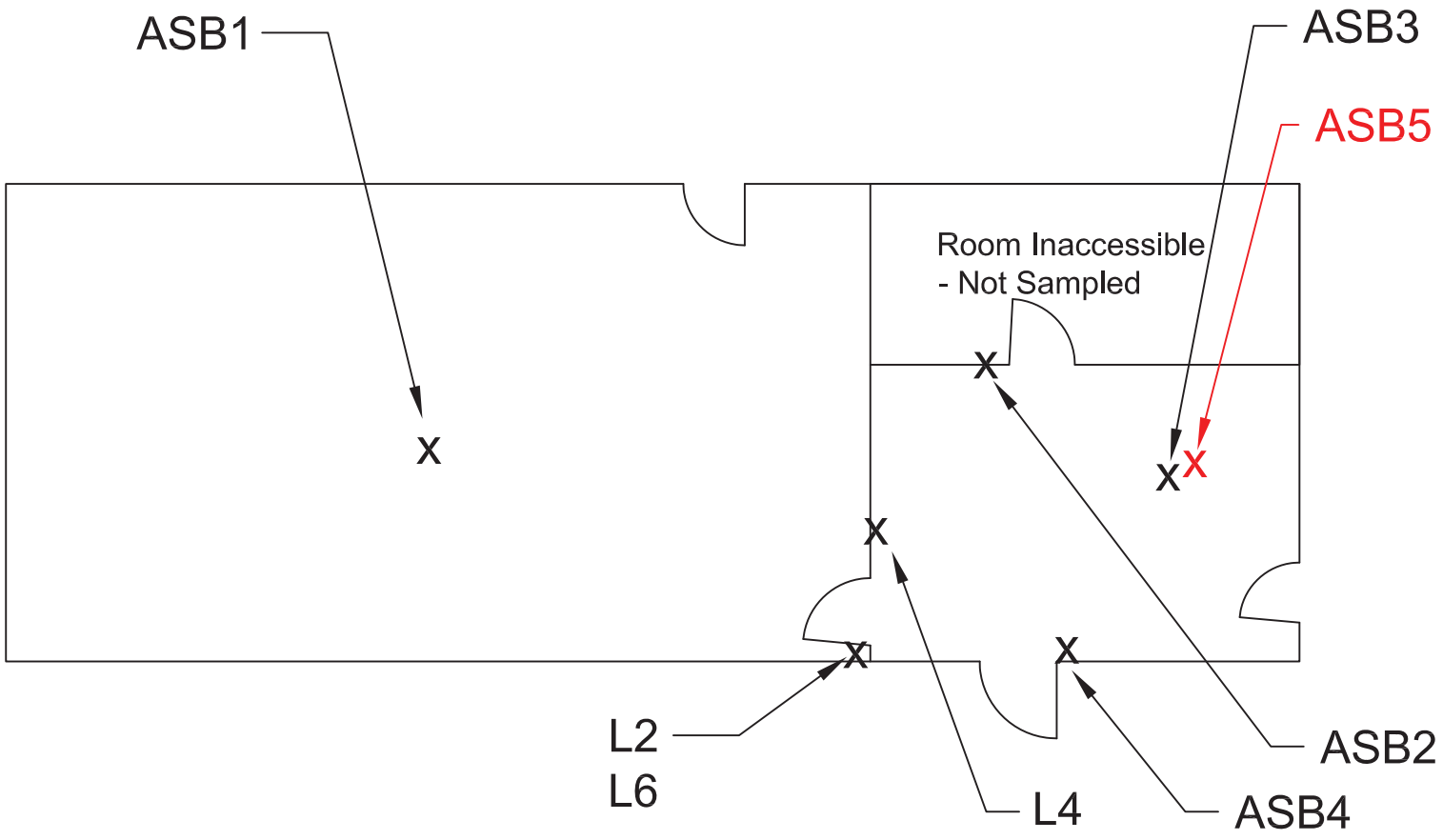
Mount Saint Mary's University
12001 Chalon Road
Los Angeles, CA 90049

Project # 15-333

Date 08/28/2015

Sheet 2 of 4

Ellis



Key

x = Lead-Based/Lead Containing Paint

x = Asbestos Containing Material

Figure 3: Sample Locations
Interior Samples
Fitness Center - Gym

Firm Name and Address

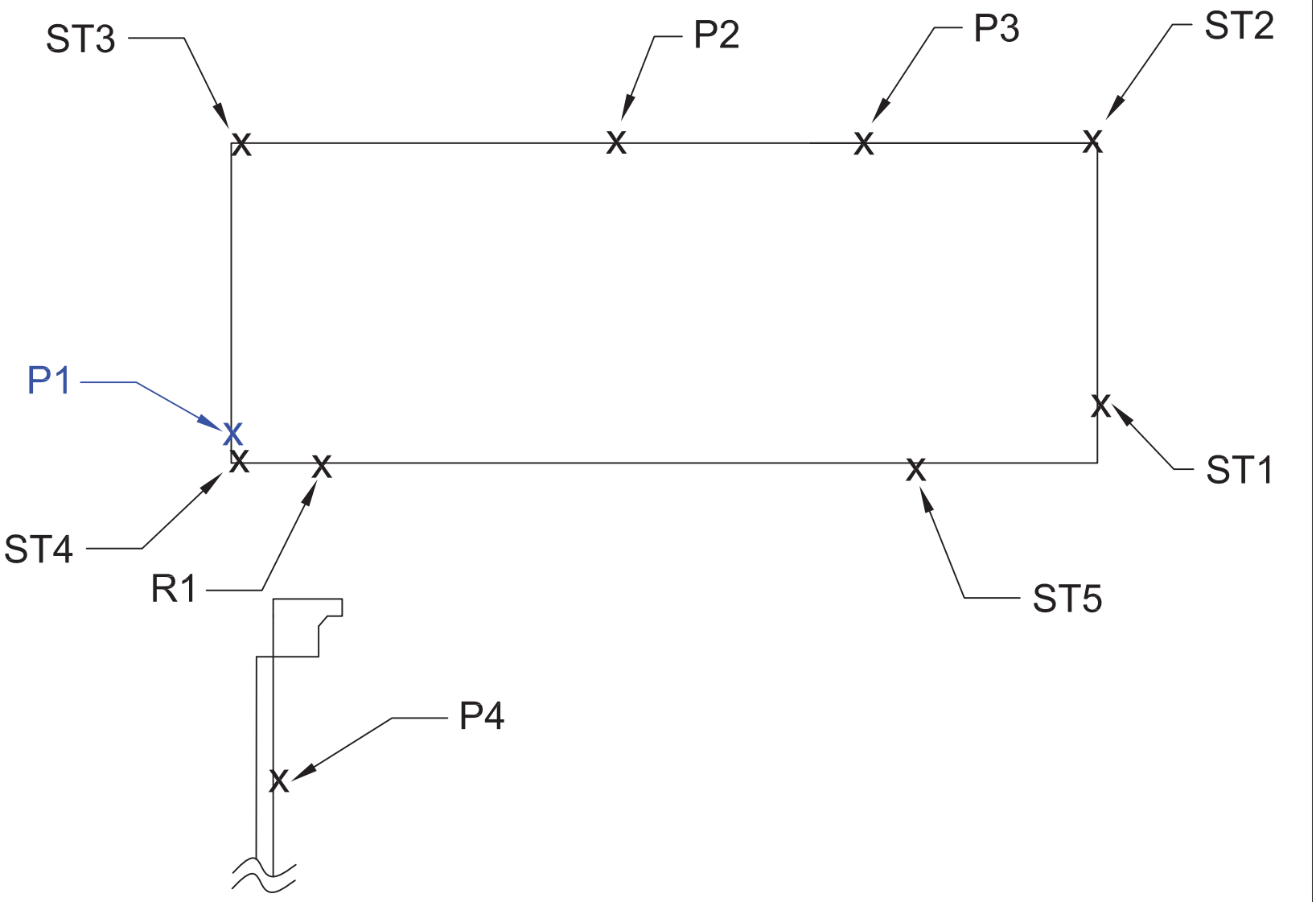
Ellis Environmental Mgmt, Inc.
430 Silver Spur Rd., Suite 201
Rancho Palos Verdes, CA 90275

Client Name and Address

Mount Saint Mary's University
12001 Chalon Road
Los Angeles, CA 90049

Project #	Sheet
15-333	3 of 4
Date: 08/28/2015	

Ellis



Key

x = Lead-Based/Lead Containing Paint

x = Asbestos Containing Material

N

Figure 4: Sample Locations Exterior and Roof Fitness Center - Gym

Firm Name and Address

Ellis Environmental Mgmt, Inc.
430 Silver Spur Rd., Suite 201
Rancho Palos Verdes, CA 90275

Client Name and Address

Mount Saint Mary's University
12001 Chalon Road
Los Angeles, CA 90049

Project #	Sheet
15-333	4 of 4
Date 08/28/2015	

Ellis

Attachment B

Laboratory Results

LA Testing
520 Mission Street, South Pasadena, CA 91030
Phone/Fax: (323) 254-9960 / (323) 254-9982
http://www.LATesting.com pasadenalab@latesting.com

LA Testing Order: 321518572
CustomerID: 32EEMI45
CustomerPO:
ProjectID:

Attn: **Duane Behrens**
Ellis Environmental Management, Inc.
430 Silver Spur Road
Suite 201
Rancho Palos Verdes, CA 90275

Phone: (310) 544-1837
Fax:
Received: 08/28/15 12:30 PM
Collected:

Project: **15-333 MT. ST. MARY'S FACILITIES MGMT**

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client Sample Description	*Lab ID*	*Collected*	*Analyzed*	*Lead Concentration*
L10	*321518572-0001*		8/31/2015	3.1 % wt
	Site: BLUE PAINT			
L12	*321518572-0002*		8/31/2015	0.14 % wt
	Site: WHITE PAINT			
L14	*321518572-0003*		8/31/2015	<0.028 % wt
	Site: TEAL PAINT			
L18	*321518572-0004*		8/31/2015	<0.010 % wt
	Site: BEIGE PAINT			
L5	*321518572-0005*		8/31/2015	<0.025 % wt
	Site: WHITE PAINT			
P7	*321518572-0007*		8/31/2015	1.7 % wt
	Site: WHITE EVE PAINT			
P8	*321518572-0008*		8/31/2015	0.15 % wt
	Site: WHITE GUTTER PAINT			

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

*Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.010 % wt based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities. Samples received in good condition unless otherwise noted. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. The QC data associated with the sample results included in this report meet the recovery and precision requirements established by the AIHA-LAP, unless specifically indicated otherwise.

Samples analyzed by LA Testing South Pasadena, CA CA ELAP 2283, AIHA-LAP, LLC ELLAP 102814

Initial report from 09/01/2015 12:55:39

LA Testing
520 Mission Street, South Pasadena, CA 91030
Phone/Fax: (323) 254-9960 / (323) 254-9982
http://www.LATesting.com pasadenalab@latesting.com

LA Testing Order: 321518572
CustomerID: 32EEMI45
CustomerPO:
ProjectID:

Attn: **Duane Behrens**
Ellis Environmental Management, Inc.
430 Silver Spur Road
Suite 201
Rancho Palos Verdes, CA 90275

Phone: (310) 544-1837
Fax:
Received: 08/28/15 12:30 PM
Collected:

Project: **15-333 MT. ST. MARY'S FACILITIES MGMT**

Test Report: Total Threshold Limit Concentration

Client Sample Description	*Lab ID*	*Collected*	*Analyzed*	*Lead Concentration*
L16	*321518572-0006*		9/1/2015	<40 mg/Kg
	Site: 12"X12" BEIGE CERAMIC FT/GROUT			

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

This report relates only to those items tested. Samples received in good condition unless otherwise noted. Quality Control Data associated with this sample set is within acceptable limits, unless otherwise noted

Samples analyzed by LA Testing South Pasadena, CA CA ELAP #2283

Initial report from 09/01/2015 12:55:39

LA Testing
520 Mission Street, South Pasadena, CA 91030
Phone/Fax: (323) 254-9960 / (323) 254-9982
http://www.LATesting.com pasadenalab@latesting.com

LA Testing Order: 321518574
CustomerID: 32EEMI45
CustomerPO:
ProjectID:

Attn: **Duane Behrens**
Ellis Environmental Management, Inc.
430 Silver Spur Road
Suite 201
Rancho Palos Verdes, CA 90275

Phone: (310) 544-1837
Fax:
Received: 08/28/15 12:30 PM
Collected:

Project: **15-333 MT. ST. MARY'S 12001 CHALON RD LOS ANGELES, CA**

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client Sample Description	*Lab ID*	*Collected*	*Analyzed*	*Lead Concentration*
P1	*321518574-0001*		8/31/2015	0.28 % wt
	Site: EVE PAINT-WHITE			
P2	*321518574-0002*		8/31/2015	<0.010 % wt
	Site: BLUE WHINDOW PAINT			
P3	*321518574-0003*		8/31/2015	<0.010 % wt
	Site: BEIGE/GREEN STUCCO PAINT			
P4	*321518574-0004*		8/31/2015	<0.010 % wt
	Site: WHITE CMU PAINT			
L2	*321518574-0005*		8/31/2015	<0.010 % wt
	Site: BLUE PAINT			
L4	*321518574-0006*		8/31/2015	0.055 % wt
	Site: LIGHT BLUE PAINT			
L6	*321518574-0007*		8/31/2015	<0.010 % wt
	Site: WHITE PAINT			
L3	*321518574-0008*		8/31/2015	<0.021 % wt
	Site: GRAY FLOOR PAINT			
L8	*321518574-0009*		8/31/2015	<0.011 % wt
	Site: YELLOW PAINT			
L1	*321518574-0011*		8/31/2015	2.0 % wt
	Site: WHITE WINDOW FRAME PAINT			
P5	*321518574-0012*		8/31/2015	0.17 % wt
	Site: WHITE RAFTER EVE PAINT			
P6	*321518574-0013*		8/31/2015	0.18 % wt
	Site: WOODSHIP DOOR PAINT WHITE			

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

*Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.010 % wt based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities. Samples received in good condition unless otherwise noted. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. The QC data associated with the sample results included in this report meet the recovery and precision requirements established by the AIHA-LAP, unless specifically indicated otherwise.

Samples analyzed by LA Testing South Pasadena, CA CA ELAP 2283, AIHA-LAP, LLC ELLAP 102814

Initial report from 09/01/2015 12:54:19

LA Testing
520 Mission Street, South Pasadena, CA 91030
Phone/Fax: (323) 254-9960 / (323) 254-9982
http://www.LATesting.com pasadenalab@latesting.com

LA Testing Order: 321518574
CustomerID: 32EEMI45
CustomerPO:
ProjectID:

Attn: **Duane Behrens**
Ellis Environmental Management, Inc.
430 Silver Spur Road
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Rancho Palos Verdes, CA 90275

Phone: (310) 544-1837
Fax:
Received: 08/28/15 12:30 PM
Collected:

Project: **15-333 MT. ST. MARY'S 12001 CHALON RD LOS ANGELES, CA**

Test Report: Total Threshold Limit Concentration

Client Sample Description	*Lab ID*	*Collected*	*Analyzed*	*Lead Concentration*
L7	*321518574-0010*		9/1/2015	<40 mg/Kg
	Site: WHITE 4"X4" CT			

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

This report relates only to those items tested. Samples received in good condition unless otherwise noted. Quality Control Data associated with this sample set is within acceptable limits, unless otherwise noted

Samples analyzed by LA Testing South Pasadena, CA CA ELAP #2283

Initial report from 09/01/2015 12:54:19

LA Testing
520 Mission Street, South Pasadena, CA 91030
Phone/Fax: (323) 254-9960 / (323) 254-9982
http://www.LATesting.com pasadenalab@latesting.com

LA Testing Order: 321518659
CustomerID: 32EEMI45
CustomerPO:
ProjectID:

Attn: **Duane Behrens**
Ellis Environmental Management, Inc.
430 Silver Spur Road
Suite 201
Rancho Palos Verdes, CA 90275

Phone: (310) 544-1837
Fax:
Received: 08/28/15 12:00 PM
Analysis Date: 9/1/2015
Collected:

Project: **15-333/ 12001 CHALON RD LOS ANGELES, CA**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos				Asbestos
Sample	**Description**	**Appearance**	**%**	**Fibrous**	**%**	**Non-Fibrous**	**% Type**
ASB2-Drywall *321518659-0001*	WB.JC	Brown/White Fibrous Heterogeneous	10%	Cellulose	90%	Non-fibrous (other)	**None Detected**
		No JC present for analysis.					
ASB2-Caulk-like 1 *321518659-0001A*	WB.JC	Gray Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB2-Caulk-like 2 *321518659-0001B*	WB.JC	White Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB4 *321518659-0002*	JC ON WOOD	White Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB1 *321518659-0003*	2X2 CT	Gray/White Fibrous Heterogeneous	50% 10%	Cellulose Min. Wool	30% 10%	Perlite Non-fibrous (other)	**None Detected**
ASB2-Cove Base *321518659-0004*	BLACK COVEBASE/ MASTIC	Black Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB2-Mastic *321518659-0004A*	BLACK COVEBASE/ MASTIC	Tan Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB5-Vinyl Floor Tile *321518659-0005*	SPECKLED GRAY 1X1 FT/ MASTIC	Gray Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**

Analyst(s)

Julie Vong (8)
Olivia Santiago (33)

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

Initial report from 09/01/2015 12:52:58

LA Testing
520 Mission Street, South Pasadena, CA 91030
Phone/Fax: (323) 254-9960 / (323) 254-9982
http://www.LATesting.com pasadenalab@latesting.com

LA Testing Order: 321518659
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Fax:
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Collected:

Project: **15-333/ 12001 CHALON RD LOS ANGELES, CA**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos			Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**		**% Non-Fibrous**	**% Type**
ASB5-Mastic *321518659-0005A*	SPECKLED GRAY 1X1 FT/ MASTIC	Black/Yellow Non-Fibrous Heterogeneous			97% Non-fibrous (other)	**3% Chrysotile**
R1-Shingle 1 *321518659-0006*	ROOFING SHINGLE FELTS	Brown/Black Fibrous Heterogeneous	10%	Glass	90% Non-fibrous (other)	**None Detected**
R1-Shingle 2 *321518659-0006A*	ROOFING SHINGLE FELTS	Gray/Black Fibrous Heterogeneous	10%	Glass	90% Non-fibrous (other)	**None Detected**
ST1-Finish Coat *321518659-0007*	STUCCO	Green Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ST1-Base Coat *321518659-0007A*	STUCCO	Gray Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ST1-Texture *321518659-0007B*	STUCCO	White Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ST1-Mastic *321518659-0007C*	STUCCO	Black Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ST2-Finish Coat 1 *321518659-0008*	STUCCO	White Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**

Analyst(s)

Julie Vong (8)
Olivia Santiago (33)

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

Initial report from 09/01/2015 12:52:58

LA Testing
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Phone: (310) 544-1837
Fax:
Received: 08/28/15 12:00 PM
Analysis Date: 9/1/2015
Collected:

Project: **15-333/ 12001 CHALON RD LOS ANGELES, CA**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos % Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
ST2-Finiah Coat 2 *321518659-0008A*	STUCCO	Green Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ST2-Base Coat *321518659-0008B*	STUCCO	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ST2-Mastic *321518659-0008C*	STUCCO	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ST3-Finish Coat 1 *321518659-0009*	STUCCO	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ST3-Finish Coat 2 *321518659-0009A*	STUCCO	Green Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ST3-Base Coat *321518659-0009B*	STUCCO	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ST4-Finish Coat *321518659-0010*	STUCCO	Green Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
ST4-Base Coat *321518659-0010A*	STUCCO	Gray Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**

Analyst(s)

Julie Vong (8)
Olivia Santiago (33)

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

Initial report from 09/01/2015 12:52:58

LA Testing
520 Mission Street, South Pasadena, CA 91030
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Received: 08/28/15 12:00 PM
Analysis Date: 9/1/2015
Collected:

Project: **15-333/ 12001 CHALON RD LOS ANGELES, CA**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos % Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
ST5-Finish Coat *321518659-0011*	STUCCO	Green Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
ST5-Base Coat *321518659-0011A*	STUCCO	Gray Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
ASB6-Joint Compound *321518659-0012*	WB/JC	White Non-Fibrous Homogeneous		100% Non-fibrous (other) No WB present for analysis.	**None Detected**
ASB8-Wallboard *321518659-0013*	WB/JC	Brown/White Fibrous Heterogeneous	10% Cellulose <1% Glass	90% Non-fibrous (other)	**None Detected**
ASB8-Joint Compound *321518659-0013A*	WB/JC	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB7-Joint Compound *321518659-0014*	WB/JC	White Non-Fibrous Homogeneous		100% Non-fibrous (other) No WB present for analysis.	**None Detected**
ASB9-Wallboard *321518659-0015*	WB/JC	Brown/White Fibrous Heterogeneous	10% Cellulose 2% Glass	88% Non-fibrous (other)	**None Detected**

Analyst(s)

Julie Vong (8)
Olivia Santiago (33)

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

Initial report from 09/01/2015 12:52:58

LA Testing
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Collected:

Project: **15-333/ 12001 CHALON RD LOS ANGELES, CA**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos				Asbestos
Sample	**Description**	**Appearance**	**%**	**Fibrous**	**%**	**Non-Fibrous**	**% Type**
ASB9-Joint Compound *321518659-0015A*	WB/JC	White Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB11 *321518659-0016*	WINDOW PUTTY	White Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB13 *321518659-0017*	WINDOW PUTTY	White Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
R2-Mastic *321518659-0018*	ROOF CORE	Black Non-Fibrous Homogeneous	5%	Synthetic	95%	Non-fibrous (other)	**None Detected**
R2-Roof Core *321518659-0018A*	ROOF CORE	White/Black Fibrous Heterogeneous	10% 5%	Synthetic Glass	85%	Non-fibrous (other)	**None Detected**
R3 *321518659-0019*	VENT MASTIC	White/Black Fibrous Heterogeneous	20%	Cellulose	80%	Non-fibrous (other)	**None Detected**
R4 *321518659-0020*	VENT PIPE MASTIC	White/Black Fibrous Heterogeneous	20%	Cellulose	80%	Non-fibrous (other)	**None Detected**
R5 *321518659-0021*	VENT PIPE MASTIC	White/Black Fibrous Heterogeneous	10%	Cellulose	90%	Non-fibrous (other)	**None Detected**

Analyst(s)

Julie Vong (8)
Olivia Santiago (33)

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

Initial report from 09/01/2015 12:52:58

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Project: **15-333/ 12001 CHALON RD LOS ANGELES, CA**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
ASB49-Flooring *321518659-0022*	POOL HOUSE FLOORING	Green Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB49-Leveling Compound *321518659-0022A*	POOL HOUSE FLOORING	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**

Analyst(s)

Julie Vong (8)
Olivia Santiago (33)

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

Initial report from 09/01/2015 12:52:58

333 - per Lina

~~322~~

3215186659 -

Ellis Environmental Management, Inc.

430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
(310) 544-1837 (tel)
(310) 544-2167 (fax)

Project No.: 15-~~0000~~

Client: MT. ST. MARY'S

Location: 12001 CHALON RD.
LOS ANGELES, CA

Sampler: RD / MY / LS

CHAIN OF CUSTODY RECORD

Sheet 1 of 3

Sample Number	Description	Date	Time	H20	Air	Solid	Tests Required
ASB2	WB / JC	8/28/15	AM			X	PLM - ASBESTOS
ASB4	JC ON WOOD						
ASB1	2 x 2 CT						
ASB2	BLACK COVE BASE / MASTIC						
ASB5	SPECKLED GRAY 1x1 FT / MASTIC						
P1	EVE PAINT - WHITE						FLAME AAS - LEAD
P2	BLUE WINDOW PAINT						
P3	BEIGE / GREEN STUCCO PAINT						
P4	WHITE CMU PAINT						
R1	ROOFING SHINGLE FELTS						PLM - ASBESTOS
ST1	STUCCO						
ST2	" "						

GYM

Turnaround: ___ same day ___ 24 hrs. X 48 hrs. X 3 days ___ 5 days (Standard)

Special Instructions:

Date	Relinquished By	Received By	Date
8/28/15			8-28-15 12:30pm

321518659 -

333

Project No.: 15-322

Client: MT. ST. MARY'S

Location: GYM, POOL HOUSE

Ellis Environmental Management, Inc.
430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
(310) 544-1837 (tel)
(310) 544-2167 (fax)

CHAIN OF CUSTODY RECORD

Sampler: RD/MY/LS

Sheet 2 of 3

GYM

POOL HOUSE

Sample Number	Description	Date	Time	H20	Air	Solid	Tests Required
ST3	" "	8/28/15	AM			X	PLM - ASBESTOS
ST4	" "						
ST5	" "						
L2	BLUE PAINT						FLAME AAS - LEAD
L4	LIGHT BLUE PAINT						
L6	WHITE PAINT						
ASB6	WB/JC						PLM - ASBESTOS
ASB8	" "						
ASB7	" "						
ASB9	" "						
ASB11	WINDOW PUTTY						
ASB13	" "						

Turnaround: ___ same day ___ 24 hrs. X 48 hrs. ___ 3 days ___ 5 days (Standard)

Special Instructions:

Date	Relinquished By	Received By	Date

321518659 -

OrderID: 321518659

Page 3 Of 3

Bliss Environmental Management, Inc.
430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
(310) 544-1837 (tel)
(310) 544-2167 (fax)

Project No.: 15-~~322~~ 333
Client: MT. ST. MARY'S
Location: POOL HOUSE

Sampler: RD/MY/LS

CHAIN OF CUSTODY RECORD

Sheet 3 of 3

Sample Number	Description	Date	Time	H20	Air	Solid	Tests Required
L3	GRAY FLOOR PAINT	8/28/15	AM			X	FLAME AAS - LEAD
L8	YELLOW PAINT						↓ ↓
L7	WHITE 4"x4" CT						TTLC - LEAD
L1	WHITE WINDOW FRAME PAINT						FLAME AAS - LEAD
P5	WHITE RAFTER EYE PAINT						↓ ↓
P6	WOODSHOP DOOR PAINT - WHITE						
R2	ROOF CORE						
R3	VENT MASTIC						PLM - ASBESTOS
R4	VENT PIPE MASTIC						↓ ↓
R5	" "						
ASB49	POOL HOUSE FLOORING						

Turnaround: ____ same day ____ 24 hrs. X 48 hrs. ____ 3 days ____ 5 days (Standard)

Special Instructions:

Date	Relinquished By	Received By	Date

Attachment C

Ellis Employee Certifications

State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

Duane E Behrens
Name

Certification No. **92-0226**

Expires on **07/10/16**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.

State of California Department of Public Health

Lead-Related Construction Certificate

Certificate Type

Inspector/Assessor

Expiration Date

04/12/2016

27508

Duane E. Behrens

ID #: 7914

State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

Ryan C Davidson
Name

Certification No. **15-5395**

Expires on **05/12/16**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.

State of California Department of Public Health

Lead-Related Construction Certificate

Certificate Type: Inspector/Assessor

Expiration Date: 04/19/2016

Ryan C. Davidson

ID #: 26018

State of California
Division of Occupational Safety and Health

Certified Site Surveillance Technician

Maxwell R Yourman
Name

Certification No. **15-5375**

Expires on **05/12/16**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.


State of California Department of Public Health
Lead-Related Construction Certificate
Certificate Type
Expiration Date
Inspector/Assessor
10/21/2016
270935
Maxwell R. Yourman
ID #: 27531

Certificate Of Completion

Asbestos Building Inspector Refresher Course

DOSH #:CA-015-06

Lina Sok

ABIR0807150002N7922

John Daly

Principal Instructor

Michael W. Horner

Michael W. Horner
Training Director

8/7/2015	8/7/2015	8/7/2015	8/7/2016
Course Start Date	Course End Date	Exam Date	Expiration Date

This course satisfies the education requirements for Asbestos accreditation under the Toxic Substances Control Act, Title II. This course has been approved by the Department of Industrial Relations, Division of Occupational Safety and Health of the State of California

NATEC International, Inc.

National Association of Training and Environmental Consulting

1100 Technology Circle- Suite A, Anaheim, CA 92805 • www.natecintl.com • 800-969-3228

Ellis Environmental Management, Inc.

430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
Tel: (310) 544 1837
Fax: (310) 544 2167

September 9, 2015

Mr. John Deeb
Mount Saint Mary's University
12001 Chalon Drive
Los Angeles, CA 90049

Pre-Demolition Asbestos/Lead Survey

Facilities Management Building
Mount Saint Mary's University

Executive Summary

On August 28, 2015, Ellis Environmental Management, Inc. (Ellis) conducted bulk sampling at the subject site, a 2 story 4,751 s.f. building, built in 1980. Sampling and analyses were conducted for the following potential contaminants:

1. Asbestos in Building Materials. Asbestos (>1%) was identified in all roof penetration mastic and exterior window putty. These materials were assessed as "non-friable" (unable to be crushed using normal hand pressure) on the date of inspection.
2. Lead in Painted Surfaces. Results indicated significant lead present in white eave paint and white gutter paint throughout the facilities management building. Paint must be stabilized (remove loose and flaking) by an abatement contractor prior to demolition.
3. Lead in Ceramic Tile. Results indicated no elevated concentrations of lead present in any ceramic tiles. Pre-demolition abatement will not be required.

The structures are currently occupied. **Suite 200 and Suite 201 were inaccessible** at the time of sampling and were therefore not included in this survey.

Background

Asbestos-containing materials and lead-based paints have been widely used in the construction of public and commercial buildings since the 1930's. Insulation and fireproofing in more than 750,000 buildings in this country contain some quantity of asbestos. Lead paint was widely applied up until circa 1978, when concentrations of lead in paint began to be reduced.

In their normal state, most types of asbestos-containing building materials are unlikely to release airborne fibers. When broken up or disturbed improperly, however, asbestos fibers may become airborne. Inhalation exposures to high levels of asbestos over long periods and/or ingestion of lead-based paint are associated with an increased incidence of cancer, respiratory, liver and other diseases.

Any activity that could disturb asbestos materials or lead-based paint should be undertaken with care and in accordance with applicable law.

Methodology

Samples were collected by Ryan Davidson, Max Yourman and Lina Sok, EPA course-certified building inspectors employed by Ellis. All samples were collected under the direction of Duane Behrens, CAC #92-0226 and DOHS Cert. #7914.

1. Asbestos Bulk 40CFR Part 763, Subpart F, Appendix A. (AHERA Final Rule). Results expressed in percent of measured area.
2. Lead Paint. Flame AAS SW 846 3050 B/7000B. Results expressed in % by wt.
2. Lead. TTLC (ceramic tile), results expressed in mg/kg.

Inaccessible Areas

This is an occupied, operating facilities building. Not all walls and carpet could be demolished to gain complete visual access. There is a chance that additional suspect materials (flooring under carpet, pipe insulation in walls, original ceilings above newer hard lids, asbestos-cement piping under the slab, etc.) will be exposed during demolition. During demolition activities, exposed materials not identified in this report should be analyzed for asbestos prior to disturbance.

Results

Refer also to the attached laboratory reports.

Asbestos

Asbestos (>1%) was detected in:

1. Roof penetration mastics (10% Chrysotile). Quantity = approximately 25 s.f. Condition = non-friable, good.
2. Window putty (2% Chrysotile). Quantity = approximately 5 s.f. Condition = non-friable, slightly damaged.

The above materials were assessed as "non-friable" (unable to be crushed using normal hand pressure) and were both in good condition and slightly damaged at the time of inspection. Where required, removal will be performed by a state-licensed abatement contractor under the requirements and guidelines of California Title 8 Section 1529 and SCAQMD Rule 1403.

No asbestos was detected in samples collected from:

1. wall plaster/ceiling plaster,
2. wallboard/joint compound,
3. overspray,
4. 2'x4' ceiling tiles,
5. 12" floor tiles/mastics(5),
6. Cove base/mastics(5)
7. roofing felts,
8. stucco

Lead

Lead-Based paint (≥0.06%) was detected in:

1. White eave paint – exterior (1.7%). Condition = damaged, flaking
2. White gutter paint – exterior (0.15%). Condition = damaged, flaking

White eave and gutter paint

Disturbance of lead-containing materials is regulated under California Title 8 Section 1532.1.

Recommendations

Asbestos

Asbestos was detected in various roof penetration mastics and window putty. Notification to employees and occupants regarding the presence and location of asbestos materials is required under California Health and Safety Code 25914 and 25915. Prior to demolition, removal of asbestos materials is required, regulated under California Title 8 1529, 29CFR 1926.1101, South Coast Air Quality Management District (SCAQMD) Rule 1403, and others.

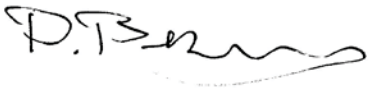
Lead

Lead was identified in exterior white paint. Stabilize damaged (peeling and flaking) paint prior to demolition. Profile remaining construction waste for lead. Removal will be performed by lead-certified workers following 5-day CDPH notification, under Cal. Title 8 S1532.1. Drum and profile all waste prior to transport and disposal. When profiling, do not mix potential lead-containing waste with any other materials (e.g. paper suits).

This report is not intended as an endorsement or rejection of the means and methods used in the handling of potentially hazardous materials. Ellis is a privately-held company and is not affiliated with any financial institution or other corporate entity. Ellis is retained as an independent contractor to provide objective, impartial investigatory or analytical service regarding environmentally regulated hazardous or toxic materials. This report is not an endorsement or rejection of any specific methods used in handling or transport of potentially hazardous chemicals. Ellis provides

independent testing for indoor air contaminants and other potentially hazardous materials. The company and its employees are certified and licensed to practice in the State of California. Retained laboratories are accredited by the EPA (AREAL), NIOSH (AIHA), and the California Air Resources Board (CARB).

Respectfully,



Duane E. Behrens
President
CAL/OSHA Cert. #92-0226
DOHS Cert. #7914

cc 15-333

Attachment A

Sample Location Drawings

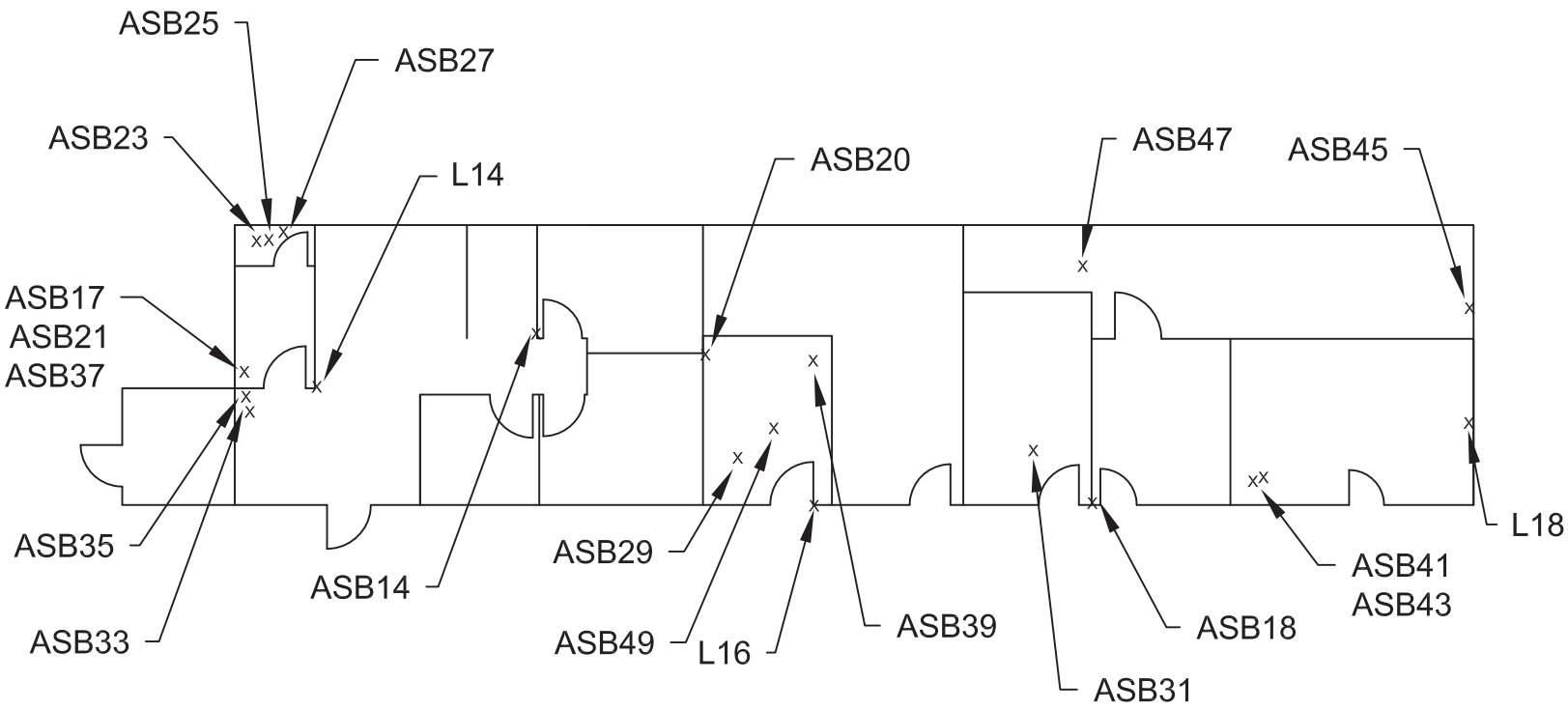


Figure 1: Sample Locations
Floor 1 - Interior
Facilities Management Building

Firm Name and Address

Ellis Environmental Mgmt, Inc.
430 Silver Spur Rd., Suite 201
Rancho Palos Verdes, CA 90275

Client Name and Address

Mount Saint Mary's University
12001 Chalon Road
Los Angeles, CA 90049

Project #	Sheet
15-333	1 of 3
Date: 08/28/2015	

Ellis

Figure 3: Sample Locations
Floor 2 - Interior
Facilities Management Building

Firm Name and Address

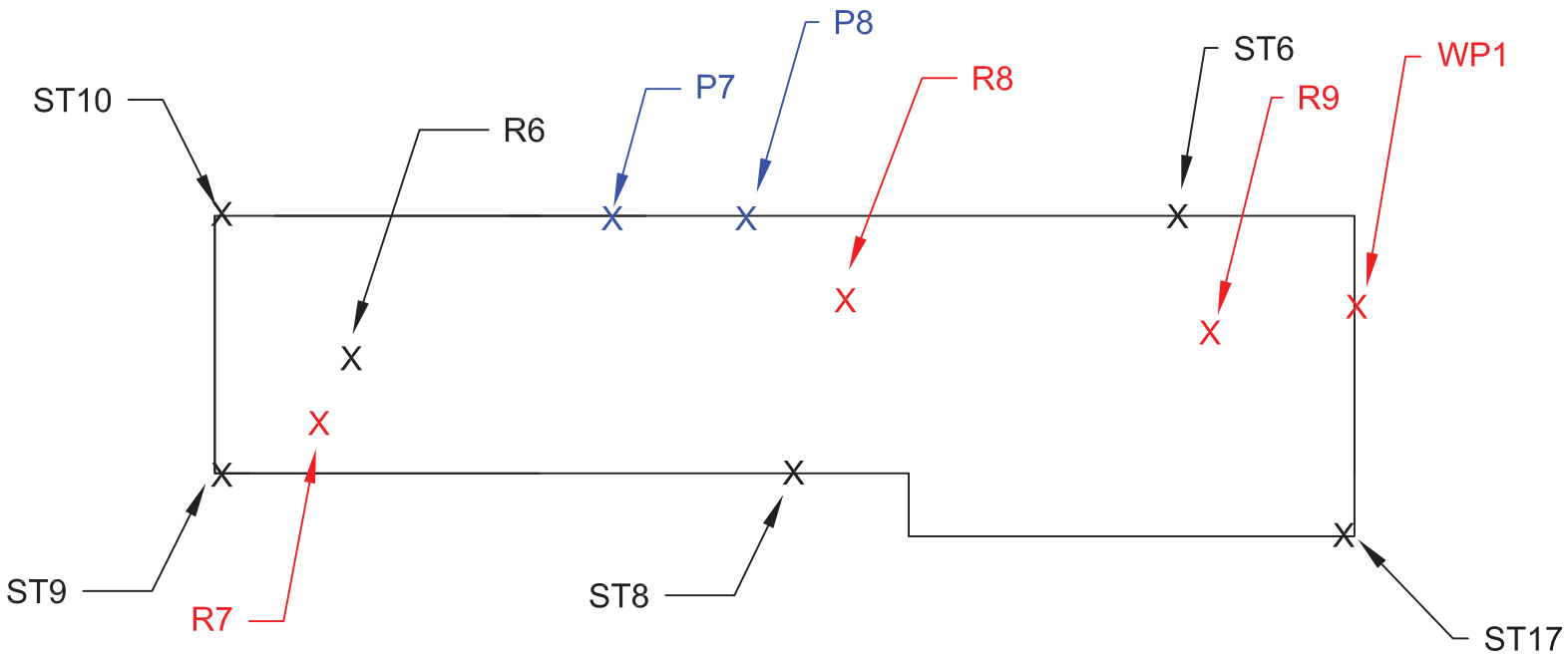
Ellis Environmental Mgmt, Inc.
430 Silver Spur Rd., Suite 201
Rancho Palos Verdes, CA 90275

Client Name and Address

Mount Saint Mary's University
12001 Chalon Road
Los Angeles, CA 90049

Project #	Sheet
15-333	2 of 3
Date	
08/28/2015	

Ellis



Key

x = Lead-Based/Lead Containing Paint

x = Asbestos Containing Material

Figure 3: Sample Locations Exterior and Roof Facilities Management Building

Firm Name and Address

Ellis Environmental Mgmt, Inc.
430 Silver Spur Rd., Suite 201
Rancho Palos Verdes, CA 90275

Client Name and Address

Mount Saint Mary's University
12001 Chalon Road
Los Angeles, CA 90049

Project #	Sheet
15-333	3 of 3
Date	
08/28/2015	

Ellis

Attachment B

Laboratory Results

LA Testing
520 Mission Street, South Pasadena, CA 91030
Phone/Fax: (323) 254-9960 / (323) 254-9982
http://www.LATesting.com pasadenalab@latesting.com

LA Testing Order: 321518572
CustomerID: 32EEMI45
CustomerPO:
ProjectID:

Attn: **Duane Behrens**
Ellis Environmental Management, Inc.
430 Silver Spur Road
Suite 201
Rancho Palos Verdes, CA 90275

Phone: (310) 544-1837
Fax:
Received: 08/28/15 12:30 PM
Collected:

Project: **15-333 MT. ST. MARY'S FACILITIES MGMT**

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client Sample Description	*Lab ID*	*Collected*	*Analyzed*	*Lead Concentration*
L10	*321518572-0001*		8/31/2015	3.1 % wt
	Site: BLUE PAINT			
L12	*321518572-0002*		8/31/2015	0.14 % wt
	Site: WHITE PAINT			
L14	*321518572-0003*		8/31/2015	<0.028 % wt
	Site: TEAL PAINT			
L18	*321518572-0004*		8/31/2015	<0.010 % wt
	Site: BEIGE PAINT			
L5	*321518572-0005*		8/31/2015	<0.025 % wt
	Site: WHITE PAINT			
P7	*321518572-0007*		8/31/2015	1.7 % wt
	Site: WHITE EVE PAINT			
P8	*321518572-0008*		8/31/2015	0.15 % wt
	Site: WHITE GUTTER PAINT			

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

*Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.010 % wt based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities. Samples received in good condition unless otherwise noted. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. The QC data associated with the sample results included in this report meet the recovery and precision requirements established by the AIHA-LAP, unless specifically indicated otherwise.

Samples analyzed by LA Testing South Pasadena, CA CA ELAP 2283, AIHA-LAP, LLC ELLAP 102814

Initial report from 09/01/2015 12:55:39

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LA Testing Order: 321518572
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Received: 08/28/15 12:30 PM
Collected:

Project: **15-333 MT. ST. MARY'S FACILITIES MGMT**

Test Report: Total Threshold Limit Concentration

Client Sample Description	*Lab ID*	*Collected*	*Analyzed*	*Lead Concentration*
L16	*321518572-0006*		9/1/2015	<40 mg/Kg
	Site: 12"X12" BEIGE CERAMIC FT/GROUT			

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

This report relates only to those items tested. Samples received in good condition unless otherwise noted. Quality Control Data associated with this sample set is within acceptable limits, unless otherwise noted

Samples analyzed by LA Testing South Pasadena, CA CA ELAP #2283

Initial report from 09/01/2015 12:55:39

LA Testing
520 Mission Street, South Pasadena, CA 91030
Phone/Fax: (323) 254-9960 / (323) 254-9982
http://www.LATesting.com pasadenalab@latesting.com

LA Testing Order: 321518645
CustomerID: 32EEMI45
CustomerPO:
ProjectID:

Attn: **Duane Behrens**
Ellis Environmental Management, Inc.
430 Silver Spur Road
Suite 201
Rancho Palos Verdes, CA 90275

Phone: (310) 544-1837
Fax:
Received: 08/28/15 12:30 PM
Analysis Date: 9/1/2015
Collected: 8/28/2015

Project: **15-333 / Mt. St. Mary's Facilities MGMT**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos %	Fibrous	Non-Asbestos %	Non-Fibrous	Asbestos % Type
ASB 10-Wallboard *321518645-0001*	- WB/JC	Brown/White Fibrous Heterogeneous	10%	Cellulose	90%	Non-fibrous (other)	**None Detected**
ASB 10-Joint Compound *321518645-0001A*	- WB/JC	Beige Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB 14-Joint Compound *321518645-0002*	- WB/JC	White Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
		Insufficient WB present for analysis.					
ASB 18-Wallboard *321518645-0003*	- WB/JC	Brown/White Fibrous Heterogeneous	10%	Cellulose	90%	Non-fibrous (other)	**None Detected**
ASB 18-Joint Compound *321518645-0003A*	- WB/JC	Beige Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB 18-Plaster *321518645-0003B*	- WB/JC	Tan Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB 20-Wallboard *321518645-0004*	- WB/JC	Brown/White Fibrous Heterogeneous	20%	Cellulose	80%	Non-fibrous (other)	**None Detected**

Analyst(s)

Julie Vong (15)
Kieu-anh Pham Duong (47)

Jerry Drapala Ph.D, Laboratory Manager
or other approved signatory

Initial report from 09/01/2015 12:54:06

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Received: 08/28/15 12:30 PM
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Collected: 8/28/2015

Project: **15-333 / Mt. St. Mary's Facilities MGMT**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos % Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
ASB 20-Joint Compound *321518645-0004A*	- WB/JC	White/Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 17-Wallboard *321518645-0005*	- WB/JC	Brown/White Fibrous Heterogeneous	20% Cellulose	80% Non-fibrous (other)	**None Detected**
ASB 17-Joint Compound *321518645-0005A*	- WB/JC	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 23 *321518645-0006*	- CEILING PLASTER	Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 25 *321518645-0007*	- CEILING PLASTER	Beige Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
ASB 29-Plaster *321518645-0008*	- CEILING PLASTER	Tan Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 29-Wallboard *321518645-0008A*	- CEILING PLASTER	Brown/White Fibrous Heterogeneous	10% Cellulose	90% Non-fibrous (other)	**None Detected**
ASB 29-Joint Compound *321518645-0008B*	- CEILING PLASTER	Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**

Analyst(s)

Julie Vong (15)
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Collected: 8/28/2015

Project: **15-333 / Mt. St. Mary's Facilities MGMT**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos				Asbestos
Sample	**Description**	**Appearance**	**%**	**Fibrous**	**%**	**Non-Fibrous**	**% Type**
ASB 47 *321518645-0009*	- CEILING PLASTER	Tan Non-Fibrous Heterogeneous			100%	Non-fibrous (other)	**None Detected**
ASB 45-Plaster *321518645-0010*	- WALL PLASTER	Tan Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB 45-Wallboard *321518645-0010A*	- WALL PLASTER	Brown/White Fibrous Heterogeneous	10%	Cellulose	90%	Non-fibrous (other)	**None Detected**
ASB 27-Overspray *321518645-0011*	- OVERSPRAY	White Non-Fibrous Homogeneous	3%	Synthetic	97%	Non-fibrous (other)	**None Detected**
ASB 27-Plaster *321518645-0011A*	- OVERSPRAY	Beige Non-Fibrous Homogeneous			100%	Non-fibrous (other)	**None Detected**
ASB 31 *321518645-0012*	- 2'X4' CT	White/Beige Fibrous Heterogeneous	50% 10%	Cellulose Min. Wool	30% 10%	Perlite Non-fibrous (other)	**None Detected**
ASB 39 *321518645-0013*	- 2'X4' CT	White/Beige Fibrous Heterogeneous	50% 10%	Cellulose Min. Wool	30% 10%	Perlite Non-fibrous (other)	**None Detected**
ASB 49 *321518645-0014*	- 2'X4' CT	Gray/White Fibrous Heterogeneous	50% 20%	Cellulose Min. Wool	20% 10%	Perlite Non-fibrous (other)	**None Detected**

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Analysis Date: 9/1/2015
Collected: 8/28/2015

Project: **15-333 / Mt. St. Mary's Facilities MGMT**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos % Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
ASB 12-Floor Tile *321518645-0015*	- 12"X12" TAN FT/MASTIC	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 12-Mastic *321518645-0015A*	- 12"X12" TAN FT/MASTIC	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 12-Leveling Compound *321518645-0015B*	- 12"X12" TAN FT/MASTIC	Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 16-Cove Base *321518645-0016*	- BROWN COVE BASE/MASTIC	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 16-Mastic *321518645-0016A*	- BROWN COVE BASE/MASTIC	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 15-Mastic *321518645-0017*	- PEACH COVE BASE/MASTIC	Tan Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 15-Joint Compound *321518645-0017A*	- PEACH COVE BASE/MASTIC	Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 19-Floor Tile *321518645-0018*	- 12"X12" FT/MASTIC-TAN & COLORS	Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**

Analyst(s)

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Project: **15-333 / Mt. St. Mary's Facilities MGMT**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
ASB 19-Mastic *321518645-0018A*	- 12"X12" FT/MASTIC-TAN & COLORS	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 21-Cove Base *321518645-0019*	- CREAM COVE BASE/MASTIC	Tan Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 21-Mastic *321518645-0019A*	- CREAM COVE BASE/MASTIC	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 21-Joint Compound *321518645-0019B*	- CREAM COVE BASE/MASTIC	Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 33 *321518645-0020*	- WHITE AIR VENT MASTIC	Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 35-Cove Base *321518645-0021*	- TURQOISE COVE BASE/MASTIC	Green Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 35-Mastic *321518645-0021A*	- TURQOISE COVE BASE/MASTIC	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ASB 35-Joint Compound *321518645-0021B*	- TURQOISE COVE BASE/MASTIC	Beige Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**

Analyst(s)

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Collected: 8/28/2015

Project: **15-333 / Mt. St. Mary's Facilities MGMT**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos			Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**		**% Non-Fibrous**	**% Type**
ASB 37-Floor Tile *321518645-0022*	- 12"X12" TEAL FT/MASTIC	Green Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ASB 37-Mastic *321518645-0022A*	- 12"X12" TEAL FT/MASTIC	Yellow Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ASB 41-Cove Base *321518645-0023*	- BLACK COVE BASE/MASTIC	Black Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ASB 41-Mastic 1 *321518645-0023A*	- BLACK COVE BASE/MASTIC	Yellow Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ASB 41-Mastic 2 *321518645-0023B*	- BLACK COVE BASE/MASTIC	Brown Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ASB 43-Floor Tile *321518645-0024*	- 12"X12" BLUE FT/MASTIC	Blue Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
ASB 43-Mastic *321518645-0024A*	- 12"X12" BLUE FT/MASTIC	Gray Non-Fibrous Homogeneous			100% Non-fibrous (other)	**None Detected**
R6-Roof Core *321518645-0025*	- ROOF CORE	Gray/Black Fibrous Heterogeneous	20% Cellulose 10% Glass		70% Non-fibrous (other)	**None Detected**

Analyst(s)

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Collected: 8/28/2015

Project: **15-333 / Mt. St. Mary's Facilities MGMT**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos % Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
R6-Foam *321518645-0025A*	- ROOF CORE	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
R7 *321518645-0026*	- VENT PIPE/MASTIC	Gray/Black Fibrous Heterogeneous		90% Non-fibrous (other)	**10% Chrysotile**
R8 *321518645-0027*	- PATCH MASTIC	Gray/Black Fibrous Heterogeneous		90% Non-fibrous (other)	**10% Chrysotile**
R9 *321518645-0028*	- VENT PIPE/MASTIC	Gray/Black Fibrous Heterogeneous		90% Non-fibrous (other)	**10% Chrysotile**
ST6-Finish Coat 1 *321518645-0029*	- STUCCO	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ST6-Finish Coat 2 *321518645-0029A*	- STUCCO	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
ST6-Base Coat *321518645-0029B*	- STUCCO	Gray Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
ST7 *321518645-0030*	- STUCCO	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**

Analyst(s)

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Project: **15-333 / Mt. St. Mary's Facilities MGMT**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos			Asbestos	
Sample	**Description**	**Appearance**	**%**	**Fibrous**	**% Non-Fibrous**	**%**	**Type**
ST8-Finish Coat *321518645-0031*	- STUCCO	Beige Non-Fibrous Homogeneous			100% Non-fibrous (other)		**None Detected**
ST8-Base Coat *321518645-0031A*	- STUCCO	Gray Non-Fibrous Homogeneous			100% Non-fibrous (other)		**None Detected**
ST8-Mastic Like *321518645-0031B*	- STUCCO	Black Non-Fibrous Homogeneous	3%	Cellulose	97% Non-fibrous (other)		**None Detected**
ST9 *321518645-0032*	- STUCCO	White Non-Fibrous Heterogeneous			100% Non-fibrous (other)		**None Detected**
ST10-Finish Coat *321518645-0033*	- STUCCO	White Non-Fibrous Heterogeneous			100% Non-fibrous (other)		**None Detected**
ST10-Base Coat *321518645-0033A*	- STUCCO	Gray Non-Fibrous Heterogeneous			100% Non-fibrous (other)		**None Detected**
WP1 *321518645-0034*	- WINDOW PUTTY	Gray/Beige Non-Fibrous Heterogeneous			98% Non-fibrous (other)	**2%**	**Chrysotile**

Analyst(s)

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Jerry Drapala Ph.D, Laboratory Manager
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Initial report from 09/01/2015 12:54:06

321518645

Ellis Environmental Management, Inc.
430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
(310) 544-1837 (tel)
(310) 544-2167 (fax)

Project No.: 333 15-~~322~~
Client: MT. ST. MARY'S
Location: FACILITIES MGMT

Sampler: RD/MY/LS

CHAIN OF CUSTODY RECORD

Sheet 1 of 4

Sample Number	Description	Date	Time	H20	Air	Solid	Tests Required
ASB 10	WB/JC	8/28/15	AM			X	PLM - ASBESTOS
ASB 14	" "						
ASB 18	" "						
ASB 20	" "						
ASB 17	" "						
ASB 23	CEILING PLASTER						
ASB 25	" "						
ASB 29	" "						
ASB 47	" "						
ASB 45	WALL PLASTER						
ASB 27	OVERSPRAY						
ASB 31	2'x4' CT						

Turnaround: ___ same day ___ 24 hrs. X 48 hrs. X 3 days ___ 5 days (Standard)

Special Instructions:

Date	Relinquished By	Received By	Date
8/25/15			8-28-15 12:30pm

321518645

Ellis Environmental Management, Inc.
430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
(310) 544-1837 (tel)
(310) 544-2167 (fax)

Project No.: 15 ~~322~~ 333
Client: MT. ST. MARY'S
Location: FACILITIES MGMT

Sampler: RD/MY/LS

CHAIN OF CUSTODY RECORD

Sheet 2 of 4

Sample Number		Description	Date	Time	H20	Air	Solid	Tests Required
ASB39	2'× 4'	CT	8/25/15	AM			X	PLM - ASBESTOS
ASB49	"	"						
ASB12	12"× 12"	TAN FT/MASTIC						
ASB16	BROWN	~~BBB~~ COVE BASE/MASTIC						
ASB15	PEACH	COVE BASE/MASTIC						
ASB19	12"× 12"	FT/MASTIC - TAN & COLORS						
ASB21	CREAM	COVE BASE/MASTIC						
ASB33	WHITE	AIR VENT MASTIC						
ASB35	TURQUOISE	COVE BASE/MASTIC						
ASB37	12"× 12"	TEAL FT/MASTIC						
ASB41	BLACK	COVE BASE/MASTIC						
ASB43	12"× 12"	BLUE FT/MASTIC						

Turnaround: ___ same day ___ 24 hrs. X 48 hrs. ___ 3 days ___ 5 days (Standard)

Special Instructions:

Date	Relinquished By	Received By	Date

3215186 45

Ellis Environmental Management, Inc.
430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
(310) 544-1837 (tel)
(310) 544-2167 (fax)

Project No.: 15-~~222~~333
Client: MT. ST. MARY'S
Location: FACILITIES MGMT

Sampler: RD/MY/LS

CHAIN OF CUSTODY RECORD

Sheet 3 of 4

Sample Number		Description	Date	Time	H20	Air	Solid	Tests Required
L10	BLUE	PAINT	8/28/15	AM			X	FLAME AAS - LEAD
L12	WHITE	PAINT	↓	↓			↓	↓
L14	TEAL	PAINT						
L18	BEIGE	PAINT						
L5	WHITE	PAINT						
L16	12"×12"	BEIGE CERAMIC FT/GROUT						TTLC - LEAD
P7	WHITE	EVE PAINT						FLAME AAS - LEAD
P8	WHITE	GUTTER PAINT						↓ ↓
R6	ROOF CORE							PLM - ASBESTOS
R7	VENT PIPE/MASTIC							
R8	PATCH	MASTIC						
R9	VENT	PIPE/MASTIC						

Turnaround: ___ same day ___ 24 hrs. X 48 hrs. ___ 3 days ___ 5 days (Standard)

Special Instructions:

Date		Relinquished By	Received By	Date

321518645

Ellis Environmental Management, Inc.
430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275
(310) 544-1837 (tel)
(310) 544-2167 (fax)

Project No.: 15-~~322~~333
Client: MT. ST. MARY'S
Location: FACILITIES MGMT

Sampler: RD/MY/LS

CHAIN OF CUSTODY RECORD

Sheet 4 of 4

Sample Number		Description	Date	Time	H20	Air	Solid	Tests Required
ST 6	STUCCO		8/25/15	AM			X	PLM - ASBESTOS
ST 7	"	"						
ST 8	"	"						
ST 9	"	"						
ST 10	"	"						
WP 1	WINDOW	PUTTY						

Turnaround: ___ same day ___ 24 hrs. X 48 hrs. ___ 3 days ___ 5 days (Standard)

Special Instructions:

Date		Relinquished By	Received By	Date

Attachment C

Ellis Employee Certifications

State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

Duane E Behrens
Name

Certification No. **92-0226**

Expires on **07/10/16**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.

State of California Department of Public Health

Lead-Related Construction Certificate

Certificate Type

Inspector/Assessor

Expiration Date

04/12/2016

27508

Duane E. Behrens

ID #: 7914

State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

Ryan C Davidson
Name

Certification No. **15-5395**

Expires on **05/12/16**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.

State of California Department of Public Health

Lead-Related Construction Certificate

Certificate Type: Inspector/Assessor

Expiration Date: 04/19/2016

Ryan C. Davidson

ID #: 26018

State of California
Division of Occupational Safety and Health

Certified Site Surveillance Technician

Maxwell R Yourman
Name

Certification No. **15-5375**

Expires on **05/12/16**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.


State of California Department of Public Health
Lead-Related Construction Certificate
Certificate Type
Expiration Date
Inspector/Assessor
10/21/2016
270935
Maxwell R. Yourman
ID #: 27531

Certificate Of Completion

Asbestos Building Inspector Refresher Course

DOSH #:CA-015-06

Lina Sok

ABIR0807150002N7922

John Daly

Principal Instructor

Michael W. Horner

Michael W. Horner
Training Director

8/7/2015	8/7/2015	8/7/2015	8/7/2016
Course Start Date	Course End Date	Exam Date	Expiration Date

This course satisfies the education requirements for Asbestos accreditation under the Toxic Substances Control Act, Title II. This course has been approved by the Department of Industrial Relations, Division of Occupational Safety and Health of the State of California

NATEC International, Inc.

National Association of Training and Environmental Consulting

1100 Technology Circle- Suite A, Anaheim, CA 92805 • www.natecintl.com • 800-969-3228

CITADEL
ENVIRONMENTAL SERVICES, INC.

Appendix D
Historical Aerial Photographs

Chalon Campus - Wellness Pavilion Project
12001 Chalon Road
Los Angeles, CA 90049

Inquiry Number: 4622623.12
May 19, 2016

The EDR Aerial Photo Decade Package

6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

05/19/16

Site Name:

Chalon Campus - Wellness Pa
12001 Chalon Road
Los Angeles, CA 90049
EDR Inquiry # 4622623.12

Client Name:

Citadel Environmental Services
111 North Market Street
San Jose, CA 95110-0000
Contact: Whitney Barlow

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

Search Results:

Year	Scale	Details	Source
2012	1"=500'	Flight Year: 2012	USDA/NAIP
2010	1"=500'	Flight Year: 2010	USDA/NAIP
2009	1"=500'	Flight Year: 2009	USDA/NAIP
2005	1"=500'	Flight Year: 2005	USDA/NAIP
2002	1"=500'	Flight Date: June, 05 2002	USGS
1995	1"=500'	Acquisition Date: June, 01 1994	USGS/DOQQ
1989	1"=500'	Flight Date: August, 22 1989	USGS
1981	1"=500'	Flight Date: February, 21 1981	EDR Proprietary Brewster Pacific
1977	1"=500'	Flight Date: April, 25 1977	EDR Proprietary Brewster Pacific
1970	1"=500'	Flight Date: February, 08 1970	EDR Proprietary Brewster Pacific
1967	1"=500'	Flight Date: August, 13 1967	USGS
1964	1"=500'	Flight Date: July, 28 1964	USGS
1952	1"=500'	Flight Date: April, 11 1952	USGS
1947	1"=500'	Flight Date: August, 15 1947	USGS
1938	1"=500'	Flight Date: May, 22 1938	USGS
1928	1"=500'	Flight Date: January, 01 1928	USGS

When delivered electronically by EDR, the aerial photo images included with this report are for ONE TIME USE ONLY. Further reproduction of these aerial photo images is prohibited without permission from EDR. For more information contact your EDR Account Executive.


PROJECT SITE
INQUIRY #: 4622623.12
YEAR: 2012
= 500'
N
EDR


PROJECT SITE
INQUIRY #: 4622623.12
YEAR: 2010
= 500'
N
EDR


PROJECT SITE
INQUIRY #: 4622623.12
YEAR: 2009
= 500'
N
EDR

INQUIRY #: 4622623.12

YEAR: 2005

= 500'

N

EDR


PROJECT SITE
INQUIRY #: 4622623.12
YEAR: 2002
= 500'
N
EDR


PROJECT SITE
INQUIRY #: 4622623.12
YEAR: 1995
= 500'
N
EDR

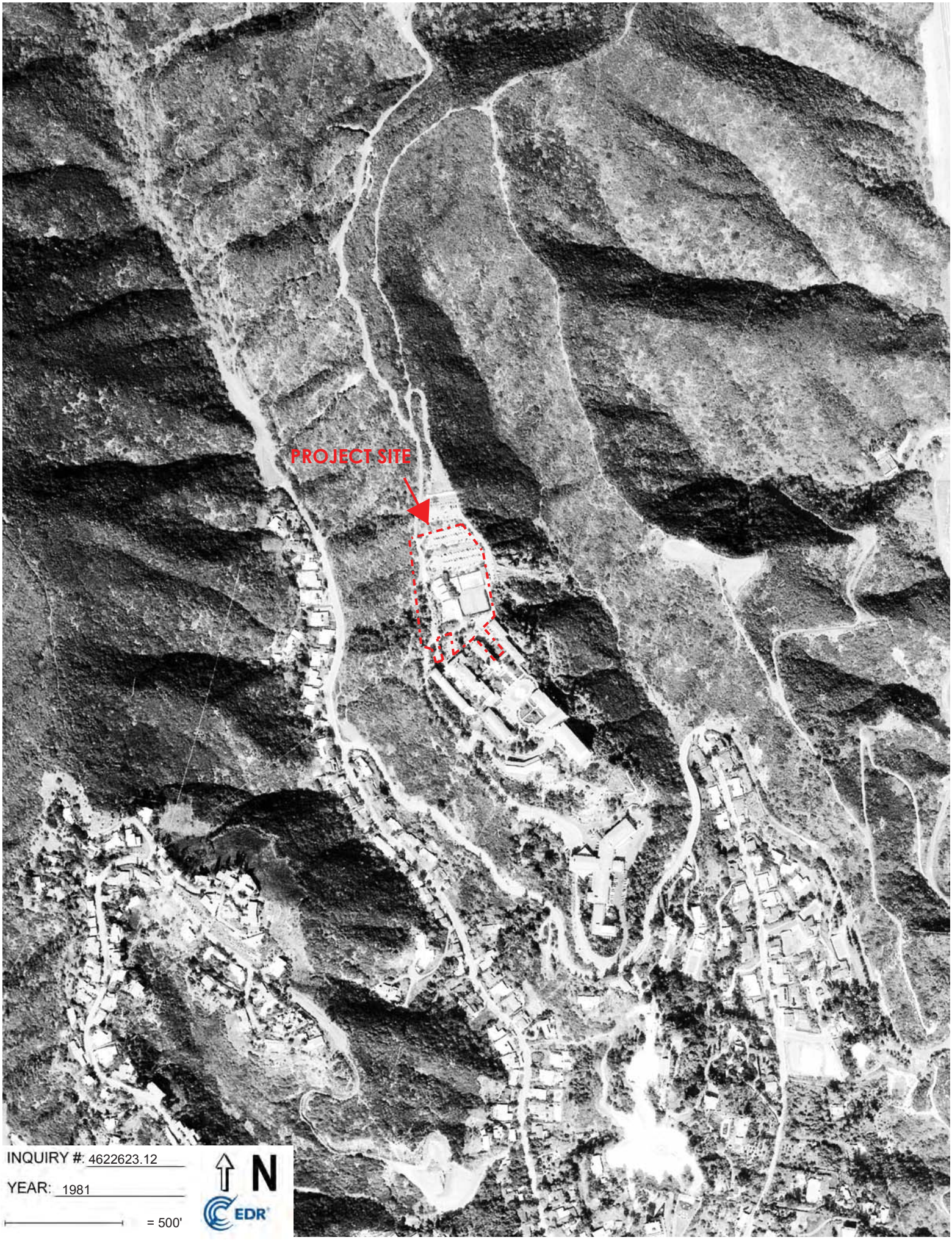
INQUIRY #: 4622623.12

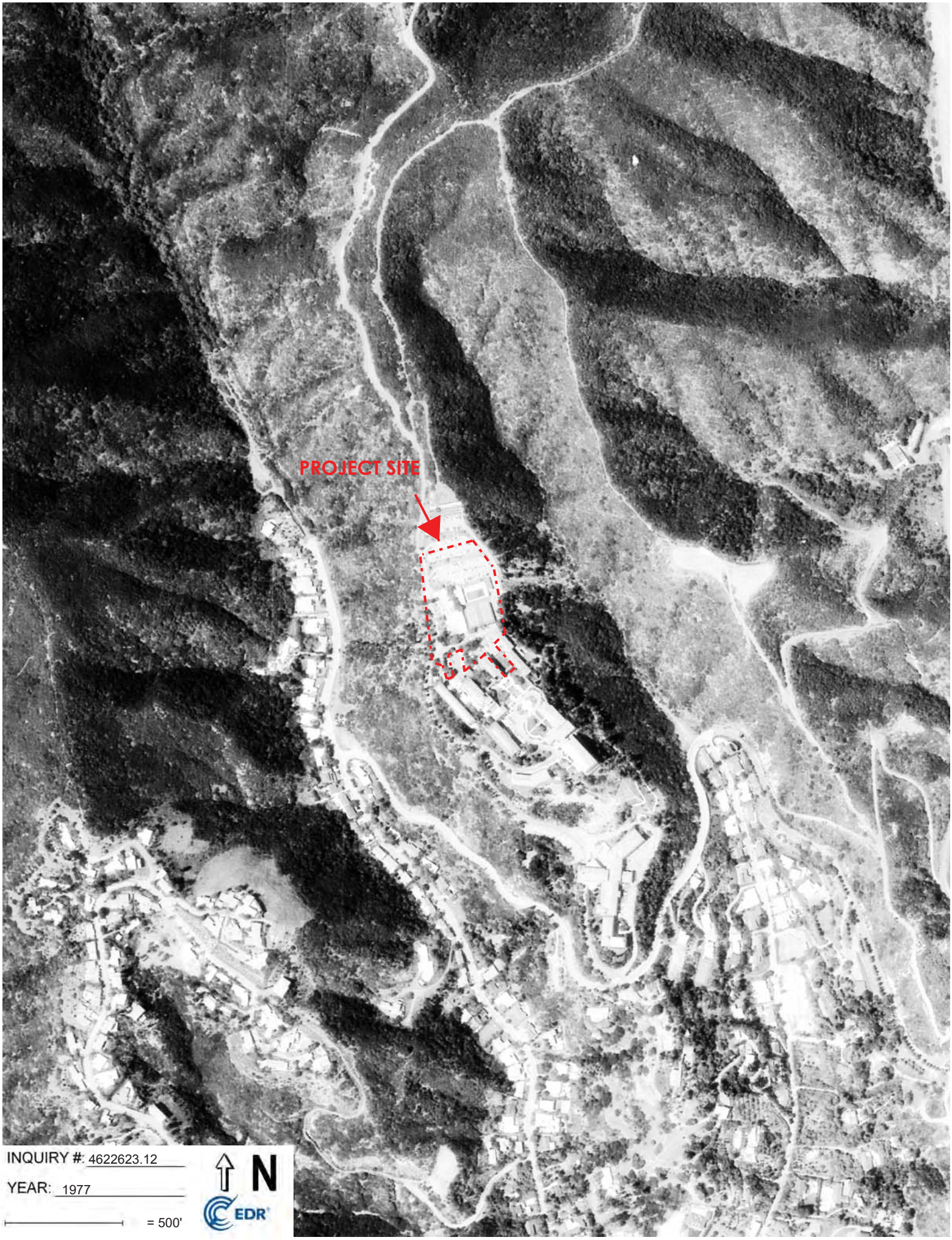
YEAR: 1989

= 500'

N

EDR


PROJECT SITE
INQUIRY #: 4622623.12
YEAR: 1981
= 500'
N
EDR



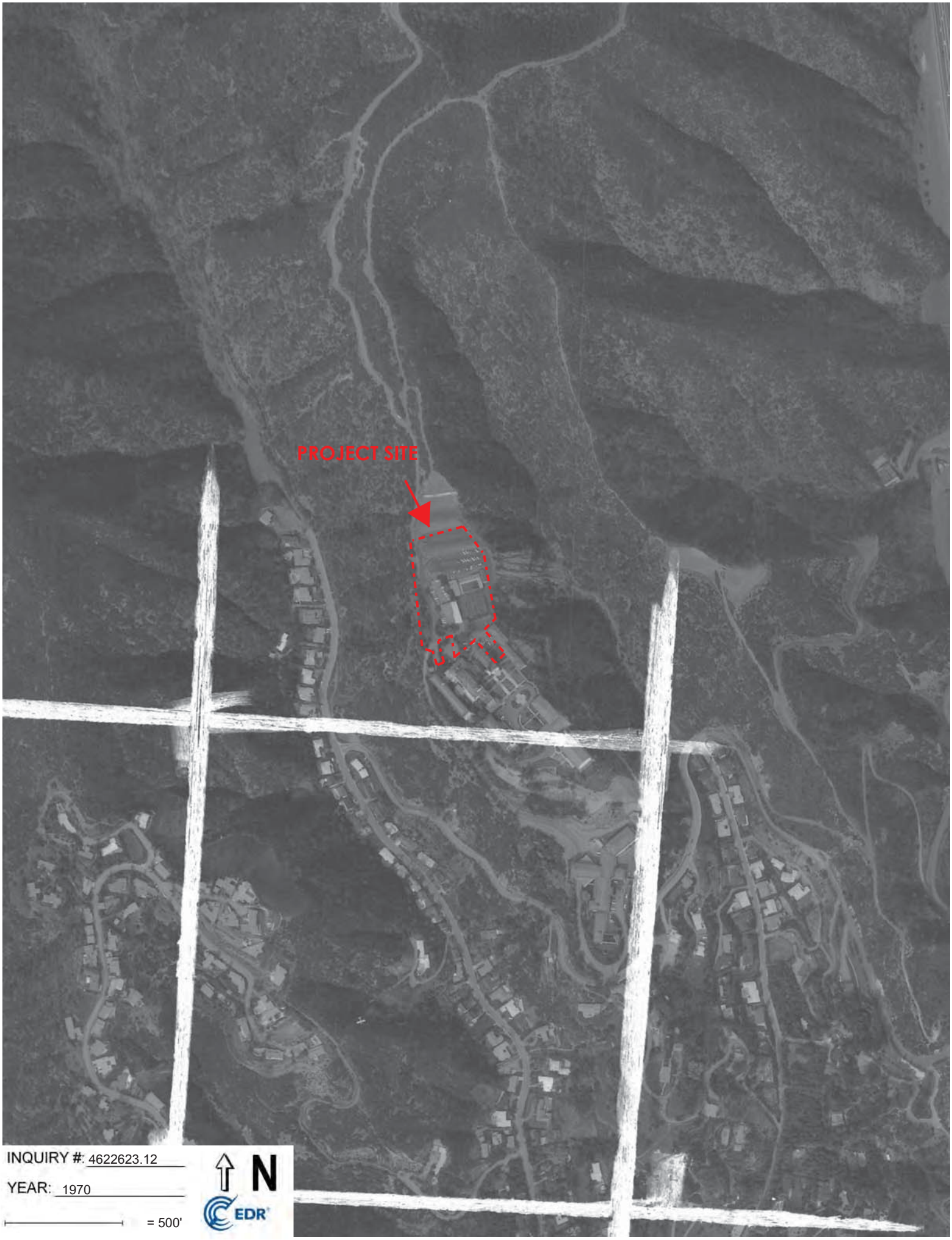
INQUIRY #: 4622623.12

YEAR: 1977

= 500'

N

EDR



INQUIRY #: 4622623.12

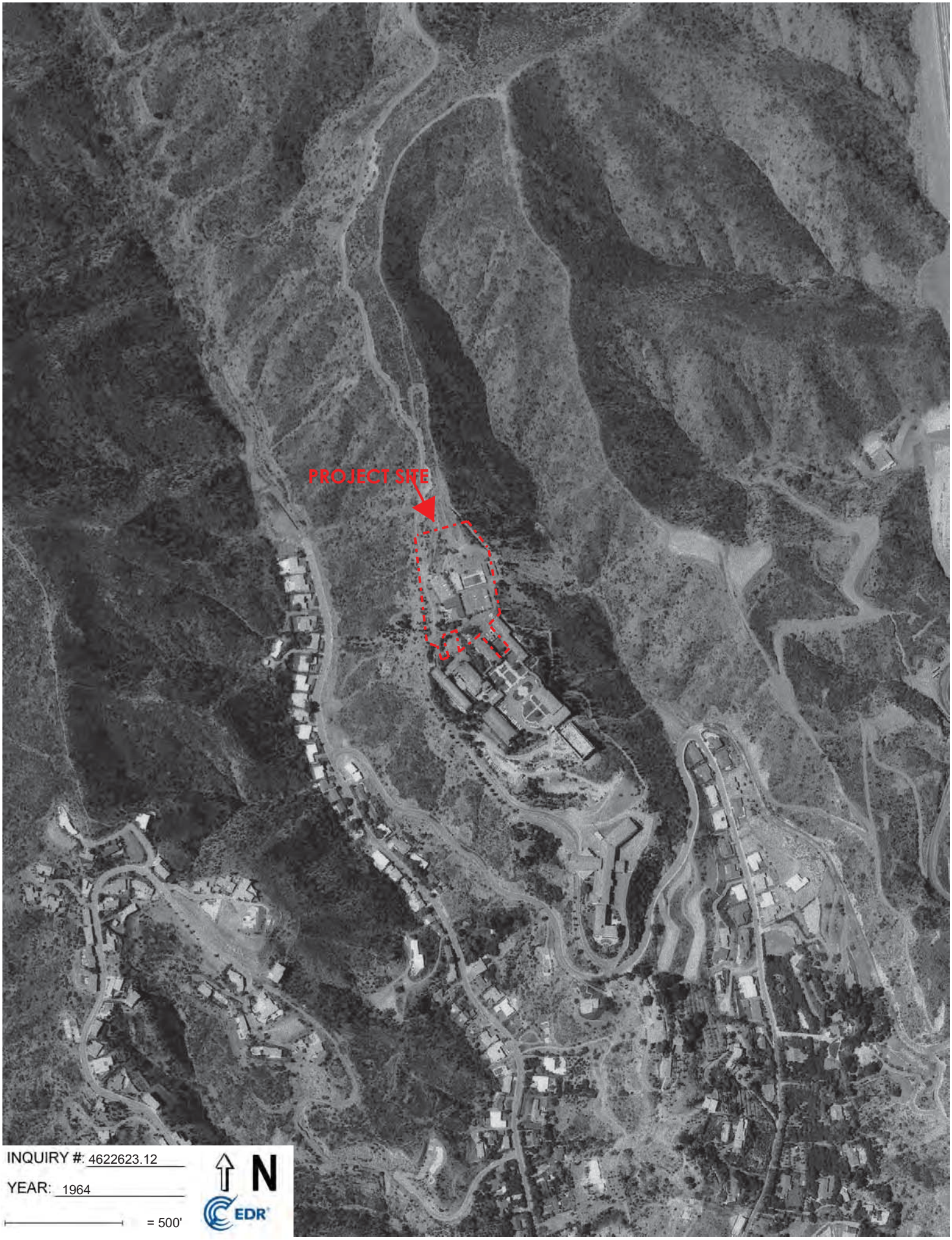
YEAR: 1970

= 500'

N

EDR


PROJECT SITE
INQUIRY #: 4622623.12
YEAR: 1967
= 500'
N
EDR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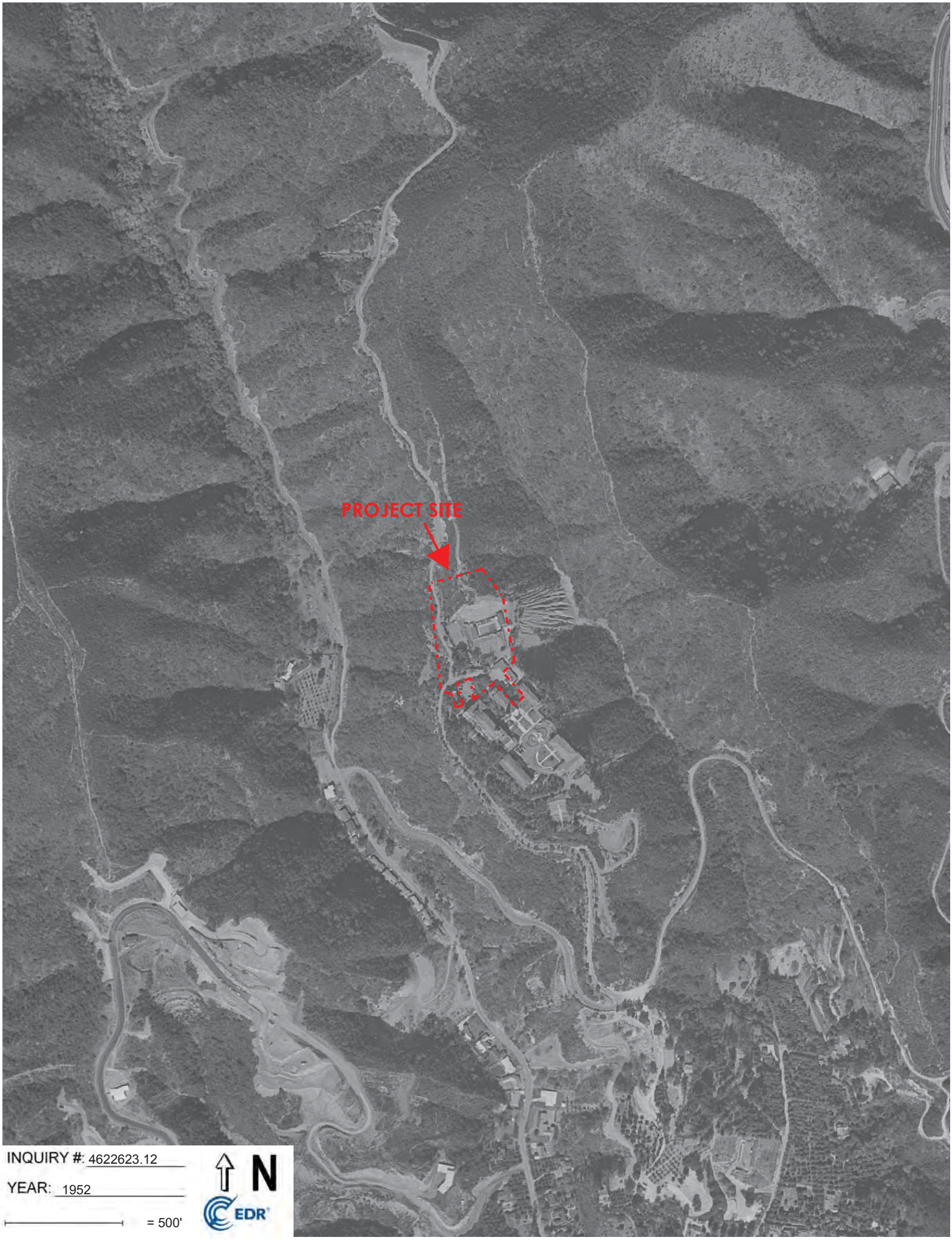
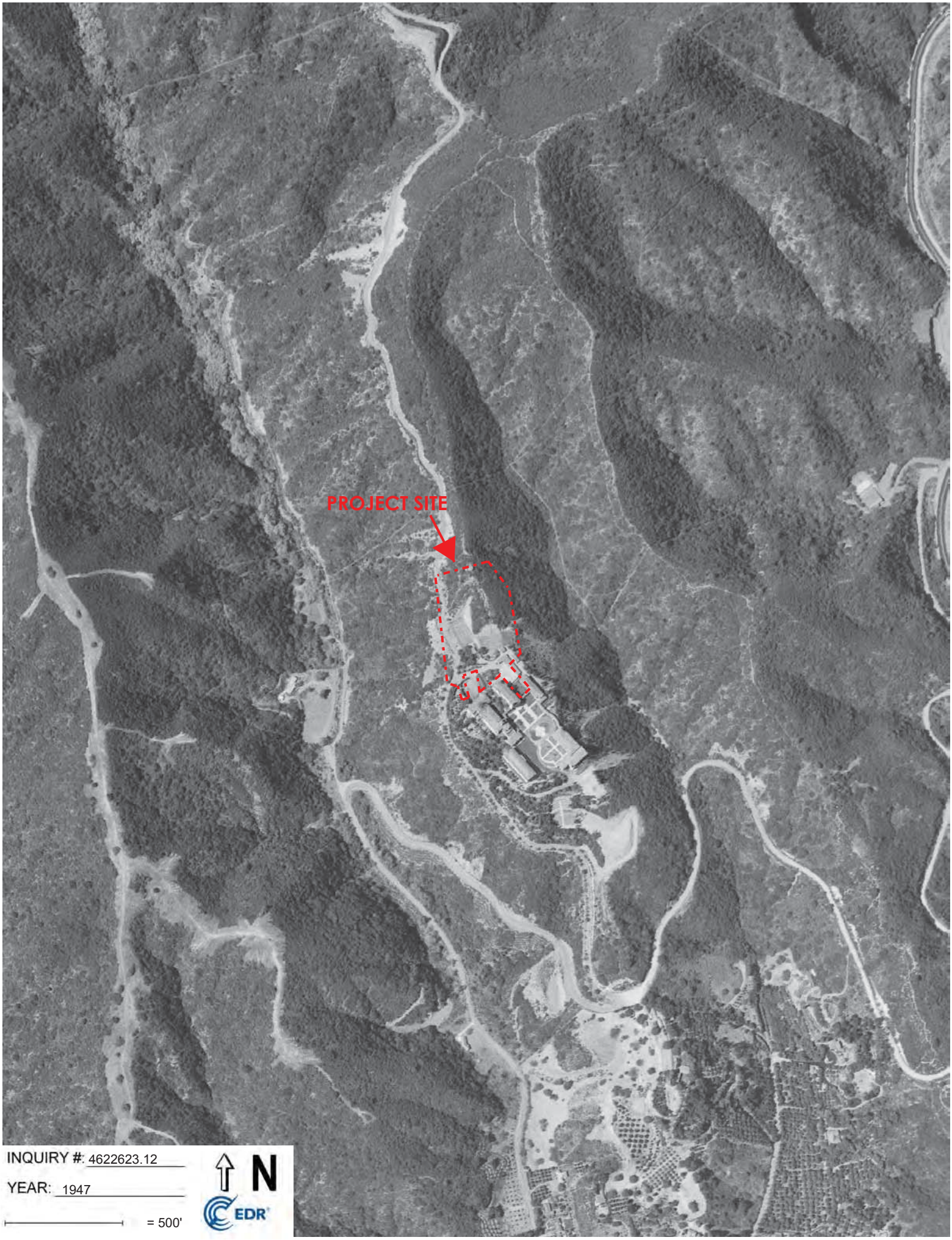
INQUIRY #: 4622623.12
YEAR: 1964
= 500'
N
EDR


PROJECT SITE
INQUIRY #: 4622623.12
YEAR: 1952
= 500'
N
EDR



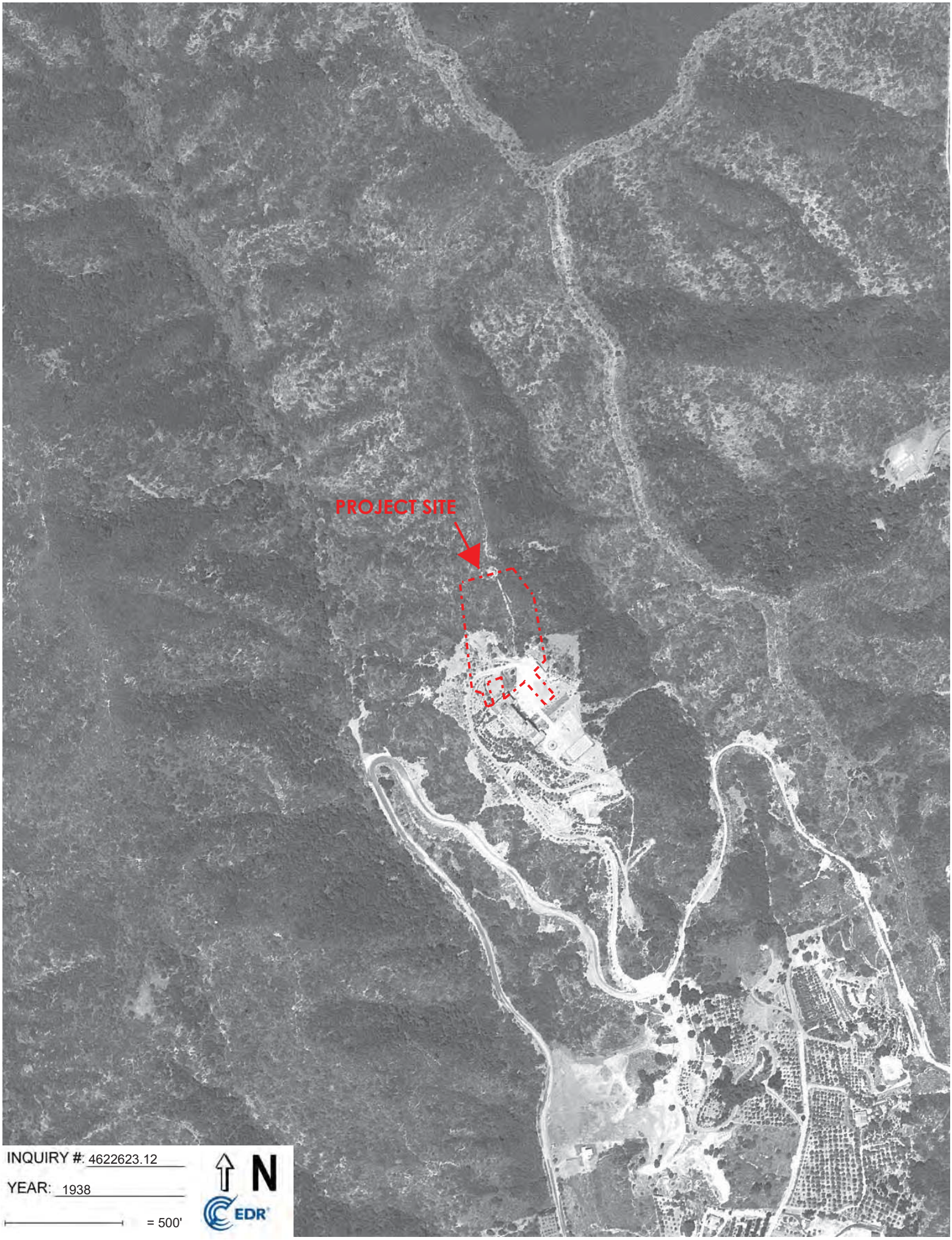
INQUIRY #: 4622623.12

YEAR: 1947

= 500'

N

EDR



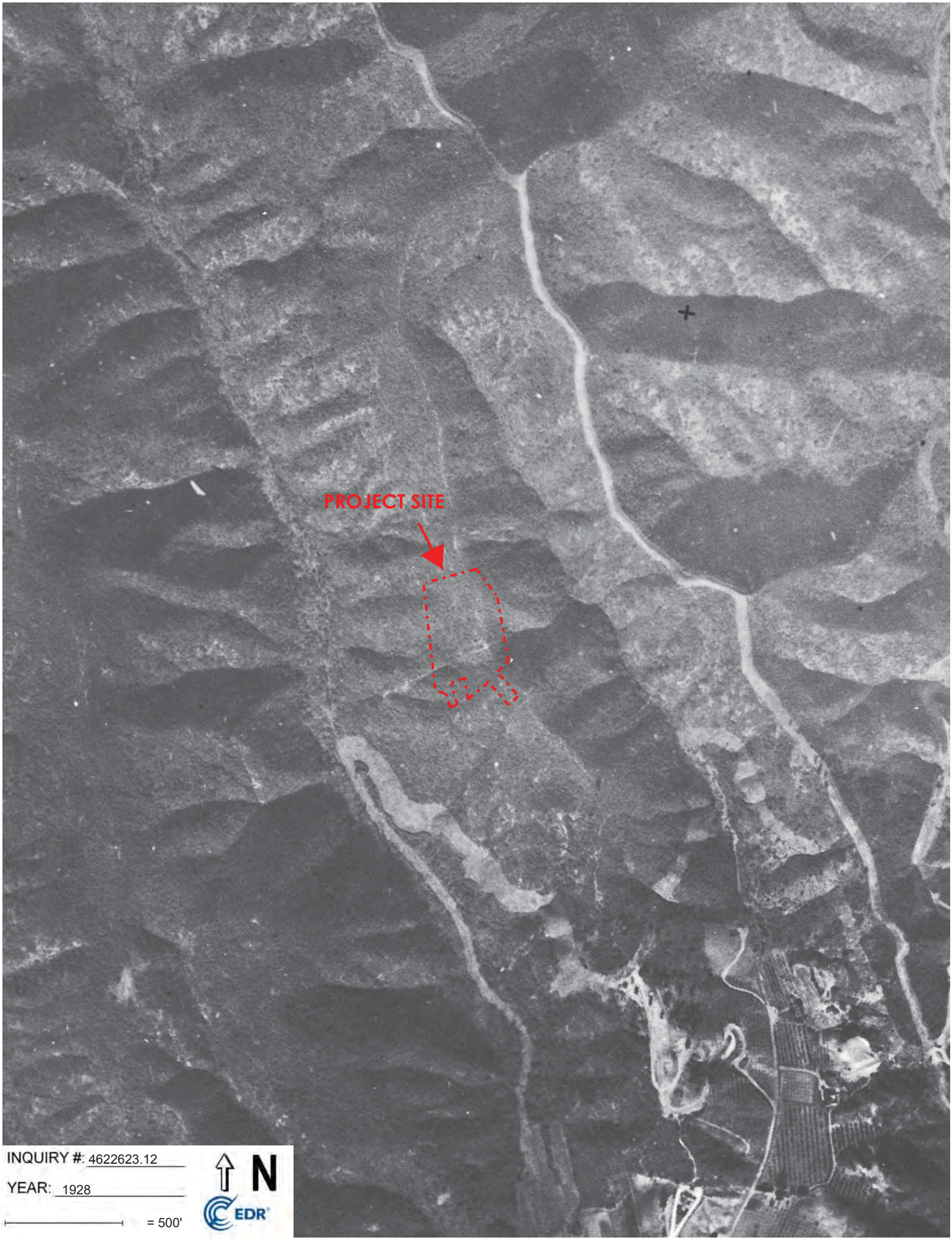
INQUIRY #: 4622623.12

YEAR: 1938

= 500'

N

EDR



INQUIRY #: 4622623.12

YEAR: 1928

= 500'

N

EDR

PHASE I ESA APPENDICES E to L AVAILABLE UPON REQUEST TO CITY OF LOS ANGELES PLANNING DEPARTMENT

Appendix B

Wastewater Technical Memo

18400 Von Karman Avenue, Suite 600 Irvine, CA 949.252.1022
kpff.com

DATE: June 28th, 2016

TO: Steve Flanagon, LPA, Inc.

FROM: Ali Khamsi P.E., KPFF Consulting Engineers

SUBJECT: Mt. St. Mary's University Wellness Pavilion: Wastewater Service Data

KPFF is conducting a public utility feasibility study and has prepared this memo for your review and support of the project's initial checklist response and NOP. Should you have any questions, please feel free to contact us.

Existing Condition

The Project Site is located within the City of Los Angeles and is currently developed. The project site totals approximately 3.78 acres located on a ridge crest. Currently, the project site is occupied by the existing fitness center, pool, basketball court, and volleyball court, all to be demolished and removed for the proposed Wellness Pavilion and parking structure facility.

Using Los Angeles Bureau of Engineering (LABOE) anticipated sewer generation rate for facilities management building, fitness center, and swimming pool, the existing sewer generation and demand is calculated to be 1,123 gallons per day.

Facility Description	**Building SF**	**SGF[a] in GPD**	**GPD**	**GPM x 3[b]**
Facilities Management Building	4,970	0.15GPD/sf	745	1.6
Fitness Center	1,030	0.25GPD/sf	258	0.5
Swimming Pool	Process Flow	Process Flow	120	0.3
Total			1,123	2.4

a. Sewer Generation Factor per the Department Public Works, Bureau of Engineering (BOE)
b. Peaking factor of 3 to determine the peak demand

Proposed Condition

We understand the proposed development consists of the following:

- Gymnasium
- Offices
- Dance Studio
- Multi-Purpose Rooms/Phys. Therapy Lab
- Other Facility Spaces
- Swimming Pool: Commercial with Backwash

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kpff.com

Using LABOE's (Los Angeles Bureau of Engineering) anticipated sewer generation rate, the anticipated sewer generation and demand for the proposed development is calculated to be 19,718 gallons per day.

Facility Description	Building SF	SGF[a] in GPD	GPD	GPM x 3[b]
Gymnasium	9,500	0.25 GPD/sf	2,375	5.0
Offices	1,000	0.15 GPD/sf	150	0.3
Dance Studio	2,000	0.080 GPD/sf	160	0.3
Multi-Purpose Rooms/Phys. Therapy Lab[c]	2,850	.0.25 GPD/sf	713	1.5
Other Facility Spaces[d,e]	18,250	0.80 GPD/sf	14,600	30.4
Swimming Pool: Commercial with Backwash	Process Flow	Process Flow	120	0.3
Other Wellness/Sports Activities	400 outside guests	4GPD/ Occupant[f]	1,600	3.3
Total			19,718	41.1

a. Sewer Generation Factor per the Department Public Works, Bureau of Engineering (BOE)
b. Peaking factor of 3 to determine the peak demand
c. Assumes generation factor equivalent to medical office category
d. Assumes generation factor for Health Club/Spa category. Health club/spa includes "lobby area, workout floors, aerobic rooms, swimming pools, sauna, locker rooms, showers, and restrooms. If a health club/spa has a gymnasium facility, use the gymnasium rate for that portion. Gymnasiums include basketball courts, volleyball courts, and any other large open space with low occupancy density."
e. Support spaces such as equipment rooms, storage spaces, electrical rooms, stairways which are anticipated to total approximately 4,400 SF would not generate wastewater and are excluded from the proposed conditions.
f. Assumes generation factor equivalent to Community Center category for Outside Guests.

Sewer Capacity Availability Request (SCAR)

The existing 8" public sewer main runs West on Chalon Rd., and continues South to Bundy Dr. Since the sanitary sewer connection from the Project site is anticipated to be 6" connection within the private access road on the Mt. St. Mary's University Campus, a SCAR will not be needed.

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Utility Systems Science and Software, Inc. (US3) Sewer Capacity Study

US3 has conducted a sewer capacity study of two of the sewer manholes serving the Mt. St. Mary's University campus. One of the sewer manholes studied is located within one of the parking areas on campus, West of Grace Ln/Carondelet Center. This manhole was chosen because it observes the behavior and capacity of the upstream 6" sewer pipe, and the downstream 8" sewer pipe. The location of this manhole (manhole #1) is depicted here in figure 1:

Figure 1

The US3 Sewer capacity statistics for manhole #1 can be seen in attachment 1, and summarized here as follows. The upstream sewer pipe size serving this manhole is 6". Its maximum flow observed is 112.85 gallons per minute (GPM) and average flow observed is 53.32 GPM. The maximum velocity observed is 4.98 feet per second (FPS) and average velocity observed is 3.37 FPS. The maximum level observed within this pipe is 1.62 inches (in).

Sewer manhole #2 is located within the intersection of Chalon Rd. and the MSMU private access road (Grace Lane). This location was chosen because it observes the behavior and capacity at the connection to the public sewer main. Its location can be depicted here in figure 2:

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kpff.com

Figure 2

The US3 Sewer Capacity Statistics for manhole #2 can be seen in attachment 2, and summarized here as follows. The upstream sewer pipe size is 8" and downstream public sewer main is 8". Its maximum flow observed is 165.07 GPM and average flow observed is 67.89 GPM. The maximum velocity observed is 7.30 FPS and average velocity observed is 4.45 FPS.

From the sewer generation factors provided by City of Los Angeles, Bureau of Engineering, the total proposed sewage flow is 34.68 GPM. The existing sewage flow from existing buildings currently on site is 2.32 GPM. Therefore, the total additional sewage capacity flow is equal to 32.36 GPM. The maximum flow that the existing sewer pipes would encounter would be equal to 32.36 GPM plus the maximum observed flow from the US3 sewer capacity study (165.07 GPM). This equals 197.43 GPM.

Using Bentley FlowMaster V8i, a PVC pipe with a slope of 8%, a diameter of 6", and a normal depth of 3", the max discharge is equal to 462 GPM (attachment 3), which is much greater than 197.43 GPM. It is determined that the existing sewer pipes and sewer mains serving the project would have adequate capacity to accommodate the project. The availability of additional capacity can be attributed to the steep average slope of the university in the North to South direction. The average slope is within the range of 8-12%, creating large flow velocities within the existing sewer pipes.

Utility Systems Science and Software

Report Date: 04/20/2016
Customer: MSMU
Group: Flow Monitoring
SiteID: 2419

Statistics from MSMU Parking Area MH: 04/06/2016 thru 04/18/2016

	Flow (GPM)			Flow (MGD)			Velocity (FPS)			Level (inches)				
Date	**Avg**	**Max**	**Min**	**Avg**	**Max**	**Min**	**Avg**	**Max**	**Min**	**Avg**	**Max**	**Min**	**Total Gal**	**Rain**
4/6/16	62.89	95.42	12.08	0.09	0.14	0.02	3.76	4.98	1.12	1.27	1.48	0.97	90,562	
4/7/16	57.90	89.65	12.36	0.08	0.13	0.02	3.56	4.80	1.16	1.24	1.48	0.96	83,382	
4/8/16	45.88	82.01	10.62	0.07	0.12	0.02	3.16	4.42	0.99	1.15	1.44	0.94	66,068	
4/9/16	37.52	67.71	8.26	0.05	0.10	0.01	2.73	4.14	0.76	1.11	1.32	0.94	54,023	
4/10/16	48.97	87.22	19.79	0.07	0.13	0.03	3.19	4.35	1.65	1.20	1.53	1.04	70,511	
Week:	**50.63**	**95.42**	**8.26**	**0.07**	**0.14**	**0.01**	**3.28**	**4.98**	**0.76**	**1.20**	**1.53**	**0.94**	**364,546**	
4/11/16	65.94	94.93	10.00	0.10	0.14	0.01	3.75	4.81	0.93	1.31	1.48	0.97	94,951	
4/12/16	60.79	94.31	9.72	0.09	0.14	0.01	3.68	4.77	0.99	1.26	1.47	0.91	87,545	
4/13/16	66.25	100.28	13.75	0.10	0.14	0.02	3.78	4.89	1.25	1.31	1.53	0.98	95,397	
4/14/16	60.23	91.46	11.94	0.09	0.13	0.02	3.63	4.70	1.12	1.26	1.51	0.94	86,732	
4/15/16	48.55	86.25	9.72	0.07	0.12	0.01	3.26	4.68	0.94	1.16	1.43	0.94	69,907	
4/16/16	37.00	66.25	14.37	0.05	0.10	0.02	2.82	4.19	1.35	1.08	1.33	0.96	53,282	
4/17/16	39.72	112.85	9.17	0.06	0.16	0.01	2.87	4.97	0.89	1.10	1.62	0.91	57,202	
Week:	**54.07**	**112.85**	**9.17**	**0.08**	**0.16**	**0.01**	**3.40**	**4.97**	**0.89**	**1.21**	**1.62**	**0.91**	**545,015**	
4/18/16	61.55	97.50	12.85	0.09	0.14	0.02	3.64	4.62	1.21	1.27	1.54	0.96	88,634	
Week:	**61.55**	**97.50**	**12.85**	**0.09**	**0.14**	**0.02**	**3.64**	**4.62**	**1.21**	**1.27**	**1.54**	**0.96**	**88,634**	
Totals:	**53.32**	**112.85**	**8.26**	**0.08**	**0.16**	**0.01**	**3.37**	**4.98**	**0.76**	**1.21**	**1.62**	**0.91**	**998,195**	

ATTACHMENT 2

Utility Systems Science and Software

Report Date: 04/20/2016
Customer: MSMU
Group: Flow Monitoring
SiteID: 2418

Statistics from Chalon Rd MH: 04/06/2016 thru 04/18/2016

	Flow (GPM)			Flow (MGD)			Velocity (FPS)			Level (inches)				
Date	**Avg**	**Max**	**Min**	**Avg**	**Max**	**Min**	**Avg**	**Max**	**Min**	**Avg**	**Max**	**Min**	**Total Gal**	**Rain**
4/6/16	71.39	119.51	26.39	0.10	0.17	0.04	4.45	5.87	2.55	1.25	1.53	0.94	102,797	
4/7/16	72.52	140.83	23.47	0.10	0.20	0.03	4.64	6.76	2.27	1.22	1.57	0.94	104,424	
4/8/16	61.69	110.14	25.83	0.09	0.16	0.04	4.31	6.34	2.49	1.16	1.37	0.94	88,836	
4/9/16	56.65	79.93	20.69	0.08	0.12	0.03	4.26	5.29	2.13	1.10	1.22	0.90	81,573	
4/10/16	66.82	112.29	35.56	0.10	0.16	0.05	4.47	6.06	2.81	1.20	1.47	1.01	96,219	
Week:	**65.81**	**140.83**	**20.69**	**0.09**	**0.20**	**0.03**	**4.42**	**6.76**	**2.13**	**1.19**	**1.57**	**0.90**	**473,849**	
4/11/16	73.84	141.94	21.32	0.11	0.20	0.03	4.46	6.90	2.15	1.26	1.55	0.91	106,324	
4/12/16	70.82	122.64	27.01	0.10	0.18	0.04	4.43	6.13	2.55	1.25	1.48	0.96	101,987	
4/13/16	80.83	129.24	28.19	0.12	0.19	0.04	4.84	6.38	2.61	1.28	1.58	0.97	116,395	
4/14/16	78.35	155.97	39.03	0.11	0.22	0.06	4.84	7.30	3.30	1.26	1.55	1.03	112,822	
4/15/16	63.12	113.40	26.11	0.09	0.16	0.04	4.33	5.74	2.45	1.17	1.47	0.96	90,896	
4/16/16	55.58	81.81	28.89	0.08	0.12	0.04	4.17	5.51	2.64	1.11	1.21	0.97	80,031	
4/17/16	60.75	165.07	23.19	0.09	0.24	0.03	4.26	7.08	2.24	1.14	1.65	0.94	87,477	
Week:	**69.04**	**165.07**	**21.32**	**0.10**	**0.24**	**0.03**	**4.48**	**7.30**	**2.15**	**1.21**	**1.65**	**0.91**	**695,931**	
4/18/16	70.17	115.97	24.24	0.10	0.17	0.03	4.38	6.06	2.29	1.25	1.51	0.96	101,046	
Week:	**70.17**	**115.97**	**24.24**	**0.10**	**0.17**	**0.03**	**4.38**	**6.06**	**2.29**	**1.25**	**1.51**	**0.96**	**101,046**	
Totals:	**67.89**	**165.07**	**20.69**	**0.10**	**0.24**	**0.03**	**4.45**	**7.30**	**2.13**	**1.20**	**1.65**	**0.90**	**1,270,825**	

Worksheet for Circular Pipe - 1

Project Description

Friction Method	Manning Formula
Solve For	Discharge

Input Data

Roughness Coefficient	0.010	
Channel Slope	0.08000	ft/ft
Normal Depth	0.25	ft
Diameter	0.50	ft

Results

Discharge	1.03	ft³/s
Flow Area	0.10	ft²
Wetted Perimeter	0.79	ft
Hydraulic Radius	0.13	ft
Top Width	0.50	ft
Critical Depth	0.48	ft
Percent Full	50.0	%
Critical Slope	0.01733	ft/ft
Velocity	10.51	ft/s
Velocity Head	1.72	ft
Specific Energy	1.97	ft
Froude Number	4.18	
Maximum Discharge	2.22	ft³/s
Discharge Full	2.06	ft³/s
Slope Full	0.02000	ft/ft
Flow Type	SuperCritical	

GVF Input Data

Downstream Depth	0.00	ft
Length	0.00	ft
Number Of Steps	0	

GVF Output Data

Upstream Depth	0.00	ft
Profile Description		
Profile Headloss	0.00	ft
Average End Depth Over Rise	0.00	%
Normal Depth Over Rise	50.00	%
Downstream Velocity	Infinity	ft/s

Worksheet for Circular Pipe - 1

GVF Output Data

Upstream Velocity	Infinity	ft/s
Normal Depth	0.25	ft
Critical Depth	0.48	ft
Channel Slope	0.08000	ft/ft
Critical Slope	0.01733	ft/ft

A-3 Scoping Meeting Materials

We need your input!

Please take a few minutes to provide your comments and return the completed form to the Department of City Planning. Comments must be provided in writing and can be submitted either at the scoping meeting, by mail, by fax to 213-978-1343, or by email to kathleen.king@lacity.org.

The purpose of the scoping process is to identify public and agency concerns, define the issues that will be examined in the Environmental Impact Report (EIR), and help to identify project impacts, alternatives, and mitigation measures that can lessen the significant environmental impacts from both temporary construction activities and long-term operation of the proposed Project.

The deadline for submitting preliminary comments is Friday, September 2, 2016. All written comments submitted will be considered during preparation of the Draft EIR, which will be available for public review at a later date. The Initial Study is available for review at the Department of City Planning, 200 N. Spring St., Rm 750, LA, CA 90012 and online at: http://planning.lacity.org

Tape Here

Attn: Kathleen King
Major Projects - Department of City Planning
200 N Spring Street, Room 750
Los Angeles, CA 90012
RE: ENV-2016-2319-EIR

Public Scoping Meeting

Project Name: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Case No.: ENV-2016-2319-EIR

Project Location: Mount Saint Mary's University's Chalon campus located at 12001 Chalon Road, Los Angeles, CA 90049

Community Planning Area: Brentwood – Pacific Palisades Community Plan

Council District: 11, Mike Bonin

Due Date for Public Comments: September 2, 2016

ENVIRONMENTAL ISSUES & IMPACTS

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report?

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

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

CONTACT INFORMATION (Optional, please print clearly)

Name: _____ Representing Agency or Organization: _____

Address: _____ City/State/Zip: _____

SCOPING MEETING

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

August 16, 2016

6:00 P.M. – 8:00 P.M.

SCOPING MEETING OBJECTIVES

- Provide information about the Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
- Provide information on Environmental Impact Report (EIR) process and timeline
- Identify environmental issues for analysis in EIR
- Solicit community input on environmental issues or concerns to be addressed in EIR

The Scoping Meeting is for community input only. The City is at the beginning of the environmental review process.

PROJECT DESCRIPTION

- **Wellness Pavilion:** 2-Story, up to approximately 38,000 square foot multi-use building to replace existing outdated fitness and recreation facilities on 3.8 acre site within Chalon Campus
- **Components:** Recreation and practice gymnasium, multipurpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support spaces
- **Proposed Height:** 42 feet
- **Parking:** Remove 226 existing spaces. Provide 279 spaces in new accessory deck, reducing the number of student parking along Chalon Road
- **Construction Duration:** Approximately 22 months

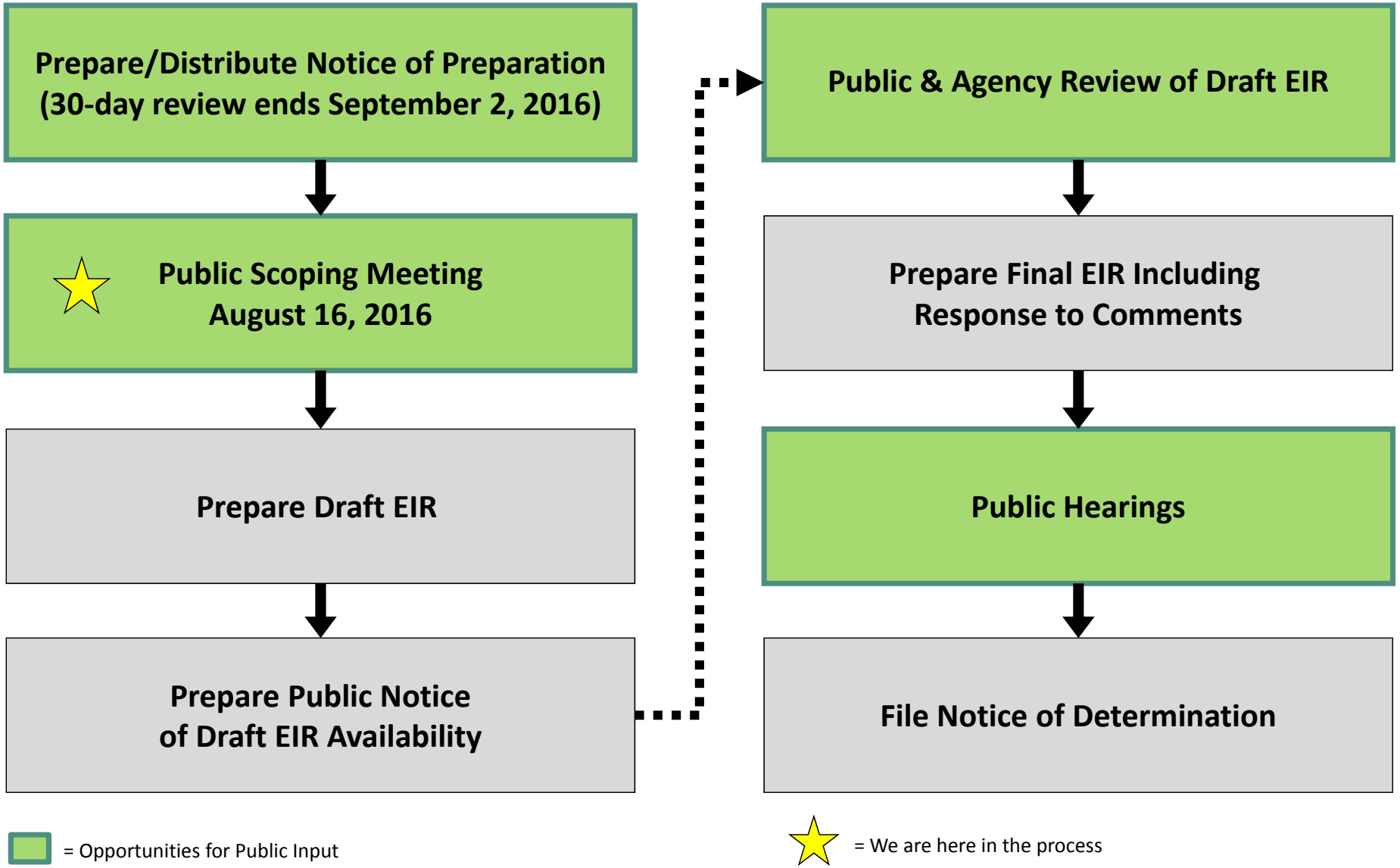
NECESSARY APPROVALS

- Plan Approval to allow Wellness Pavilion in a conditional use educational Campus
- Building Height Modification to allow a building height up to 42 feet.
- Zoning Administrator's Approval to exceed the "by-right" maximum for non-exempt grading (under the Baseline Hillside Ordinance) on a site in the RE40 Zone.
- Demolition Permits
- Construction permits, including building, grading, excavation, foundation, and associated permits.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

- Purpose: To inform decision-makers and the public of a project's potential environmental effects
- Increases public understanding of and participation in environmental review process
- Discloses potential impacts on the environment
- Identifies ways to avoid or reduce potential impacts through mitigation measures or alternatives

THE EIR PROCESS



SCOPE OF EIR ANALYSIS

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources (Historic, Archaeology, Paleontology)
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology/Water Quality
- Land Use and Planning
- Noise
- Public Services (Police and Fire)
- Recreation
- Transportation/Traffic
- Utilities (Water and Solid Waste)
- Alternatives

SUBMITTAL OF PUBLIC COMMENTS

Public Comments on EIR Scope

- Submit written comments using pre-addressed form provided tonight
  - Leave in box or turn in to City staff or EIR consultants
  - Add postage and mail to City Hall
- Email comments
- Submit electronic comments tonight at laptop stations

CONTACT INFORMATION

Please direct EIR comments to:

Kathleen King
Major Projects - Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, California 90012

Fax: (213) 978-1343

Email: kathleen.king@lacity.org

Reference Case No.: *ENV-2016-2319-EIR*

Exterior view of fitness center and pool.

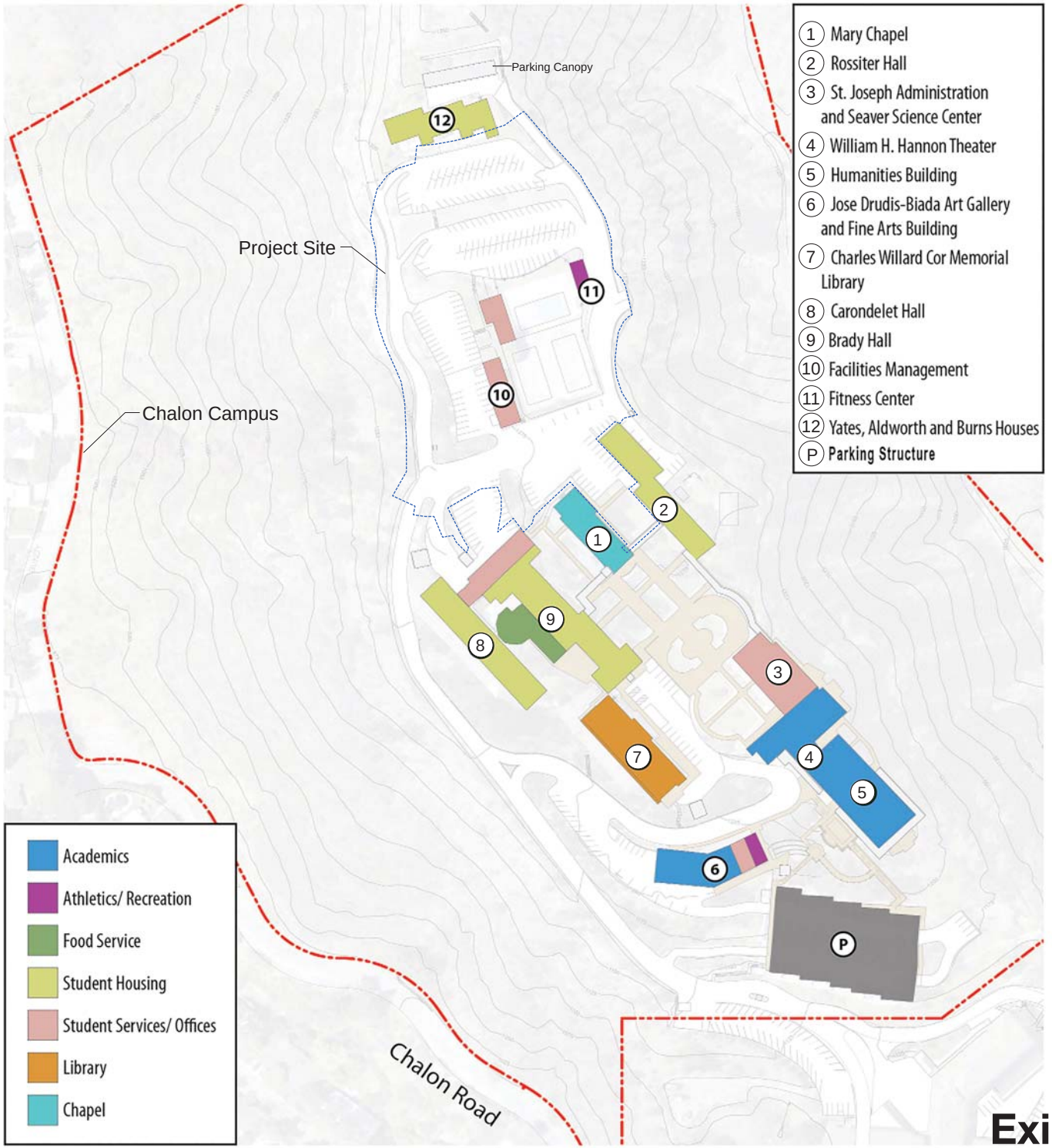
Check in desk in fitness center.

Interior of fitness center.

Basketball court and tennis court.

Existing Fitness Facilities to be Removed

Aerial View of Project Site



Chalon Campus
Existing Facilities and Uses

Proposed Easterly View

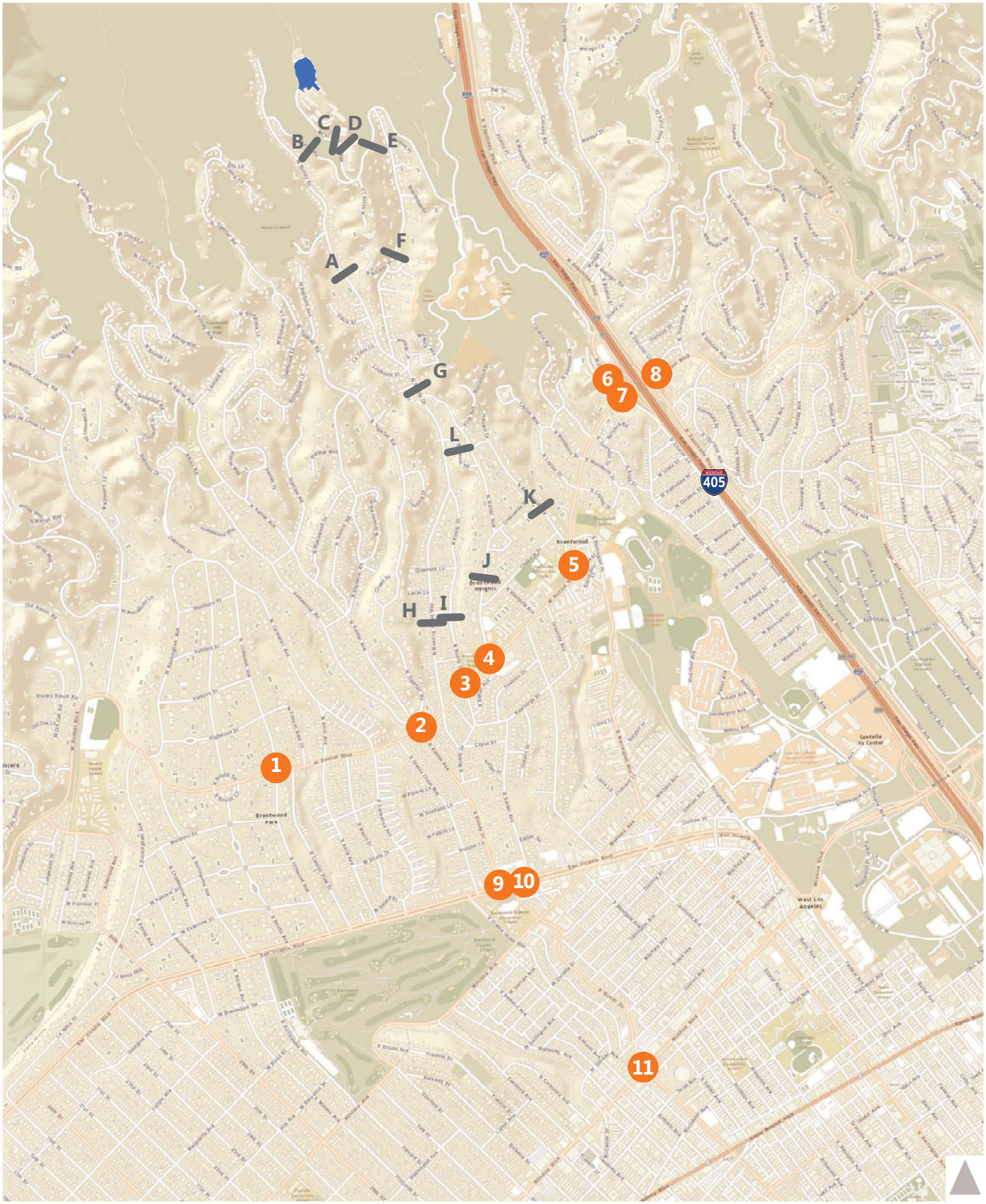
Proposed Entry View

Proposed Northerly Aerial View

Proposed Southeast Corner View


Rossiter Hall
(EXISTING)
Wellness Promanade
(NEW)
Campus Green
(NEW)
Mary Chapel
(EXISTING)
Garden Walk
(NEW)
Motor Court Drop-off
(NEW)
Wellness Pavilion
(NEW 2 STORY BUILDING)
Brady Hall
(EXISTING)
Pool
(NEW)
Brady Loy Parking Lot 'E'
(EXISTING)
Wellness Pavilion Accessory Parking Deck
(NEW 3 STORY BUILDING)
Storm Water Planter Box
(NEW)
Burns House
(EXISTING)
Carondelet Parking Lot 'D'
(EXISTING)
Chalon Road
LIMIT OF WORK

Site Plan



Project Location X Study Intersection Locations X Segment Analysis Locations

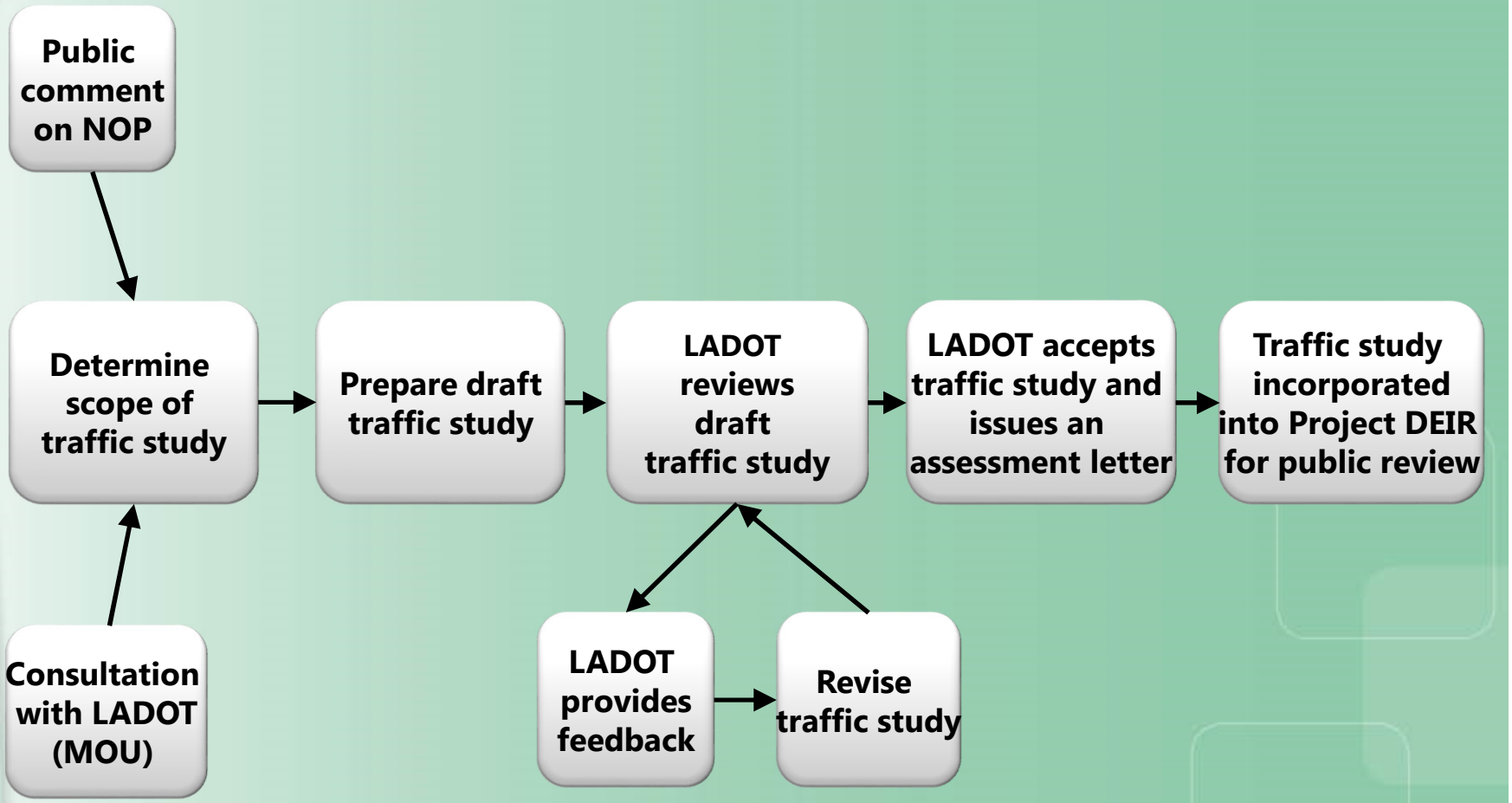
Study Intersections & Roadway Segments

Note: Board is for informational purposes at this time

FEHR PEERS

Traffic Study Process

City of Los Angeles Department of Transportation (LADOT)



CITY OF LOS ANGELES
PUBLIC SCOPING MEETING – MOUNT SAINT MARY'S UNIVERSITY CHALON CAMPUS WELLNESS PAVILION PROJECT

Name	Affiliated Organization (if applicable)	Address	City, Zip Code	Phone	E-mail
MaryAnn Jackson		372 N Bundy Dr.	Los Angeles CA		
Wendy Sue Rosen	Brentwood Residents Coalition	PO Box 491103 LA CA 90049	LA CA	310.476.1383	Rosenfree@aol.com
Zofia & David Wright		11845 Chaparal St LA, CA 90049			zofia.wright@gmail.com
Scottgarvey		1559 N. Bundy DR LA, CA 90049			scottgarvey02@dwchor.com
Bernadette Leiweke		572 N. BUNDY LA 90049			Bleiweke@gmail.com
Jacqueline Bacal	Bundy Canyon Association	1221 N. NORMAN Place	Los Angeles 90049	310-254-7575	jc.bacal@yahoo.com.
FRED NIK		153 N. BOWLING GREEN WAY	LA 90049	310.801-5363	
ROBERTA MENDELSOHN		862 N. NORMAN PL	LA 90049		
Rob Jacobs		700 Halliday Ave	90049	310 4403188 HOME	ROBJACOBS@MAC.COM
SAID GABBARI		12416 Sunset	90049	310-458-2711	Sfabbari@gmail.com.
Tony Koreleneff		11972 Chalon Rd	90049	310 3812107	KTOlick@gmail.com
Laura Tiffel		601 N. Saltair Ave	90049	310-592-3851	tomson9@yahoo.com

CITY OF LOS ANGELES
PUBLIC SCOPING MEETING – MOUNT SAINT MARY'S UNIVERSITY CHALON CAMPUS WELLNESS PAVILION PROJECT

Name	Affiliated Organization (if applicable)	Address	City, Zip Code	Phone	E-mail
Sally Altabet		349 N. Bowling Green	LA Ca 90049	3104765071	north349@aol.com
David Davoodian	BCA	671 N. Saltair Ave	LA 90049		david@sublime Entertainment.com
Stef Michaels	BCA	1278 N. Norman	LA. 90049	310.476.9535	SMCPRODUCTIONS @ROADRUNNER.COM
Sharon Jacobson			LA 90049		Sharondjacobson@ Yahoo.Com
MARCIA HERMAN	BHO	600 Hanley WAY	90049	31 476 6111	
Silvia Saucedo	Raines			323.243.4556	~~SHVI~~ ssaucedo@raineslaw.com
Tim Scott		1263 N Norman Pl.	90049	310 972 3463	online.scott@earthlink.net
melma Waxman	BHA/BCC	11840 Chaparal ST	90049	3104721282	melma.waxman@gmail.com
Bethany Nagy		11901 W. Sunset Blvd. #103	90049	310.344.5327	bethanynagy@hotmail.com
LISA Lee	BCC	Brentridge Lane	90049		Kenstachange@gmail.com
Cheryl Kingston		N Bundy Dr	Encino		
Zhila Ross	—	1331 North Bundy Dr.	LA, 90049	310.254.7696	zhila.ross@yahoo.com

CITY OF LOS ANGELES
PUBLIC SCOPING MEETING – MOUNT SAINT MARY'S UNIVERSITY CHALON CAMPUS WELLNESS PAVILION PROJECT

Name	Affiliated Organization (if applicable)	Address	City, Zip Code	Phone	E-mail
CHRISTOPHER NEIL			Los Angeles	949 324 1605	Chrisneil1@gmail.com
Judith Nestrum	BHA and KNBS	200 S Woodlawn	CA 90049	310-207-4822	
HRATCH SARKIS		1140 GRACE LN.	90049	310 471 5163	
KARIN GRANT		808 LOCKEARN	90049	810-600-0952	
Debra Hockemeyer	BHHA	21069 Westridge Rd	LA CA 90049	(310) 795-7771	debra@WesternRidge.com
TERI ROWAN KANN	BCC	13360 Catron Rd	90049	(310) 472 3714	TERIKANN2003@YAHOO.COM
CHUCK KANN	SPOUSE	"	"	"	CKANN2003@YAHOO.COM
Kathleen Flanagan	BHA	455 N. Tigertail Rd.	90049	310-728-5119	Flanagan1203@gmail.com
RICK BENFIELD	ARCHER	11725 SUNSET Blvd	90049	310-873-7019	RBENFIELD@ARCHER.ORG
Victor Pesci	Brentwood Sch	1005 Barrington Pl	90049	310 873 1136	VPESCI@BWSCampus.com
Iris + Victor Antola		610 N. Bundy Dr	90049	310 472 5803	Vicantolak yahoo.com
Fred Bauer		12006 Chalon Rd.	90049	310 824 3807	———

CITY OF LOS ANGELES
PUBLIC SCOPING MEETING – MOUNT SAINT MARY'S UNIVERSITY CHALON CAMPUS WELLNESS PAVILION PROJECT

Name	Affiliated Organization (if applicable)	Address	City, Zip Code	Phone	E-mail
Mort Kirshner		1036 No. Bundy Dr.	90049	453-0911	MORT@MORTSAL.COM
Grace Scherrer		1100 Grace Ln. L.A.	90049	310.210.0876	—
King Mendelsohn		862 N. Norman Pl	90049	310-472-5060	Kmmead@gte.net
Olga Krasovski		11972 CHALON RD	90049	310.989.1787	Olushka@gmail.com
DAVID MOHABER		844 NORWAY LN		310-210-9951	DMOHABER@YAHOO.COM
Tim & Stephanie Reuben		1041 N NORMAN PL	90049	310-777-1990	tdR@RRBAttorneys.com
[redacted] Snowdy Dodson	CA I.F. Native Plant Society	15811 Ladwell St. Van Nuys CA	91406	818.257.0309 [redacted]	lacnps@lacnps.org

CITY OF LOS ANGELES
PUBLIC SCOPING MEETING – MOUNT SAINT MARY'S UNIVERSITY CHALON CAMPUS WELLNESS PAVILION PROJECT

Name	Affiliated Organization (if applicable)	Address	City, Zip Code	Phone	E-mail
TOM + CAROL BACON		570 N. BUNDY DR.	L.A. 90049	310 367 9694	tombacon@gmail.com
LAWRENCE BROWN		1010 N. BUNDY DR	LA. 90049	(310)4765739	
STEPHEN AND LYNN SKOOTSKY		1469 N. BUNDY DR.	L.A. 90049		SSKOOTSKY@YAHOO.COM

A-4 NOP Comments

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
Public Agencies																				
State																				
CALTRANS	California Department of Transportation – District 7 **Dianna Watson, Branch Chief, Regional – Community Planning & LD IGR Review** 100 S. Main Street, MS 16 Los Angeles, CA 90012 (August 31, 2016)													X						
SCAQMD	South Coast Air Quality Management Distrct **Jillian Wong, Planning and Rules Manager** 21865 Copley Drive, Diamond Bar, CA 91765-4178 (August 10, 2016)				X															
NAHC	Native American Heritage Commission **Gayle Totton, M.A., PhD** 1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691 (August 10, 2016)						X													

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
SCH	California State Clearinghouse Scot Morgan 1400 Tenth Street Sacramento, CA 95812																			CEQA Compliance
Local																				
LASAN	LA Sanitation **Ali Poosti** (September 27, 2016)															X				
Organizations																				
CNPS	California Native Plant Society – Los Angeles/Santa Monica Mountains Chapter **Snowdy Dodson, Conservation Chair** 15811Leadwell Street Cany Nuys, CA 91406-3113 (January 21, 2014)					X														
BCC	Brentwood Community Council **Thelma Waxman** 149 S. Barrington Ave., Box 194, Los Angeles, CA 90049 (September 1, 2016)	X	X	X	X			X		X	X	X		X						Hazardous Materials

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
BHA	Brentwood Homeowners Association **Raymond Klein** P.O.Box 49427 Los Angeles, CA 90049 (September 2, 2016)	X	X	X	X			X		X	X	X		X						Hazardous Materials
BHHA	Brentwood Hills Homeowners Association **Debra Hockemeyer** (September 1, 2016)	X		X		X					X			X						
SC	Sunset Coalition **David Wright** (September 2, 2016)	X	X								X			X						
GAB	Gabrieleno Band of Mission Indians Andrew Salas P.O. Box 393 Covina, CA 91723						X								X					

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
Individuals																				
Antola	Victor Antola (August 17, 2016)										X			X						Letter of support - General Opposition - Scope of EIR Wildfire hazard Letter of support Sarcastic alternative: bicycles instead of Project Letter of support Auto breakins Photo of Bundy Canyon Dr.; No text -
Ashworth_C	Chris Ashworth 1212 North Bundy Drive Brentwood, CA 90049 (August 7, 2016)													X						
Ashworth_V	Veronica Ashworth 1212 North Bundy Drive Brentwood, CA 90049 (August 16, 2016)													X						

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
Bacal_1	Jacqueline and Howard Bacal 1221 N. Norman Place Los Angeles, CA 90049 (August 8, 2016)													X						
Bacal_2	Jacqueline and Howard Bacal 1221 N. Norman Place Los Angeles, CA 90049 (August 25, 2016)													X						
Baum	Tom Baum 570 N. Bundy Dr. Los Angeles, CA 90049 (August 17, 2016)													X						
Benitez-Bloch	Dr. Rosalyn Benitez-Bloch (August 10, 2016)													X						
Blasio	Ronald P. and Julie D. Clark De Blasio 359 N. Bundy Dr. Los Angeles, CA 90049 (September 2, 2016)																			Letter of Support
Brown	Lawrence and Ronna Brown 1010 North Bundy Drive Los Angeles, CA 90049 (August 31, 2016)												X	X						

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
Carstens LLP	Douglas P. Carstens 2200 Pacific Coast Highway, Suite 318 Hermosa Beach, CA 90254 (September 2, 2016)	X	X	X		X	X	X		X	X	X	X	X			X			
Davoodian1	David Davoodian (August 10, 2016)													X						
Davoodian2	David Davoodian 671 North Saltair Ave Los Angeles, CA 90049 (August 5,2016)													X						
Delmas	Magali Delmas (August 13, 2016)													X						
Diaan	David Diaan (August 10, 2016)													X						
Diamond	Linda Diamond, M.S, CCC 615 Hanley Way Los Angeles, CA 90049 (September 6, 2016)													X						
Dillard	Joyce Dillard P.O.Bos 31377 Los Angeles, CA 90031 (September 2, 2016)									X										

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
Ehrman	Katie and Jesse Ehrman 515 N. Bundy Dr. (September 2, 2016)													X						
Feldman LLP	Ronald E. Altman 9720 Wilshire Blvd, 5th Floor Beverly Hills, CA 90212 (September 1, 2016)	X			X			X	X		X	X	X	X		X				
Fischer	Cheryce Fischer (August 31, 2016)				X							X		X						
Fredricks	Shirley Fredricks (August 24, 2016)													X						
Glickman1	Roger Glickman 575 N. Bundy Drive Los Angeles, CA 90049 (August 16, 2016)													X						
Glickman2	Wendy Glickman (August 29, 2016)													X						
Grant	Karen Grant (August 16, 2016)													X						
Jacobs	Rob Jacobs 700 Halliday Ave Los Angeles, CA 90049	X												X						
Julien	Laurie Julien (August 15, 2016)												X							

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
Koslow	Ron Koslow 1014 N. Bundy Dr. Los Angeles, CA 90049 (August 10, 2016)													X						
Krasovki	Olga Krasovki 11972 Chalon Rd Los Angeles, CA 90049											X		X						
Lechtholz	Ann Lechtholz (August 26, 2016)										X		X	X						
Leiweke	Bernadette Leiweke (August 21, 2016)	X												X						
Lyon	Mary Lyon 524 North Bundy Drive Los Angeles, CA 90049 (September 1, 2016)													X						
Maupil_Chiccarelli	Emily Maupin and Joe Chiccarelli (August 11, 2016)													X						
Mendelsohn	King M. Mendelsohn 862 N. Norman Place Los Angeles, CA 90049 (August 16, 2016)													X						
Michaels	Stefanie Michaels (August 10, 2016)	X											X	X						Wildfire Hazard

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
Michaels_BCA	Stefanie Michaels Bundy Canyon Association (August 25, 2016)												X	X						
Mohaber	David Mohaber (August 23, 2016)													X						
Nagy	Bethany Nagy (September 2, 2016)	X		X	X	X	X	X		X	X	X	X		X		X			Hazardous Matereials
Natker	Andrew and Roslyn Natker 1501 N. Bundy Drive Los Angeles, CA 90049 (September 1, 2016)							X						X						
Pouladian	Delara Pouladian 1043 Bundy Drive Los Angeles, CA 90049 (August 25, 2016)													X						
Reuben	Timothy D. Reuban 10940 Wilshire Blvd, 18th Floor Los Angeles, CA 90024 (August 17, 2016)													X						
Ross1	Bill and Zhila Ross 1331 North Bundy Drive Los Angeles, CA 90049 (August 16, 2016)	X		X	X	X			X	X	X		X	X		X				

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
Ross2	Zhila Ross (September 2, 2016)																			Infeasible alternative: bicycles instead of Project
Scherer	Grace Scherer 1100 Grace Lane Los Angeles, CA 90049													X						
Schirripa	Joe Schirripa 915 Norman place Los Angeles, CA 90049 (August 7, 2016)																			Letter of Support
Schulman	Toni M. Schulman (August 29, 2016)													X						
Shelton	James Shelton (August 30, 2016)													X						
Stein	Ira Stein 524 No. Greencraig Rd Los Angeles, CA 90049 (August 10, 2016)												X	X						
Stiebel	Arlene Stiebel (August 24, 2016)																X			
Sunshine	Debra and Randall Sunshine (August 26, 2016)										X			X						

List of Commenters/Issues

Letter Name	Commentor	2.0 Project Description	3.0 General Description of Env Setting	4.A. Aesthetics	4.B. Air Quality	4.C. Biological Resources	4.D Cultural Resources	4.E. Geology and Soils	4.F. Greenhouse Gas Emissions	4.G Hydrology and Water Quality	4.H. Land Use and Planning	4.I Noise	4.J Public Services	4.K Traffic/Transportation	4.L Tribal Cultural Resources	4. M Utilties and Service Systems	5.0. Alternatives	6.0 Other Mandatory CEQA Considerations	7.0 Emergy	Explanation of Other
Tippl	Laura Tippl (August 16, 2016)													X						
Tomson	Stef Tomson (August 25, 2016)																			Photo of Bundy Canyon Dr.; No text
Trapnell	Charles F. Trapnell 12220 Benmore Terrace Los Angeles, CA 90049 (August 27, 2016)													X						
Waxman	Thelma Waxman 11840 Chaparal Street Los Angeles, CA 90049 (September 2, 2016)													X						
Weiskopf	Evelyn Lanner Weiskopf (August 24, 2016)				X									X						
Yard	Joseph Jay Yard 418 N. Bundy Drive Los Angeles, CA 90049 (August 16, 2016)												X	X						

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
www.dot.ca.gov

Serious drought.
Help save water!

August 31, 2016

Ms. Kathleen King
City of Los Angeles
Major Projects – Dept. of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project/
ENV-2016-2319-EIR
Notice of Preparation (NOP) for DEIR
SCH# 2016081015
IGR# 07-LA-2016-00075
Vic. LA/ 405/ PM 33

Dear Ms. King:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes to construct a Wellness Pavilion, approximately 38,000 square feet multi-use building, and a new outdoor pool area, landscaped open space, and a new accessory parking deck, a total of 279 parking spaces.

To determine if a traffic impact analysis is necessary, please refer to the Freeway Impact Analysis Screening Criteria Agreement, between the City of Los Angeles and Caltrans District 7, dated October 01, 2013, and Amendment dated December 15, 2015, for guidance. Please note that if it is determined that this project is not required to conduct additional analysis of the freeway mainline and off ramps based on the screening criteria, a cumulative traffic analysis should still be conducted to determine if there will be a significant cumulative traffic impact on State facilities when all future development projects are considered.

If it is determined that a traffic impact analysis is necessary to evaluate the impacts of the project on State transportation facilities, it should be prepared prior to preparing the Draft Environmental Impact Report (DEIR). Please confirm the identify study/screening locations on the State facilities with Caltrans prior to preparing the Environmental Impact Report (EIR). Please refer the Project's traffic consultant to Caltrans' traffic study guide website: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

Listed below are some elements of what is expected in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to the I-405 freeway, including immediate and alternative on/off ramp accesses within and in close proximity to the project site. The direct I-405 freeway access to the proposed site to be analyzed which includes: ramps, ramps influence areas (acceleration/deceleration lanes), weaving areas, and freeway segment onto off-ramp and from on-ramp; such that includes northbound and southbound of Sunset Boulevard, Moraga Drive, and Getty Center Drive of I-405 freeway.

2. An off-ramp queuing analysis using HCM methodology. The capacity of the ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with some safety factor. The queue length should be calculated from the traffic counts, actual signal timing and the percent of truck assignments to the ramp with a passenger car equivalent factor of 3.0 (worst case scenario). The analyzed result may determine whether project-related plus cumulative traffic is expected to cause long queues on the on- and off-ramps.

3. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area with and without the project. Future conditions including built-out and plan-horizon years. It is also recommend that the report include AM/PM peak hour volumes for bicycles under the existing conditions.

4. A cumulative traffic analysis, which includes existing traffic, traffic generated by the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments.

5. A discussion of multi-modal mitigation measures, including possible active transportation enhancements, appropriate to alleviate anticipated traffic impacts. Any mitigation involving transit or Transportation Demand Management (TDM) should be justified and the results conservatively estimated.

6. A fair share contributions toward pre-established or future improvements on the State Highway System (SHS) is considered to be an acceptable form of mitigation. (Please refer to Appendix "B" of the Guide).

Although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County's CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. The CMP does not adequately address cumulative transportation impacts and does not analyze for safety, weaving problems, or delay. Caltrans' Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements and criteria of significance to be used in the traffic impact analysis.

Generally, when traffic is added to already deficient highway conditions (LOS "F"), it is considered a cumulative significant impact, as it may contribute to the extension of the congestion period and deterioration of safety.

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to "*provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability.*"

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians are critical at every on and off ramp and freeway terminus intersection with local streets. Caltrans recommends the traffic study to include the impact of the traffic from pedestrians and bicyclists and will work with the City to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists. Opportunities for improvements may exist on State facilities such as: freeway termini, on/off-ramp intersections, overcrossings, under crossings, tunnels, bridges, on both conventional state highways and freeways.

With regard to public transit, we recommend planning for gradual continual improvement of transit stops, bus bays, or other facilities, to accommodate traffic flow, especially on streets that are State Route locations or are near freeway intersections.

As a reminder, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods. Also, a truck/traffic construction management plan may be necessary for this project. If one has been prepared, please submit for Caltrans' review.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that project needs to be designed to discharge clean run-off water.

If you have any questions or concerns regarding these comments, please feel free to contact me at (213) 897-9140 or project coordinator Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,

DIANNA WATSON
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

August 10, 2016

kathleen.king@lacity.org

Kathleen King, Planning Assistant
Major Projects – Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
ENV-2016-2319-EIR

Notice of Preparation of a CEQA Document for the
Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft EIR. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a Draft EIR document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for

performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Finally, should the proposed project include equipment that generates or controls air contaminants, a permit may be required and the SCAQMD should be listed as a responsible agency and consulted. The assumptions in the submitted Draft EIR would also be the basis for permit conditions and limits. Permit questions can be directed to the SCAQMD Permit Services staff at (909) 396-3385, who can provide further assistance.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Mitigation Measure resources are available on the SCAQMD CEQA Air Quality Handbook website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (http://www.aqmd.gov).

The SCAQMD staff is available to work with the lead agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Gordon Mize, Air Quality Specialist by e-mail at gmize@aqmd.gov or by phone at (909) 396-3302.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Planning and Rules Manager
Planning, Rule Development & Area Sources

JW:GM

LAC160804-07
Control Number

NAHC

STATE OF CALIFORNIA — Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
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August 10, 2016

Kathleen King
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

sent via e-mail:
kathleen.king@lacity.org

RE: SCH# 2016081015; Mount Saint Mary's University Chalon Campus Wellness Pavilion Project, Notice of Preparation for Draft Environmental Impact Report, Los Angeles County, California

Dear Ms. King:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
    a. A brief description of the project.
    b. The lead agency contact information.
    c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
    d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
    a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
    a. Alternatives to the project.
    b. Recommended mitigation measures.
    c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
    a. Type of environmental review necessary.
    b. Significance of the tribal cultural resources.
    c. Significance of the project's impacts on tribal cultural resources.
    d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
    a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
    b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
   i. Protecting the cultural character and integrity of the resource.
   ii. Protecting the traditional use of the resource.
   iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

    This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have been already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
    a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
    a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
    b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
    c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

cc: State Clearinghouse

SCH

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

Notice of Preparation

August 4, 2016

To: Reviewing Agencies

Re: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
SCH# 2016081015

Attached for your review and comment is the Notice of Preparation (NOP) for the Mount Saint Mary's University Chalon Campus Wellness Pavilion Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Kathleen King
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Rep
State Clearinghouse Data Base

SCH# 2016081015
Project Title Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
Lead Agency Los Angeles, City of

Type NOP Notice of Preparation

Description Demolition of all existing uses on a 3.8-acre project site and construction of the proposed Wellness Pavilion, a two-story, approximately 38,000 sf multi-use building, which would house a recreation and practice gym, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e. lockers, showers, restrooms, equipment storage, and mechanical spaces). The project does not include a request to increase the max student enrollment (2,244 students) on the campus, nor would it create a need for a future increase in the max student enrollment.

Lead Agency Contact

Name Kathleen King
Agency City of Los Angeles
Phone (213) 978-1195 **Fax**
email
Address 200 N. Spring Street, Room 750
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Chalon Rd and Grace Lane
Lat / Long
Parcel No. 4429-003-033
Township 1S **Range** 16W **Section** **Base** SB

Proximity to:

Highways I 405
Airports
Railways
Waterways Rustic Creek
Schools MSMU, Archer, Brentwood, others
Land Use No change to the existing zoning and land use designations are proposed under the project. Z: Res Estate Hillside Area Height District 1 (RE40-1-H); LU: Min res

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4

Date Received 08/04/2016 **Start of Review** 08/04/2016 **End of Review** 09/02/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

2016081015

Notice of Completion & Environmental Document Transmittal

SCH #_____

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044 916/445-0613

Project Title: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Lead Agency: City of Los Angeles – Department of City Planning Contact Person: Kathleen King

Mailing Address: Dept. of City Planning, 200 N. Spring Street, Room 750 Phone: 213-978-1195

City: Los Angeles Zip: 90012 County: Los Angeles

Project Location: The Project Site is located within Mount Saint Mary's University's Chalon campus located at 12001 Chalon Road, Los Angeles, CA 90049.

County: Los Angeles City/Nearest Community: Los Angeles

Cross Streets: Chalon Road and Grace Lane Zip Code: 90049 Total Acres: 3.8

Assessor's Parcel No.: Portion of APN 4429-003-033

Section: unsectioned Twp. 1 South Range: 16 West Base: San Bernardino Base Meridian

Within 2 Miles: State Hwy #: I-405 Waterways: Rustic Creek (~2 miles away)

Airports: N/A Railways: N/A Schools: MSMU (Chalon Campus), Archer School, Brentwood School, Others

Document Type:

CEQA: ☒ NOP ☐ Supplement/Subsequent EIR (Prior SCH No.) _____ NEPA: ☐ NOI Other: ☐ Joint Document
☐ Early Cons ☐ Other _____ ☐ EA ☐ Final Document
☐ Neg Dec ☐ Draft EIS ☐ Other
☐ Draft EIR ☐ FONSI

Governor's Office of Planning & Research

Local Action Type:

☐ General Plan Update ☐ Master Plan ☐ Use Permit ☒ Other: New Wellness Pavilion/Recreational Facility on existing developed Campus
☐ General Plan Amendment ☐ Planned Unit Development ☐ Land Division (Subdivision, etc.)
☐ General Plan Element ☐ Site Plan ☐ Annexation
☐ Community Plan ☐ Rezone ☒ Redevelopment
☐ Specific Plan ☐ Prezone ☐ Coastal Permit

APR 04 2016

STATE CLEARINGHOUSE

Development Type:

☐ Residential: *Units*__ *Acres*_____
☐ Office: *Sq.ft.*_____ *Acres*_____ *Employees*_____
☐ Commercial: *Sq.ft* _____ *Acres*_____ *Employees*_____
☐ Industrial: *Sq.ft.* _____ *Acres*_____ *Employees*_____
☒ Educational _____
☒ Recreational 38,000 SF total
☐ Water Facilities: *Type* *MGD* N/A

☐ Transportation: *Type*_____
☐ Mining: *Mineral*_____
☐ Power: *Type*_____ *Watts*_____
☐ Waste Treatment: *Type*_____
☐ Hazardous Waste: *Type*_____
☐ Other:

Funding (approx.): Federal $ _____ State $ _____ Total $ _____

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☒ Flood Plain/Flooding ☒ Schools/Universities ☒ Water Quality
☐ Agricultural Land ☐ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Air Quality ☒ Geologic/Seismic ☒ Sewer Capacity ☐ Wetland/Riparian
☒ Archeological/Historical ☐ Minerals ☒ Soil Erosion/Compaction/Grading ☒ Wildlife
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Growth Inducing
☒ Drainage/Absorption ☐ Population/Housing Balance ☒ Toxic/Hazardous ☒ Land use
☐ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☒ Cumulative Effects
☐ Fiscal ☒ Recreation/Parks ☒ Vegetation ☐ Other

Present Land Use/Zoning/General Plan Designation:

No change to the existing zoning and land use designations are proposed under the Project.

- Zoning: Residential Estate Hillside Area Height District 1 (RE40-1-H)
- Land Use: Minimum Residential

Project Description: Demolition of all existing uses on a 3.8-acre Project Site and construction of the proposed Wellness Pavilion, a two-story, approximately 38,000 square foot (SF) multi-use building, which would house a recreation and practice gymnasium, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e., lockers, showers, restrooms, equipment storage, and mechanical spaces). The Project does not include a request to increase the maximum student enrollment (2,244 students) on the Campus, nor would it create a need for a future increase in the maximum student enrollment.

NOP Distribution List

County: Los Angeles SCH# 2016081015

Resources Agency

- [x] **Resources Agency**
  Nadell Gayou
- [ ] **Dept. of Boating & Waterways**
  Denise Peterson
- [ ] **California Coastal Commission**
  Elizabeth A. Fuchs
- [ ] **Colorado River Board**
  Lisa Johansen
- [ ] **Dept. of Conservation**
  Elizabeth Carpenter
- [ ] **California Energy Commission**
  Eric Knight
- [ ] **Cal Fire**
  Dan Foster
- [ ] **Central Valley Flood Protection Board**
  James Herota
- [ ] **Office of Historic Preservation**
  Ron Parsons
- [x] **Dept of Parks & Recreation**
  Environmental Stewardship Section
- [ ] **California Department of Resources, Recycling & Recovery**
  Sue O'Leary
- [ ] **S.F. Bay Conservation & Dev't. Comm.**
  Steve McAdam
- [x] **Dept. of Water Resources**
  Resources Agency
  Nadell Gayou

Fish and Game

- [ ] **Depart. of Fish & Wildlife**
  Scott Flint
  Environmental Services Division
- [ ] **Fish & Wildlife Region 1**
  Curt Babcock
- [ ] **Fish & Wildlife Region 1E**
  Laurie Harnsberger
- [ ] **Fish & Wildlife Region 2**
  Jeff Drongesen
- [ ] **Fish & Wildlife Region 3**
  Craig Weightman
- [ ] **Fish & Wildlife Region 4**
  Julie Vance
- [x] **Fish & Wildlife Region 5**
  Leslie Newton-Reed
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6**
  Tiffany Ellis
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6 I/M**
  Heidi Calvert
  Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Wildlife M**
  Becky Ota
  Marine Region

Other Departments

- [ ] **Food & Agriculture**
  Sandra Schubert
  Dept. of Food and Agriculture
- [ ] **Depart. of General Services**
  Public School Construction
- [ ] **Dept. of General Services**
  Cathy Buck/George Carollo
  Environmental Services Section
- [ ] **Delta Stewardship Council**
  Kevan Samsam
- [ ] **Housing & Comm. Dev.**
  CEQA Coordinator
  Housing Policy Division

Independent Commissions,Boards

- [ ] **Delta Protection Commission**
  Michael Machado
- [ ] **OES (Office of Emergency Services)**
  Monique Wilber
- [x] **Native American Heritage Comm.**
  Debbie Treadway
- [ ] **Public Utilities Commission**
  Supervisor
- [ ] **Santa Monica Bay Restoration**
  Guangyu Wang
- [ ] **State Lands Commission**
  Jennifer Deleong
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Cal State Transportation Agency CalSTA

- [ ] **Caltrans - Division of Aeronautics**
  Philip Crimmins
- [ ] **Caltrans – Planning HQ LD-IGR**
  Terri Pencovic
- [x] **California Highway Patrol**
  Suzann Ikeuchi
  Office of Special Projects

Dept. of Transportation

- [ ] **Caltrans, District 1**
  Rex Jackman
- [ ] **Caltrans, District 2**
  Marcelino Gonzalez
- [ ] **Caltrans, District 3**
  Eric Federicks – South
  Susan Zanchi - North
- [ ] **Caltrans, District 4**
  Patricia Maurice
- [ ] **Caltrans, District 5**
  Larry Newland
- [ ] **Caltrans, District 6**
  Michael Navarro
- [x] **Caltrans, District 7**
  Dianna Watson
- [ ] **Caltrans, District 8**
  Mark Roberts
- [ ] **Caltrans, District 9**
  Gayle Rosander
- [ ] **Caltrans, District 10**
  Tom Dumas
- [ ] **Caltrans, District 11**
  Jacob Armstrong
- [ ] **Caltrans, District 12**
  Maureen El Harake

AN

Cal EPA

Air Resources Board

- [ ] Airport & Freight
  Cathi Slaminski
- [ ] Transportation Projects
  Nesamani Kalandiyur
- [ ] Industrial/Energy Projects
  Mike Tollstrup
- [ ] **State Water Resources Control Board**
  Regional Programs Unit
  Division of Financial Assistance
- [ ] **State Water Resources Control Board**
  Cindy Forbes – Asst Deputy
  Division of Drinking Water
- [ ] **State Water Resources Control Board**
  Div. Drinking Water #_____
- [ ] **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] **State Water Resouces Control Board**
  Phil Crader
  Division of Water Rights
- [ ] **Dept. of Toxic Substances Control**
  CEQA Tracking Center
- [ ] **Department of Pesticide Regulation**
  CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- [ ] **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] **RWQCB 3**
  Central Coast Region (3)
- [x] **RWQCB 4**
  Teresa Rodgers
  Los Angeles Region (4)
- [ ] **RWQCB 5S**
  Central Valley Region (5)
  - [ ] **RWQCB 5F**
    Central Valley Region (5)
    Fresno Branch Office
  - [ ] **RWQCB 5R**
    Central Valley Region (5)
    Redding Branch Office
- [ ] **RWQCB 6**
  Lahontan Region (6)
  - [ ] **RWQCB 6V**
    Lahontan Region (6)
    Victorville Branch Office
- [ ] **RWQCB 7**
  Colorado River Basin Region (7)
- [ ] **RWQCB 8**
  Santa Ana Region (8)
- [ ] **RWQCB 9**
  San Diego Region (9)

- [ ] **Other** _____
  _____
  _____
- [ ] _____
  Conservancy

Last Updated 4/25/2016

FORM GEN. 160 (Rev. 8-12)

LASAN

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

RECEIVED OCT 04 2016

DATE: September 27, 2016

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: Kathleen King, Planning Assistant
Department of City Planning

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation

SUBJECT: **MOUNT SAINT MARY'S UNIVERITY – NOTICE OF PREPERATION ENVIORMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING**

This is in response to your August 4, 2016 letter requesting a review of your proposed mixed-use project located at 12001 Chalon Road, Los Angeles, 90049. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Existing			
Fitness Center	200 GPD/1000 SQ.FT	2,773 SQ.FT	(555)
Offices	120 GPD/1000 SQ.FT	4,515 SQ.FT	(542)
Pool	117,306 Gallons	1 Pool	(117,306)
Proposed			
Fitness Center	200 GPD/1000 SQ.FT	37,000 SQ.FT	7,400
Offices	120 GPD/1000 SQ.FT	1,000 SQ.FT	120
Pool	117,306 Gallons	1 Pool	117,306
Total			**6,423**

File Location: \Div Files\SCAR\CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\Mount Staint Mary's University - NOP EIR and Public Scoping Meeting.doc

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Chalon Road. The sewage from the existing 8-inch line feeds into a 21-inch sewer line on Bundy Drive, then into a 30-inch sewer line on Granville Boulevard before discharging into a 30-inch sewer line on National Boulevard. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Chalon Rd.	*	1.02 MGD
21	Bundy Dr.	32	4.75 MGD
18	Bundy Dr.	52	2.27 MGD
30	Granville Blvd.	58	9.61 MGD
30	National Blvd.	57	7.38 MGD

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. However, the 30-inch line on National Boulevard is slowing reaching its capacity and is currently being addresses by the City. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Eduardo Perez of my staff at (323) 342-6207.

STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on Stormwater Low Impact Development (LID) requirements. The projects that are subject to LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant

documents can be found at: www.lastormwater.org. It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements.

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Floor, Station 18.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm

drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers the Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of $1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

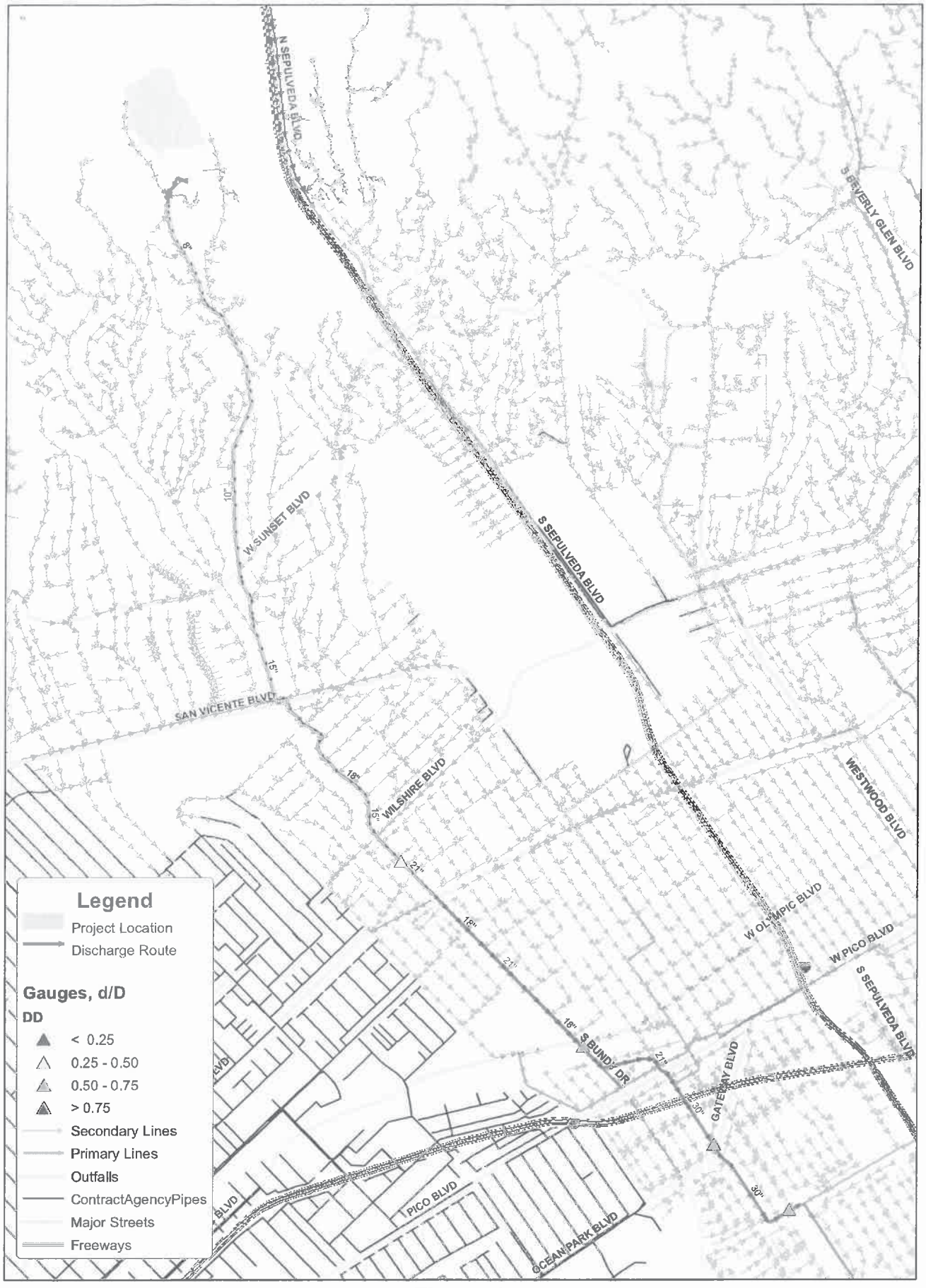
SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

EP/AP:as

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN
Daniel Hackney, LASAN
Eduardo Perez, LASAN



Wastewater Engineering Services Division
LA Sanitation
City of Los Angeles

Figure 1
MSMU Wellness Pavilion Project
Sewer Map

N
W E
S

0 550 1,100 2,200 3,300 4,400
Feet

CALIFORNIA NATIVE PLANT SOCIETY

Los Angeles /Santa Monica Mountains Chapter
15811 Leadwell Street
Van Nuys, California 91406-3113

August 16, 2016

President Ann McElaney-Johnson
Mount Saint Mary's University
12001 Chalon Road
Los Angeles CA 90049

Ms Kathleen King
Major Projects – Department of City Planning
200 N Spring St, Room 750
Los Angeles CA 90012

VIA HAND DELIVERY

RE: MOUNT SAINT MARY'S UNIVERSITY
ENV-2016-2319-EIR
WELLNESS PAVILION SCOPING

Dear Ms King and President McElaney-Johnson;

California Native Plant Society (CNPS) is a science and policy based interest group formed a half century ago. CNPS works hard to protect California's native plant heritage and preserve it for future generations. CNPS actively promotes the use of science in land use and management decisions through our *Online Rare Plant Inventory* and essential reference book: *Manual of California Vegetation*, 2nd Edition, both of which are the most advanced resources available for identifying and managing critical habitat in California. We work closely with decision-makers, scientists, and local planners to advocate for well-informed and environmental friendly policies, regulations, and land management practices.

Our chapter sphere of influence includes most of the City of Los Angeles, including the Santa Monica Mountains. We are locally active with issues both in urban and open space areas. Members are familiar with Bundy Canyon, Mount Saint Mary's (MSM) Brentwood campus, its natural resources, and history. We appreciate the opportunity to share scoping comments and recommendations regarding the proposed Wellness Pavilion at this early planning stage of the project.

California Native Plant Society supports the concept of the MSM Wellness Center. The facility will provide access to a variety of health-based services integral to supporting students and staff. It will contribute to eliminating some traffic by encouraging people to spend time on campus between classes and assignments.

We recognize the proximity of MSM to the pristine wildlands of the Upper Bundy Canyon watershed. It is evident the university has respected the environment and learned to co-exist with Nature during the school's 91-year history at the site.

The campus is located adjacent to a permanently-protected 10,000-acre open space area called the 'Big Wild.' California Native Plant Society believes there is an important nexus between the founding principles of the Wellness Pavilion and the tangent pristine mountains landscape. We urge MSM representatives and City planners to integrate Nature as design and maintenance elements into the project. We respectfully submit the following recommendations for your consideration:

- Landscape with California native plant species optimally genotypic from the Santa Monica Mountains region
- Include a demonstration garden with a healing theme in parts of the landscaping utilizing California native medicinal or edible native plants
- Incorporate California native trees and vines in the plant palette for summer cooling, winter warming, habitat, ambience

The utility of these suggestions will be mutually beneficial to campus constituents and the ambient environment. They will contribute to connectivity with the adjacent wildlands and open space, create wildlife habitat especially for birds and pollinators on campus, ensure water, energy and maintenance savings, and serve as possible tie-ins to courses offered.

Volunteers with the Los Angeles/Santa Monica Mountains Chapter of California Native Plant Society are available for consultative purposes during the planning and implementation processes of the Wellness Pavilion. We look forward to the advancement of the project.

Sincerely,

Snowdy Dodson, Chair
Los Angeles/Santa Monica Mountains Chapter
California Native Plant Society

Cc: Brentwood Community Council

BCC

BRENTWOOD Community Council

149 S. Barrington Ave., Box 194, Los Angeles, CA 90049
www.brentwoodcommunitycouncil.org

September 1, 2016

Via email: Kathleen.king@lacity.org

Kathleen King
Major Projects--Department of City Planning
200 North Spring Street
Room 750
Los Angeles, CA 90012

Re: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
12001 Chalon Road, Los Angeles, CA 90049
Case No. ENV-2016-2319-EIR

Dear Ms. King,

Thank you for the opportunity to comment upon the scope of the proposed Environmental Impact Report for Mount Saint Mary's University's Chalon Campus Wellness Pavilion Project. On behalf of the Brentwood Community Council ("BCC"), the broadest based Brentwood community organization representing approximately 50,000 stakeholders within the 90049 neighborhood, we submit the following comments to ensure the City's EIR will properly consider the Project's potential impacts and ways to reduce or avoid those impacts altogether.

I. Introduction

Mount Saint Mary's University ("MSMU") is located in a quiet residential neighborhood in Brentwood. Its primary access route, Sunset Boulevard, is shared by seven other schools within a two and a half mile radius of MSMU--Archer School for Girls, Brentwood School East Campus, Brentwood School West Campus, St. Martin of Tours School, Sunshine Preschool, University Synagogue School and Kenter Canyon School. As Councilman Mike Bonin acknowledged, traffic on Sunset Boulevard in Brentwood is one of the worse traffic choke points in the City. While traffic is unbearable now, it will only become worse as Brentwood School, Archer School for Girls, and MSMU commence construction projects within the next two years. Once these projects are completed, close to 400,000 square feet in new construction will be added to an already congested area. If these projects proceed as scheduled, all three projects will occur simultaneously in the years 2018-2020. In addition, each project proposes increased operational use of the new facilities, which means more vehicle trips to an area that suffers from traffic gridlock. That is why BCC is particularly concerned about the potential traffic impacts of MSMU's project, not only due to construction, but also from increased operational use of the new facility.

Our review of the Initial Study and Checklist dated August 4, 2016 reveals a number of concerns and issues that we feel the EIR should address to provide a more complete description of the Project as well as the existing conditions, potential impacts and possible mitigation measures.

II. **Additional Information Should be Included in the EIR in Order to Fully Analyze and Mitigate Impacts**

Impacts from Simultaneous Construction Projects Along Sunset Corridor Should Be Analyzed

The following projects have either obtained City approval or in the process of obtaining approval.

	Years of Construction	Probable Start Date	Square Footage of New Construction
Archer School for Girls	3 years	2017	94,880 sq ft
Brentwood School	13 years	2017	244,300 sq ft
MSMU	2 years	2018	38,000 sq ft (plus accessory parking deck)

All three projects propose using Sunset Boulevard for construction related activity. The EIR should include an analysis of the cumulative impacts from these simultaneous projects on Sunset Boulevard, particularly the impacts on air quality, noise and traffic. The EIR should provide specific details as to how the projects will be coordinated to mitigate impacts and protect the residences and businesses that are adjacent to or in close proximity to Sunset Boulevard. Consideration should be given to delaying the MSMU construction to avoid simultaneous days of hauling on Sunset and other measures that would prevent or minimize the use of Sunset Boulevard on the same day for large construction trucks and equipment. Any traffic study undertaken for the Project must also include traffic from the other projects as well in order to correctly measure the impact.

A Complete Analysis of Current Parking Utilization and Demand Should Be Included

There are currently 561 parking spaces on campus.[1] In addition to the 237 spaces in the structure and the 324 surface spaces on campus, the Study states that there are approximately 107 parking spaces off campus along Chalon Road that are used by students[2]. The Study goes on to describe how the School has attempted to reduce parking impacts in the adjacent single-family neighborhood through transit subsidies and shuttle improvements that encourage the use of alternative modes of transportation.

However, at a town hall meeting in March of 2015, the School stated that there is plenty of parking on campus for students, so there is no need for students to park off campus in the residential area on Chalon Road. Yet students continue to park off campus along Chalon Road. The School's explanation for this behavior is the fee charged for an on campus parking permit. Rather than encourage on campus parking or other modes of transportation, the parking permit fee has had the opposite effect. Students choose to park for free on Chalon Road rather than pay for parking on campus. In order to more fully evaluate the effectiveness of the current transportation plan as well as parking and transit programs, the following questions should be answered:

[1] Initial Study and Checklist, Figure A-4
[2] Ibid. A-6

- What information does the School have to support its claim that the Project's addition of 53 parking spaces would help take cars off the street?
- Should the parking fee be reduced in order to motivate students to park on campus? What is the utilization rate of the on campus parking?
- Of the 1,561 enrolled students, how many use public transportation to access the campus? How many utilize the inter-campus shuttles offered? How many utilize the shuttles into Santa Monica and Westwood? What else can be done to limit vehicle trips to campus?
- Of the 1,922 students enrolled on the Doheny campus, how many use the Chalon campus for studies or recreation? Do they all come by shuttle?
- Will the Wellness Pavilion increase vehicle trips from the Doheny campus by faculty and staff using the new facilities? If they drive to campus, where will they park?

Any voluntary parking programs that the School has implemented to alleviate this problem should be measurable and enforceable and be required in a set of comprehensive conditions. If the School's previous strategies to discourage off campus parking have not worked, alternative measures should be considered. One way to mitigate the impact of over 100 cars parking along Chalon Road near residences would be to require permit parking only for residences along Chalon Road so that violators would be ticketed. This would induce students and guests to park on campus since it would be more cost effective to park on campus rather than get a parking ticket on Chalon.

<u>More Information is Required to Properly Evaluate an Increase in Campus Events for Outside Use</u>
In order to reduce traffic to the Chalon Campus, MSMU has reduced academic programming on campus, moved the Commencement Ceremony off campus and reduced to a bare minimum the number of weddings and wedding receptions allowed to occur on campus.[3] Yet, the School continues to rent its facilities for non-School related events. [4] In 2015 12 "external events" occurred on campus that drew anywhere from 600 to 5,400 attendees.[5] Given its acknowledgement of traffic on the surrounding residential area and its past efforts to reduce this impact, why would the School propose increasing outside use[6] with a 60-day Summer Camp (with 450 attendees per day) and 48 Sports Activities (50-450 attendees per event for a maximum of 21,600 guests) intended only for non-university guests that would bring more cars to the campus? The School provides no explanation.

The Wellness Pavilion, according to the project description, is for the benefit of the faculty, staff and students. To open the facility to outside uses for non-school events burdens the surrounding areas with increased vehicle trips for a use that has nothing to do with the operations or mission of the university. The EIR should provide specific details as to the value of allowing outside use (besides monetary gain) and the impacts of such use on traffic in a heavily congested area. This analysis should not only include the proposed new use but the current practice of renting the facilities for outside use.

The School states that only two events would increase the number of attendees due to the proposed Wellness Pavilion: Homecoming and Athenian Day. The EIR should provide details on what would cause this increase. In addition, the Project Description states that the Wellness Pavilion will be used for

[3] Ibid. A-9
[4] Ibid. A-10
[5] Ibid.
[6] Ibid. A-31

intercollegiate competition, but provides no information regarding the number of competitions, the number of guests at the competitions or the number of teams. Without this information the impact from the facility on traffic and noise cannot be properly analyzed. The EIR should provide the following information:

- number of teams that currently compete on campus and whether the School has plans to increase this number in the future
- number of competitions scheduled per year campus and whether the School has plans to increase this number in the future
- number of guests at each competition
- date and time of each competition and means of transportation for visiting team and guests
- future plans to expand athletic program

III. **Approvals Required by EIR Should Include a Conditional Use Permit**

Part of the environmental review process is to establish a set of conditions that will mitigate the impacts from the Project. However, for these environmental conditions to truly mitigate the impacts from the Project, they must be combined with vesting conditional use conditions for the School as a whole. Together, these conditions would provide the road map for the City to measure, monitor and enforce the requirements under which the School shall operate its current and future facilities. Currently MSMU operates without a CUP because it predates the requirement.[7] Because of this the City can grant the new buildings to be erected though a Plan Approval for a "deemed-approved conditional use." However, now is the time for the City to require MSMU to follow the same standard that the other educational institutions along Sunset Boulevard follow and operate under, a Conditional Use Permit. By requiring a CUP in conjunction with the Project, the City will ensure that the Project and School operations are consistent with the zoning of the residential neighborhood in which the School resides and does not unduly alter the character of the neighborhood with current and future operations.

In 1998 Archer School for Girls began operations on Sunset Boulevard in Brentwood. Since that time it has operated under a CUP that has set the standard for private schools. In fact, in 2007, Zoning Administrator Dan Green (the ZA for Archer) prepared Draft School Conditions for the City Planning Department that reflected the types of conditions he implemented for Archer and that he felt should be considered for all schools seeking a CUP. These conditions included limits on hours of operation, limits on special events, limits on outdoor use, traffic management programs that reduce vehicle trips through busing and carpools and compliance through Plan Approvals. Archer's CUP has set the standard and represents best practices for private schools that operate in heavily congested neighborhoods.

MSMU operates under only eight conditions that were included in the approval of the parking structure in July of 1984. These conditions provide no information on hours of operation or the size or number of events. In addition, there is no cap on enrollment. Enrollment may increase if parking increases. Clearly these requirements do not reflect the current environment in which MSMU operates and offer no mitigation from effects of the School's operations on the surrounding community. We appreciate the steps the School has taken voluntarily to ameliorate some of the problems associated with traffic and parking from its operations; however, unless those voluntary programs are required as part of a new CUP the community has no assurances that those mitigation measures are effective and will continue. That is why we would like to see those programs, and others like it that mitigate traffic

[7] Ibid. A-12

impacts from current operations and any intensification of use, enforced in a City-approved CUP that includes verification and compliance provisions.

We request that the following information be included in the EIR as well as a new vesting conditional use permit:

- Hours of Operation
- Number of special events with event, date, time, and attendance limits
- Details on rental of facilities for outside use (events, size of events, time of events)
- Number of athletic teams and number of competitions per team
- Number of athletic tournaments (if any) held each year on campus
- Details of the Transportation Demand Management Program (TDM)
- Compliance and enforcement of the TDM
- Regular Plan Approvals
- Construction Management and Traffic Work Plan
- Traffic Reduction Plan
- Details on valet service and parking reservation system
- Traffic calming measures
- Community communications
- Enforcement on neighborhood traffic restrictions for student vehicles

IV. The EIR Must Comprehensively Address All of The Project's Potentially Significant Environmental Impacts

The Initial Study Checklist identifies 14 (out of the 18) environmental factors that would have a potential significant impact; therefore, the EIR must be detailed in its analysis of these impacts. In addition to the responses to the questions within the Study, we ask that the following concerns be addressed.

Land Use and Planning

MSMU states it is not asking for an increase in the maximum enrollment of 2,244. In fact, the School states they have been consistently under the "cap" and have no intention of increasing enrollment.[8] However, this enrollment cap is not really a cap since it is based on the current number of parking spaces on campus and can be changed at any time. MSMU's enrollment cap is based on a 1984 Approval of the multi-level parking structure that included only eight conditions of approval. Condition 3 states that "the ratio of parking to students shall not be less than ¼ parking spaces for each student enrolled at Mt. St. Mary's College" and Condition 4 states "that not more than 268 automobile parking spaces be constructed on the site." The approval goes on to state on page 3 that enrollment would increase to 1,037 from the current 750 with an additional 188 spaces added. Using the ¼ ratio, the City Planning Staff was using only 259 parking spaces to calculate the maximum enrollment. This calculation does not include any existing surface parking spaces on campus. Yet clearly, there are over 300 on campus. Were they added after this approval? If so, did they not require additional plan approvals? They were clearly not included in the enrollment calculation staff report if they were in existence. These conditions and their intent are confusing and should be clarified and updated.

If the School's current enrollment is 1,561 and they have no plans to increase enrollment, then the EIR should recommend a hard cap at this level. Any increase in enrollment from this level should be

[8] Ibid. A-10

analyzed and impacts on traffic should be mitigated through an effective transportation program that can be verified.

In addition to this issue of the enrollment cap, the EIR should address the following:

- Limits on hours of operation and use to lessen the impacts created by the structure on the surrounding community.
- The impact of increased use from School-related and non-School related activities, especially on traffic.
- Does MSMU foresee any need, desire or have any plan to alter the current enrollment level either to generate increased revenue to finance or otherwise pay for the cost of the project or to make use of the new facility?
- Does MSMU have any forward-looking plan or projection of changes in enrollment over the next five years?

Noise

Noise impacts must be thoroughly analyzed and observed. The significance of noise impacts depends on their environmental setting. The current environment is one of relative quiet. Will noise from activities in the outdoor pool be significant? The construction and use of construction equipment including trucks, vehicles and other heavy machinery will substantially increase the noise levels throughout the construction phase. How will MSMU screen or otherwise buffer neighbors from the noise that will result from the construction? What buffering and landscape screening should surround the proposed Wellness Center to dampen noise from its operations? What materials should be used in the construction of the proposed new facilities to maximize noise dampening?

What restrictions on hours of operation should be placed on the new facilities particularly during weekends to limit the additional noise that will be created by the operation of the new facilities and use of an outdoor pool? What will the noise impact be from 279 cars parking in one structure, partially enclosed?

In order to understand the impact of an increase in the size and number of existing events and additional events, more information should be included about the size and number of the 50 events planned for 2016 (date, time, and # of guests should be included for each event). For large events, transportation information should be provided regarding use of shuttles or valet service.

Transportation/Traffic

The use of construction equipment including trucks, vehicles and other machinery as well as the transportation of workers will substantially increase traffic and parking issues in a heavily congested area. The EIR should include mitigation measures that include a detailed construction traffic plan that utilizes shuttles and staggers arrivals and departures during peak hours in order to minimize adverse traffic effects from construction activities. These mitigation measures must take into account the increase in traffic from the other two projects occurring at the same time—Archer School for Girls and Brentwood School (both east and west campuses).

With the advent of WAZE and other real time navigation apps, many cars use the narrow, non-conforming streets of North Barrington Avenue, Chaparal Street, Benmore Terrace, and Saltair Avenue to avoid congestion on Sunset. All construction related traffic should be prohibited from accessing the

project site from these streets. The EIR should analyze what damage, if any, the heavy construction equipment will cause to Bundy Drive and the other residential streets to access the project site.

In addition to the impact of construction traffic, what effect will operation of the new facilities have on already overburdened streets? What restrictions should be imposed to mitigate and minimize any potential adverse effects on traffic and parking? For traffic and transportation impacts to truly be measured and analyzed completely, the study area should include not only the immediate area around the school, but also major streets south of the School and Sunset Boulevard such as Wilshire Boulevard and San Vicente Boulevard and east of the School at the Sunset/405 intersection. With thousands of students, faculty, staff and guests coming year round from all over Los Angeles, the traffic study area should be broad enough to capture all of the significant impacts on traffic from the project and MSMU's operations.

Aesthetics

The project description states that the Project Site will be located entirely within the Campus. However, the Campus is located in a residential area with single-family homes to the west on Bundy Drive and to the south along Chalon Road. The EIR should provide in detail answers to the following questions:

- What will be done to buffer the construction site from view of neighboring residences?
- What noise buffers and landscape screening will be used to shield the Wellness Pavilion from view (as well as reduce noise) from the surrounding neighbors after construction?
- What is the square footage of the accessory parking deck?
- Will the accessory parking deck be visible to the surrounding residences?
- Will all lighting be shielded from residences?
- Will the building material for the Wellness Pavilion produce glare on nearby residences?

To mitigate the impact from the removal of landscaping and trees that will affect the visual setting on the campus, the Project should propose a landscape plan that will maintain the current scenic vistas and screen the Wellness pavilion from view of neighboring residents.

Air Quality

In addition to a detailed analysis of air quality surrounding the Project Site, the EIR should analyze how air quality will be affected along Sunset Boulevard with three construction projects occurring simultaneously. The EIR should include an analysis of Archer School's and Brentwood School's construction vehicle trips in order to accurately assess the cumulative net increase of pollutants to the residences along Sunset Boulevard from construction vehicles on Sunset Boulevard.

Geology and Soils

The EIR should analyze what can be done to ensure that the removal of dirt and soil will not cause soil shifting that could undermine or weaken the foundations of existing buildings and increase the risks of lateral spreading, subsidence, liquefaction or collapse. In addition, given that the Project Site is located within an area governed by the Baseline Hillside Ordinance, careful analysis should be given to how the displacement of dirt and soil may effect drainage on the School site as well as neighboring properties whether through erosion, removal of top soil or otherwise. In addition, what, if any, effect will the new building have on drainage and runoff?

Hazards and Hazardous Materials

The Project Site is located in an area that is surrounded by open space that is a fire hazard due to the drought. Dry conditions in the surrounding hillsides make it vulnerable to fires. What steps will MSMU take to limit the fire hazard from dangerous tools and flammable substances such as paint and fuels? In addition, the Project will include demolition of buildings with asbestos. How will MSMU protect students and nearby residents from exposure to asbestos or other hazardous materials that might be released during demolition of existing structures?

How will MSMU protect against any spills or leaks of hazardous materials that might be transported from the site during construction including contaminated soil that might be removed during construction?

Hydrology and Water Quality

As part of its analysis regarding possible stormwater pollution sources and drainage, the EIR should analyze whether construction will alter existing water flows or cause water to flow onto neighboring properties in greater volume than current flows. In addition, will the water used during construction result in contamination of groundwater beneath the project site or nearby properties? In addition, while activities of the project have the potential to cause erosion and convey pollutants into municipal storm drains, the EIR should also analyze whether water used during construction can seep into the soil of adjacent properties potentially undermining foundations or otherwise creating the risk of structural weakening.

Finally, we ask that you add our organization to the distribution list for all notices or documents related to this Project. Thank you for your consideration of the foregoing. We look forward to a robust EIR that carefully considers and analyzes not only the "potentially significant impacts" associated with the proposed project but also mitigation measures that will eliminate or at least lessen those effects.

Sincerely,

Thelma Waxman

Thelma Waxman
Chair, Subcommittee on MSMU, Brentwood Community Council

cc: Councilman Mike Bonin, CD11
Tricia Keane, CD11 Director of Land Use & Planning
Ezra Gale, CD11 Deputy Director of Land Use & Planning

BHA

BRENTWOOD HOMEOWNERS ASSOCIATION

PO Box 49427 ✦ Los Angeles, California 90049 ✦ (424) BHA-8765 ✦ info@brentwoodhomeowners.org

September 2, 2016

Kathleen King
Major Projects--Department of City Planning
200 North Spring Street
Room 750
Los Angeles, CA 90012

Via email: Kathleen.king@lacity.org

Re: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
12001 Chalon Road, Los Angeles, CA 90049
Case No. ENV-2016-2319-EIR

Dear Ms. King,

We submit the following comments on the scope of the proposed Environmental Impact Report for Mount Saint Mary's University's Chalon Campus Wellness Pavilion Project ("Project"). The Brentwood Homeowners Association ("BHA"), represents approximately 3,200 single-family homes within the 90049 neighborhood surrounding the Project. We submit the following comments to ensure the City's EIR will properly consider the Project's potential impacts and ways to reduce or avoid those impacts altogether. Our Members live on the streets (Bundy, Norman, Saltair) that are most impacted by vehicles travelling between Sunset Blvd and the Project. Hence, although this letter is similar to the letter from the Brentwood Community Council, it should be read in its entirety because it contains important differences that relate to the concerns of the homeowner association that surrounds the Project.

I. Introduction

Mount Saint Mary's University ("MSMU") is located in a quiet residential neighborhood in Brentwood. Its primary access route, Sunset Boulevard, is shared by seven other schools--Archer School for Girls, Brentwood School East Campus, Brentwood School West Campus, St. Martin of Tours School, Sunshine Preschool, University Synagogue School and Kenter Canyon School. As Councilman Mike Bonin acknowledged, traffic on Sunset Boulevard in Brentwood is one of the worse traffic choke points in the City. While traffic is unbearable now, it will only become worse as Brentwood School, Archer School for Girls, and MSMU commence construction projects within the next two years. Once these projects are completed, close to 400,000 square feet in new construction will be added to an already congested area. If these projects proceed as scheduled, all three projects will occur simultaneously in the years 2017-2020. In addition, each project proposes increased operational use of the new facilities, which means more vehicle trips to an area that suffers from traffic gridlock. That is why BHA is particularly concerned about the potential traffic impacts of MSMU's project, not only due to construction, but also from increased operational use of the new facility.

Our review of the Initial Study and Checklist dated August 4, 2016 reveals a number of concerns and issues that we feel the EIR should address to provide a more complete description of the Project as well as the existing conditions, potential impacts and possible mitigation measures.

Further, the existing CUP for MSMU is out-of-date, confusing, and inadequate. The DEIR needs to study and disclose to the public and the decision makers whether MSMU is or is not in compliance with the existing CUP, and how a new CUP should be drafted that includes, but is not limited to, the Project.

II. Additional Information Should be Included in the EIR in Order to Fully Analyze and Mitigate Impacts

Impacts from Simultaneous Construction Projects Along Sunset Corridor Should Be Analyzed

The following projects have either obtained City approval or are in the process of obtaining approval.

	Years of Construction	Probable Start Date	Square Footage of New Construction
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All three projects propose using Sunset Boulevard for construction related activity. The EIR should include an analysis of the cumulative impacts from these simultaneous projects on Sunset Boulevard, particularly the impacts on air quality, noise and traffic. The EIR should provide specific details as to how the projects will be coordinated to mitigate impacts and protect the residences and businesses that are adjacent to or in close proximity to Sunset Boulevard. The EIR must take into account that Brentwood School has two campuses, and the west campus is on Sunset where MSMU traffic is heaviest. Consideration should be given to delaying the MSMU construction to avoid simultaneous days of hauling on Sunset and other measures that would prevent or minimize the use of Sunset Boulevard on the same day for large construction trucks and equipment. Any traffic study undertaken for the Project must also include traffic from the other projects as well in order to correctly measure the impact. If all construction traffic will use the Sunset/405 intersection, a traffic study must extend to (at least) that intersection.

A Complete Analysis of Current Parking Utilization and Demand Should Be Included

There are currently 561 parking spaces on campus.[1] In addition to the 237 spaces in the structure and the 324 surface spaces on campus, the Study states that there are approximately 107 parking spaces off campus along Chalon Road that are used by students[2]. The Study goes on to describe how the School has attempted to reduce parking impacts in the adjacent single-family neighborhood of BHA through transit subsidies and shuttle improvements that encourage the use of alternative modes of transportation.

[1] Initial Study and Checklist, Figure A-4
[2] Ibid. A-6

However, at a town hall meeting in March of 2015, the School stated that there is plenty of parking on campus for students, so there is no need for students to park off campus in the residential area on Chalon Road. Yet students continue to park off campus along Chalon Road. The School's explanation for this behavior is the fee charged for an on campus parking permit. Rather than encourage on campus parking or other modes of transportation, the parking permit fee has had the opposite effect. Students choose to park for free on Chalon Road rather than pay for parking on campus. In order to more fully evaluate the effectiveness of the current transportation plan as well as parking and transit programs, the following questions should be answered:

- What information does the School have to support its claim that the Project's addition of 53 parking spaces would help take cars off the street?
- Should the parking fee be reduced in order to motivate students to park on campus? What is the utilization rate of the on campus parking?
- Of the 1,561 enrolled students, how many use public transportation to access the campus? How many utilize the inter-campus shuttles offered? How many utilize the shuttles into Santa Monica and Westwood? What else can be done to limit vehicle trips to campus?
- Of the 1,922 students enrolled on the Doheny campus, how many use the Chalon campus for studies or recreation? Do they all come by shuttle?
- Since the Chalon campus is used on a daily basis by the students primarily enrolled at the Doheny campus, the EIR must study the combined impacts and restrictions of both campuses on enrollment, parking, vehicle trips, busing, car pooling, extra-curricular activities, attendance of guests at school events, and necessary limits on all these factors in order to mitigate impacts.

If the School's previous strategies to discourage off campus parking have not worked, alternative measures should be considered. One way to mitigate the impact of over 100 cars parking along Chalon Road near residences would be to require permit parking only for residences along Chalon Road so that violators would be ticketed. This would induce students and guests to park on campus since it would be more cost effective to park on campus rather than get a parking ticket on Chalon.

<u>More Information is Required to Properly Evaluate an Increase in Campus Events for Outside Use</u>
In order to reduce traffic to the Chalon Campus, MSMU has reduced academic programming on campus, moved the Commencement Ceremony off campus and reduced to a bare minimum the number of weddings and wedding receptions allowed to occur on campus.[3] Yet, the School continues to rent its facilities for non-School related events. [4] In 2015 12 "external events" occurred on campus that drew anywhere from 600 to 5,400 attendees.[5] Given its acknowledgement of traffic on the surrounding residential area streets and its past efforts to reduce this impact, why would the School propose increasing outside use[6] with a 60-day Summer Camp (with 450 attendees per day) and 48 Sports Activities (50-450 attendees per event for a maximum of 21,600 guests) intended only for non-university, outside use that would bring more cars to the campus? The School provides no explanation

[3] Ibid. A-9
[4] Ibid. A-10
[5] Ibid.
[6] Ibid. A-31

for a use that clearly impacts the community. The EIR must not assume that any MSMU voluntary mitigation steps will continue unless they are made requirements in a new CUP.

The Wellness Pavilion, according to the project description, is for the benefit of the faculty, staff and students. To open the facility to outside uses burdens the surrounding areas with increased vehicle trips for a use that has nothing to do with the operations of the university. The EIR should provide specific details as to the value of allowing outside use (besides monetary gain) and the impacts of such use on traffic in a heavily congested area. This analysis should not only include the proposed new use but the current practice of renting the facilities for outside use.

III. Approvals Required by EIR Should Include a Conditional Use Permit

Part of the environmental review process is to establish a set of conditions that will mitigate the impacts from the Project. However, for these environmental conditions to truly mitigate the impacts from the Project, they must be combined with vesting conditional use conditions for the School as a whole. Together, these conditions would provide the road map for the City to measure, monitor and enforce the requirements under which the School will operate its current and future facilities. Currently MSMU may be operating without a CUP, as such, because it predates the requirement, although the School's entire situation of approvals and conditions is complex and confusing and needs to be clarified.[7] Because of this the City has granted approval of new buildings to be erected though a Plan Approval for a "deemed-approved conditional use." However, now is the time for the City to require MSMU to follow the same standard that the other educational institutions along Sunset Boulevard follow and operate under-- a Conditional Use Permit. By requiring a CUP in conjunction with the Project, the City will ensure that the Project and School operations are consistent with the zoning of the residential neighborhood in which the School resides and does not unduly alter the character of the neighborhood with current and future operations.

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MSMU operates under only eight conditions that were included in the approval of the parking structure in July of 1984. These conditions provide no information on hours of operation or the size or number of events. In addition, there is no cap on enrollment. Enrollment may increase if parking increases (which is the tail wagging the dog). Clearly these requirements do not reflect the current environment in which MSMU operates and offer no mitigation from effects of the School's operations on the surrounding community. We would like to see programs that mitigate traffic impacts from current operations and any intensification of use, codified in a City-approved CUP that includes additional compliance and enforcement provisions.

[7] Ibid. A-12

We request that the following information be included in the EIR and be included in a new vesting conditional use permit:

- Hours of Operation
- Number of special events with event, date, time, and attendance limits
- Details on rental of facilities for outside use (events, size of events, time of events)
- Number of athletic teams and number of competitions per team
- Number of athletic tournaments held each year on campus
- Details of the Transportation Demand Management Program (TDM)
- Compliance and enforcement of the TDM
- Regular Plan Approvals
- Construction Management and Traffic Work Plan
- Traffic Reduction Plan
- Details on valet service and parking reservation system
- Traffic calming measures
- Community communications
- How the School will enforce restrictions on student vehicles to assure compliance with speed limits, stop signs, and other driving rules that apply to all drivers but are reportedly being violated by the students

IV. The EIR Must Comprehensively Address All of The Project's Potentially Significant Environmental Impacts

The Initial Study Checklist identifies 14 (out of the 18) environmental factors that would have a potential significant impact; therefore, the EIR must be detailed in its analysis of these impacts. In addition to the responses to the questions within the Study, we ask that the following concerns be addressed.

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MSMU states it is not asking for an increase in the maximum enrollment of 2,244. In fact, the School states they have been consistently under the "cap" and have no intention of increasing enrollment.[8] However, this enrollment cap is not really a cap since it appears to be based on the current number of parking spaces on campus and can be changed at any time (which has the equation backwards since the required parking should depend on the permitted enrollment). MSMU's enrollment cap is based on a 1984 Approval of the multi-level parking structure that included only eight conditions of approval. Condition 3 states that "the ratio of parking to students shall not be less than ¼ parking spaces for each student enrolled at Mt. St. Mary's College" and Condition 4 states "that not more than 268 automobile parking spaces be constructed on the site." The approval goes on to state on page 3 that enrollment would increase to 1,037 from the current 750 with an additional 188 spaces added. Using the ¼ ratio, the City Planning Staff was using only 259 parking spaces to calculate the maximum enrollment. This calculation does not include any existing surface parking spaces on campus. Yet clearly, there are over 300 on campus. Were they added after this approval? If so, did they not require additional plan

[8] Ibid. A-10

approvals? They were clearly not included in the enrollment calculation staff report if they were in existence. These conditions and their intent are confusing and should be clarified and updated.

If the School's current enrollment is 1,561 and they have no plans to increase enrollment, then the EIR should recommend a hard cap at this level. Any increase in enrollment from this level should be analyzed and impacts on traffic should be mitigated through an effective transportation program that can be verified.

In addition to this issue of the enrollment cap, the EIR should address the following:

- Limits on hours of operation and use to lessen the impacts created by the structure on the surrounding community.
- What impact will an increase in use from School-related and non-School related activities have on the environment? Especially on traffic.
- Does MSMU foresee any need, desire or have any plan to alter the current enrollment level either to generate increased revenue to finance or otherwise pay for the cost of the project or to make use of the new facility?
- Does MSMU have any forward-looking plan or projection of changes in enrollment over the next five years?

Noise

Noise impacts must be thoroughly analyzed and observed. The significance of noise impacts depends on their environmental setting. The current environment is one of relative quiet. Will noise from activities in the outdoor pool be significant? The construction and use of construction equipment including truck, vehicle and other heavy machinery will substantially increase the noise levels throughout the construction phase. How will MSMU screen or otherwise buffer neighbors from the noise that will result from the construction? What buffering and landscape screening should surround the proposed Wellness Center to dampen noise from its operations? What materials should be used in the construction of the proposed new facilities to maximize noise dampening?

What restrictions on hours of operation should be placed on the new facilities particularly during weekends to limit the additional noise that will be created by the operation of the new facilities and use of an outdoor pool? What will the noise impact be from 279 cars parking in one structure, partially enclosed?

In order to understand the impact of an increase in the size and number of existing events and additional events, more information should be included about the size and number of the 50 events planned for 2016 (date, time, and # of guests should be included for each event). For large events, transportation information should be provided regarding use of shuttles or valet service.

Transportation/Traffic

The use of construction equipment including trucks, vehicles and other machinery as well as the transportation of workers will substantially increase traffic and parking issues in a heavily congested area. The EIR should include mitigation measures that include a detailed construction traffic plan that utilizes shuttles and staggers arrivals and departures during peak hours in order to minimize adverse traffic effects from construction activities. These mitigation measures must take into account the increase in construction

traffic from the other two projects occurring at the same time—Archer School for Girls and Brentwood School (both east and west campuses).

With the advent of WAZE and other real time navigation apps, many cars use the narrow, non-conforming streets of North Barrington Avenue, Chaparal Street, Benmore Terrace, and Saltair Avenue to avoid congestion on Sunset. All construction related traffic should be prohibited from accessing the project site from these streets. The EIR should analyze what damage, if any, the heavy construction equipment will cause to Bundy Drive and the other residential streets to access the project site.

In addition to the impact of construction traffic, what effect will operation of the new facilities have on already overburdened streets? What restrictions should be imposed to mitigate and minimize any potential adverse effects on traffic and parking? For traffic and transportation impacts to truly be measured and analyzed completely, the study area should include not only the immediate area around the school, but also major streets south of the school and Sunset Boulevard such as Wilshire Boulevard and San Vicente Boulevard. With thousands of students, faculty, staff and guests coming year round from all over Los Angeles, the traffic study area should be broad enough to capture all of the significant impacts on traffic from the project and MSMU's operations.

Aesthetics

The project description states that the Project Site will be located entirely within the Campus. However, the Campus is located in a residential area with single-family homes to the west on Bundy Drive and to the south along Chalon Road. The EIR should provide in detail answers to the following questions:

- What will be done to buffer the construction site from view of neighboring residences?
- What noise buffers and landscape screening will be used to shield the Wellness Pavilion from view (as well as reduce noise) from the surrounding neighbors after construction?
- What is the square footage of the accessory parking deck?
- Will the accessory parking deck be visible to the surrounding residences?
- Will all lighting be shielded from nearby residences?

To mitigate the impact from the removal of landscaping and trees that will affect the visual setting on the campus, the Project should propose a landscape plan that will maintain the current scenic vistas and screen the Wellness pavilion from view of neighboring residents.

Air Quality

In addition to a detailed analysis of air quality surrounding the Project Site, the EIR should analyze how air quality will be affected along Sunset Boulevard with three construction projects occurring simultaneously. The EIR should include an analysis of Archer School's and Brentwood School's construction vehicle trips in order to accurately assess the cumulative net increase of pollutants to the residences along Sunset Boulevard from construction vehicles on Sunset Boulevard.
In addition, air quality must be studied, after the construction is complete, from the operations of all these projects and the additional cumulative vehicle trips.

Geology and Soils

The EIR should analyze what can be done to ensure that the removal of dirt and soil will not cause soil shifting that could undermine or weaken the foundations of existing buildings and increase the risks of

lateral spreading, subsidence, liquefaction or collapse. In addition, given that the Project Site is located within an area governed by the Baseline Hillside Ordinance, careful analysis should be given to how the displacement of dirt and soil may effect drainage on the School site as well as neighboring properties whether through erosion, removal of top soil or otherwise. In addition, what, if any, effect will the new building have on drainage and runoff?

Hazards and Hazardous Materials

The Project Site is located in an area that is surrounded by open space that is a fire hazard due to the drought. Dry conditions in the surrounding hillsides make it vulnerable to fires. What steps will MSMU take to limit the fire hazard from dangerous tools and flammable substances such as paint and fuels? In addition, the Project will include demolition of buildings with asbestos. How will MSMU protect students and nearby residents from exposure to asbestos or other hazardous materials that might be released during demolition of existing structures?

How will MSMU protect against any spills or leaks of hazardous materials that might be transported from the site during construction including contaminated soil that might be removed during construction?

Hydrology and Water Quality

As part of its analysis regarding possible stormwater pollution sources and drainage, the EIR should analyze whether construction will alter existing water flows or cause water to flow onto neighboring properties in greater volume than current flows. In addition, will the water used during construction result in contamination of groundwater beneath the project site or nearby properties? In addition, while activities of the project have the potential to cause erosion and convey pollutants into municipal storm drains, the EIR should also analyze whether water used during construction can seep into the soil of adjacent properties potentially undermining foundations or otherwise creating the risk of structural weakening.

Thank you for your consideration of the foregoing. We look forward to an EIR that carefully considers and analyzes not only the "potentially significant impacts" associated with the proposed project but also mitigation measures that will eliminate or at least lessen those effects.

Please add our organization to the list for all notices regarding the Project.

Sincerely,

Raymond Klein
President

Cc: Councilmember Mike Bonin, CD11
Tricia Keane, CD11 Director of Land Use & Planning
Ezra Gale, CD11 Deputy Director of Land Use & Planning

September 1, 2016

Via email: Kathleen.king@lacity.org

Kathleen King
Major Projects--Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Re: Mount Saint Mary's University Chalon Campus Wellness Pavilion Project
12001 Chalon Road, Los Angeles, CA 90049
Case No. ENV-2016-2319-EIR

Dear Kathleen King,

Thank you for the opportunity to comment on the proposed Environmental Impact Report for Mount Saint Mary's University's Chalon Campus Wellness Pavilion Project. On behalf of Brentwood Hills Homeowners Association (BHHA), representing approximately 500 homeowners in Mandeville Canyon, we submit the following comments to ensure the City's EIR will properly consider this project's potential impacts, as well as include ways to reduce or avoid these impacts altogether.

Parking: The last CUP approved by the City for MSMU authorizes parking of 244/268 spaces. It's actually confusing because on page 2 of the 1984 CUP, it states 268 spaces, but on all other pages in the CUP Amendment, it references 244 parking spaces. Which number is correct? In addition, the current scoping document (p 24) says that MSMU currently has a total of 561 spaces at the Chalon campus … now how did that happen?!

- It appears that MSMU is already operating outside of their approved Conditional Use Permit.
- The public picture boards at their Scoping Meeting were also misleading, as they only stated that MSM will remove 226 space and provide 279 spaces in its place.

- We request MSMU have accurate, consistent and fully transparent communication with any and all of the organizations in the Brentwood Community throughout the EIR process.

Enrollment: The Jan 1984 CUP approved by the City explicitly authorizes enrollment at the Chalon campus for 750. The last CUP Amendment (July 1984) grants MSMU 268 parking spaces (x 4) for an implicit enrollment of 1072. MSMU's Nov 2, 2015 letter to Chalon neighbors admits to "Enrollment at the Chalon Campus is under 1600" and their current scoping document says MSMU is currently authorized for 2,244 students … how did that happen!?

- It appears that MSMU is already operating outside of their approved Conditional Use Permit.
- The public picture boards at their Scoping Meeting were also misleading, as they only noted that they plan to remove 226 space and provide 279 spaces in its place, which implies a net impact to enrollment of 53x4 = +212. Since MSMU has admitted that they're already operating at close to 1600, but now claiming that they're authorized to operate at 2244, then theoretically, MSMU can increase enrollment by 644 (3x what their Scoping Boards say). But if we look at what MSMU is actually approved for, the increase in enrollment is actually 209% (1072 to 2244)
- We request MSMU have accurate, consistent and fully transparent communication with any and all of the organizations in the Brentwood Community throughout the EIR process.

Intersections to be Studied: As tax paying home owners west of MSMU, it is our experience that the impact to the community will be far greater than the 9 intersections they plan to study, so we request more intersections west of MSMU be studied.

- Please include Mandeville Canyon and 26th Street / Allenford, at both Sunset and San Vicente (a total of 4 additional intersections) in the intersections to be studied.

Impact to Trip Time: As tax paying homeowners in the community, we are most concerned about the increase in trip time, loss of our productivity, the cost to us personally and the companies we work for (hence revenue to the city and state). The number of cars that can theoretically clear a green light, or the rating of an intersection, have no meaning to us. The technology exists today to compute the impact to trip time. Let's use that!

- We would like to see the impact to overall trip time, based upon the real

increase in enrollment and traffic, specified during peak hours (7-9am and 3-7pm, Monday - Friday) for Construction periods as well as ongoing Operational periods, from all major intersections studied east to the 405.

Compounding effects of Concurrent Construction: We know that the City discounts the impact that construction has on residents, but we are extremely concerned about the compounded effect of many concurrent projects along Sunset Blvd (Archer School for Girls, Brentwood School East and West Campus projects, Rick Carruso's Pacific Palisades Project, etc.).

- We request a detailed construction schedule, showing the types and counts of construction vehicles that will be coming/going to/from the campus, by month, by day, by hour and by type of construction vehicle, for the full duration of the project.

Deviation to BHO: Regarding your requested deviation to the BHO - Any approved deviation for MSM on height, sets a dangerous precedent for similarly zoned properties in the area. Our community has a lovely, local feel to it and we do not want to open the doors for hi-rise buildings on Sunset, San Vicente or side streets similarly zoned.

Aesthetics / Wildlife / Recreational Trails: The Canyonback / Bundy Trails, part of the Westridge-Canyonback Trail loop, are cherished by our community and we want to ensure this development will have no impact on the view from the trails we fought so hard to save. We are concerned with the height of the building and the white color on the roofs.

Finally, we ask that you add our organization to the distribution list for all notices or documents related to this Project. Thank you for your consideration of the above. We look forward to a robust Draft EIR that carefully considers and analyzes not only the "potentially significant impacts" associated with the proposed project but also provides mitigation measures that will eliminate or at least lessen those effects to less than significant.

Debra Hockemeyer

VP & Treasurer
Brentwood Hills Homeowners Association

Sunset Coalition

www.sunsetcoalition.org

September 2, 2016

Kathleen King
Major Project- Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Env-2016-2319-EIR
Email: Kathleen.king@lacity.org

RE: Notice of Preparation Comments Re Mount St. Mary's University ENV-2016-2319-EIR

Dear Ms. King,

Thank you for the opportunity to comment on the scope of the proposed Draft Environmental Impact Report (DEIR) for Mount St. Mary's University's (MSMU) expansion project in the Brentwood-Pacific Palisades area of the City of Los Angeles in Los Angeles County. These comments are submitted on behalf of Sunset Coalition, a group of concerned neighbors and organizations from Brentwood to the Palisades dedicated to reducing traffic and environmental impacts on Sunset Blvd and surrounding neighborhoods.

Sunset Coalition represents Residential Neighbors of Archer, Bundy Canyon Association, Brentwood Hills Homeowners Association, Mandeville Canyon Association, Bel Air Skycrest Property Owners' Association, Brentwood Residents Coalition and many other residents in the 90049 zip code, including residents living in the vicinity of Mount St. Mary's University, who will be most affected by the proposed expansion project.

Introduction and Summary

Mount St. Mary's University Chalon campus is located in a residential neighborhood in the Santa Monica Mountains, at 12001 Chalon Road, Los Angeles. The Notice of Preparation (NOP) incorrectly states that the campus is located approximately one mile north of Sunset Boulevard. In reality, in order to get to the Chalon campus, one must travel more than two miles from

Sunset Boulevard to the entrance of the campus on very narrow, steep and winding residential streets with limited visibility and virtually no sidewalks.

However, the even more challenging part of the vehicle routes to and from MSMU is the heavily congested one mile stretch of Sunset Boulevard between Bundy Ave and the I-405. One of the intersections along that stretch, at Barrington Ave and Sunset Boulevard is in fact so gridlocked on a daily basis that Councilmember Bonin called it "one of the worse choke points in the city".

MSMU proposes to build a 38,000 SQ FT Wellness Pavilion, a new outdoor pool and a "parking deck" with 279 parking spaces. Notice of Preparation also states that the project does not include a request to change the permitted student enrollment of 2,244. However, this is incorrect and is in violation of the July 1984 CUP, where upon building of a new parking structure Mount St. Mary's University was allowed to have 1,072 students. Currently, according to a letter from Nov 2, 2015, issued by the University's president, there are under 1,600 students at the Chalon campus.

Over the years, Mount St. Mary's University has exhibited tremendous intensification of use, some of it without disclosure and permitting. In addition, the University has practiced and continues to have a blatant disregard for the concerns and safety of its residential neighbors, regardless of the many complaints that have been submitted to the City. The neighborhood has had to endure years of worsening traffic, speeding student and delivery vehicles, noise and light pollution.

It is important to mention that two other schools in the vicinity, Brentwood School and Archer School, are also planning on starting massive expansion projects (at three campuses) at about the same time and the cumulative impacts of these will have a tsunami effect on this residential neighborhood. Everyone living in Brentwood or commuting on Sunset Blvd is essentially looking at several years of multiple and concurrent, massive construction projects with many severe and negative impacts imposed on this area.

This is why Sunset Coalition believes that MSMU Draft Environmental Impact Report must consider all cumulative and long-term impacts of the proposed expansion project, as is required by CEQA. After review of the Initial Study for Mount St. Mary's University's proposed project, we discovered many issues and concerns that need to be addressed in the DEIR. The Initial Study acknowledges *Potentially Significant Impacts* in many areas and the proposed Draft Environmental Impact Report must be comprehensive, detailed and thorough in order to comply with CEQA.

We are especially concerned with the overlapping timing of the MSMU proposed expansion with other projects in the area, construction traffic and noise impacts and post construction operational use impacts, especially increases in enrollment and events. In addition, the Initial Study lists *Potential Significant Impacts* in the following areas: Aesthetics, Air Quality, Biological

Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Noise Levels, Transportation and Circulation, Utilities and Services Systems and many others. The DEIR must analyze each category identified by Mount St. Mary's University as having *Potential Negative Impact.*

Background as to Traffic Issues and Impacts

Mount St. Mary's University is located in a complex and congested location, with its only access to and from being the most gridlocked portions of Sunset Boulevard. There are several other educational institutions in the area, which also contribute to the existing traffic and noise and air pollution. The University's current operations create many negative impacts forced upon the residential neighborhood and the proposed expansion would only make the situation worse.

MSMU's contribution to traffic impacts on the residential roads between Sunset and the Chalon campus was problematic in 1984, more so in 1996, and is currently severe. Student and staff vehicles, MSMU buses, delivery and service vehicles, etc. constitute a substantial portion of all weekday and weekend traffic flows on those narrow, winding roads.

Traffic on Sunset Boulevard between the I-405 Freeway and as far west of Bristol Avenue is currently very heavily congested on weekdays, particularly when the seven adjacent schools and MSMU are in session, both eastbound and westbound from early in the morning until midday, and eastbound from about 3:00 pm until about 8:00 pm in the evening. As just one example, when the queues of waiting vehicles behind the traffic signals at Barrington Avenue and to the west are full, trip time for the one mile from N. Kenter Avenue to Barrington is approximately 60 minutes. This concern has been echoed by Councilmember Bonin during the Feb 6, 2016 Traffic Charette when he said "It can take folks an hour to drive a mile and that's not an exaggeration, It's really, really bad."

The MSMU construction vehicle traffic will have significant impacts on traffic flows on Sunset Boulevard westbound from the I-405 Freeway (and backed up east of the I-405) to Cliffwood Avenue and beyond, on weekday mornings from whatever time its vehicles begin to arrive, until whatever time the last MSMU construction vehicles leave the I-405. These vehicles will increase trip time on Sunset of residents of Brentwood and Pacific Palisades, as well as hundreds of people who commute from the San Fernando Valley to jobs in Pacific Palisades and Santa Monica using Sunset.

Similarly, the MSMU construction vehicle traffic will have significant impacts on eastbound traffic flows on Sunset Boulevard from Santa Monica and Pacific Palisades to the I-405 Freeway on weekdays from whatever time its vehicles begin to leave the MSMU Chalon worksite until whatever time the last MSMU construction vehicles leave the worksite. The largest increases in

trip time will be for drivers who need to pass through the most signaled intersections, namely residents and commuters from Pacific Palisades, and commuters from Santa Monica.

Meaningful Metrics and New Traffic Analysis Technology

Westside residents are frankly not very interested in Level of Service (LOS) or street segment bi-directional 24-hour traffic flows. Those studies, although outdated, should be included in the MSMU DEIR, however, so that independent traffic experts can review them, and herein below we will specify additional road segments and intersections that are likely to be impacted by the combined construction traffic of the three school projects mentioned above and should therefore be included in studies in the MSMU DEIR.

What residents, commuters and all others who use the painfully congested Sunset Boulevard both during the morning commute and the afternoon and evening commute care about is trip time, and particularly the projected increases in trip time during each hour of a typical weekday when the schools on the Sunset Boulevard corridor are in operation that will be caused by construction vehicle traffic from MSMU and the other overlapping projects mentioned herein.

We are extremely concerned that the combined construction traffic (which in the case of Archer is projected to be compressed into the hours between 7:00 AM and 3:00 PM) will cause an increase on the order of 50% of trip time during non-peak hours, and some possible increase during peak hours unless Brentwood School and MSMU are required to cease construction traffic movement by 3:00 PM each weekday during the school year.

New technology allows relatively inexpensive benchmarking of trip time (on Sunset Boulevard, for example) during each hour of the day, by using satellite technology that accesses cellular phones. Such trip time information, for example, can be obtained inexpensively from Google.

Similarly, the concerns of Westside residents, commuters and others who use Sunset are not limited to a single “peak hour”, but how long it takes to get from place to place every hour of the day when Sunset is congested. As to MSMU’s construction project, and increased intensity of use, it is important to inform the residents and the city’s decision makers about the projected increase in trip time for each hour when an increase is likely.

Here is an example of how trip time impacts are far more meaningful than LOS or “peak hour” studies: Anytime when the queues behind the signaled intersections on Sunset from N. Kenter Avenue to Barrington Avenue are rated F (Failed) on the LOS system, the trip time to drive that distance is the same. But is that the “peak hour”? Not if one is driving from the Pacific Palisades eastbound to the I-405 Freeway or other points to the east.

The key is how many intersections west of Barrington are Failed. The more Failed intersections, the longer that person’s trip time will be. Every five minutes they wait in queues even west of N. Kenter, more vehicles are entering the forward queues from the side streets still ahead.

Modeling of increases in trip times: Once baseline trip time data is collected for the periods mentioned below, computer modeling should be done to estimate the increases in trip times that will be caused by the MSMU construction vehicles, and cumulative with those from overlapping projects, based on the projected flows of various construction vehicles (see the attached sample pages from Archer Appendix C-1 and Appendix C-2), to estimate the frequency of passage of construction vehicles at each signaled intersection on Sunset, and taking into account the use of flagmen at the Archer driveway entrances, particularly for departing vehicles which will need to frequently interrupt three lanes of Sunset traffic to turn eastbound toward the I-405 Freeway.

Updated Baseline Traffic Studies

It is essential that current baseline traffic studies be included as to (1) all intersections and segments of Sunset Boulevard that will or may be impacted by MSMU construction traffic, and (2) all road segments between Sunset and MSMU's Chalon Campus.

Westbound traffic on Sunset: Updated manual traffic count studies should be made during a school day at all signaled intersections on Sunset Boulevard from Veteran Avenue (east of the I-405 Freeway) to at least Cliffwood Avenue, for each weekday hour from 7:00 am to 3:00 pm, when it is expected that Archer's construction traffic will end. In addition, the construction vehicle schedule for Brentwood School and Caruso Project should be included in this analysis.

Eastbound traffic on Sunset: Updated manual traffic count studies should be made during a school day at all signaled intersections on Sunset Boulevard from Allenford Avenue to the first signaled intersection east of the I-405 Freeway, for each weekday hour from 7:00 am to 8:00 pm, which is when eastbound congestion typically eases.

Residential streets between MSMU Chalon campus and Sunset Blvd.: MSMU should survey the residents of the Bundy Canyon area north of Sunset, to determine their experiences of times of day when those residents observe traffic problems on their streets, and should collect meaningful baseline traffic data for the periods and directions of heaviest traffic, based on those surveys. "24-hour bi-directional traffic flows" are not the relevant metric.

Construction vehicle traffic:

The MSMU construction phase is proposed to begin in "late fall" of 2017, and its construction would completely overlap with the massive construction project at the Archer School for Girls (currently projected to begin in May 2017), and phases of an expansion project at the Brentwood School (East and West Campus) and Caruso Project in Pacific Palisades.

All projects will use Sunset Boulevard for all construction vehicles arriving and leaving their respective construction sites, to and from the I-405 Freeway to the east. Archer's plan calls for

all construction vehicles to enter and leave the Archer worksite via Archer's two un-signaled driveways that open directly onto Sunset Boulevard, and permits unlimited use of flagmen to halt traffic in one or both directions as needed to facilitate entry and exit of the construction vehicles to and from Sunset.

In its DEIR, Archer included detailed schedules, by week, of the expected onsite construction activities (and the numbers and types of onsite construction equipment) and construction vehicles, by type. Particularly because of the overlap in construction activities, it is essential that the MSMU DEIR include a detailed schedule of construction activities and onsite equipment, by week, similar to Archer Appendix C-1, and construction vehicles, by type, by week, similar to Archer Appendix C-2.

In addition, in order that the cumulative impact of the construction traffic from the MSMU project can be determined, it is essential that the MSMU DEIR include an updated schedule of the Archer construction vehicle traffic (Archer is now planning to work concurrently on several portions of its project) and a combined schedule to reflect the total number of projected construction vehicles by week and by type.

MSMU should make reasonable inquiry of Archer School and its construction firm, Matt Construction, to obtain the needed information, and should make similar inquiry of Brentwood School and its contractor, as well as Caruso Project and its contractor, as to its projected construction vehicle trips, by week and by type, for the period that MSMU projects it will be involved in construction, and for any reasonably possible extension into a subsequent period.

Mitigation of Traffic Impacts

At a Traffic Charrette organized by Councilmember Mike Bonin on Feb 6, 2016, a number of traffic experts were brought together to discuss the problems of severe congestion Sunset Boulevard and to consider innovative and modern ways to improve the situation. Councilmember Bonin reported that he has retained two of those experts to work with him to mitigate traffic congestion on Sunset. Although no report has been provided from those two experts, MSMU should consult with all experts currently familiar with traffic on Sunset to enumerate and analyze.

We concur in and adopt the requests for detailed analysis of baseline and projected traffic flows on all local street segments between Sunset and MSMU's Chalon campus, modeling increases in trip time, slower emergency response, accidents and other impacts.

Operational Traffic Impacts – Increase in Enrollment and Events

We are very concerned that MSMU is operating its Chalon campus with an enrollment far beyond that permitted by its most recent Conditional Use Permit. Its current and projected enrollment and intensity of use are of great concern not only to residents on the narrow

winding residential streets that lead for two miles from Sunset to MSMU and constitute the only routes of egress and ingress to MSMU, but also on Sunset Boulevard, with impacts on the 55,000 residents of Pacific Palisades and Brentwood. The DEIR must address the enrollment issues and how the University is planning on being in compliance with their existing CUPs.

As mentioned before, the Notice of Preparation for MSMU proposed expansion nonchalantly mentions that "The Project does not include a request to change the permitted student enrollment limitations…may never be used to increase the enrollment cap of 2,244 students." Neither the NOP nor the Initial Study offer the grounds for this fictitious enrollment number. Mount St. Mary's University is supposed to operate under the conditions outlined in the July 1984 CUP when a parking structure for 268 parking spaces was approved by the City. The condition for calculating enrollment cap was based on using a ratio of 4 students to one parking space, which resulted in an enrollment cap of 1,072 students.

In 1984 MSMU had enrollment of about 750 students and the traffic conditions at that time were already severe. The Initial Study Traffic Analysis (attached to this letter) for the July 1984 CUP states that the "impact of traffic generation" was "not significant, **provided that no enrollment increase is allowed**." In August 1995, James Crisp, a MSMU residential neighbor, raised the MSMU enrollment issues and other violations by filing a complaint with the City and requesting a revocation of use permits (attached). The MSMU president replied in a Nov 7, 1995 letter (attached) stating that the Chalon campus had 1,025 students and therefore wasn't in violation of the existing conditions.

It is worth noting that the MSMU president also admitted that the University was violating use permits by allowing rental of the onsite Chapel for weddings. While the request for revocation of use permits was denied at that time, Bob Rogers, Principal City Planner, in his Jan 1995 letter (attached) to Councilmember Braude, states that "Should additional evidence be submitted regarding uses not permitted by the conditional use grants or **excessive traffic**, this office will give further consideration to initiation of revocation proceedings."

Given this background, it is clear that the increased enrollment at MSMU is not only a violation of existing conditions, but also has a direct and negative impact on local traffic, noise and air pollution and safety. The MSMU Draft Environmental Report must address the enrollment issues and the plan for complying with existing use grants.

Pursuant to Public Resources Code section 21092.2, we request notification of future hearings and notices about this project.

Thank you for your consideration of our comments.

Sincerely,

David Wright

David Wright
Co-chair, Sunset Coalition
info@sunsetcoalition.org

cc: Councilman Mike Bonin, CD11
Director of Land Use & Planning, Tricia Keane, CD11

Attachments:

1. Archer School Construction Activity Schedule
2. Archer School Round Trips per Vehicle Classification
3. Initial Traffic Analysis July 1984 CUP
4. Aug 29, 1995 Letter from James Crisp to Councilmember Braude
5. Nov 7, 1995 Letter from MSMU President to City Planner, Bob Rogers
6. Jan 25, 1996 Letter from City Planner, Bob Rogers to Councilmember Braude

Appendix C-1

Construction Activity Schedule

Revised: September 18, 2013

The Archer School for Girls
Archer Forward: Campus Preservation and Improvement Plan
Construction Activity Schedule

North Wing Renovation and Phase 1: Site Preparation and Excavation and Haul
Month 1 through Month 16

Month	North Wing Renovation Month 1 through Month 16						Phase 1: Site Preparation and Excavation and Haul Month 11 through Month 16					
	Work	Primary Activities	Workers Onsite	Parking Location	Large Deliveries and Exports	Large Equipment On Site	Work	Primary Activities	Workers Onsite	Parking Location	Large Deliveries and Exports	Large Equipment On Site
1	Clearing and Grading	Village Demo	15	Onsite	Trash Removal, Grading/Service Equipment	1 Loader, 3 Trucks, 1 Track Loader, 2 Back Hoe Trenchers						
2	Demo Electrical	Clearing & Grading – Village Demo, Utilities	15	Onsite	Demo Trash, Grading/Service Equipment	2 Loaders, 6 Trucks, 1 Track Loader, 2 Back Hoe Trenchers						
3	Demo Electrical Village Site Improvements	Demo Utilities Grading Village	20	Onsite	Grading & Service Equipment, Form Lumber, Concrete Ready-Mix and Demo Trash	2 Loaders, 10 Trucks, 1 Track Loader, 1 Excavator, 1 Concrete Pump, 1 Back Hoe Trencher						
4	Demo Caissons Electrical Village Site Improvements	Demo Pour Caissons Utilities in Village	20	Onsite	Concrete, Excavation Equipment, Drill Rig & Svcs. Truck, Concrete Ready-Mix and Modulars	1 Loader, 3 Trucks, 2 Excavators, 1 Stinger, 1 Back Hoe Trencher, 1 Drill Rig, 1 Concrete Pump, 6 Modulars						
5	Foundations	Concrete/Block, Retaining Walls and Bldg. Foundations	25	Offsite	Concrete Block, Ready-Mix, Rebar, Structural Steel and Aggregate	3 Trucks, 1 Stinger, 1 Concrete Pump, 1 Erection Crane, 1 Loader & Personnel Lift, 1 Back Hoe Trencher						
6	Bldg. Structure	Erect Structure	20	Offsite	Structural Steel, Lumber and Service Truck	2 Trucks, 1 Fork Lift, 1 Erection Crane, 3 Welding Trucks, 3 Personnel Lifts						
7	Bldg. Structure	Erect Structure	25	Offsite	Structural Steel, Lumber, Equipment Deck, Service Truck and Rental Equipment	2 Trucks, 1 Fork Lift, 1 Erection Crane, 4 Welding Trucks, 4 Personnel Lifts						
8	Bldg. Structure	Erect Structure	25	Offsite	Structural Steel, Lumber, Equipment Deck and Service Truck and Rental Equipment	4 Trucks, 1 Fork Lift, 1 Erection Crane, 4 Welding Trucks, 4 Personnel Lifts						
9	Bldg. Mechanical Bldg. Structural	Erect Structure Mechanical/ Electrical/ Plumbing	25	Offsite	MEP Supplies, Equipment Delivery & Elevator Equipment	3 Trucks, 1 Fork Lift, 2 Personnel Lifts, 1 Crane						

Source:
PAUL W. SPEER, INC.
7141 Valjean Avenue, Suite 102, Van Nuys, California 91406
818.781.4910

Appendix C-2

Round Trips per Vehicle Classification

Revised: September 19, 2013

The Archer School for Girls
Archer Forward: Campus Preservation and Improvement Plan
Round Trips per Vehicle Classification[i] (RTVC)

North Wing Renovation											
Month	Week	Daily Round Trips by Vehicle Classification									Total Daily Round Trips
		I	II	III	IV	V	VI	VII	VIII	IX	
1	1	2	2	1	0	0	0	0	0	0	**5**
	2	2	2	1	0	0	0	0	0	0	**5**
	3	4	4	3	2	7	2	0	0	1	**23**
	4	4	4	5	2	5	2	0	0	1	**23**
2	5	4	4	5	2	5	2	3	0	1	**26**
	6	4	4	6	2	5	2	1	0	1	**25**
	7	4	4	8	1	10	27	0	0	2	**56**
	8	5	4	4	1	10	27	0	0	2	**53**
	9	5	4	4	7	10	36	0	0	0	**66**
3	10	6	3	8	6	10	18	0	0	1	**52**
	11	4	4	8	2	5	2	0	0	1	**26**
	12	4	4	8	2	5	2	0	0	1	**26**
	13	4	2	10	2	3	2	0	0	1	**24**
4	14	4	4	12	2	5	2	0	0	1	**30**
	15	4	5	12	2	2	2	0	0	1	**28**
	16	4	4	14	6	2	3	10	2	3	**48**
	17	4	4	12	8	3	3	10	2	3	**49**
5	18	4	3	12	4	1	3	10	0	1	**38**
	19	4	6	11	3	3	3	10	0	1	**41**
	20	4	4	25	3	3	3	1	2	1	**46**
	21	2	2	35	2	0	1	0	2	1	**45**
	22	4	3	24	2	1	0	10	0	1	**45**
6	23	4	3	30	4	3	1	0	0	4	**49**
	24	4	4	36	3	3	1	0	0	2	**53**
	25	4	2	24	3	4	1	0	0	2	**40**
	26	4	3	37	3	3	1	0	0	2	**53**
7	27	4	2	29	3	2	2	0	0	2	**44**
	28	4	3	33	2	1	1	0	0	2	**46**
	29	4	4	36	1	1	1	0	0	2	**49**
	30	2	1	31	1	1	0	0	0	2	**38**
8	31	4	2	28	2	2	1	0	0	2	**41**
	32	4	2	25	3	1	1	0	0	2	**38**
	33	4	2	30	3	2	2	0	0	2	**45**
	34	1	1	16	1	1	0	0	0	2	**22**

Source:
PAUL W. SPEER, INC.
7141 Valjean Avenue, Suite 102, Van Nuys, California 91406
818.781.4910

INITIAL STUDY
TRAFFIC ANALYSIS

EIR CASE NO.: 113-84-CU2 TRANSMITTAL DATE: 3-28-84

PROJECT DESCRIPTION: Cond. Use for a 4 story, 80,000 sq. ft. parking structure for 244 cars located on the Mt. St. Mary's College property on 45.5 net acres, zoned RE40-1-H.

PROJECT LOCATION: 12001 - Chalon Rd.

EXISTING ZONES: RE40-1-H PLANNED ZONES: RE40-1-H

PROJECTED GENERATED TRIPS: —

Bundy Dr. (Street) ADT 290 TPH 33

(Street) ADT TPH

CRITICAL INTERSECTIONS:

& &

	AM	PM		AM	PM
NB					
SB					
EB					
WB					

COMMENTS: * Provided that no enrollment increase is allowed.

IMPACT OF TRAFFIC GENERATION:

NOT SIGNIFICANT	MAY BE SIGNIFICANT	MAY BE CUMULATIVE	TRAFFIC STUDY NEEDED
X *			

Prepared by: [signature] Date: 4/4/84

CP-1206 (3/79)

JAMES J. CRISP, M.S
3692 LOWRY ROAD, LOS ANGELES, CA 90027-1436
(213) 661-3312 FA (213) 667-2930

August 29, 1995

Honorable Marvin Braude
Councilman, Eleventh District
Room 275, Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012-4801

RE: Revocation - Conditional Use Authority - Case No. CPC 4072 - Mount St. Mary's College

RE: Conditional Use Authority - Carondelet Center - Skilled Nursing Facility (Hospital) in the RE40-1-H Zone

On behalf of the Brentwood Homeowners Association, hereafter referred to as "BHA", and the Bundy/Norman Place Committee, hereafter referred to as "BNPC", I hereby request that formal revocation action be initiated in accordance with the provisions of Section 12.24-J of the Los Angeles Municipal Code to revoke the current conditional use authority for Mount Saint Mary's College on the basis that it has been operated and maintained in such a manner that it:

(a) Adversely affects the health, peace and safety of persons residing and working in the surrounding area;

(b) Jeopardizes or endangers the public health and safety of persons residing and working in the surrounding area:

(c) Constitutes a public nuisance;

(d) Results in repeated nuisance activities including but not limited to disturbances of the peace, loitering, littering, illegal parking, excessive loud noise and traffic violations; and,

(e) Violates provisions of Article 2 of Chapter 1 of the Los Angeles Municipal Code and other city, state or federal regulations, ordinances or statutes.

I further request on behalf of the aforementioned community groups that the operation of the Carondelet Center as a skilled nursing facility (i.e., hospital) on a RE40-1-H zoned site be suspended unless and until a "Reduction in Site" has been issued and, conditional use authority approved for this purpose, all in accordance with the provisions of Section 12.24 of the Los Angeles Municipal Code.

Evidence to sustain the subject revocation request and need for conditional use authority for the Carondelet Center is offered as follows:

Background - Mount Saint Mary's College

On December 5, 1928, the City Council denied a report and recommendation from the Planning Commission under Case No. 3066 recommending that a 33 1/3 acre site be classified in the "B" zone thereby permitting the establishment of Mount Saint Mary's College by right. In lieu hereof, said City Council adopted a report from their City Planning Committee partially stating that "...in view of the special circumstances that attach to the property, and in order to protect the adjoining property to the fullest extent, that the action of said Board (i.e., Board of City Planning Commissioner's) in recommending that the property be placed in the "B" zone be not concurred in and that the City Attorney be instructed to prepare an ordinance under the terms of Section 4 of the Zoning Ordinance, allowing the establishment of said college on the property therein described..." subject to the following condition:

> "...that the plans for the buildings and the location of same be approved by this Council prior to the issuance of building permits..."

On January 3, 1929 the City Council approved Ordinance No. 62642 granting an exception (i.e., variance) from the provisions of Ordinance No 42,666 that became effective on October 19,1921 which classified the City of Los Angeles into five zones ("A", "B", "C", "D", and "E"), with the subject property placed in the "A" zone by the adoption of Ordinance No. 58283 which became effective on September 2, 1927. It is important to note that the "A" Zone only permitted single family dwellings by right.

In concert with the adoption of the Comprehensive Zoning Plan for the City of Los Angeles on June 1, 1946 under Ordinance No. 90,500, said property was classified in the R1 One Family Zone being subsequently changed to the RE40-1-H Zone. Further, Ordinance No. 90,500 placed "Educational Institutions" under the authority of the Planning Commission as a Conditional Use (i.e., see Section 12.24); and, provided that "...any of the uses enumerated in this Section (i.e., Section 12.24) which are legally existing at the time it became effective, shall be deemed to have been approved by the Commission and nothing in this Section shall be construed to prevent the enlargement of existing buildings for such uses if all other regulations of this article are complied with, including the conditions of any special district ordinance, exception or variance heretofore granted authorizing said use."

It is noted that in zoning language this provision granted "deemed-to-be approved" status to legally created land uses which subsequently came under Conditional Use authority at a later date, with this privilege continuing to the present day under current provisions of the Los Angeles Municipal Code (i.e., see Section 12.24-F on Page 369).

On March 7, 1950, Ordinance No. 96,222 was approved by the City Council substantially amending the Comprehensive Zoning Ordinance by permitting expansions and enlargements of existing conditional use sites by plan approval. These provisions remain in effect to the present time (i.e., see Section 12.24-F of the Los Angeles Municipal Code). Said ordinance also permitted hospitals or "special care facilities" by right in the R5 Zone and split conditional use authority for "Hospitals or Sanitariums" between the Planning Commission (over 100 beds) and Office of Zoning Administration (under 100 beds if located in the R1, R2, R3, R4, or C1 Zones).

On May 23, 1952, plans were approved for a 17 acre addition to the existing school site for future expansion and the construction of athletic facilities with City Plan Case No. 4072 issued for this purpose. Of particular importance is Condition No. 3 which partially states that:

> 3. *This grant shall only apply to school use involving educational subjects which are in conformance with the State Educational Code, religious services, or religious educational activities.*

Between this date and 1960 plans for said athletic facilities were approved, a Tract Map was recorded, and plans were approved for an addition to the chapel.

Ordinance No. 117,450, which became effective on December 18, 1960, removed any conditional use authority for hospitals from the jurisdiction of the Planning Commission with the Zoning Administrator retaining conditional use authority for hospitals or "special care facilities" with no limitation on number of beds. This authority is maintained to the present time under the provisions of Section 12.24C-49 of the Los Angeles Municipal Code.

Ordinance No. 128,417 became effective on October 26, 1964 requiring a "reduction of site" if any portion of a conditional use site is "...severed therefrom or utilized for other purposes...". This provision is still in effect at the present time.

Finally, on January 26, 1984, the Planning Commission approved plans for a faculty residence hall with a maximum of three dwelling units or 33 bedrooms, the relocation of 39 existing parking spaces and the construction of a 11 space parking garage with enrollment limited to 750 students; and, on July 12, 1984, plans were approved for a multi-level parking garage for 244 automobiles requiring 1/4 parking space for each student with on-site parking limited to 268 automobile parking spaces. This provision, in effect, limited enrollment to a maximum of 1072 students.

No further actions of record have been undertaken to the present time.

Background - Carondelet Center

As stated previously, on March 7, 1950, Ordinance No. 96,222 was approved by the City Council substantially amending the Comprehensive Zoning Ordinance by permitting expansions and enlargements of existing conditional use sites by plan approval. These provisions remain in effect to the present time (i.e., see Section 12.24-F of the Los Angeles Municipal Code). Said ordinance also permitted hospitals or "special care facilities" by right in the R5 Zone and split conditional use authority for "Hospitals or Sanitariums" between the Planning Commission (over 100 beds) and Office of Zoning Administration (under 100 beds if located in the R1, R2, R3, R4, or C1 Zones).

Further, Ordinance No. 117,450, which became effective on December 18, 1960, removed any conditional use authority for hospitals from the jurisdiction of the Planning Commission with the Zoning Administrator retaining conditional use authority for hospitals or "special care facilities" with no limitation on number of beds. This authority is maintained to the present time under the provisions of Section 12.24C-49 of the Los Angeles Municipal Code.

Finally, Ordinance No. 128,417 became effective on October 26, 1964 requiring a "reduction of site" if any portion of a conditional use site is "...severed therefrom or utilized for other purposes...". This provision is still in effect at the present time.

In direct violation of the aforementioned provisions of the Los Angeles Municipal Code as contained in said ordinances, a 7+ acre parcel of land was removed from the existing school site and transferred to the Sisters of Saint Joseph in California on October 1, 1981 changing a former novitiate to a skilled nursing facility (i.e., hospital) with approximately 40 residents. As a independent entity under separate ownership, this skilled nursing facility (i.e., hospital) is in operation at the present time being identified as the Carondelet Center. While a Parcel Map was approved for said 7+ acre parcel of land being identified as Parcel A of PMLA 4304, said Carondelet Center has no legal right to exist under current provisions of the Los Angeles Municipal Code nor is there any evidence that any authority was ever requested.

Being under separate ownership, a "Reduction in Site" would have to have been approved thereby modifying existing conditional use authority for the college (i.e., see Section 112.24G-2 of the Code on Page 370) before said center was ever established. Following the approval of said "Reduction in Site" a conditional use for said center would have to have been approved by the Zoning Administrator since it is classified as a hospital (i.e., skilled nursing facility, special care facility, etc.). In addition, no assessment of required parking for said Carondelet Center has ever been made as a entity distinct from the college (i.e., see Section 12.24A-4(d) of the Code on Page 242). Finally, parking for the college and Carondelet Center cannot be shared being distinct land uses and separate ownerships (i.e., see Section 12.21A-4 of the Code on Page 239).

Existing Conditions

Mount Saint Mary's College occupies a 45+ acre site of the northerly terminus of Bundy Drive, Chalon Road and Norman Place with the adjacent Carondelet Center occupying an adjacent 7+ acre site being classified in the RE40-1-H Zone. The sites are located approximately 2 miles north of Sunset Boulevard with access restricted to substandard local hillside streets and similar roads such as Barrington and Saltair Avenues. The use and nature of the Carondelet Center has been previously described. At the present time, Mount Saint Mary's College has approximately 576 on-site parking spaces at this location, the Carondelet Center has 103 on-site parking spaces, approximately 1935 students are currently enrolled at the college, over 100 faculty members and administrators are employed and the number of maintenance/service employees are unknown. Classes are taught seven days per week between *7:00a.m.* and *9:30p.m.* and campus facilities are rented/leased for all types of commercial activities ranging from conferences and seminars to workshops lasting in some instances, until midnight. Finally, large busses are routinely used to bring tours, faculty and visitors to and from the site on a regular basis.

Traffic Generation

The local street system is critically deficient serving hillside residential areas being substandard in terms of dedication and alignment. No major or secondary highways serve the subject site and no street is even improved to collector status (i.e., 60 feet of dedication with 40 feet of improved roadway width). In another vein, a conference or seminar with 150 persons attending generates approximately 150 trips with a ratio of two persons per car; and, a four year educational institution such as the college in question generates approximately 2.37 trips per student per day (i.e., consult trip generation factors as issued by the Department of Transportation of the City of Los Angeles). At a student enrollment of approximately 1935 students, Mount Saint Mary's College would generate 4585 trips per day not counting those trips generated by seminars, conference, etc. This amount of traffic impact on a deficient street system raises the potential for accident or injury to an unacceptable level of risk; and, has direct traffic related impacts of accident, injury, noise, lighting and general disturbance on residential properties. While not removing all potential risk and disturbance, it has been suggested that the college voluntarily limit student instruction to day time hours Monday through Friday and terminate all commercial activities, including bus tours, thereby substantially mitigating the problem. However, these suggestions have been routinely dismissed.

Commercial Use of the Site

A review of all the records and evidence in this case indicate that no authority has ever been issued permitting use of the involved site for anything other than a "...school use involving educational subjects which are in conformance with the State Educational Code, religious services or religious education activities..." (i.e., see Plan Approval dated May 23, 1952 as previously discussed). Further, there is no evidence that any variance authority has ever been requested for this purpose.

Yet the college's advertising and publications demonstrate that its facilities are regularly used for such commercial purposes as:

- an 11-day "symphony orchestra camp" for children
- an adult weekend featuring a trip to the Hollywood Bowl and sessions on stress management, nutrition, and exercise habits (cost: $165)
- a 3-day AFL-CIO Institute
- 5-day Yoga seminars which attract up to 500 devotees each day
- local musical theater performances
- 10-day Industrial Areas Foundation conventions
- a 3-day Hugh O'Brian Youth Foundation conference for 200 Central California high-school sophomores

The aforementioned activities and similar use of the property stand in violation of previous grants and authority and would never be permitted by right in this location being classified in the RE40-1-H Zone.

Further, use of the site for commercial use stands in direct violation of past and current provisions of the Los Angeles Municipal Code and there is no indication that any effort to reduce or eliminate these activities is being voluntarily undertaken at the present time. To the contrary, these commercial activities have been consistently promoted and expanded.

Attention to Citizen Concerns

Records and information received from the "BHA" and "BNPC" indicate that individuals and groups from the community have consistently tried to reach some degree of compromise or problem recognition from college representatives since at least 1989. All these efforts have failed with the college representatives taking no initiative to resolve concerns or mitigate potential and very real problems. Further, college representatives continue to ignore physical constraints imposed upon the use by location and the physical capacity of capital improvements to serve it; and continue to avoid any responsibility for conformance with past authority issued for school purposes as well as the legal dictates of the provisions of the Los Angeles Municipal Code which, in theory, equally apply to everyone. As an outstanding example of current management practices, a "Weekend College" program was began approximately 3 years ago offering classes exclusively on Saturday and Sunday. Therefore, revocation action is both needed and necessary with no other form of reasonable dialogue or solution available or acceptable to the parties involved.

Conclusion

In view of the aforementioned evidence, it can only be concluded that revocation action should be undertaken in the subject case since the operation and management practices of Mount Saint Mary's College are:

(a) Adversely affecting the health, peace and safety of persons residing and working in the subject residential area by creating on-street congestion, noise, and disturbance of the peace, early and late night operation and the generation of traffic related impacts raising to the level of an actual invasion of privacy; and

(b) Jeopardizing and endangering the public health and safety of persons residing and working in the subject residential area by increasing the risk of accident or injury to an unacceptable and unreasonable level of risk by generating unwarranted traffic levels on substandard local hillside streets; by use of the property for commercial purposes; and by conducting classes and staging events in the evenings and on weekends; and,

(c) Creating a public nuisance which is having a detrimental economic effect on adjacent residential properties as well as disturbing the normally accepted principle of the right for a peaceful enjoyment of ones property; and,

(d) Resulting in repeated nuisance activities as previously described with no evidence of concern or voluntary efforts of mitigation; and,

(e) Violating past authority and current provisions of the Los Angeles Municipal Code by:

(1) Separating the Carondelet Center site from the Mount Saint Mary's College site without approval of the required "Reduction in Site"; and,

(2) Sharing parking between the Carondelet Center and Mount Saint Mary's College site without authorization being distinct and separate land uses under different ownerships; and,

(3) Utilizing the Mount Saint Mary's College site for commercial purposes such as conferences, seminars, workshops etc. with no variance authority issued for this purpose; and,

(4) Potentially and knowingly violating the Conditions of Operation imposed under a Plan Approval dated July 12, ~~1994~~ 1984 which limited parking on the site to 268 automobile parking spaces and enrollment to a maximum of 1072 students.

Further that any maintenance and operation of the Carondelet Center be suspended unless and until a proper "Reduction in Site" has been approved and a conditional use has been granted by a Zoning Administrator for use of a RE40-1-H zoned site for hospital purposes.

If you have any questions or concerns in this matter, please contact me at any time.

With Respect,

James J. Crisp, M.S.

cc: Brentwood Homeowners Association
Bundy/Norman Place Committee
Attn: David H. Breier, Attorney at Law
Planning Commission, City of Los Angeles
Office of Zoning Administration
Honorable Richard Riordan, Mayor, City of Los Angeles

ount
ST. MARY'S COLLEGE

Office of the President

November 7, 1995

CW response never contradicts the enrollment allowed @ 1079

Mr. Bob Rogers
Chief Hearing Examiner
City of Los Angeles
Department of City Planning
221 So. Figueroa
3rd Floor
Los Angeles, CA 90012-2601

Dear Mr. Rogers:

I received your request that we provide you with information regarding a complaint letter sent by James Crisp to Councilman Marvin Braude, relative to Mount St. Mary's College (MSMC). We were surprised to see the requests and claims made in the letter, especially given the many steps that MSMC has taken to address neighborhood concerns.

The College is very appreciative of the special challenges of operating in a residential area. We do our best to minimize the disturbance college-related traffic can cause for a neighborhood, and try to be as responsibe as possible when specific problems are brought to our attention.

A clarification is necessary before addressing the college-related complaints which are noted in the letter sent recently to your office. Carondelet Center and Mount St. Mary's College are two separately incorporated organizations. Issues with the Center need to be addressed separately. I understand that the Center has responded to you concerning issues involving that organization. I might just add here that there is no shared parking between the College and the Center.

College-related comments in the letter are also in need of basic clarifications, beginning with the "Existing Conditions" section. MSMC actually consists of two campuses operating different degree programs. Our second campus, the Doheny Campus, is located downtown near Adams and Figueroa, just down the street from the University of Southern California. Mr. Crisp's failure to note this fact led him to base much of his complaint on erroneous enrollment data. The total enrollment of the College was 1,935 students in the fall of 1994, but students attended different programs split between the two campuses.

On the Chalon Campus, the College enrolled 790 students in the weekday B.A. program, 744 of whom were full time. Our Weekend College program enrolled an average of 235 students for the 1994-1995 academic year. The remaining students were enrolled at our Doheny Campus. There is also a misconception concerning class times at the Chalon Campus: classes are taught only five days a week, with a few nursing classes starting at 7:00 a.m. and a few art classes ending at 9:00 p.m. The few evening classes are not held on Friday evenings for obvious reasons. The Weekend College meets only every third weekend when in session.

With regard to rentals, the College rents its facilities, mainly in the summer months, to selected outside groups which have educational purposes. The sole rentals not strictly for educational uses are for weddings and receptions held in our chapel. Normally only alumnae and current employees use our Chapel for weddings. During 1994 we accommodated some additional weddings owing to earthquake damage at St. Monica's church. However, that church has now been repaired and the usage is again restricted to alumnae and employees.

As I read the traffic analysis presented in the letter, I was concerned that the analysis appears to have been completed using an incorrect enrollment figure. As I noted above, the actual enrollment at the Chalon Campus is considerably lower than that of the entire College.

In the interests of good communication, I would like to draw your attention to some of the past and recent actions the College has undertaken in an effort to be a good neighbor and to address citizen concerns. The College:

1. Makes its facilities available for the neighborhood to vote for all elections.

no longer does so

2. Worked with the City of Los Angeles in June of 1995 to add speed bumps along local roads to help control traffic.

3. Worked with the City of Los Angeles in July of 1995 to add a stop sign at the corner of Bundy and Norman Place to help control traffic.

4. Maintains an open campus for all neighbors, which allows access to trails behind the campus as well as the campus itself. In addition, MSMC allows neighbors the use of our athletic facilities, which has resulted in upwards of forty people using our swimming pool and tennis courts on a regular basis.

no longer

5. Committed $17,500 of institutional funds to help construct left turn lanes off Sunset onto Saltair and Bundy. MSMC made this contribution in a spirit of support for the local community.

6. Attempted to hire off-duty police to patrol the local streets and to enforce the traffic laws. Regrettably, we were informed that off-duty police officers could not enforce traffic law when off duty.

7. Implemented this past summer a comprehensive plan to address various issues raised by our neighbors. A copy of this plan was submitted to at least two neighborhood representatives, and included:

A. Installation of speed hump-type barriers at the entrance/exit of the college to help move the flow of traffic to the right when exiting the College, in keeping with a traffic flow agreement made with neighborhood groups.

B. Installation of signs and warnings in the parking garage reminding all employees and students to respect the speed limits in the neighborhood and to leave the College via Bundy.

C. Having a member of the LAPD address all new and returning students during orientation concerning the seriousness of driving safely and within speed limits while approaching or leaving the College. The message of that talk is also being reinforced through staff meetings.

D. Increasing the incentives in our AQMD plan to encourage more faculty and staff to ride share or use public transportation. The monetary incentives for the current academic year were increased by 20% over last year. We have added monthly prize drawings as an additional incentive for those who partake in the plan.

E. Regular follow-up on calls from neighbors who report unsafe driving to the College. The College cannot legally punish either students or staff who are observed driving unsafely, but we do counsel them on the potential dangers of such behavior. If a College van is reported as driving unsafely, with enough information to identify the driver, i.e., time of day, direction, location, we take immediate action with that employee. We do not tolerate unsafe driving by College employees while on College business.

I hope that this brief outline of our action plan implemented at the beginning of the current academic year illustrates the seriousness with which MSMC takes its relationship with the local neighbors. It has always been the intention and practice of the College to abide by both the letter and the spirit of the municipal code.

We are grateful to have our College surrounded by this wonderful neighborhood and appreciate the concerns of those with whom our students share their home away from home and with whom our employees share their workplace.

If there is any further information which would be helpful to you please do not hesitate to ask.

Sincerely,

Karen M. Kennelly, CSJ
President

KMK:ss

cc: Honorable Councilman Marvin Braude
Eleventh District
Room 275, Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012-4801

rogers/s

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
CITY PLANNING
221 N. FIGUEROA STREET
LOS ANGELES, CA 90012-2601

CITY PLANNING
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FAX: (213) 580-1176

INFORMATION
(213) 580-1172

January 25, 1996

Honorable Marvin Braude
Councilman, Eleventh District
Room 275, Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012-4801

RE: Requested Revocation of use permits - Mount Saint Mary's College and Carondolet Center

Dear Councilman Braude:

This communication is in response to your request to review a letter from Mr. Jim Crisp concerning revocation of the conditional use permit for Mt. St. Mary's College and the Carondolet Center. Mr. Crisp's letter discussed a number of issues and asserted a number of contentions. I have researched the issues and the regulatory history of the site. I have met with staff, the Chief Zoning Administrator and with staff of Mt. St. Mary's College, and have reviewed documents submitted on behalf of the Brentwood Homeowners Association, including most notably a comprehensive traffic study. I have outlined my analysis of the specific contentions and attached them to this letter for your review. Based on my research, there is insufficient evidence to support the initiation of a revocation action.

However, it is recommended that the school meet with residents to try and resolve long simmering traffic issues. Should additional evidence be submitted regarding uses not permitted by the conditional use grants or excessive traffic, this office will give further consideration to initiation of revocation proceedings.

If I can be of further assistance, please contact me at (213) 847-3672.

Very truly yours,

Bob Rogers
Principal City Planner

BR:jj

Attachment

cc: Mt. St. Mary's College
James J. Crisp
Con Howe
Robert Janovici

ATTACHMENT
CONTENTIONS

In his letter of August 29, 1995, Mr. Crisp raised the following issues concerning the operation of the two uses:

(a) The uses adversely affect the health, peace and safety of persons residing and working in the surrounding area;

(b) The uses jeopardize or endanger the public health and safety of persons residing or working in the area;

(c) The uses constitutes a public nuisance;

(d) The uses results in repeated nuisance activities including but not limited to disturbances of the peace, loitering, littering, illegal parking, excessive loud noise and traffic violations; and

(e) Violate provisions of Article 2 of Chapter 1 of the Los Angeles Municipal Code and other city, state or federal regulations, ordinances or statutes.

The letter also states that the Carondolet Center at the southern tip of the campus operates illegally as a "skilled nursing facility (i.e., Hospital) and should be suspended until a "Reduction in Site" has been approved per Section 12.24 of the Los Angeles Municipal Code.

Further information was submitted in the Crisp letter as evidence to support the recommended actions relative to the following considerations:

(a) The college has permitted activities not consistent with its conditional use permit authorizations; specifically:

  (1) Commercial use of the campus

  (2) Exceeding of enrollment and parking requirements

  (3) Use of the Carondolet Center portion of the subject property as a "skilled nursing facility"

(b) Failure to file for a "Reduction in Site" on the southern tip of the campus to separate the Carondolet Center from the conditional use site.

(c) Increasing the risk of accident or injury to an unacceptable and unreasonable level of risk by generating unwarranted traffic levels on substandard local hillside streets.

ANALYSIS

A. Commercial Use of the Site

The request for revocation initiation asserts that a variety of classes offered at night and on weekends constituted a commercial use of the subject site, inconsistent with a 1952 conditional use approval for a 17 acre addition to the campus "for athletic purposes and future buildings. (NB: the original conditional use permit dates back to 1928 with another conditional use permit issued in 1984 for a faculty residence and parking garage). The action allows for the expansion with a limitation that the grant is for "school use involving educational subjects".

The request for revocation proceedings cites numerous classes such as a symphony orchestra camp, a three day AFL-CIO Institute and a five day Yoga seminar (see page 6 of James J. Crisp letter attached) as commercial uses of the campus and the frequent use of the school's chapel for weddings.

The educational content of classes at universities and colleges has historically and consistently been broadly defined to not limit intellectual curiosity and inquiry. The fact that a few of the classes cited obviously would not have been intended for undergraduates of the school is not contrary to the fact that such classes are routinely offered at other colleges in the area.

Representatives of the Mt. St. Mary's administration did admit that there were numerous weddings in the chapel for a short period following the Northridge earthquake, pending repairs to a Saint Monica Church. They indicate that weddings are now limited to registered students enrolled in the school's B.A. program or alumni of the institution.

B. Exceeding Enrollment Limits and Parking Requirements

As indicated previously, there have been three conditional use permits granted on the property and numerous plan approvals for compliance with those three permits.

City Plan Case No. 3066 was the original grant in 1928 for a college "subject to plans for buildings and the location of buildings." In 1952, City Plan Case No. 4072 was approved for a 17 acre expansion. In neither case was there a limit imposed on enrollment. Note that in 1952 the enrollment for the school was 650.

In 1984, the City Planning Commission approved a conditional use permit to allow for a three unit residence hall with a total of 33 bedrooms and a parking garage. The Commission did not specifically limit enrollment in its approval, but in approving the plans for the parking structure, they imposed a condition requiring 1/4 parking space per student. In a Plan Approval, dated July 12, 1984, enrollment was limited to 1, 072, based on 268 parking spaces.

In the letter from Mr. Crisp, it is stated that Mt. St. Mary's College has an enrollment of 1,935 students. This number is accurate but only for the combined enrollments of the Brentwood and Doheny (Downtown) campuses. School administrators state that the Brentwood campus has an enrollment of 790 students in the weekday B.A. program of whom 744 are full time with and an average of 235 students enrolled in the Weekend College Program.

A visit to the campus clearly established that there is no problem with overflow parking from the school using Bundy Drive to park. Because of very steep terrain in the area any off campus on-street parking would be at an elevation well below the campus and would require a very substantial uphill hike to the school.

C. Use of the Carondolet Center as a "Skilled Nursing Facility"

One of the contentions regarding the Carondolet Center is that it is used as a "skilled nursing facility". Such facilities require approval of the Zoning Administrator. No such permission has ever been granted.

Our investigation reveals that the facility is not a skilled nursing facility, but rather a convent housing elderly nuns. A letter from the State Department of Social Services, which has jurisdiction in such matters, cites that a convent does not need a community care license to care for nuns of the order as long as the care givers do not provide care for financial gain or bring individuals in from outside the Order to receive care. No evidence has been submitted that such circumstances exist.

D. Reduction in Site

The request for revocation asserts that the transfer of the Carondolet Center to the Sisters of St. Joseph in 1981 required a "reduction in site" from the conditional use permit. The Zoning Code in Section 12.24.G.2 states:

"2. Reduction is Site. So long as the conditional use is continued, the entire approved site shall be retained for such conditional use, and no portion thereof shall be severed therefrom or utilized for other purposes unless the plans for the reduced site are first submitted to and approved by the Commission or by a Zoning Administrator, whichever has jurisdiction at the time."

Staff research indicates the existing convent housing elderly nuns replaced a noviate (training for nuns) in the late 1970's. Then as now, the convent and the noviate would have been considered as incidental to a Catholic college, such as Mt. St. Mary's.

While it is true that the Carondolet Center became separate in ownership, it maintained its use as a convent. The legal separation of the Center and Mt. St. Mary's sites was accomplished in 1981 with approval of Parcel Map LA No. 4304 presided over by the Deputy Advisory Agency, and a Zoning Administrator. This amounted to a reduction of the site.

E. Unwarranted Traffic Generation.

The request for revocation stated that unwarranted traffic generated by the college "increases the risk of accident or injury to an unacceptable and unreasonable level" for residents along the narrow, two mile segment of Bundy Drive, between Sunset Boulevard and the college. The letter states that the school's enrollment of 1,935 is estimated to generate 4,585 vehicular trips per day, not counting seminars, conferences, etc. Based on this, residents are asking that the college limit student instruction to daytime hours and terminate all commercial activity.

As previously indicated, the actual enrollment on the Brentwood campus is currently at 790 during the week and 235 for weekend students. Based on estimates in the Crisp letter of 2.37 trips per student, traffic would be calculated at 1,872, not 4,585 daily trips.

GAB

GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Kathleen King
Los Angeles t Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: AB52 consultation response for 12001 Chalon Road, Los Angeles, CA 90049 AB 52 Project Notification For The Proposed Mount Saint Mary's University Chalon Campus Wellness Pavillion Project

Dear Kathleen King,

August 2, 2016

Please find this letter in response to your request for consultation dated July 19, 2016. I have reviewed the project site and do have concerns for cultural resources. Your project lies in an area where the Ancestral territories of the Kizh (Kitc) Gabrieleño's villages adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods. The homeland of the Kizh Gabrieleño was probably the most influential Native American group in aboriginal southern California (Bean and Smith 1978a:538), was centered in the Los Angeles Basin, and reached as far east as the San Bernardino-Riverside area. The homeland of our neighbors the Serranos was primarily the San Bernardino Mountains, including the slopes and lowlands on the north and south flanks. Whatever the linguistic affiliation, Native Americans in and around the project area exhibited similar organization and resource procurement strategies. Villages were based on clan or lineage groups. Their home/ base sites are marked by midden deposits often with bedrock mortars. During their seasonal rounds to exploit plant resources, small groups would migrate within their traditional territory in search of specific plants and animals. Their gathering strategies of ten left behind signs of special use sites, usually grinding slicks on bedrock boulders, at the locations of the resources.

Due to the project location and the high sensitivity of the area location, we would like to request one of our certified Native American Monitor to be on site during any and all ground disturbances (including but not limited to pavement removal, post holing, auguring, boring, grading, excavation and trenching) to protect any cultural resources which may be effected during construction or development. In all cases, when the Native American Heritage Commission states there are "no records of sacred sites in the project area" the NAHC will always refer lead agencies to the respective Native American Tribe because the NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & Tribal Historians are the experts for our Tribe and are able to provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area. While the property may be located in an area that has been previously developed, numerous examples can be shared to show that there still is a possibility that unknown, yet significant, cultural resources will be encountered during ground disturbance activities. Please note, if they haven't been listed with the NAHC, it doesn't mean that they aren't there. Not everyone reports what they know.

The recent implementation of AB52 dictates that lead agencies consult with Native American Tribes who can prove and document traditional and cultural affiliation with the area of said project in order to protect cultural resources. However our tribe is connected Ancestrally to this project location area, what does Ancestrally or Ancestral mean? The people who were in your family in past times, Of, belonging to, inherited from, or denoting an ancestor or ancestors http://www.thefreedictionary.com/ancestral. Our priorities are to avoid and protect without delay or conflicts – to consult with you to avoid unnecessary destruction of cultural and biological resources, but also to protect what resources still exist at the project site for the benefit and education of future generations.

CC: NAHC

With respect,

Andrew Salas, Chairman
cell (626)926-4131

PO Box 393 Covina, CA 91723 www.gabrielenoindians@yahoo.com gabrielenoindians@yahoo.com

Antola

From: **Victor Antola** <vicantola@yahoo.com>
Date: Wed, Aug 17, 2016 at 1:42 PM
Subject: Mount Saint Mary's Campus Wellness Pavilion Project
To: "kathleen.king@lacity.org" <kathleen.king@lacity.org>
Cc: "ezra.gale@lacity.org" <ezra.gale@lacity.org>

Thank you for your time last night at the Scoping Meeting at the Mount Saint Mary's campus. As we discussed, we have resided for almost forty years on North Bundy Dr. Our biggest concern with the proposed Pavilion Project is the impact on traffic in the area. We believe the following changes and conditions to the Project can reduce the traffic concerns on North Bundy Dr.

First, the proposed Project calls for "a new accessory parking deck" for a total of 279 parking spaces. We believe that the "accessory parking" should be eliminated from the Project.

Second, we believe that Chalon Road should be designated as a no parking area. The result of these two steps will be to reduce available parking and thereby reduce traffic in the canyon. This reduced parking should encourage greater utilization of the University's bus service and should encourage students and staff to carpool. To increase bus utilization, the University's bus service might also add pickup and drop off areas, such as the Santa Monica Metro and alternative parking sites.

Third, to limit traffic in the canyon, the approval of the proposed Project should have a condition barring the University from using the Project for any Weekend/Evening College and Graduate programs or intercollegiate or special events. The University has stated that their Doheny campus is the expected site for these programs and that no intercollegiate competition will occur at the Project, so the University should have no difficulty accepting a limitation that insures that the proposed Project is not available for such uses.

We do not now have information from the University about its plans to mitigate traffic impacts in the area during construction of the Project. We look forward to receiving information on that subject in the future.

Thank you for your consideration of these points and please keep us advised on the progress of the Project.

Iris and Victor Antola, August 17, 2016
vicantola@yahoo.com

Ashworth_C

On Sun, Aug 7, 2016 at 12:21 PM, Chris Ashworth <ashworth@nohotoyota.com> wrote:

My name is Chris Ashworth.

I have lived at 1212 North Bundy Drive, Brentwood 90049 since 1995 & before that on Kenter Canyon in Brentwood for 3 years. So a Brentwood home owner for more than 25 years.

I love the Brentwood area apart from one thing. TRAFFIC congestion.

Sunset and Barrington have become so congested its unbearable. It sometimes takes us close to 1 hour just to drive the 2.75 miles to get to the 405 freeway. Barrington is backed up for multiple traffic light changes and then there is Sunset.

The Mount St. Mary's proposed expansion will make daily life even more intolerable.

As it is there are far too many students driving up and down to the college, they drive fast, and have little consideration for the neighborhood residents.

With construction vehicles for many months, if not years adding to the congestion on the small streets around us it will be noisy, messy and a burden on the environment.

Then once the expansion is complete, there will be many more students driving up Barrington, North Bundy and Norman Way.

The college has NOT held their side of agreements in the past, just like Archer school has not either.

Please do NOT allow this project to be approved. This will have terrible consequences for home owners in the area and will also affect home prices.

Enough is enough and expansion of anymore school and college campuses will take away even more of our privacy, and also cause more crime in the area.

Please feel free to contact me at any time either by e-mail or phone.

Thanking you for your attention and time.

Sincerely.

Chris Ashworth - Proud home owner in Brentwood since 1992.

Ashworth_V

From: **Veronica Ashworth** <veronica-ashworth@hotmail.com>
Date: Tue, Aug 16, 2016 at 3:20 PM
Subject: Mt Saint Marys expansion plan
To: "kathleen.king@lacity.org" <kathleen.king@lacity.org>

Hello Ms. King,

I have lived at 1212 North Bundy Drive, Brentwood 90049 for almost a decade and my husband, who owned the house before we married has lived here on Bundy Dr. for 20 years.
I love Brentwood, apart from one thing, horrible traffic! Sunset and Barrington have become so congested its unbearable. It sometimes takes us close to 1 hour just to drive the 2.75 miles to get to the 405 freeway. Barrington is backed up for multiple traffic light changes and then there is Sunset.

The Mount St. Mary's proposed expansion will make daily life even more intolerable. As it is there are far too many students driving up and down to the college, they drive fast, and have little consideration for the neighborhood residents. I cant walk my dogs or ride bikes with my kids for fear of hit by a speeding driver (most of whom seem to be college aged people). It simply is not fair to us who live here!

The college has NOT held their side of agreements in the past, just like Archer school has not either. Please do NOT allow this project to be approved. This will have terrible consequences for home owners in the area and will also affect home prices. Enough is enough and expansion of anymore school and college campuses will take away even more of our privacy, and also cause more crime in the area.

Please feel free to contact me at any time either by e-mail or phone.

Thanking you for your attention and time.

Sincerely,
Veronica Ashworth
310-968-9346

1221 N. Norman Place,
Los Angeles, CA 90049

August 8th, 2016

Ms Kathleen King,
Major Projects – Dept of City Planning,
200 N. Spring Street, Room 750
Los Angeles, CA 90012

ENV-2016-2319-EIR

Dear Ms King,

As a homeowner in Bundy Canyon , we have seen the traffic to and from Mount Saint Mary's College grow year after year. Students, supply trucks, buses and employees of the college drive carelessly through our narrow streets. Our roads were not designed for this kind of traffic. Now the school proposes a construction of a huge building. Thus, we can be assured of more heavy trucks, construction works and eventually more staff and more student speeding by our homes.

Peaceful enjoyment of our property is becoming more and more impossible.

What will be done about this?

Please HELP.

Jacqueline & Howard Bacal.

Jacqueline and Howard Bacal

ENVIRONMENTAL ISSUES & IMPACTS

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report?

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

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

We are concerned about the increase in traffic through our narrow ~~streets~~ residential streets.
The potential for more students staff and service vehicles along with large crews of construction workers will have a ~~dest~~ negative impact on our right to enjoy our homes.
With the greatly added congestion on our streets, it dangerously decreases the ease of egress in the event of a fire in an area that is already considered to be a high fire hazard zone.

RECEIVED
CITY OF LOS ANGELES
AUG 25 2015
ENVIRONMENTAL UNIT

Bacal 2

CONTACT INFORMATION (Optional, please print clearly)

HOWARD BACAL

Name: JACQUELINE BACAL Representing Agency or Organization: Bundy Canyon Association

Address: 1221 N. Norman Place City/State/Zip: Los Angeles CA 90049

Baum Kathleen King <kathleen.king@lacity.org>

Case # ENV-2016-2319-EIR--the Mount Saint Mary's Wellness Pavilion project

2 messages

Tom Baum <tombaum@gmail.com> Wed, Aug 17, 2016 at 12:53 PM
To: kathleen.king@lacity.org
Cc: Carol Baum <cbaumprods@gmail.com>, Marcie Polier Swartz <marcieps@gmail.com>

To the Department of City Planning:

Last night my wife and I attended the Public Scoping Meeting about the Mount Saint Mary's University Chalon Campus Wellness Pavilion Project, Case # ENV-2016-2319-EIR.

We live at 570 N. Bundy. Our key issue of concern is the impact on Traffic/Transportation.

For several years now, roughly between the hours of 4:30pm and 7pm, the traffic backup on Barrington Avenue north of Sunset has added as many as 30 minutes to any trip south or west of the Brentwood neighborhood in question, i.e., the neighborhood north of Sunset fed by Bundy, Bowling Green, and Barrington. (It once took us 45 minutes to get to a Brentwood restaurant we could have walked to in 15 minutes.) I can only assume that Mount Saint Mary's students, faculty, and employees are by far the major contributors to this nightly traffic jam. (Last night a representative of the school tried to lay part of the blame on the Archer School, but the Archer School doesn't have an outlet that contributes to the Barrington/Sunset intersection tie-up.)

We're unaware of any attempt on Mount Saint Mary's to mitigate this traffic problem over the last few years via flextime or other measures. No representative of the school was able to furnish any data on how many vehicles leave Mount Saint Mary's at any given time. If we understood correctly, this will solely be the responsibility of the Department of City Planning to evaluate.

According to an email from the Bundy Canyon Association, Mount Saint Mary's population has, over the years, grown beyond the limit promised by the school. Mount Saint Mary's

seems to claim that the Wellness Pavilion will only serve current students and employees. Won't the very existence of a Wellness Pavilion add to the number of employees, and increase the volume of nightly traffic at the Barrington/Sunset intersection, especially if people are hanging around after hours to use the facility? And how can the City be sure that Mount Saint Mary's won't increase its enrollment?

We trust that approval of this project will be conditional, in part, on meaningful efforts by the school to mitigate this particular problem, which, for the residents of our neighborhood, has made the overall frustration with L.A. traffic significantly worse.

Respectfully,

Tom Baum

--
310 367 9694
filmmakingreview.com/author/tombaum
filmmakingreview.com/author/tomandcarolbaum

Kathleen King <kathleen.king@lacity.org> Wed, Aug 17, 2016 at 12:57 PM
To: Tom Baum <tombaum@gmail.com>

Mr. Baum,

Thank you for your comments regarding the Mount Saint Mary's University Chalon Campus Wellness Pavilion Project. Your comment will be included in the EIR administrative record (e.g., project file) and has been forwarded to the environmental consultant for consideration in the preparation of the EIR.

Thank you again.

Kathleen King | **Assistant Planner**
Major Projects | Department of City Planning | City of Los Angeles
kathleen.king@lacity.org | **213.978.119**

[Quoted text hidden]
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Benitez-Bloch

CLINICAL AFFILIATES, A MEDICAL GROUP, INC.
GOTTFRIED R. BLOCH, M.D. ROSALYN BENITEZ-BLOCH, D.S.W.
P.O. BOX 491999
LOS ANGELES, CALIFORNIA 90049

TEL: (310) 440-9250
FAX: (310) 476-7885

August 10, 2016

Kathleen King
Major Projects-Department of City Planning
200 Spring St. Room 750
Los Angeles, CA 90012
ENV-20-16-2319-EIR

Dear Ms. King,

We are most concerned about the increasing problems in our neighborhood in Bundy Canyon. After 40 years we realistically expect some changes but it seems that there is less consideration for the residents than is shown either by adequate police protection, the increase in traffic patterns, or home construction size and numbers.

Having the greatest respect for education and schools and certainly for Mt. St. Mary's University where we have attended professional meetings we wonder why there is not more thoughtful and intelligent planning for the general neighborhood. With the anticipated expansion of Mt. St. Mary's along with the other private construction and parking on both sides of N. Bundy Dr. the traffic has become difficult and sometimes dangerous because of the volume and the speeding. In an emergency those of us who are on call are anxious that we may not be able to cross Sunset Blvd when we need to. In addition emergency medical and fire vehicles can be trapped on Bundy endangering their response time, and possibly lives or property. Some of us have had our side mirrors swiped off with no one stopping as well as have had our cars hit.

Considering that the quality of life in Brentwood is threatened by how the present planning is dealt with we are hoping that you would give those of us who live here and pay considerable taxes a thoughtful response to our problems.

Sincerely,
Dr. Rosalyn Benitez-Bloch

Blasio

Ronald P. *and* Julie D. Clark De Blasio
359 N Bundy Dr
Los Angeles CA 90049-2827
310.476.7234
rondeblasio@gmail.com; 310.486.0888
clarkdeblasio@gmail.com; 310.422.5630

September 2, 2016

Ms. Kathleen King
Major Projects – Department of City Planning
200 N Spring St, Room 750
Los Angeles CA 90012

VIA FAX & Email: 213.978.4656

PUBLIC SCOPING COMMENTS
ENV-2016-2319-EIR
WELLNESS PAVILION PROJECT
MOUNT SAINT MARY'S UNIVERSITY
CHALON CAMPUS
12001 CHALON ROAD, LOS ANGELES 90049

Dear Ms King;

We are residents of Upper Bundy Canyon having resided in the neighborhood for over a decade. This public comment letter is in support of both the concept of the Wellness Pavilion as well as the transparent process the University chose to take with regard to environmental review of the project that under California Environmental Quality Act is not required to have full review due to redevelopment of the existing built environment footprint at the project site.

The Wellness Pavilion concept is in alignment with universities throughout the nation in providing a place on campus where students, faculty and staff can relax, exercise or commune with nature. The design of the new facilities will improve physical and emotional well-being of attendees, many who live quite a distance from campus, have long commutes and extended days at the site. The placement of the Pavilion affords an additional benefit in that it abuts the serene and undisturbed Santa Monica Mountains.

The possible disruption to Bundy Canyon residents during the construction phase is commensurate with recent and current demolition and construction activities in our neighborhood due to upgrading and 'mansionization.' The total square footage of the proposed Pavilion is approximately equivalent to seven to eleven mansions, the same number which are ongoing in development at any given time in the neighborhood. We believe the temporary uptick in construction activity at the University is a small nuisance

in comparison with the long-term benefits the Pavilion will afford Mount Saint Marys University.

We laud the University for proposing and moving forward with this worthy project. We also thank them for their transparency in planning through the CEQA process.

Best intentions,

Cc: Dr. Ann McElaney-Johnson, Mount Saint Marys University

Brown

From: **ronna brown** <ronnambrown@usa.net>
Date: Wed, Aug 31, 2016 at 11:59 AM
Subject: Mount St Mary's - Wellness Pavilion Project
To: kathleen.king@lacity.org

Re: Case #ENV- 2016 - 2319 EIR
Project Name: Mount Saint Mary's University -- Chalon Campus Wellness Pavilion Project

Dear Ms. King:

We have lived on North Bundy Drive for over forty years. We have seen Mount Saint Mary's University grown from a small neighborhood school of around 300 – 400 students, with classes from 9:00 a.m. to 4:00 p.m. Monday through Friday, no evening classes, no weekend classes, no summer classes, and no seminars. Now there are classes from 8:00 a.m. to 9:00 p.m. Monday through Friday, with weekend classes and seminars, summer classes, and more than 1,500 students. Most of these students, and many teachers and employees, travel to and from the university, using their personal vehicles, by way of Sunset Boulevard and the local residential streets. This adds many cars, trucks and buses to the congestion already existing on Sunset Boulevard and western areas, all the way to Pacific Palisades.

Bundy Drive, which is the main thoroughfare to the campus, has no sidewalks and narrow streets. Most of the aforementioned traffic to and from the campus is exceeding the 30 m.p.h. posted speed limit. This is obviously a very dangerous situation, with the presence of children and adults.

There are also two very large projects planned during the same period of time. The Archer School and the Brentwood School have both submitted plans and requested permits.

Most of the students, teachers and other employees do not live in the Brentwood area. In case of an emergency such as fire, earthquake, or other catastrophes, how would we, the local residents, and the schools, evacuate this area to safety?

Please take all this information into consideration. If the schools' plan is approved, it will dramatically change the safety and the way of life for all concerned.

Respectfully submitted,

Mr. and Mrs. Lawrence Brown and Family,
1010 North Bundy Drive, Los Angeles, CA 90049.

Carstens LLP

Chatten-Brown & Carstens LLP

Hermosa Beach Office
Phone: (310) 798-2400

San Diego Office
Phone: (858) 999-0070
Phone: (619) 940-4522

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Direct Dial:
310-798-2400 Ext. 1

September 2, 2016

Kathleen King
Major Project- Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Env-2016-2319-EIR
By Email: Kathleen.king@lacity.org
and overnight mail

RE: Notice of Preparation Comments Re Mount St. Mary's University Chalon Campus, 12001 Chalon Road, ENV-2016-2319-EIR

Dear Ms. King,

We represent the Bundy Canyon Association (BCA), representing 545 homes in the contiguous Bundy Canyon area from Bowling Green to Barrington Avenue, north of Sunset Blvd. The Bundy Canyon Association is an alliance for the protection and safety of Bundy Canyon Residents. It is a group of concerned homeowners who have come together to oppose expansion efforts, support other neighborhood causes, and preserve the peace and tranquility of the Santa Monica Mountains next-door neighbor, Bundy Canyon. The Bundy Canyon Association includes the most impacted residents of the proposed Mount St. Mary's University (MSMU) expansion project at the Chalon Campus.

Bundy Canyon Association members are deeply concerned about the proposed expansion at MSMU's Chalon Campus and the effects it will have on its neighborhood in general, and more specifically, traffic, air quality, parking, noise, lighting, wildlife, environmental, safety, and aesthetics of the Bundy Canyon neighborhood.

The project would be one of the largest in the area in years. The proposed "Wellness Pavilion" would replace existing 1,110 square foot facilities with a two-story, approximately 38,000 square foot multiuse building with outdoor pool area and new parking deck. A total of 279 parking spaces would be provided rather than the existing 226.

The proposed 38,000 square foot MSMU expansion would compromise BCA members' safety in terms of increasing the risk of accidents involving faculty, staff,

students that live on Campus, and commuter students, all who have added to the ongoing traffic problems in the area. Expansion of the campus would also aggravate the existing fire risk in this High Fire Hazard Severity Zone. For example, in 2009, MSMU evacuated 300 cars during a summer program into the local streets, where neighbors could not get out of their own driveways creating safety problems. (Enclosure 4.) Thankfully, this was not during the regular school calendar, or 1600 students plus faculty, and other support staff, and Carondelet Center would have had to evacuate. As it was, the evacuation onto the streets of Norman Place and Bundy Drive compromised the safety of residents, as they could not evacuate their vehicles from their driveways. Even the Los Angeles Fire Department had difficulty heading to the fire against MSMU traffic evacuating down the hill.

We provide the following scoping comments for the above referenced project, based upon the facts that have been represented to us, or are available from the public record. We provide these comments in conjunction with those of planning consultant Sandra Genis. (Enclosure 11.) Both our and her comments must be considered as the Draft Environmental Impact Report is prepared.

I. INTRODUCTION AND SUMMARY.

In the August 4, 2016 City of Los Angeles Notice of Preparation (NOP), under Project Location, MSMU is said to be one mile north of Sunset Blvd. In actuality, MSMU is two miles north of Sunset Blvd, and while it may be 3/10 of a mile off the I-405 freeway as stated in the NOP, there is no direct access to that freeway. (Enclosure 1.) The only ingress and egress to 12001 Chalon Road is off of Sunset Blvd. and Bundy Drive to Norman Place onto Chalon Road through two miles of narrow, winding residential streets, many with no sidewalks and parking on both sides. (See photos, Enclosure 3.) MSMU is located in an "urbanized area" and abutting the Santa Monica Mountains. It sits in a quiet suburban residential neighborhood surrounded by single-family homes.

This is not the only error in the MSMU project description. The enrollment numbers of 2,244 as stated in the NOP are not found in any documentation for the project. While intensification of use is illegal without disclosure and necessary permitting, it appears that in the past MSMU has transgressed without city planning approvals.

Additionally, in reviewing the record for this project, MSMU has a history of building first and seeking permits after the fact. This has occurred with the addition of the Campus's existing swimming pool and one of the buildings on the property. In the past, MSMU has not lived up to its prior CUPs, and has made modifications without proper permits or permissions from the city. (Enclosure 11, p. 1-2.)

Because of its past violations and sensitive location, it is unsurprising that on August 29, 1995, James J. Crisp submitted a letter to Councilman Marvin Braude seeking Revocation of Conditional Use Authority, Case No. CPC 4072- Mount St. Mary's College. (Enclosure 2.) Also included with Enclosure 2 is the City's response to Mr. Crisp's letter denying revocation was justified but noting "Should additional evidence be submitted regarding uses not permitted by the conditional use grants or excessive traffic, this office will give further consideration to initiation of revocation proceedings." (Bob Rogers, Principal City Planner, letter dated January 25, 1996, p. 2.)

To evaluate this phase of the project, MSMU must provide in the Draft EIR a proper project description, disclose all impacts from the uses currently operating on Campus and disclose any and all future changes it intends to seek above and beyond this 38,000 square foot structure. Deferred disclosure, review and mitigation is not appropriate.

The Carondelet Center is part of the MSMU property footprint, although it is called a "separate property" as of 1981. It is located on Chalon Road inside the property boundary and adjacent to MSMU Campus. (Enclosure 5.) BCA is concerned that there is a plan for future expansion to include this Center without any disclosure.

The Draft EIR must also consider the cumulative and long-term impacts of the proposed project and related projects that currently have approvals or applications pending with the City or that will be approved for construction at the same time as Mount St. Mary's, including the Archer School for Girls, Brentwood School East and West Campus expansion projects, Caruso Palisades Project, and any others that will impact Sunset Blvd. or the Canyon streets used for ingress and egress to the Mount St. Mary's Chalon Campus. The Draft EIR must analyze the effect of this project on the community in all impact areas required by CEQA. Special attention should be given to three distinct areas: (1) construction impacts, (2) operational impacts of the completed project, and (3) any future uses that MSMU intends for the future use of its Campus.

II. THE EIR MUST COMPREHENSIVELY ADDRESS ALL OF THE PROJECT'S POTENTIALLY SIGNIFICANT ENVIRONMENTAL EFFECTS.

To be legally adequate, an EIR must comprehensively identify and address all of the "significant environmental effects" of a proposed project. (Public Resources Code § 21100(b)(1); CEQA Guidelines § 15126.2.) "All phases of a project," including "planning, acquisition, development, and operation," must be addressed. (CEQA Guidelines § 15126.) And both "[d]irect and indirect significant environmental effects"

must be analyzed, "giving due consideration to both the short-term and long-term effects." (CEQA Guidelines § 15126.2(a).

Here, among other significant environmental effects, the Project would impact area aesthetics and dramatically increase traffic congestion during both construction and operation. Construction air quality impacts and noise will likely be severe and must be mitigated. BCA insists that the Draft EIR comprehensively analyze all of the Project's significant environmental effects, including, without limitation, addressing each of the following points and questions.

A. PROJECT DESCRIPTION.

In addition to the incorrect description of the location of the Campus from the I-405 and the permitted enrollment numbers, per the City of Los Angeles MSMU NOP dated August 6, 2016, MSMU states that use of the new facility, will be used "*primarily*" by student body, staff and faculty, as well as provide a practice facility for MSMU sports teams. Because it says primarily and not exclusively, does this mean that MSM can rent, lease, invite any other entity private or public to participate in the use of these facilities in the future, i.e. weekend conference center, swimming pool and outside leases to schools in the neighborhood or other entities? This could enormously increase traffic into and out of the canyon.

B. FIRE AND EMERGENCY ACCESS.

Higher enrollment means more traffic and danger to the community. For example, in 2009, according to NBC News, The Chalon Road/Norman Place fire caused 300 people and cars to evacuate MSMU Campus during the Summer program (with reduced student population), which trapped residents in their own driveways and created gridlock on the narrow windy roadways of Norman Place and Bundy Drive. (Enclosure 4.) The LAFD had a difficult time maneuvering its fire vehicles into the Canyon because of the conflict with exiting cars on the narrow roadway.

MSMU has been told in an event of emergency they will most likely be required to shelter in place. Will MSMU invite nearby residents to shelter in place on campus? In the case that MSMU is not permitted or chooses not to shelter in place, has an evacuation plan been implemented? Please provide detailed information on MSMU's public safety and evacuation plans and answer the questions below.

Does MSM have emergency plans in place?

What kind of emergency plan does MSM have?

How many people can MSM evacuate per minute?

How will MSM evacuate for fire and earthquake?

Does MSMU currently practice fire drills and evacuation drills for all the Chalon students, staff, faculty and other people on campus?

The last fire on Norman and Chalon was caused by electrical equipment in 2009. Has MSMU adopted a plan that would address the construction equipment that will be used for this project so it does not create this type of dangerous hazard in the High Fire Hazard Severity Zone?

What if there is a fire caused by an earthquake? How will MSM evacuate their 1600 students, or even 2,244 students, faculty, guests, and staff, support personnel? How will this high number of MSMU people affect residents trying to evacuate?

C. LAND USE IMPACTS AND NONCOMPLIANCE WITH CURRENT AND PRIOR CUP CONDITIONS.

According to their 1984 CUP, MSMU was to have limited visual effect of their parking structure in the canyon by installing landscaping and low-level lighting for security purposes. However, 32 years later, the parking structure has not been landscaped and lights are clearly visible throughout the neighborhood. MSMU Condition #2 states, "That along the south and east sides of the parking structure, landscaping be provided to further screen the structure from the view of adjacent residential properties." And Condition #6 states, "All lighting shall be directed onto the site, and no floodlighting shall be located as to be seen directly by the adjacent residential areas. This condition shall not preclude the installation of low-level security lighting."

There is a currently a complaint filed with the Los Angeles City Department of Building and Safety- complaint number: 367735, February 23, 2016, with Paul Chopp, regarding current CUP for enrollment 1072 and lack of compliance regarding foliage around the parking structure, which was also required by the condition from the 1984 CUP.

An illegal sign was installed at the end of 2015 on the side of the wall of an MSMU building visible to the entire community. (See photo in enclosure 3). In January, a Bundy Canyon Association member reported this to the City. MSMU was cited by the Department of Building and Safety, and the sign was removed in May 2016.

How does the property of Carondelet Center fit into MSMU's future plans—its use of guest rooms, facilities, and space? Would MSMU guarantee that they would never

subsume that property, or in the long term are they planning to utilize the space for a potential resort, conference center or any other use?

D. PARKING AND ENROLLMENT MUST BE DEFINED AND ENFORCEABLY CAPPED.

1. PARKING.

The August 4, 2016 NOP on Page 3 notes, "Although the project would result in an increase of 53 parking spaces, as part of the Project MSMU is volunteering a condition of approval specifying that these new net parking spaces may never be used to increase the student enrollment cap of 2244 students."

In 1984, the Initial Study Traffic Analysis form states, under "Project Description," "Cond. Use for a 4 story, 80,000 sq. ft. parking structure for 244 cars located on the Mt. St. Mary's College property,…." Under "Impact Of Traffic Generation," there is a check mark above "Not Significant" with an asterisk next to it referring back to the comment "Provided that no enrollment increase is allowed." (Enclosure 10.)

The importance of this statement indicates that if any increased enrollment should occur, there is a potential for significant traffic impact, triggering the need for a traffic analysis for any increase in student enrollment over 1077 as permitted by the 244 approved parking spaces in the 1984 CUP.

The current 1984 CUP, under which we have been told MSMU continues operating, states that the parking structure of 244-268 spaces is to allot ¼ students per space. It is unclear how many other parking spaces exist on the property and how they were allocated for faculty, staff, guests, maintenance, rentals, outside events, and other activities.

How many parking spaces exist on the property?
Where are all the parking spaces located?
How many total parking spaces exist for students, faculty, support staff and guests?

Where do the 500 students who live on campus, park? How many have cars?

How do those who do not have cars get to and from campus?

How many full time students are parking on campus?

How many part time students are parking on campus?

Where do commuter students traveling from work park?

Where do the students who do not live on the campus park?

With this project, and into the future, how many parking spaces will be added?

Does MSMU have any incentive for bicycling, or other transportation?
BCA members have seen several Uber vehicles travel up to campus; how many occur daily?
How many permanent staff?
How many part time staff?
What kind of special events require parking?
Special program parking? Summer programs? Camp?
How many students come from the other campus to park?
How many spaces are going to be saved for those using the facility?
Will the neighbors be invited to use the new wellness facility, as they do the current facility? If so, where will they park?
What will the hours be for neighbors to use the new facility?
How is parking arranged during lectures? Conferences? Sporting practices?

How many guests visit campus each day and utilize on campus parking?

Where does MSMU get to the estimate of 2,244 students in light of the fact that guests, faculty and staff must also utilize parking on campus?

Historically, MSMU has permitted parking on campus for trail users to access the nearby public trails. This is an important part of the benefits of the campus that justify a CUP, and BCA would like this formalized in the MSMU CUP.

2. ENROLLMENT.

MSMU has not explained its current enrollment on the Chalon campus. The 1984 CUP stated that parking spaces "That not more than 268 automobile parking spaces be constructed on the subject site" and that the ratio of parking to students would be "not less than ¼". (Enclosure 6, 1984 CUP.) Therefore, mathematically, there would be a cap of 1,072 students. At the time in 1984, MSMU had 750 students and sought to increase enrollment to 1037.

In 1995, residents sought to revoke MSMU's CUP due to the significant traffic impacts on the community. The response from MSMU stated:

> MSMC actually consists of two campuses operating different degree programs. The total enrollment of the College was 1,935 students in the fall of 1994, but students attended different programs split between the two campuses. On the Chalon campus, the College enrolled 790 students in the weekday V.A. program, 744 of whom were full time. Our Weekend College Program enrolled an average of 235 students for the 1994-1995 academic year. The remaining students were enrolled at our Doheny campus.

In 1995, MSMU was very clear about what its enrollment cap was, and they used the justification of remaining below the cap as a reason for not revoking their permit.

On November 2, 2015 MSMU President stated enrollment at the Chalon campus "is under 1,600." (See Enclosure 7.) Chris K. McAlary, MBA Vice President for Administration and Finance stated at the MSMU Scoping meeting on August 4, 2016 that they will not have more than 1,500 students enrolled on the Chalon Campus.

As of August 2016, the Niche website (https://colleges.niche.com/mount-saint-marys-university-ca/statistics/) states 1,900 fulltime students and 500 part time students are at the Chalon campus. (Enclosure 8, Niche screenshot).) The NOP dated August 4, 2016 for the project states a student cap would be set at 2,244, which is well above the 1,072 students approved by the 1984 CUP.

How does MSMU justify expanding enrollment, with no city planning approval, no traffic studies, and no mitigation measures to alleviate significant traffic impacts has on the community?

How many students actually attend the school part-time, full time, special events, special classes?

Do online students have to show up for in person updates?
How many come over from the other campus to take classes, summer programs?

If the Doheny campus increases student enrollment, how will that effect the usage for those students coming to the Chalon campus?

How many people/students does MSM expect from other locations?
How much enrollment does MSM add every year?
What about special workshops?
How many staff?
How many coaches?
What about any future enrollment not "currently" planned per MSMU?

How does one monitor enrollment at any given time?

What kind of additional classes once the wellness center is completed?
Where will the neighbors park? People from other areas? Parents? Guests?
How will they accommodate neighbors visiting?
What about team practices?
Are there students on the sports teams from both campuses? If so, how will they get to the new wellness center? Where will they park?

If MSM is planning to hit the student cap of 2,244, MSM must do studies to justify an increase in enrollment from its originally approved 1071, to the more than doubling of the student enrollment, then they must conduct a traffic study that involves all of those impacts.

3. GRADUATION.

We understand that MSMU holds all its graduations on the Doheny campus. Can MSMU ensure that all graduations will continue to take place on the Doheny Campus?

4. LEASE OF FACILITY FOR FILMING AND OTHER EVENTS.

MSMU Chalon campus has weddings and it is also used as a filming location. The area's narrow, windy roads are already at capacity. Additional uses would be disruptive to the neighborhood.

The community would like a prohibition on filming and outside uses for anything other than educational purposes on campus. MSMU must agree to prohibit filming and other outside uses on their campus.

ALL of MSMU's current and proposed events must be listed on a chart, with dates, times and locations. All events must be included in a traffic and cumulative impacts study.

5. OUTSIDE PROGRAMS.

Who will be allowed to utilize the new facility?
Is there a plan to rent the facilities to other schools?
Is there any current proposed deal/discussions/future plans with Archer School or any other school or group for them to utilize these facilities?
Will there be overnight guests?
Will there be weekend wellness programs?
Will there be wellness guest speakers?

MSMU states in the NOP they will not hold games, but just practices. Will MSM allow other schools to use the facilities for games?
Sports finals?
Filming movies and TV shows?

E. CONSTRUCTION IMPACTS.

While MSM anticipates demolishing the current facility and parking lot, they do not discuss the removal and digging out the dirt for the new pool.

Where will the demolition materials go?
How will it affect the stability of the hill?
We request a soil and geology expert to review the hillside issues.
How many construction vehicle trips per day?
What time will those trucks be permitted?
What are the construction hours?
How many days of construction per week? Will it happen over the summer?
What happens if they go over their completion date?
What streets/traffic patterns are the construction vehicles planning to take?
How safe is it for compact fill on a hillside property?
How much noise will impact the canyon?
How much noise will impact the nature/animal corridor?
Is school going to be open during construction?
What will the impacts be with student traffic and additional construction traffic?

What will the impacts be with student traffic and additional construction traffic?
What are the cumulative impacts on construction impacts on Sunset? On Barrington? On Bundy? On Chaparral? On Saltair? On Chalon?

The demolition and construction phases may generate numerous airborne contaminants that the draft EIR must address.

The Office of Health Hazard Assessment (OEHHA) has released new guidelines that are more protective of public health. We request any air quality analysis incorporate these guidelines.

What are the cumulative impacts with the Archer, Brentwood school projects, and Caruso project, all during construction and operations?

What will be the pollution from the emission of construction equipment?
How will MSMU protect their neighbors from dust compiled by the demolition of their current facility?

Has the current building been tested for lead paint, asbestos, and other dangerous particulates' from removing these structures?
If these materials are found, how do they plan to mitigate the impacts?
What are the cumulative impacts on Air Quality?
What additional emissions will come from the construction trucks?

Just north of the MSMU property, there are methane vents from the Old Mission Canyon Landfill, gas vents are just north of the property, and transport gas. What about the methane gas releases from construction into the air?
What happens if they break a methane gas pipe, due to the methane gas field?
Where is the building site compared to the methane gas field?
How will the methane gas field be impacted by the construction?
What safety precautions would they take?

F. TRAFFIC AND CIRCULATION.

1. TRAFFIC IMPACTS FROM EXPANSION COULD BE SIGNIFICANT.

Over the years, there have been numerous complaints about the traffic and public safety impacts created by MSMU. There has been a huge increase of student body, MSMU transport vehicles, constant and ongoing traffic on the narrow and winding roadways, and MSMU has done little to address these problems. That is why the increase of enrollment from the 1984 CUP is such a concern to the community.

How would MSMU traffic, including the 2,244 cap as stated in the City of LA NOP, impact the canyon, neighborhood, and Sunset Blvd. traffic?

The NOP indicates that in addition to this new Wellness Facility being used by the students on the Chalon Campus, MSMU will also be bringing in the Doheny Campus students, involved in the weekend/evening college and graduate programs, the online program, and the associate of arts program. (It is our understanding that MSM's bachelors and nursing programs are on the Chalon campus- masters program is on the Doheny campus).

What is the baseline being used?

What will the project do to increase traffic on Sunset Blvd.?
What are student traffic patterns?
How many students per hour access MSM?
How many leave between 4-7 pm during high peak hours on Sunset?
What is the busing schedule?

A detailed traffic study of additional student trips from the Doheny campus to the new facility once the building is completed must be conducted.

2. BUSING.

Before MSMU began using buses, students were transported between the Doheny campus to the Chalon campus with vans. Currently, the MSMU buses are large trucks with a diesel truck cab. These trucks have a hard time staying in the lines on the roadway and navigating curves so they are creating slower traffic in the neighborhood. Oftentimes, on Bundy Canyon's narrow and windy roads, MSMU buses have been stuck, holding up traffic and creating dangerous conditions. The MSMU buses are wrapped with large MSMU ads and can be seen driving through the neighborhood mostly empty. Sometimes two to three of these buses are in the area at the same time, following each other up or down the hill. The buses roar loudly, creating noise issues on all streets in Bundy Canyon.

On Nov. 8, 2015 MSMU brought several hundred students onto campus in large yellow school buses over several days. Debbie Ream, the MSMU public relations liaison said it was students that MSMU were courting to register for MSMU upcoming school years. These buses were so large they created traffic jams on most of the narrow streets heading up to the school. (See photos in Enclosure 3).

If MSMU plans to continue these types of events to court future students, they need to be included in the traffic study, and please advise how MSMU will mitigate the impacts on traffic.

How many MSMU large sized buses are currently in operation?
How many MSM medium sized buses are currently in operation?
How many MSM vans are currently in operation?
How many faculty vehicles?
How many service trucks?
How many support vehicles?
How many Uber cars access the college each day?
How many pizza/food delivery trucks enter the campus each day?
Are buses and vans gas or electric? How many of each?
Are buses and vans clean running?
What is the busing schedule?
What is the traffic pattern for Brentwood?
How many buses will be going to and from the new train station?
How many buses per hour to and from the Downtown campus?
Do they adjust their schedule so that buses do not run empty?

What kind of mitigation measure are included for carpooling? MSMU Trucks? Delivery trucks? Laundry Service Vehicles?

Neighbors have asked that MSMU and Carondelet combine the use of food delivery 18-ton wheelers and other support services. To date, BCA does not know if this has happened. Please include this information in the Draft EIR.

How does this new center impact the number of trips made by food trucks, sanitation trucks, gardeners, and other support vehicles for maintenance and support of their campus?

What about Uber drop offs, food deliveries services and others coming to MSMU Chalon?

G. HAZARDOUS MATERIALS.

The NOP described the demolition of the pool, tennis courts, and parking lot, and the reuse of the material on site. If the City finds that the contents of the demolition are hazardous, what is the contingency plan for dumping?

Will there be an analysis of the building materials being demolished to ensure no hazardous materials or toxins exist?

What kind of materials are in the current building? Asbestos? Lead paint?

When were the buildings built?

What are the plans for testing and remediation prior to demolition?

H. BIOLOGICAL STUDIES.

The Santa Monica Mountains are in the California chaparral and woodlands ecoregion, and includes the California oak woodland and Southern coastal sage scrub plant community, and are covered by hundreds of local plant species, some of which are very rare or endemic.

During the school year, it is rare to see the area's wildlife movement. However, in the summer, when MSMU slows down, the wildlife returns to the area between the Getty Museum at Sepulveda past MSMU and through to the Santa Monica Mountains to the west. There are deer in the area (enclosure 9) as well as hawks, owls, coyotes, skunk, bobcat, and mountain lions, among others.

MSMU is adjacent to Santa Monica Mountains and protected trails, and a wild life corridor.

Are there any sensitive species nearby likely to be affected by construction, such as birds, animals, insects or plants? How will MSMU protect the trees and vegetation around the digging site?

When MSMU is in session will there be impacts on wildlife?
Will the proposed construction impact wildlife?

How will campus construction and operation affect wildlife?

We request a wildlife impact study.

I. GEOLOGY AND SOILS.

The grade of the new parking lot will be below the grade of the current parking.

The proposed pool requires grading. Please provide us with geological and soils analysis.

J. ARCHEOLOGICAL AND PALEONTOLOGICAL IMPACTS.

There have been reports of whalebones and other paleontogically significant finds in the area, including directly north of MSMU campus in an area called Mountaingate, formerly Mission Canyon landfill. (http://www.mednscience.org/download_product/1328/0; http://articles.latimes.com/1996-02-29/entertainment/ca-41249_1_fish-fossils; Enclosure 12.) Specific attention must be paid to how such resources may be affected if grading is to occur.

Will MSM be working with the UCLA Archeological department for potential archeological relics as proposed in the 1984-CUP?

K. AESTHETIC IMPACTS.

In the City of Los Angeles NOP dated August 6, 2016 on page 3, MSMU is asking for a variance to change height requirements for their proposed "wellness facility."

The Project may have significant aesthetic impacts on the Project site's surroundings. The Project will be visible from nearby trails. This would substantially degrade the existing visual quality of the site and its surroundings. As a matter of law, the EIR must comprehensively address this significant aesthetic effect of the Project.

(*See Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597.) Public views, such as those enjoyed from trails near the Project site, are of special importance.

BCA notes that Los Angeles Municipal Code (LAMC) section 12.24F does not provide sufficient authority for allowing height to exceed the maximum permitted height in the area. The property is zoned as RE40-1-H. Therefore the maximum allowable height is 30 feet. To exceed this height, the findings set forth by LAMC section 12.24X.10 must be made, and the permit processed as a variance in accordance with the provisions of 12.24X.10.c and 12.28.

The new building is over in height, bright in color and out of character with the surrounding buildings and Santa Monica Mountain environment. The building is all white with a white roof. What is the effect on insects, birds, and the night sky?

What kind of lighting will be on the building?

What kind of lighting will be used for new pool area, as it is designed to be located at the edge of the space with views of the coastline and canyons?

Constructing such a pool on a hillside must include a plan to mitigate issues, such as cracking and water damage.

Is there a rendering for what the facility (which will be over in height and bright white in color) will look like from neighbors' properties looking towards the campus?
How big is the pool? How many gallons of water will it contain?
If the pool needs to be drained for maintenance, cleaning, etc.? Where will the water be diverted?

What will be the lighting for late hours of use?
Does MSMU have a plan for restoring or enhancing the visual beauty of the canyon as opposed to neighbors looking at garage, lights, and large buildings?

What is the visual impact on the community?

The community spent quite a bit of time and energy, saving trails just to the north of MSMU. Will this structure be visible from the trails?

BCA requests a view shed study to address these questions.

BCA would also like to see an alternative building plan that is more green, including use of building design techniques and energy efficiency measures recommended by the

California Attorney General as examples of greenhouse gas mitigation measures. (See http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf .)

The MSM project EIR must also address energy usage as required by Appendix F of the CEQA Guidelines.

L. CUMULATIVE IMPACTS.

Cumulative impacts from all MSM uses, including parking, must be analyzed. When the possible effects of a project are "individually limited but cumulatively considerable" a finding that the project may have a significant effect on the environment must be made. (Public Resources Code § 21083.) "Cumulatively considerable" means that the increased effects of a project are considerable when viewed in connection with the effects of past, current, and probable future projects. (*Ibid.*)

We understand that MSMU wants to begin its project in 2018, Archer project plans their construction at the same time, as well as other projects such as Brentwood School east and west campus projects and Rick Caruso's Pacific Palisades project. Sunset Boulevard, in most cases, is the only ingress and egress for these projects.

When the Archer project was proposed, Councilman Mike Bonin said

> "We have the most beautiful and vibrant neighborhoods in the city – and some of the most congested roads. Like you, I can't drive down Sunset in the afternoon without planning for maddening traffic delays. That's why traffic is my first and top concern with any development proposal. Looking at potential traffic impacts is the lens through which I have approached the Archer School for Girls' application to expand and modernize its campus on Sunset Boulevard.
>
> The Archer proposal is one of the more controversial developments I have dealt with since taking office last year. Archer is a world-class institution in a terribly complex location. A phenomenal school for bright, talented young women, surrounded by a residential neighborhood and *one of the worst traffic choke points in the City*. In considering support for this project, I need to weigh three major concerns: the regional impact on traffic; the quality of life impacts on neighbors; and the educational impact on the bright young women and girls who attend Archer."

(http://archerdisaster.com/short-sited/; https://nextdoor.com/agency-detail/ca/brentwood/brentwood-community-council/, emphasis added.)

"*It can take folks an hour to drive a mile and that's not an exaggeration. It's really, really bad*" said Bonin, adding the Sunset congestion is among the issues constituents complain about the most." (Councilmember Mike Bonin, February 8, 2016, as reported in LA Curbed, http://la.curbed.com/2016/2/8/10953646/sunset-boulevard-traffic-brentwood-405, emphasis added.)

How will traffic be mitigated on Norman Place, Chalon, Saltair, Barrington and other Bundy Canyon streets, and Sunset Blvd?

M. NOISE.

Noise can be a severe impact of construction and operational activities.

What will be the impacts from construction noise?
What would be noise levels and impacts from student enrollment increase?
What are noise levels from events?
What are the noise levels of MSMU trucks coming up Norman Place and down Bundy Canyon?

The pool will apparently be an outdoor unenclosed infinity pool with views. What noise levels would be expected from pool activities and events?

Cumulative impacts must be studied as part of the EIR.

N. HYDROLOGY.

MSM is apparently rebuilding the pool on the edge of what looks like a very precarious spot on a known earthquake zone. On June 1, 2014, there was a 4.2 quake near the Getty Center in Brentwood. http://www.latimes.com/local/lanow/la-me-earthquakesa-earthquake-37-quake-strikes-near-westwood-california-ommy9j-story.html.)

How will this pool be secured for earthquakes?
How will the pool affect the water tables?

A hydrology study must be conducted to address runoff from the site.

O. OPERATIONS.

What are the hours of operation of each of the following?
--School?
--Facilities?
--Proposed wellness center?

--Pool?
What are overall campus hours?

How is MSM working with the Sunset Educational Corridor Association, if at all? It is our understanding that Councilmember Bonin created the SECA (Sunset Educational Corridor Association) modeled after Mulholland Educational Corridor Association (MECA). We understand representatives from each institution in the association meet regularly with the goal of coordinating events and working to address community concern about lack of infrastructure and traffic issues. However, BCA's members have no idea what goes on since they are not invited to the meetings and there are apparently no minutes.

Will the group be involved in funding a traffic study for Sunset?
What other schools are participating?

P. ALTERNATIVES MUST BE THOROUGHLY ANALYZED, BOTH ONSITE AND OFFSITE.

Section 15126.6 of the CEQA Guidelines requires that an EIR "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives . . . even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." This discussion must include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project," and expressly must address "[t]he specific alternative of 'no project,'" the purpose of which "is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project."

In light of this legal mandate, BCA insists that the EIR contain a complete and comprehensive "alternatives" analysis, which should include a study of alternative locations for the Project and alternative onsite designs. BCA is confident that the worthwhile goals of the Project can be accomplished at other locations in and around Los Angeles. Since the Project would expand a nonconforming use, which is allowed on sufferance under a conditional use permit, expanding that nonconforming use should be carefully examined. "A proposed change in allowed uses raises a policy question of whether the site is appropriate for the new use. Resolution of this question depends on a comparison of the advantages and disadvantages of the site with other sites that are or could be designated for the same use." (Kostka and Zischke *Practice Under the California Environmental Quality Act* Vol. 1, § 15.26, p. 756.)

CONCLUSION.

In summary the following studies and analyses will be especially critical: air quality analysis; enrollment increase justification studies; a full traffic study including analysis of additional student trips from the Doheny campus to the new facility; light study; parking analysis; wildlife impact study; geological and soils analysis; view shed study; hydrology study; hazardous materials studies; biological resources study; archeological and paleontological resources study; cumulative impacts analysis; and noise and sound study to include pool operations.

We request notification of future hearings or notices about this project pursuant to Public Resources Code section 21092.2.

BCA believes that due to the numerous impacts the proposed Project would have on the environment and the regional impact this Project would have on Bundy Canyon and the surrounding area, the minimum circulation period for a Draft EIR of 45 days would not be adequate. BCA requests that the many complex issues at play in this Project be considered when setting the circulation period, and that period should be at least 90 days.

Thank you for your consideration of these comments.

Sincerely,

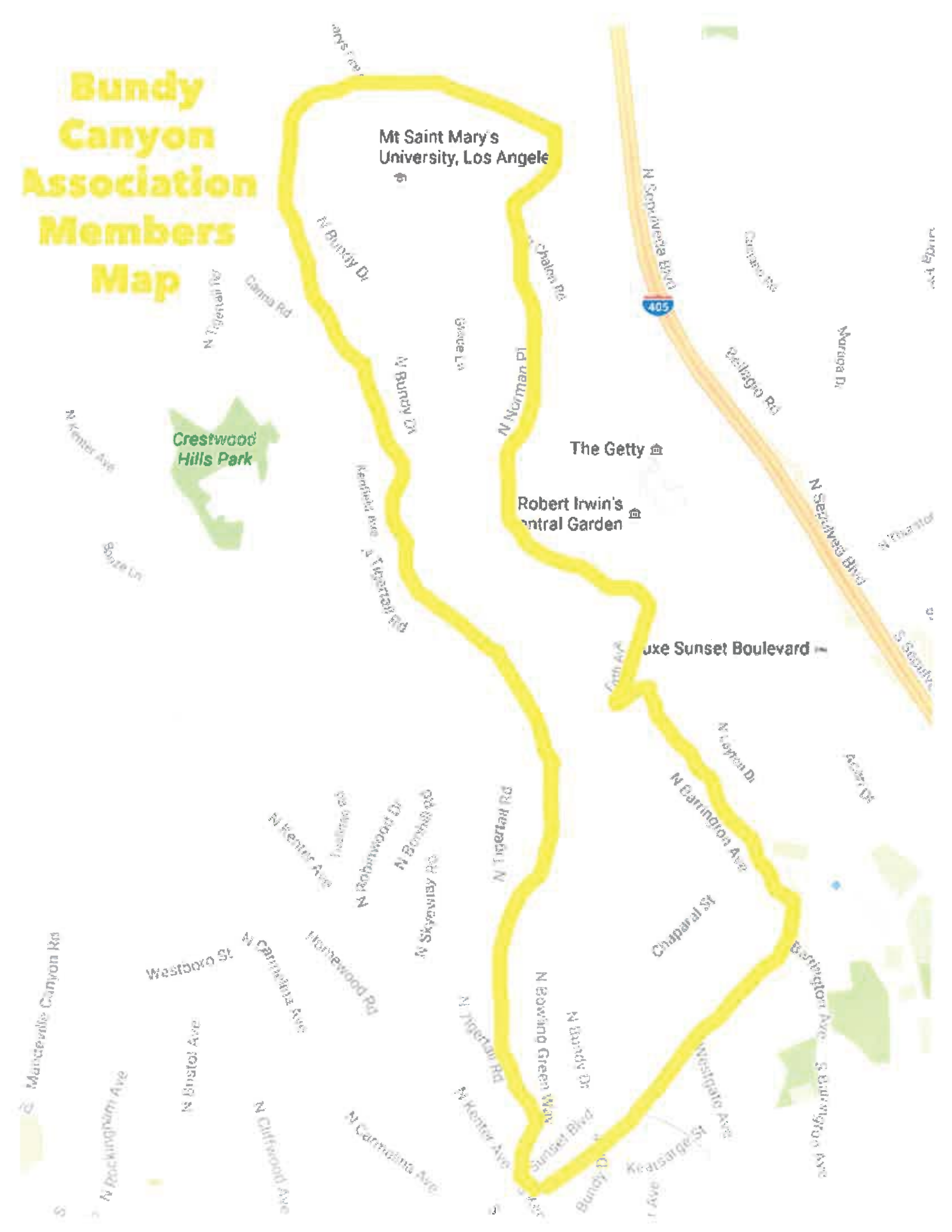
Douglas P. Carstens

Enclosures:

1. Map of region, including BCA area and 405 Freeway
2. August 29, 1995 letter from James Crisp to Councilmember Marvin Braude and January 25, 1996 denial of revocation from Principal City Planner Bob Rodgers.
3. Photos of nearby streets and surroundings, including view of parking structures
4. NBC Reports
5. Map showing Carondelet Center
6. 1984 CUP and reports.
7. November 2, 2015 Letter of MSMU President
8. Niche screenshot
9. Photo showing wildlife
10. 1984 Initial Study Traffic Analysis
11. Memorandum of Sandy Genis
12. "Whale Fossil Found in Mountains" article

ENCLOSURE 1

Bundy Canyon Association Members Map



ENCLOSURE 2

I further request on behalf of the aforementioned community groups that the operation of the Carondelet Center as a skilled nursing facility (i.e., hospital) on a RE40-1-H zoned site be suspended unless and until a "Reduction in Site" has been issued and, conditional use authority approved for this purpose, all in accordance with the provisions of Section 12.24 of the Los Angeles Municipal Code.

Evidence to sustain the subject revocation request and need for conditional use authority for the Carondelet Center is offered as follows:

Background - Mount Saint Mary's College

On December 5, 1928, the City Council denied a report and recommendation from the Planning Commission under Case No. 3066 recommending that a 33 1/3 acre site be classified in the "B" zone thereby permitting the establishment of Mount Saint Mary's College by right. In lieu hereof, said City Council adopted a report from their City Planning Committee partially stating that "...in view of the special circumstances that attach to the property, and in order to protect the adjoining property to the fullest extent, that the action of said Board (i.e., Board of City Planning Commissioner's) in recommending that the property be placed in the "B" zone be not concurred in and that the City Attorney be instructed to prepare an ordinance under the terms of Section 4 of the Zoning Ordinance, allowing the establishment of said college on the property therein described..." subject to the following condition:

> "...that the plans for the buildings and the location of same be approved by this Council prior to the issuance of building permits..."

On January 3, 1929 the City Council approved Ordinance No. 62642 granting an exception (i.e., variance) from the provisions of Ordinance No 42,666 that became effective on October 19,1921 which classified the City of Los Angeles into five zones ("A", "B", "C", "D", and "E"), with the subject property placed in the "A" zone by the adoption of Ordinance No. 58283 which became effective on September 2, 1927. It is important to note that the "A" Zone only permitted single family dwellings by right.

In concert with the adoption of the Comprehensive Zoning Plan for the City of Los Angeles on June 1, 1946 under Ordinance No. 90,500, said property was classified in the R1 One Family Zone being subsequently changed to the RE40-1-H Zone. Further, Ordinance No. 90,500 placed "Educational Institutions" under the authority of the Planning Commission as a Conditional Use (i.e., see Section 12.24); and, provided that "...any of the uses enumerated in this Section (i.e., Section 12.24) which are legally existing at the time it became effective, shall be deemed to have been approved by the Commission and nothing in this Section shall be construed to prevent the enlargement of existing buildings for such uses if all other regulations of this article are complied with, including the conditions of any special district ordinance, exception or variance heretofore granted authorizing said use."

It is noted that in zoning language this provision granted "deemed-to-be approved" status to legally created land uses which subsequently came under Conditional Use authority at a later date, with this privilege continuing to the present day under current provisions of the Los Angeles Municipal Code (i.e., see Section 12.24-F on Page 369).

On March 7, 1950, Ordinance No. 96,222 was approved by the City Council substantially amending the Comprehensive Zoning Ordinance by permitting expansions and enlargements of existing conditional use sites by plan approval. These provisions remain in effect to the present time (i.e., see Section 12.24-F of the Los Angeles Municipal Code). Said ordinance also permitted hospitals or "special care facilities" by right in the R5 Zone and split conditional use authority for "Hospitals or Sanitariums" between the Planning Commission (over 100 beds) and Office of Zoning Administration (under 100 beds if located in the R1, R2, R3, R4, or C1 Zones).

On May 23, 1952, plans were approved for a 17 acre addition to the existing school site for future expansion and the construction of athletic facilities with City Plan Case No. 4072 issued for this purpose. Of particular importance is Condition No. 3 which partially states that:

> 3. *This grant shall only apply to school use involving educational subjects which are in conformance with the State Educational Code, religious services, or religious educational activities.*

Between this date and 1960 plans for said athletic facilities were approved, a Tract Map was recorded, and plans were approved for an addition to the chapel.

Ordinance No. 117,450, which became effective on December 18, 1960, removed any conditional use authority for hospitals from the jurisdiction of the Planning Commission with the Zoning Administrator retaining conditional use authority for hospitals or "special care facilities" with no limitation on number of beds. This authority is maintained to the present time under the provisions of Section 12.24C-49 of the Los Angeles Municipal Code.

Ordinance No. 128,417 became effective on October 26, 1964 requiring a "reduction of site" if any portion of a conditional use site is "...severed therefrom or utilized for other purposes...". This provision is still in effect at the present time.

Finally, on January 26, 1984, the Planning Commission approved plans for a faculty residence hall with a maximum of three dwelling units or 33 bedrooms, the relocation of 39 existing parking spaces and the construction of a 11 space parking garage with enrollment limited to 760 students; and, on July 12, 1984, plans were approved for a multi-level parking garage for 244 automobiles requiring 1/4 parking space for each student with on-site parking limited to 268 automobile parking spaces. This provision, in effect, limited enrollment to a maximum of 1072 students.

No further actions of record have been undertaken to the present time.

Background - Carondelet Center

As stated previously, on March 7, 1950, Ordinance No. 96,222 was approved by the City Council substantially amending the Comprehensive Zoning Ordinance by permitting expansions and enlargements of existing conditional use sites by plan approval. These provisions remain in effect to the present time (i.e., see Section 12.24-F of the Los Angeles Municipal Code). Said ordinance also permitted hospitals or "special care facilities" by right in the R5 Zone and split conditional use authority for "Hospitals or Sanitariums" between the Planning Commission (over 100 beds) and Office of Zoning Administration (under 100 beds if located in the R1, R2, R3, R4, or C1 Zones).

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Finally, Ordinance No. 128,417 became effective on October 26, 1964 requiring a "reduction of site" if any portion of a conditional use site is "...severed therefrom or utilized for other purposes...". This provision is still in effect at the present time.

In direct violation of the aforementioned provisions of the Los Angeles Municipal Code as contained in said ordinances, a 7+ acre parcel of land was removed from the existing school site and transferred to the Sisters of Saint Joseph in California on October 1, 1981 changing a former novitiate to a skilled nursing facility (i.e., hospital) with approximately 40 residents. As a independent entity under separate ownership, this skilled nursing facility (i.e., hospital) is in operation at the present time being identified as the Carondelet Center. While a Parcel Map was approved for said 7+ acre parcel of land being identified as Parcel A of PMLA 4304, said Carondelet Center has no legal right to exist under current provisions of the Los Angeles Municipal Code nor is there any evidence that any authority was ever requested.

Being under separate ownership, a "Reduction in Site" would have to have been approved thereby modifying existing conditional use authority for the college (i.e., see Section 112.24G-2 of the Code on Page 370) before said center was ever established. Following the approval of said "Reduction in Site" a conditional use for said center would have to have been approved by the Zoning Administrator since it is classified as a hospital (i.e., skilled nursing facility, special care facility, etc.). In addition, no assessment of required parking for said Carondelet Center has ever been made as a entity distinct from the college (i.e., see Section 12.24A-4(d) of the Code on Page 242). Finally, parking for the college and Carondelet Center cannot be shared being distinct land uses and separate ownerships (i.e., see Section 12.21A-4 of the Code on Page 239).

Existing Conditions

Mount Saint Mary's College occupies a 45+ acre site of the northerly terminus of Bundy Drive, Chalon Road and Norman Place with the adjacent Carondelet Center occupying an adjacent 7+ acre site being classified in the RE40-1-H Zone. The sites are located approximately 2 miles north of Sunset Boulevard with access restricted to substandard local hillside streets and similar roads such as Barrington and Saltair Avenues. The use and nature of the Carondelet Center has been previously described. At the present time, Mount Saint Mary's College has approximately 576 on-site parking spaces at this location, the Carondelet Center has 103 on-site parking spaces, approximately 1935 students are currently enrolled at the college, over 100 faculty members and administrators are employed and the number of maintenance/service employees are unknown. Classes are taught seven days per week between *7:00a.m.* and *9:30p.m.* and campus facilities are rented/leased for all types of commercial activities ranging from conferences and seminars to workshops lasting in some instances, until midnight. Finally, large busses are routinely used to bring tours, faculty and visitors to and from the site on a regular basis.

Traffic Generation

The local street system is critically deficient serving hillside residential areas being substandard in terms of dedication and alignment. No major or secondary highways serve the subject site and no street is even improved to collector status (i.e., 60 feet of dedication with 40 feet of improved roadway width). In another vein, a conference or seminar with 150 persons attending generates approximately 150 trips with a ratio of two persons per car; and, a four year educational institution such as the college in question generates approximately 2.37 trips per student per day (i.e., consult trip generation factors as issued by the Department of Transportation of the City of Los Angeles). At a student enrollment of approximately 1935 students, Mount Saint Mary's College would generate 4585 trips per day not counting those trips generated by seminars, conference, etc. This amount of traffic impact on a deficient street system raises the potential for accident or injury to an unacceptable level of risk; and, has direct traffic related impacts of accident, injury, noise, lighting and general disturbance on residential properties. While not removing all potential risk and disturbance, it has been suggested that the college voluntarily limit student instruction to day time hours Monday through Friday and terminate all commercial activities, including bus tours, thereby substantially mitigating the problem. However, these suggestions have been routinely dismissed.

Commercial Use of the Site

A review of all the records and evidence in this case indicate that no authority has ever been issued permitting use of the involved site for anything other than a "...school use involving educational subjects which are in conformance with the State Educational Code, religious services or religious education activities..." (i.e., see Plan Approval dated May 23, 1952 as previously discussed). Further, there is no evidence that any variance authority has ever been requested for this purpose..

Yet the college's advertising and publications demonstrate that its facilities are regularly used for such commercial purposes as:

- an 11-day "symphony orchestra camp" for children
- an adult weekend featuring a trip to the Hollywood Bowl and sessions on stress management, nutrition, and exercise habits (cost: $165)
- a 3-day AFL-CIO Institute
- 5-day Yoga seminars which attract up to 500 devotees each day
- local musical theater performances
- 10-day Industrial Areas Foundation conventions
- a 3-day Hugh O'Brian Youth Foundation conference for 200 Central California high-school sophomores

The aforementioned activities and similar use of the property stand in violation of previous grants and authority and would never be permitted by right in this location being classified in the RE40-1-H Zone.

Further, use of the site for commercial use stands in direct violation of past and current provisions of the Los Angeles Municipal Code and there is no indication that any effort to reduce or eliminate these activities is being voluntarily undertaken at the present time. To the contrary, these commercial activities have been consistently promoted and expanded.

Attention to Citizen Concerns

Records and information received from the "BHA" and "BNPC" indicate that individuals and groups from the community have consistently tried to reach some degree of compromise or problem recognition from college representatives since at least 1989. All these efforts have failed with the college representatives taking no initiative to resolve concerns or mitigate potential and very real problems. Further, college representatives continue to ignore physical constraints imposed upon the use by location and the physical capacity of capital improvements to serve it; and continue to avoid any responsibility for conformance with past authority issued for school purposes as well as the legal dictates of the provisions of the Los Angeles Municipal Code which, in theory, equally apply to everyone. As an outstanding example of current management practices, a "Weekend College" program was began approximately 3 years ago offering classes exclusively on Saturday and Sunday. Therefore, revocation action is both needed and necessary with no other form of reasonable dialogue or solution available or acceptable to the parties involved.

Conclusion

In view of the aforementioned evidence, it can only be concluded that revocation action should be undertaken in the subject case since the operation and management practices of Mount Saint Mary's College are:

(a) Adversely affecting the health, peace and safety of persons residing and working in the subject residential area by creating on-street congestion, noise, and disturbance of the peace, early and late night operation and the generation of traffic related impacts raising to the level of an actual invasion of privacy; and

(b) Jeopardizing and endangering the public health and safety of persons residing and working in the subject residential area by increasing the risk of accident or injury to an unacceptable and unreasonable level of risk by generating unwarranted traffic levels on substandard local hillside streets; by use of the property for commercial purposes; and by conducting classes and staging events in the evenings and on weekends; and,

(c) Creating a public nuisance which is having a detrimental economic effect on adjacent residential properties as well as disturbing the normally accepted principle of the right for a peaceful enjoyment of ones property; and,

(d) Resulting in repeated nuisance activities as previously described with no evidence of concern or voluntary efforts of mitigation; and,

(e) Violating past authority and current provisions of the Los Angeles Municipal Code by:

(1) Separating the Carondelet Center site from the Mount Saint Mary's College site without approval of the required "Reduction in Site"; and,

(2) Sharing parking between the Carondelet Center and Mount Saint Mary's College site without authorization being distinct and separate land uses under different ownerships; and,

(3) Utilizing the Mount Saint Mary's College site for commercial purposes such as conferences, seminars, workshops etc. with no variance authority issued for this purpose; and,

(4) Potentially and knowingly violating the Conditions of Operation imposed under a Plan Approval dated July 12, ~~1994~~ 1984 which limited parking on the site to 268 automobile parking spaces and enrollment to a maximum of 1072 students.

Further that any maintenance and operation of the Carondelet Center be suspended unless and until a proper "Reduction in Site" has been approved and a conditional use has been granted by a Zoning Administrator for use of a RE40-1-H zoned site for hospital purposes.

If you have any questions or concerns in this matter, please contact me at any time.

With Respect,

James J. Crisp, M.S.

cc: Brentwood Homeowners Association
Bundy/Norman Place Committee
Attn: David H. Breier, Attorney at Law
Planning Commission, City of Los Angeles
Office of Zoning Administration
Honorable Richard Riordan, Mayor, City of Los Angeles

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
CITY PLANNING
221 N. FIGUEROA STREET
LOS ANGELES, CA 90012-2601

CITY PLANNING
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FAX: (213) 580-1176

INFORMATION
(213) 580-1172

January 25, 1996

Honorable Marvin Braude
Councilman, Eleventh District
Room 275, Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012-4801

RE: Requested Revocation of use permits - Mount Saint Mary's College and Carondolet Center

Dear Councilman Braude:

This communication is in response to your request to review a letter from Mr. Jim Crisp concerning revocation of the conditional use permit for Mt. St. Mary's College and the Carondolet Center. Mr. Crisp's letter discussed a number of issues and asserted a number of contentions. I have researched the issues and the regulatory history of the site. I have met with staff, the Chief Zoning Administrator and with staff of Mt. St. Mary's College, and have reviewed documents submitted on behalf of the Brentwood Homeowners Association, including most notably a comprehensive traffic study. I have outlined my analysis of the specific contentions and attached them to this letter for your review. Based on my research, there is insufficient evidence to support the initiation of a revocation action.

However, it is recommended that the school meet with residents to try and resolve long simmering traffic issues. Should additional evidence be submitted regarding uses not permitted by the conditional use grants or excessive traffic, this office will give further consideration to initiation of revocation proceedings.

If I can be of further assistance, please contact me at (213) 847-3672.

Very truly yours,

Bob Rogers
Principal City Planner

BR:jj

Attachment

cc: Mt. St. Mary's College
James J. Crisp
Con Howe
Robert Janovici

ENCLOSURE 3

Enclosure #

Bundy Canyon has tiny, windy roads many with no sidewalks

Enclosure
TRAFFIC Issues
Large MSMU Busses on narrow, windy roads
photo: Norman Place

Stuck MSMU truck on Norman at Chalon/Students backed up behind

Bundy Canyon Neighborhood Association

@Bundycanyon

- **Home**
- About
- Photos
- Likes
- Videos
- Posts

Bundy Canyon Neighborhood Association

Written by Stefanie Michaels [?] · August 26, 2015 ·

Yep. Another day, another stuck Mount St Mary's truck! Our streets are too small for all this Commotion!

MSMU Truck stuck at Norman at Chalon

Bundy Canyon Neighborhood Association

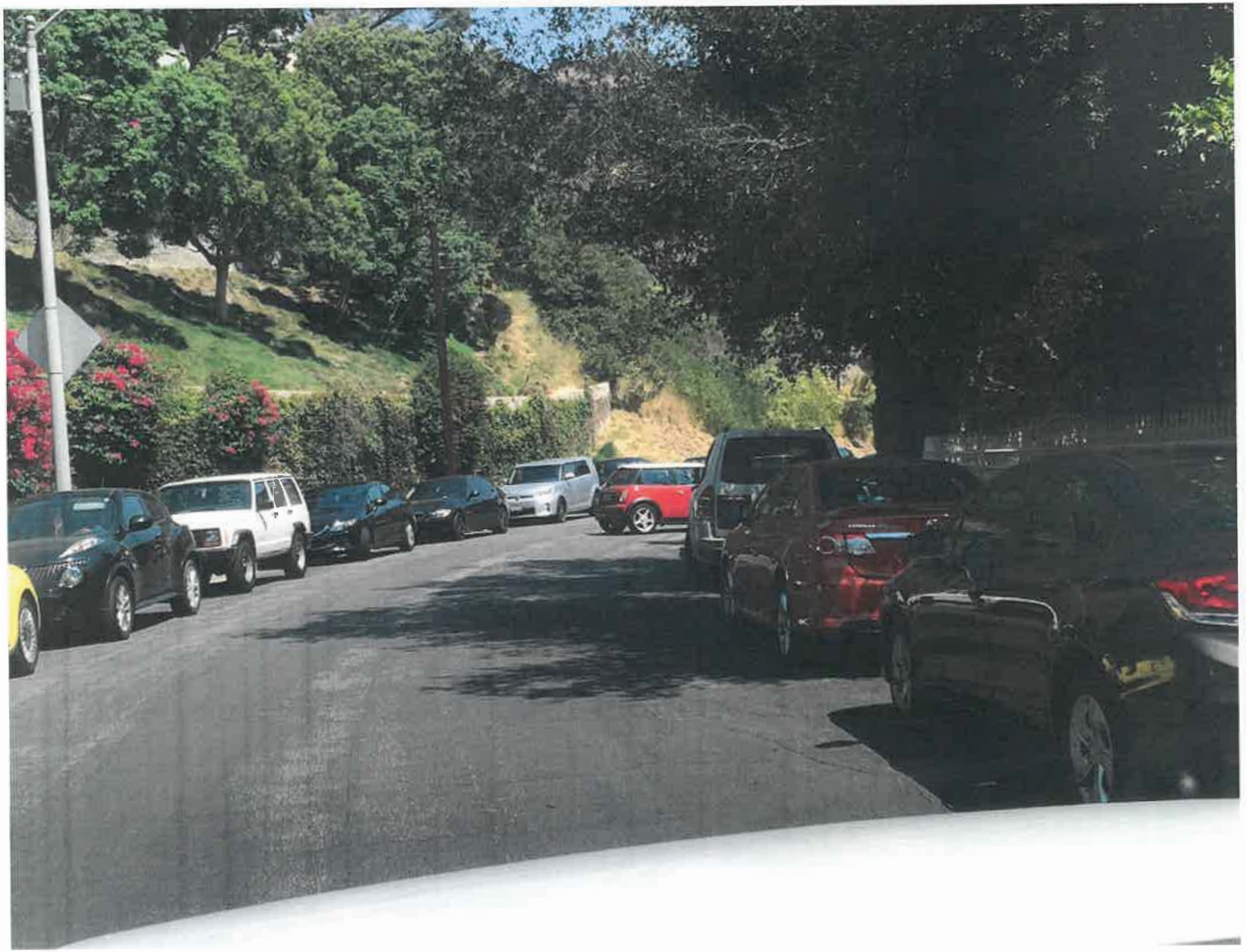
@Bundycanyon

- **Home**
- About
- Photos
- Likes
- Videos
- Posts

Bundy Canyon Neighborhood Association

Written by Stefanie Michaels [illegible] · August 26, 2015 ·

Yep. Another day, another stuck Mount St Mary's truck! Our streets are too small for all this Commotion!

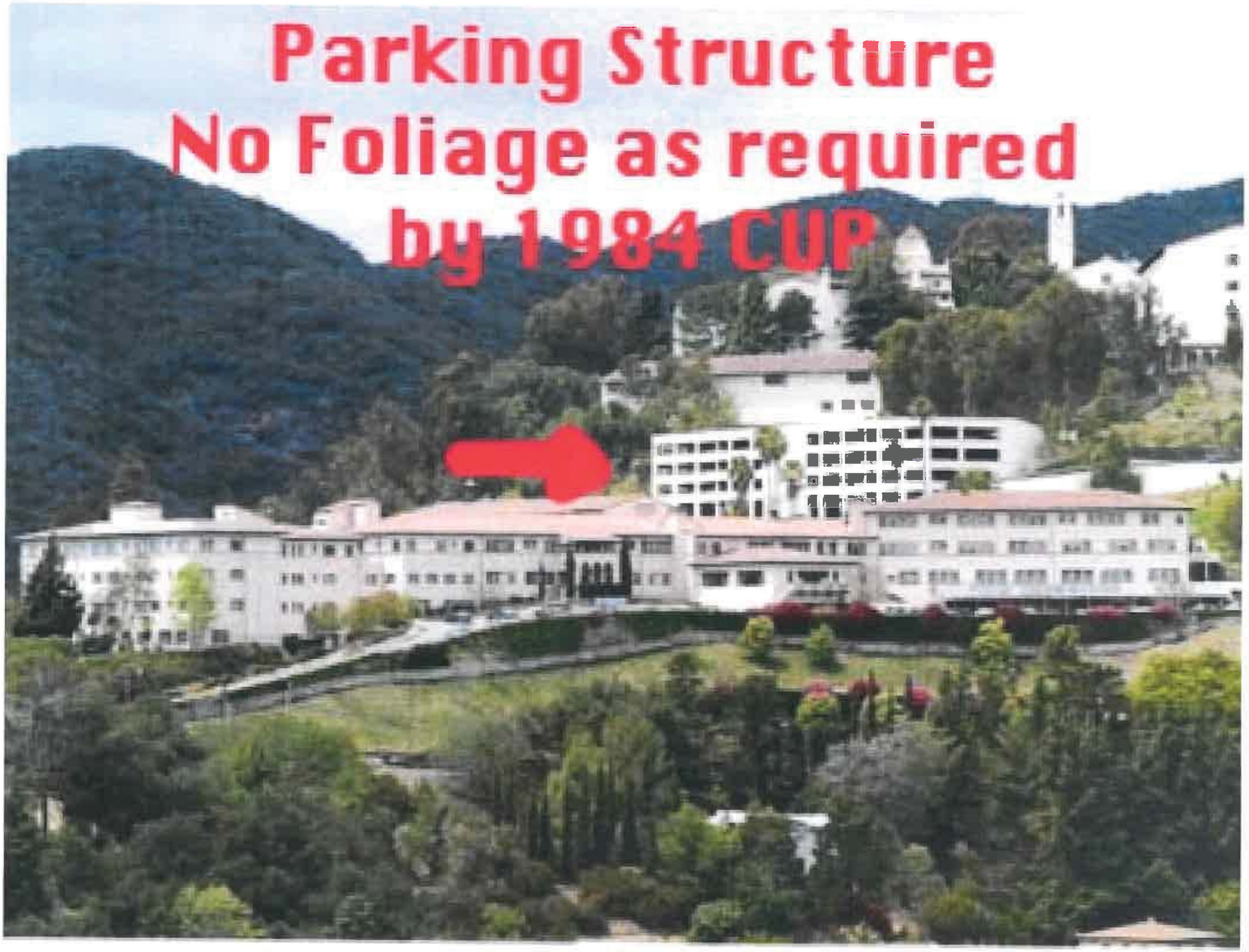


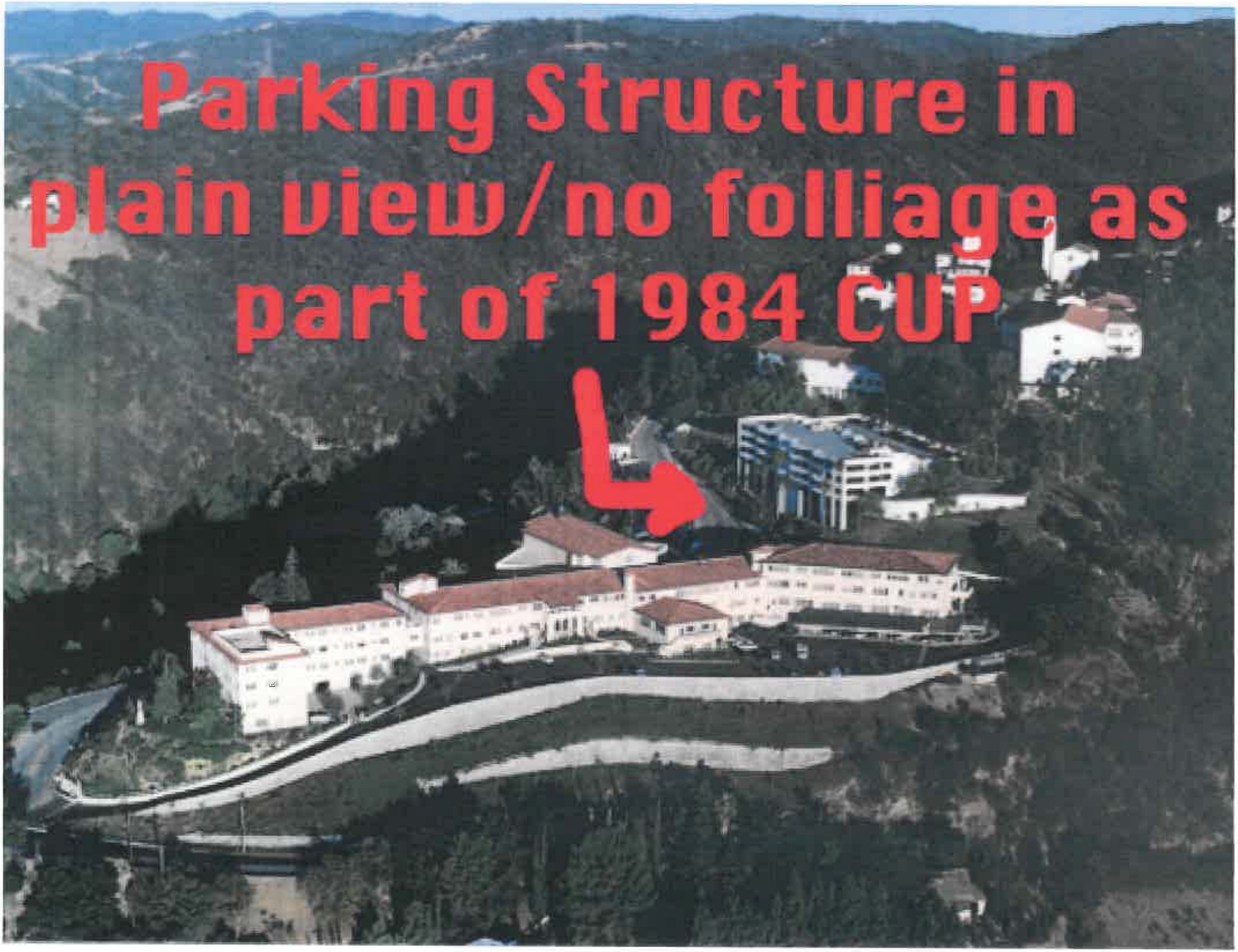
Student cars park on Chalon creating noise & traffic issues. Many turn down Norman place, which is against school policy but there has been no change initiated by MSMU to stop this

Guest Buses heading to MSMU campus stuck on Saltair at Bundy

MSMU Student recruitment bus was just one of many accessing Norman to Chalon over several days for an MSMU event– busses took up the whole road creating dangerous conditions

Trucks have to use both lanes on Chalon to access campus creating a dangerous condition


Parking Structure
No Foliage as required
by 1984 CUP


Parking Structure in plain view/no folliage as part of 1984 CUP

Enclosure
MSMU Chalon Campus Sign Violation

ENCLOSURE 4

A tram took people down the hill to parking lots so they could drive out the south gate, and the center was closed for the rest of the day, he said.

Nearby to the north, Mount St. Mary's College was evacuated as a precaution even though the fire was a mile away and a canyon lay between it and the school, spokeswoman Sarah Scopio said.

College was not in session but 100 staff members evacuated along with about 200 other people attending a conference, Scopio said.

One firefighter suffered a minor foot injury Wednesday, and another firefighter came down with heat exhaustion Thursday.

"We had one firefighter with a heat-related illness that was transported to a local hospital," said Ron Myers of the Los Angeles Fire Department. "He had to be hoisted because of accessibility issues, but his injuries are non-life threatening."

Published at 4:47 PM PDT on Jul 9, 2009

A brush fire climbs a hill near the Getty Center.

ENCLOSURE 5


Cardtronics ATM
Mt Saint Mary's University, Los Angeles
Mt Saint Mary's University Chalon...
Carondelet Center
N Bundy Dr
Chalon Rd
N Norman Pl
St Chalon Rd
Del Terrace
Google
Entrance to MSMU & Carondelet

ENCLOSURE 6

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
CITY PLANNING
561 CITY HALL
LOS ANGELES, CA 90012

CALVIN S. HAMILTON
DIRECTOR

KEI UYEDA
DEPUTY DIRECTOR

JUL 27 1984

CPC 8258

Mt. St. Mary's College
1201 Chalon Road
Los Angeles, CA 90049

Alan E. Smith
The Blurock Corporation
2300 Newport Boulevard
Newport Beach, CA 92663

Department of Building & Safety
Zoning - Room 423, City Hall

CITY PLAN CASE NO. 4072 CU COUNCIL DISTRICT NO. 11

Please be advised that the City Planning Commission on July 12, 1984 conditionally approved the plans (Exhibit ZP-2 and ZP-3, attached to the file) for a multi-level parking structure on the Mt. St. Mary's College site, located at 12001 Chalon Road, east of Bundy Drive.

This action was taken by the following vote:

Moved: Harrington
Seconded: Maston
Ayes: Krueger, Neiman, Garcia

Attached is a copy of the Staff Report adopted by the Commission, including the Conditions of Approval that were imposed (Condition No. 4 revised to permit 268 spaces).

CALVIN S. HAMILTON
Director of Planning

Raymond I. Norman

Raymond I. Norman, Secretary
City Planning Commission

RIN:ct

DEPARTMENT OF CITY PLANNING
Room 561-I, City Hall
200 North Spring Street
Los Angeles, CA 90012
485-3505 (Please make appointments by phone)

CITY PLAN CASE NO. 4072-CU — Council District No. 11
DECISION DATE: ~~July 5, 1984~~ JUL 12 1984 — Brentwood-Pacific Palisades District
District Map No. 7235, 7297 and 144-141
Time: 9:30 a.m. — Book 2, Page 490, Grid AZ-37
Location: Rm. 350, City Hall Los Angeles, CA — Env'l File No. MND-113-84-CUC

To: City Planning Commission

From: Zoning Plans Section

Requested by: Mount St. Mary's College

Subject: APPROVAL OF PLANS - TWO- TO FOUR-LEVEL PARKING STRUCTURE FOR 244 AUTOMOBILES

Property Involved: 12001 Chalon Road, east of Bundy Drive

TABLE OF CONTENTS

EXHIBITS (copies for file and Commissioners only)

ZP- 3: Plot Plan
ZP- 4: Elevation Plan
ZP- 5: Site-line Study (file copy only)

FILE COPY #9

RECOMMENDATION

ACTION RECOMMENDED BY THE STAFF: That the Commission

Consider the Staff Report

Approve the plot plan and elevation plans as shown on Exhibits ZP-2 and ZP-3, subject to the following conditions:

1. That the property be developed substantially in accordance with the plot plan and elevation plans, Exhibit Nos. ZP-2 and ZP-3 attached to the subject file, City Plan Case No. 4072.

2. That along the south and east sides of the parking structure, landscaping be provided to further screen the structure from the view of adjacent residential properties.

3. That the ratio of parking to students shall not be less than 1/4 parking spaces for each student enrolled at Mount St. Mary's College.

4. That not more than 268 automobile parking spaces be constructed on the subject site.

5. That open areas adjoining the parking structure and which areas are not used for buildings, driveways, parking areas, or walks, shall be attractively landscaped in accordance with a landscape development plan prepared by a licensed landscape architect, or licensed architect or landscape contractor to the satisfaction of the Planning Department. Approved copies of such plans shall be submitted to the Department of Building and Safety before issuance of a building permit.

6. All lighting shall be directed onto the site, and no floodlighting shall be located as to be seen directly by the adjacent residential areas. This condition shall not preclude the installation of low-level security lighting.

7. That the University of California at Los Angeles Research Center be notified when the project is started and, if any archaeological materials are encountered during the course of the project development, that the project be halted and the Research Center contacted at once for a proper assessment of the resource and an evaluation of the impact.

8. If the subject plan approval privileges are not utilized or construction work not begun and carried on diligently to completion of at least one usable unit within two years after the effective date of any plan approval authorization, the plan approval authorization shall become void.

Prepared by:

Anne V. Howell

nne V. Howell
City Planner

Approved by:

Bob Rogers

Bob Rogers
Senior City Planner

STAFF REPORT

The Request:

Approve plans and elevations for a 244-space parking structure, as is shown on the location map, Exhibit ZP- 3 and 4 attached.

Proposed Project:

The applicant proposes to develop the property with a 244-space parking structure to replace the existing 56-space parking lot on the site; e.g. to add 188 new parking spaces.

The applicant states that the plans should be approved because:

On January 26, 1984 the City Planning Commission approved the plans and staff report concerning the construction of a Faculty Residence facility on the Mt. St. Mary's Chalon Campus. In the approved staff report and on the plan, there was a reference to the construction of the proposed parking garage.

> "It should also be noted that, at the southern end of the campus, there is a proposed future parking structure. While no new parking is needed at the present time, future changes in enrollment could create a demand for more parking. The future parking structure will be constructed if and when the need for it becomes apparent."

At this time, the Mt. St. Mary's College would like to begin construction of this proposed parking structure. If the current ratio of students to parking available is used, the enrollment on campus could increase to 1037 from 750 with the additional 188 spaces (244-56 existing). The parking garage is being constructed over an existing parking lot at the southern entrance to the campus which will better facilitate "commuter" students traffic from the sourrounding area.

The current siting and configuration of the parking garage is the result of recommendations made at a meeting with City Geology Specialists of the Los Angeles Grading Department of the Department of Building and Safety.

This site is located at the closest possible position to the Academic Center of Campus and any other location would unnecessarily increase traffic to the northern residential end of campus.

General Plan Designation:

The subject property is located within the Brentwood-Pacific Palisades District Plan which designates the property for "Quasi-Public" (private School) use. No zoning designation is indicated on the plan.

Existing Zoning and Land Use:

The subject property is zoned RE40-1-H and improved with Mount St. Mary's College.

Adjoining property is zoned RE15-1-H and improved with single-family dwellings or is vacant.

Environmental Clearance:

In accordance with the Environmental Quality Act of 1970, the subject property was granted a Conditional Negative Declaration.

The environmental review determined that potential impacts could occur from the project's implementation. However, changes and alterations have been required, or incorporated into the conditions of approval or procedural requirements for this project which mitigate or avoid the environmental effects identified in the environmental clearance, including the following plan approval conditions:

1. Preservation or replacement of desirable trees.

2. Protection of any archaeological materials encountered during the course of project development.

Prior Relevant Cases:

The college has existed since 1929 under a zone variance (Zoning Administration Case No. 3066) grant by the City Council. It is considered a "deemed to be approved" conditional use. Subsequent plan approvals permitted expansion of the campus facilities beginning in 1952. The most recent grant was on January 26, 1984 to permit the construction of a faculty residence hall in anticipation of enlargement of the student enrollment. The Planning Commission stipulated in the grant that the college enrollment could not be expanded until adequate parking facilities had been constructed.

Conclusion:

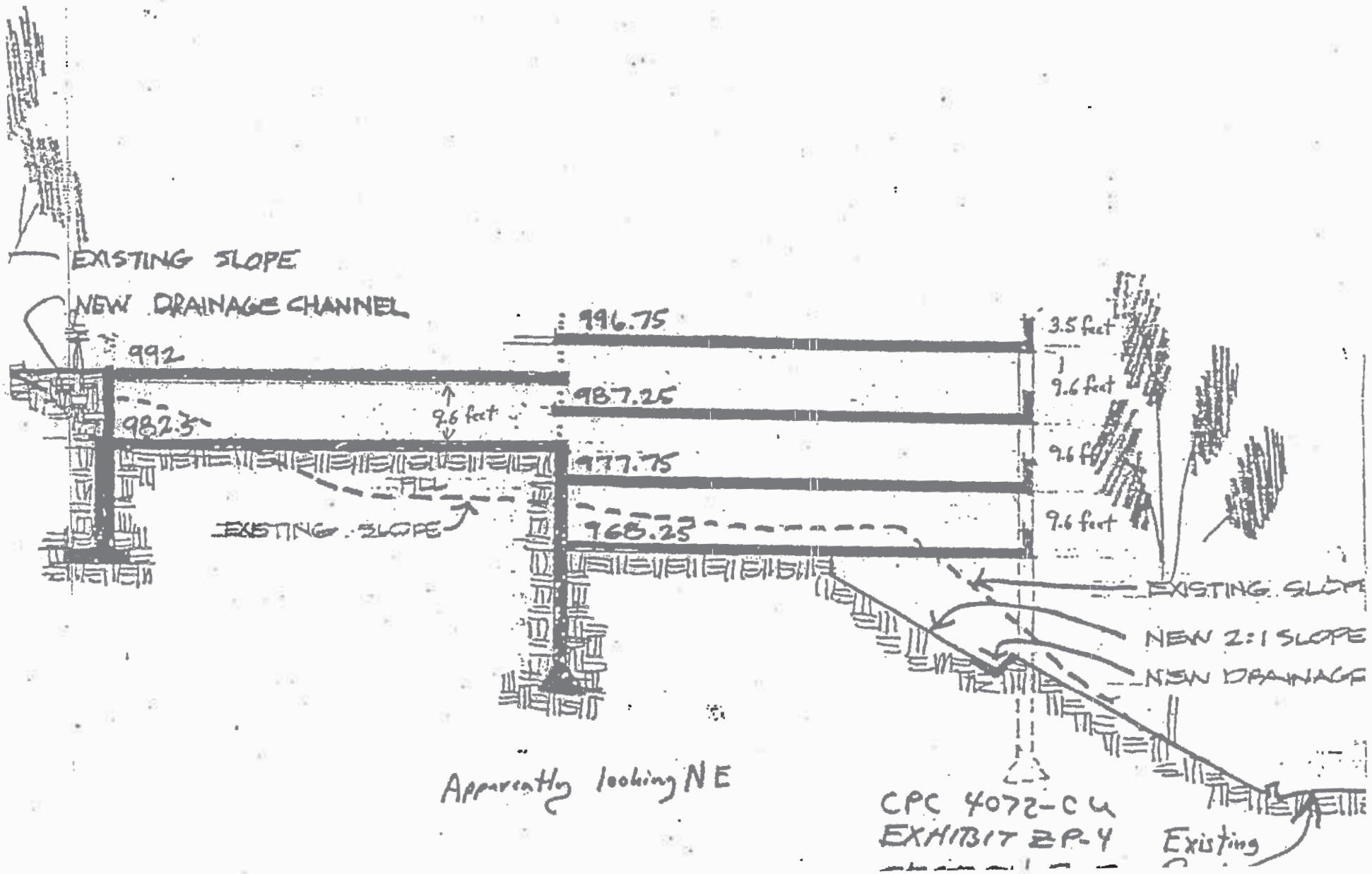
The subject plans should be approved as shown on Exhibits ZP-3 and 4 with conditions as recommended because:

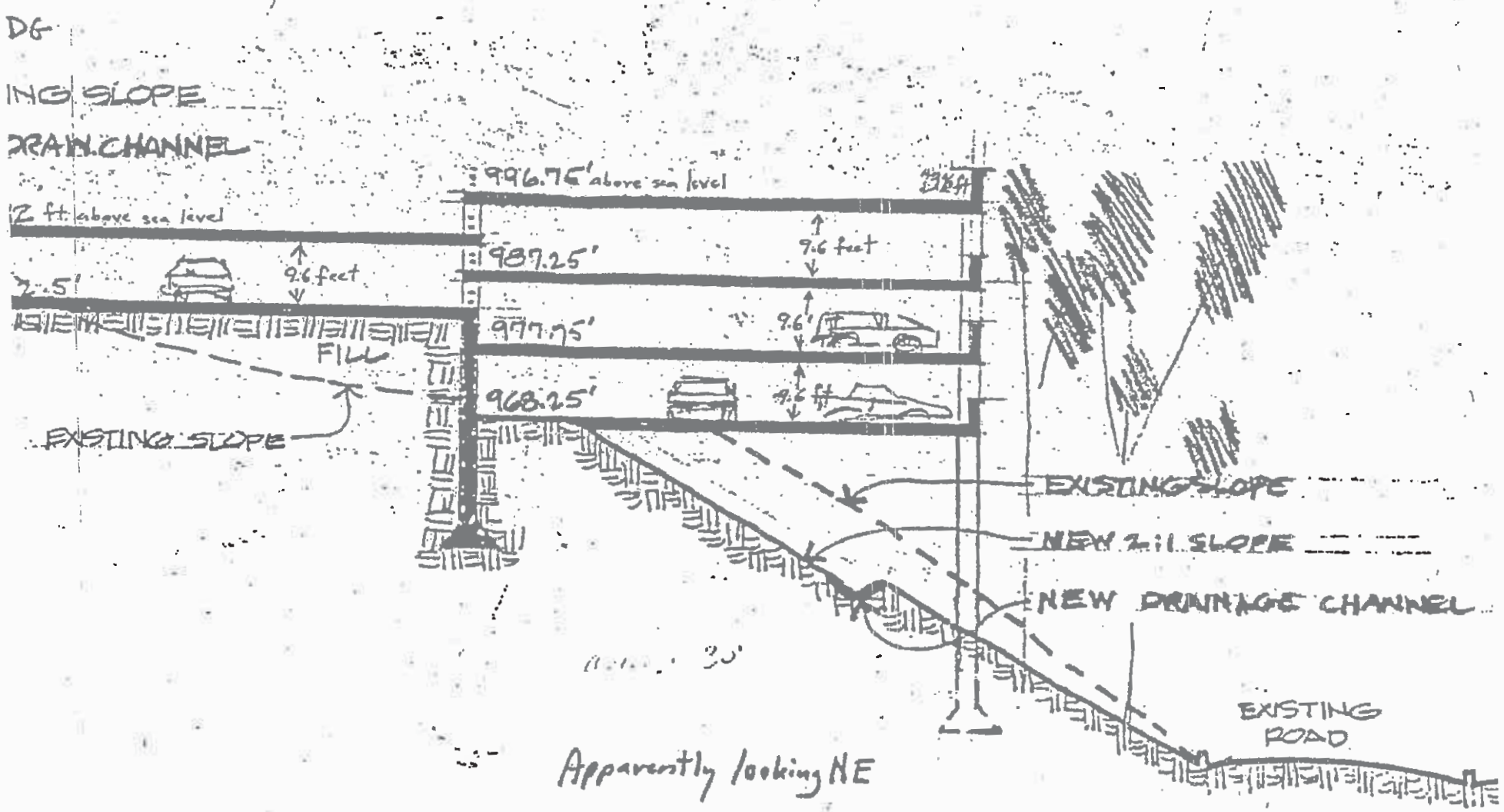
1. The project will enable the college to increase its enrollment consistent with the Commission's action of January 21, 1984 relative to its approval of a faculty residence hall. The Commission required that no increase in enrollment would be permitted until parking facilities had been provided. From the "Site-Line Study" (Exhibit ZP-5)

2. It does not appear that the project will have a visual impact on surrounding developments outside the subject ownership provided that additional trees are planted to screen the parking structure from view of residential properties to the south.

3. The project appears consistent with prior plan approval actions relative to the subject ownership.

4. The proposed parking facility will result in a student-parking ratio of approximately .23 spaces per student.

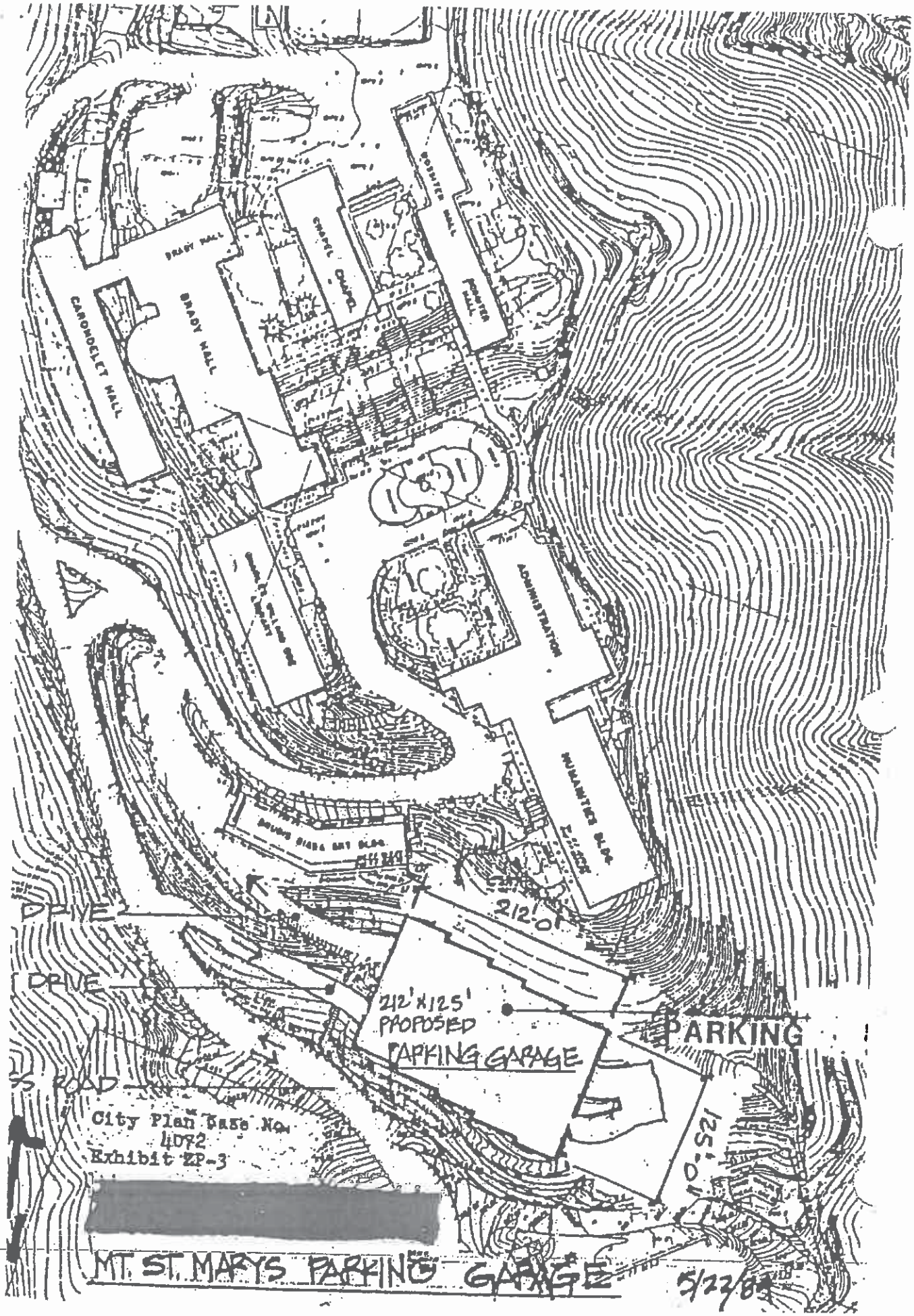

EXISTING SLOPE
NEW DRAINAGE CHANNEL
992
982.5
9.6 feet
EXISTING SLOPE
996.75
987.25
977.75
968.25
3.5 feet
9.6 feet
9.6 feet
9.6 feet
EXISTING SLOPE
NEW 2:1 SLOPE
NEW DRAINAGE
Approximately looking NE
CPC 4072-CU
EXHIBIT 2P-4
Existing



SECTION A-A

EXHIBIT 2P-4

CPC 4072-CU


BRADY HALL
CARONDELET HALL
CHAPEL
FOSTER HALL
ADMINISTRATION
HUMANITIES BLDG.
DRIVE
DRIVE
212'0"
212' X 125'
PROPOSED
PARKING GARAGE
PARKING
125'-0"
City Plan Case No.
4042
Exhibit ZP-3
MT. ST. MARYS PARKING GARAGE
5/23/84

CPC 4072

DEPARTMENT OF CITY PLANNING
Room 561-1, City Hall
200 North Spring Street
Los Angeles, CA 90012
485-3505 (Please make appointments by phone)

CITY PLAN CASE NO. 4072-CU
DECISION DATE: ~~July 5, 1984~~ JUL 12 1984
Time: 9:30 a.m.
Location: Rm. 350, City Hall
Los Angeles, CA

Council District No. 11
Brentwood-Pacific Palisades District
District Map No. 7235, 7297 and 144-141
Book 2, Page 490, Grid AZ-37
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ACTION RECOMMENDED BY THE STAFF: That the Commission

Consider the Staff Report

Approve the plot plan and elevation plans as shown on Exhibits ZP-2 and ZP-3, subject to the following conditions:

1. That the property be developed substantially in accordance with the plot plan and elevation plans, Exhibit Nos. ZP-2 and ZP-3 attached to the subject file, City Plan Case No. 4072.

2. That along the south and east sides of the parking structure, landscaping be provided to further screen the structure from the view of adjacent residential properties.

3. That the ratio of parking to students shall not be less than 1/4 parking spaces for each student enrolled at Mount St. Mary's College.

4. That not more than 244 automobile parking spaces be constructed on the subject site.

5. That open areas adjoining the parking structure and which areas are not used for buildings, driveways, parking areas, or walks, shall be attractively landscaped in accordance with a landscape development plan prepared by a licensed landscape architect, or licensed architect or landscape contractor to the satisfaction of the Planning Department. Approved copies of such plans shall be submitted to the Department of Building and Safety before issuance of a building permit.

6. All lighting shall be directed onto the site, and no floodlighting shall be located as to be seen directly by the adjacent residential areas. This condition shall not preclude the installation of low-level security lighting.

7. That the University of California at Los Angeles Research Center be notified when the project is started and, if any archaeological materials are encountered during the course of the project development, that the project be halted and the Research Center contacted at once for a proper assessment of the resource and an evaluation of the impact.

8. If the subject plan approval privileges are not utilized or construction work not begun and carried on diligently to completion of at least one usable unit within two years after the effective date of any plan approval authorization, the plan approval authorization shall become void.

Prepared by:

Anne V. Howell
City Planner

Approved by:

Bob Rogers
Senior City Planner

STAFF REPORT

The Request:

Approve plans and elevations for a 244-space parking structure, as is shown on the location map, Exhibit ZP- 3 and 4 attached.

Proposed Project:

The applicant proposes to develop the property with a 244-space parking structure to replace the existing 56-space parking lot on the site; e.g. to add 188 new parking spaces.

The applicant states that the plans should be approved because:

On January 26, 1984 the City Planning Commission approved the plans and staff report concerning the construction of a Faculty Residence facility on the Mt. St. Mary's Chalon Campus. In the approved staff report and on the plan, there was a reference to the construction of the proposed parking garage.

> "It should also be noted that, at the southern end of the campus, there is a proposed future parking structure. While no new parking is needed at the present time, future changes in enrollment could create a demand for more parking. The future parking structure will be constructed if and when the need for it becomes apparent."

At this time, the Mt. St. Mary's College would like to begin construction of this proposed parking structure. If the current ratio of students to parking available is used, the enrollment on campus could increase to 1037 from 750 with the additional 188 spaces (244-56 existing). The parking garage is being constructed over an existing parking lot at the southern entrance to the campus which will better facilitate "commuter" students traffic from the sourrounding area.

The current siting and configuration of the parking garage is the result of recommendations made at a meeting with City Geology Specialists of the Los Angeles Grading Department of the Department of Building and Safety.

This site is located at the closest possible position to the Academic Center of Campus and any other location would unnecessarily increase traffic to the northern residential end of campus.

General Plan Designation:

The subject property is located within the Brentwood-Pacific Palisades District Plan which designates the property for "Quasi-Public" (private School) use. No zoning designation is indicated on the plan.

Existing Zoning and Land Use:

The subject property is zoned RE40-1-H and improved with Mount St. Mary's College.

Adjoining property is zoned RE15-1-H and improved with single-family dwellings or is vacant.

Environmental Clearance:

In accordance with the Environmental Quality Act of 1970, the subject property was granted a Conditional Negative Declaration.

The environmental review determined that potential impacts could occur from the project's implementation. However, changes and alterations have been required, or incorporated into the conditions of approval or procedural requirements for this project which mitigate or avoid the environmental effects identified in the environmental clearance, including the following plan approval conditions:

1. Preservation or replacement of desirable trees.

2. Protection of any archaeological materials encountered during the course of project development.

Prior Relevant Cases:

The college has existed since 1929 under a zone variance (Zoning Administration Case No. 3066) grant by the City Council. It is considered a "deemed to be approved" conditional use. Subsequent plan approvals permitted expansion of the campus facilities beginning in 1952. The most recent grant was on January 26, 1984 to permit the construction of a faculty residence hall in anticipation of enlargement of the student enrollment. The Planning Commission stipulated in the grant that the college enrollment could not be expanded until adequate parking facilities had been constructed.

Conclusion:

The subject plans should be approved as shown on Exhibits ZP-3 and 4 with conditions as recommended because:

1. The project will enable the college to increase its enrollment consistent with the Commission's action of January 21, 1984 relative to its approval of a faculty residence hall. The Commission required that no increase in enrollment would be permitted until parking facilities had been provided. From the "Site-Line Study" (Exhibit ZP-5)

2. It does not appear that the project will have a visual impact on surrounding developments outside the subject ownership provided that additional trees are planted to screen the parking structure from view of residential properties to the south.

3. The project appears consistent with prior plan approval actions relative to the subject ownership.

4. The proposed parking facility will result in a student-parking ratio of approximately .23 spaces per student.

Room 561

CITY PLAN CASE NO. 4072

BRENTWOOD-PACIFIC PALISADES DISTRICT
COUNCIL DISTRICT NO. 11
Bk. 2, Page 490
Grid A2/37

DECISION DATE: January 26, 1984
TIME: After 9:30 A.M.
LOCATION: Van Nuys Woman's Club
14836 Sylvan Street
Van Nuys, CA

To: City Planning Commission

From: Zoning Plans Section

Requested by: Mt. St. Mary's College, Chalon Campus

Subject: APPROVAL OF PLANS - FACULTY RESIDENCE BUILDING

Property Involved: Located at 12001 Chalon Road, east of Bundy Drive.

TABLE OF CONTENTS

EXHIBITS: COPIES FOR COMMISSIONERS ONLY

RECOMMENDATION

ACTION RECOMMENDED BY THE STAFF: That the Commission

Consider the Staff Report.

Approve the construction of a faculty residence hall, a one-story parking garage and a relocation of 39 parking spaces, subject to the following conditions:

1. There shall be no increase in student enrollment beyond 750 students, until a parking structure is constructed at the southern end of the campus. In lieu of this, when an increase in enrollment beyond 750 students is contemplated, the college may apply to the City Planning Commission for a review of the adequacy of existing and any proposed on-campus surface parking.

2. The faculty residence hall shall contain not more than three dwelling units nor 3∃ bedrooms, including three bedrooms to be used as guest rooms.

3. The faculty residence hall shall not exceed three stories in height, and the garage building shall not exceed one story in height.

4. The subject property shall be developed substantially in accordance with the plans, Exhibit ZP-2, attached to City Plan Case No. 4072, on file in the Los Angeles City Planning Department, except as the subject property may be required to meet the provisions set down by the Municipal Code and the conditions herein.

5. Prior to the issuance of building permits, detailed development plans, including a complete landscape plan, shall be submitted to the Department of City Planning for approval.

6. Eleven parking spaces shall be provided adjacent to the faculty residence hall.

7. This approval shall be utilized within two years after the effective date of approval. If at least one usable dwelling is not completed by that date, this approval shall become void.

Recommended by:

John J. Parker Jr.
City Planner

Approved by:

William E. Lillenberg
Senior City Planner

STAFF REPORT

Request: -

The Commission has received a request from Mt. St. Mary's College (Chalon Campus) for approval for a three-dwelling unit apartment building, containing 32 bedrooms, including several guest rooms, to be used for housing faculty and staff presently located elsewhere on the campus. The housing used elsewhere will be made available for students living on-campus.

Comments:

The proposed structure would be three stories in height. To the north would be a one-story garage structure, let into the earth bank on the north side. The requested faculty residence hall would also entail a minor reconfiguration of campus parking, as explained below.

The college, for the past five years, has maintained a constant enrollment of between 700 and 750 students. The college is planning to keep enrollment steady at its current level in the foreseeable future. The new residence hall is therefore being built to increase the number of students living on-campus, not to increase enrollment. The construction of the new faculty residence hall will open up rooms in Rossiter Hall, located approximately at the center of the campus, which can then be occupied by students.

By Code, the proposed residence hall will require seven additional parking spaces. This includes two parking spaces for each of the three dwelling units, and one additional space for three guest bedrooms (the latter requirement is so low because more than 60 guest rooms are located elsewhere within the campus). The proposed new residence hall is being built on the northern-most parking lot within the campus which currently contains 39 spaces. Eleven new spaces would be contained within the proposed garage building, for a net loss of 28 spaces on the site. The lost spaces would be replaced on a lower lot (see Drawing AS-5 in the exhibits) through the removal of several temporary trailers and a portion of a dilapidated building. This will create 38 new parking spaces at that location resulting in an overall campus gain of 10 parking spaces (or three more than the seven required for the new residence hall).

In addition to increasing the net existing number of parking spaces on the campus by 10, the relocation of parking from the northern-most lot where the residence hall will be constructed to the more southerly location will place that parking in a more convenient location and it should be more fully utilized. It should also be noted that, at the southern end of the campus, there is a proposed future parking structure. While no new parking is needed at the present time, future changes in enrollment could create a demand for more parking. The future parking

structure will be constructed if and when the need for it becomes apparent.

The requested faculty residence hall will have no discernible impact on any surrounding development. The Mt. St. Mary's campus is located atop a leveled ridge. The campus is straddled on both sides by precipitous canyons which are uninhabited. The nearest development is to the west of Chalon Road and Bundy Drive.

At the specific location of the proposed residence hall at the northern end of the campus, the view to both the east and west is composed of plunging canyons which then rise precipitously to ridge lines along which no development is visible. To the north, the topography rises steeply, again with no visible development (the garage building would be let in to this north rising slope). The sole direction in which development is visible is to the south, the campus itself.

Conclusion:

It is the staff recommendation that, with the recommended conditions, the requested addition of a faculty residence hall and reconfiguration of parking be approved. In consideration of the severe topography on three sides of the subject site, in combination with the total lack of any visible development to and beyond the ridge lines in these three directions, the proposed development will have no impact of any type on surrounding off-campus developments. The relocation of the existing parking lot from its present position to a more centralized location, will be beneficial since it will promote a greater utilization of the parking spaces.

The staff has recommended that any future expansions of enrollment be predicated upon the construction of the future parking structure at the southern end of the campus. While it is true, as the applicant has noted, that the proposed faculty residence hall contemplates a net addition of 10 parking spaces on-campus with no increase in student enrollment, there would be no inherent control in this approval to insure that enrollment would not grow in an ad hoc fashion, apart from the condition relating future increases to the proposed parking structure.

JJP/ad
1-5-84

ENCLOSURE 7

Mount Saint Mary's University
LOS ANGELES

Office of the President

November 2, 2015

Dear Chalon Neighbor:

For 90 years, Mount Saint Mary's University has had a long association with our Brentwood neighborhood. It is our continued desire to work in a spirit of mutual collaboration with and respect for our neighbors.

We have held two Town Hall meetings in the last year to provide our neighbors with information about the university and the proposed construction of a fitness facility on the campus, and to listen to the questions and concerns you may have. You may have received misinformation about the university and its plans, and we'd like to share the facts with you.

Will the new fitness center expand the Chalon Campus? No. The building will sit on the existing footprint of the current fitness center, pool, facility offices, resident manager housing and parking. Additionally, while the project as originally envisioned was approximately 48,000 square feet, we are analyzing the final project size. We anticipate it will be smaller than originally planned.

This fitness facility is for our current student body. Enrollment at the Chalon Campus is under 1,600. The remainder of our student body is centered at our Doheny Campus located in downtown Los Angeles, which includes the graduate and weekend/evening programs.

We have also committed to the development of an Environmental Impact Report (EIR) to examine all aspects of the project and its potential impacts. We have engaged a construction manager early in this process so that we can work with them to minimize the impacts of construction on the community. We will be sharing the information with our neighbors and the Brentwood Homeowners Association.

We publish an electronic newsletter for our Chalon neighbors two times a year, at the beginning of each semester. If you have any questions, or would like to be informed about events happening on campus, as well as information about the proposed facility, please email Debbie Ream, Director of Communications and Marketing, at dream@msmu.edu, and we will add you to our mailing list.

Sincerely,

Ann McElaney-Johnson

Ann McElaney-Johnson
President

Chalon Campus, 12001 Chalon Road, Los Angeles, CA 90049 Doheny Campus, 10 Chester Place, Los Angeles, CA 90007 amcelaney@msmu.edu Phone:310.954.4011

ENCLOSURE 8

Mount Saint Mary's University (CA)

Overall Niche Grade	LOCATION	UNDERGRADS	TUITION	ACCEPTANCE RATE	
	Los Angeles, CA	1,919	$33,852	74 %	More statistics . . .

Statistics

Basic Statistics

School Contact

Mount Saint Mary's
12001 Chalon Road
Los Angeles, CA 90049
(310) 954-4000
www.msmc.la.edu

General Statistics

Founded:	Not Reported
Coed:	No, All Women
Control:	Private Non-Profit
Setting:	Large city
Academic Calendar:	Semester
General Religion:	Catholic
Specific Religion:	Roman Catholic

Cost Statistics

In-State Tuition:	$33,852
Out-of-State Tuition:	$33,852
Room & Board:	$10,530
Books & Supplies:	$1,774

Student Body Statistics

Full-Time Undergrads:	1,919
Part-Time Undergrads:	539
Male Undergrads:	164
Female Undergrads:	2,294
Total Grad Students:	688
Full-Time Grad Students:	420
Part-Time Grad Students:	268

Financial Aid Statistics

General Information

Financial Aid Forms Deadline:	Not Reported
Tuition Guaranteed Plan:	Not Available
Prepaid Tuition Plan:	Not Available
Tuition Payment Plan:	Available
In-State Tuition:	$33,852
Out-of-State Tuition:	$33,852

Contact Financial Aid

Phone: (310) 954-4190
Email: Not Reported
Web Site: www.msmc.la.edu/pages/220.asp

Aid/Loans	Federal Grant Aid	Institution Grant Aid	State Grant Aid	Student Loans	Total
Average Amount	$4,994	$12,789	$8,164	$6,867	$29,799
% Students That Got It	65%	98%	57%	95%	100%

NOTE: Financial aid is only available for those who qualify.

Admissions Statistics

Overall Admissions Statistics

Total Applicants:	2,316
Male Applicants:	106
Female Applicants:	2,210
Total Acceptances:	1,716
Male Acceptances:	41
Female Acceptances:	1,675

Acceptance Rate:	74%
Yield:	33%

Contact Admissions

Phone:	(310) 954-4000
Email:	mountnews@msmc.la.edu
Web Site:	www.msmc.la.edu/pages/107.asp

Application Information

Open Admissions:	No
Common Application:	Yes
Application Fee:	$50
Application Web Site:	www.msmc.la.edu/pages/1969.asp

Dates To Know	Deadline	Notification
Early Action	December 1	January
Early Decision	May 1	Not Reported
Regular Decision	February 15	Not Reported
Must-Reply-By	May 1	

Admissions Consideration	Required	Recommended	Neither Required Nor Recommended
GPA			
HS Rank			
HS Transcript			
College Prep Courses			
Recommendations			
Audition/Portfolio			
SAT/ACT			
TOEFL			

Freshmen Enrollment Statistics

Total Freshmen Enrollment:	559
Full-Time Male Enrollment:	19
Full-Time Female Enrollment:	535
Part-Time Male Enrollment:	1
Part-Time Female Enrollment:	4

Waitlist Statistics

Applicants Placed:	Not Reported
Applicants Accepting:	Not Reported
Students Enrolled:	Not Reported

Transfer Statistics

Applications Received:	316
Applicants Accepted:	135
Students Enrolled:	77

Standardized Tests Statistics

Standardized Test Scores	Critical Reading	Math	Writing	Composite (out of)
SAT (25th - 75th Percentile)	420 - 510	420 - 520	420 - 530	1260 - 1560 (2400)
ACT (25th - 75th Percentile)	Not Reported	Not Reported	Not Reported	16 - 22 (36)

General Statistics

Top 10% of HS Class:	Not Reported
SAT/ACT Required:	Not Reported
Students Submitting SAT:	91%
Students Submitting ACT:	35%

SAT Subject Test Requirements

Not Reported

ENCLOSURE 9

Enclosure

Deer migrating during summer season at Chalon and Norman Place

ENCLOSURE 10

INITIAL STUDY
TRAFFIC ANALYSIS

EIR CASE NO.: 113-84-CU2 TRANSMITTAL DATE: 3-28-84

PROJECT DESCRIPTION: Cond. Use for a 4 story, 80,000 sq. ft. parking structure for 244 cars located on the Mt. St. Mary's College property on 95.5 net acres, zoned RE40-1-H.

PROJECT LOCATION: 12001-Cholon Rd.

EXISTING ZONES: RE40-1-H PLANNED ZONES: RE40-1-H

PROJECTED GENERATED TRIPS: —

Bundy Dr. (Street) ADT 290 TPH 35

(Street) ADT TPH

CRITICAL INTERSECTIONS:

& &

	AM	PM		AM	PM
NB					
SB					
EB					
WB					

COMMENTS: * Provided that no enrollment increase is allowed.

IMPACT OF TRAFFIC GENERATION:

NOT SIGNIFICANT	MAY BE SIGNIFICANT	MAY BE CUMULATIVE	TRAFFIC STUDY NEEDED
X	*		

Prepared by: [signature] Date: 4/4/84

CP-1206 (3/79)

ENCLOSURE 11

SANDRA GENIS, PLANNING RESOURCES
1586 MYRTLEWOOD COSTA MESA, CA. 92626 PHONE/FAX (714) 754-0814

To: Doug Carstens

From: Sandra Genis

Date: September 2,2016

Subject: Case Number: ENV-2016-2319-EIR, Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

These comments are submitted in response to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Mount Saint Mary's University Chalon Campus Wellness Pavilion Project, Case Number: ENV-2016-2319-EIR (SCH 2016081015) and are submitted on behalf of the Bundy Canyon Association.

The project entails demolition of the existing fitness center, facilities management building, tennis courts and pool on a 3.8-acre portion of the 45-acre Mount Saint Mary's University site. and the construction of a Wellness Pavilion and swimming pool. The Wellness Pavilion would be a two-story, approximately 38,000 sq. ft. multi-use building, which would house a recreation and practice gym, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e. lockers, showers, restrooms, equipment storage, and mechanical spaces).

Project Background

The Mount Saint Mary's facility was originally approved in 1928. Minutes for Petition 3066 include a statement from "the sisters" that they would have between 100 and 200 students, with a maximum cap of 500. A January 1984 staff report for City Plan Case No. 4072 CU to allow a new residence hall indicated that the college had maintained a constant enrollment of 700 to 750 (Page 2) and there were no plans to increase the number of students (Page 1). It is not clear how or if the increase above 500 students was granted.

Later the same year, in July 1984, the Planning Commission approved construction of a parking garage at what was then Mount Saint Mary's College under Case No. 4072 CU. Under conditions of approval adopted for Case No. 4072 CU at that time, at least ¼ parking space was to be provided for each student (Condition 3), and on-site parking was capped at 268 spaces, effectively capping enrollment at 1,072 students. However, the IS states that 561 parking spaces are provided on campus (p. A-6)

Documents available for review via the City's on-line Zoning Information and Map Access System and from Piper Tech show no major changes in permitted activity levels since 1984.

According to the Initial Study (IS p. A-10), the project would not entail any increase in enrollment at the Chalon campus of Mount Saint Mary's University. The IS then states that the deemed approved enrollment cap at the Chalon campus is 2,244 students and that the facility has consistently been below the maximum student enrollment cap. In light of continued growth of student enrollment and lack of documentation regarding changes in the allowable cap over time, this statement must be verified based on fully documented approvals.

The IS also references a requirement for valet parking for events with more than fifty attendees (p. A-6). It is not clear when this condition was imposed. In order to adequately assess the impact of currently requested project approvals on the community, a full review of past approvals must be provided, including any conditions of approval adopted at the time of the approvals. Any changes in current conditions of approval must be identified and potential impacts of any changes must be examined.

Project Site

The IS references the 45-acre campus (p. A-2). Figure A-1 shows the "Project Site" to be just a portion of the total campus, and the "Project Site" is described in relation to other areas of campus (P. A-5). It is not clear whether or not the area to be redeveloped is a separate lot from other portions of the campus. If it is not a separate lot, how is the area included in the "Project Site" defined?

It is not clear what the size of the "Project Site" is, though reference is made to 3.8 acres. Identification of the size of the site is essential to an evaluation of whether the proposed floor area ratios and lot coverage would be appropriate and would be compatible with the surrounding area. The EIR must be clear as to whether any mitigation measures or conditions imposed on the project apply to the campus as a whole or to just the "Project Site". In order to avoid confusion, it may be preferable to refer to the area to be redeveloped as the "development area" or some other name that makes it clear whether any discussion or condition applies to all or just a portion of the campus.

Project Description

The project description must include not only physical improvements but operational characteristics, including hours of operation. The description must be consistent and complete. For example, while a roof garden is not included in the project description, Section XV indicates that a roof garden would provide outdoor recreation space (p. B-32). The IS states that natural light would be "harvested" using large expanses of glass and skylights (A-34) but then says that glazing would be "protected from direct sunlight with deep overhangs to mitigate glare and reduce solar radiation" (p. A-35.)

Facility Users

As noted in the IS, Mount Saint Mary's operates at another location known as the Doheny campus. The EIR must address increased visits to the Chalon campus Wellness facility by students enrolled in programs at Doheny, focusing on traffic and parking.

The EIR must address any re-alignment of activities between the Doheny and Chalon campuses or student bodies as a result of the proposed project. Will any programs now being conducted at the Doheny campus be relocated to the Chalon campus?

It is not clear if any of the Wellness facilities will be used for training of students in physical therapy or other health care fields or whether this would involve treatment of off-campus individuals. This must be addressed along with associated impacts on traffic and related factors.

Use of the proposed athletic facilities must be limited to students and faculty. Outside use of the proposed athletic facilities must not be permitted.

Events

The EIR must address both campus events and external events, listing the type, number, and anticipated attendance at events. Attendance must be capped at no more than the attendance numbers used in the EIR analyses. All events must be required to end fifteen minutes before the latest regularly scheduled shuttle leaves the campus and no event must be permitted to begin prior to the arrival of the first shuttle of the day. Start and end times for events must be offset from peak traffic hours. Project alternatives must include a prohibition of external events and a prohibition on rental of campus facilities for filming.

Circulation and Parking

The IS notes the availability of 107 on-street parking spaces within one quarter mile of the campus (p. A-6). Parking in the neighborhood is not a legitimate solution to meeting campus parking demand. The proposed new facilities have the potential to exacerbate this problem.

The campus is on a hill and is not in close proximity to any bus stop. It is thus reasonable to ban walk-ons in order to discourage parking in the neighborhood. A parking restriction should be considered, allowing only residents and their guests to park on streets surrounding the campus.

It is not clear whether any Doheny students park at the Chalon campus or on streets around the campus to take the shuttle to the Doheny campus. The EIR must address impacts of any Doheny students using the Chalon Campus and surrounding area as a sort of "park-and-ride".

Planning and Zoning

The subject property is located in the RE-40-1-H Zoning District. In accordance with Los Angeles Municipal Code Section 12.21.1:

> No building or structure shall be erected or enlarged which exceeds the total floor area, the number of stories or the height limits hereinafter specified for the district in which the building or structure is located. …
>
> … In the RA, RE, RS, and R1 Zones in Height District No. 1, located in a Hillside Area, as defined in Section 12.03 of this Code, no Building or Structure shall exceed the height limits established in Paragraph (d) of Subdivision 10 of Subsection C. of Section 12.21 of this Code.

In accordance with Section 12.21.C.10(d):

> No portion of a Building or Structure shall be erected or enlarged which exceeds the envelope height limits as outlined in Table 12.21 C.10-4

In accordance with Table 12.21.C.10-4, maximum allowable height would be 30 or 36 feet, depending on roof slope. While elevations of the proposed structures are provided, roof slope is not defined. The EIR must identify roof slope and the normally required height limitation.

The proposed structure would be 42 feet in height. The IS suggests that the additional height can be approved in connection with a Plan Approval for a deemed-approved conditional use. This is inappropriate.

As noted the Los Angeles Superior Court in Donald Kottler; and Marlene Kottler v. City of Los Angeles; Central Area Planning Commission of the City of Los Angeles, in addressing the inappropriate granting of a zoning "adjustment":

> The "adjustment" provided for in LAMC section 12.28 is "a permit to build a structure or engage in an activity that would not otherwise be allowed under the zoning ordinance ... ". Neighbors in Support of Appropriate Land Use v. County of Tuolumne (2007) 157 Cal. App.4th 997, 1007; see also Hamilton v. Board of Supervisors of Santa Barbara County (1969) 269 Cai.App.2d 64, 66. In other words, it is a variance. Under the plain terms of the City's own charter any such variance could only be made after the ZA made five findings relating to the need for a special exception to the zoning requirements. See Los Angeles City Charter§ 562(c); Petitioners RJN, Ex. 1, p. 5. Accordingly, Respondents erred when they approved a variance without making the required findings under City Charter section 562(c).
>
> … Condition use permits, on the other hand, relate to the permitted use of a property, not the size or design features of the buildings on that property. See Essick v. City of Los Angeles (1950) 34 Cal.2d 614, 623 ("[A] .conditional use is a separate and distinct concept from a variance and ... is granted for a public or quasi-public purpose within the terms of the ... ordinance itself rather than to obviate the 'practical difficulties, unnecessary hardships or results inconsistent with the general purposes of the zoning

regulations' as applied to individual property owners, which must be shown before a variance may be granted .... ").

Thus, a variance would be required for the additional height. In accordance with Los Angeles City Charter Section 562(c), a variance could only be granted if all of the following findings could be made:

(1) that the strict application of the provisions of the zoning ordinance would result in practical difficulties or unnecessary hardships inconsistent with the general purposes and intent of the zoning regulations;

(2) that there are special circumstances applicable to the subject property such as size, shape, topography, location or surroundings that do not apply generally to other property in the same zone and vicinity;

(3) that the variance is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property in the same zone and vicinity but which, because of the special circumstances and practical difficulties or unnecessary hardships, is denied to the property in question;

(4) that the granting of the variance will not be materially detrimental to the public welfare, or injurious to the property or improvements in the same zone or vicinity in which the property is located; and

(5) that the granting of the variance will not adversely affect any element of the General Plan.

Project Alternatives

As noted above, alternatives must include no use of the facilities for external events and no filming. An operational alternative should consider operations consistent with the 1984 approvals, the last known documented approval for campus operations, i.e. 268 parking spaces.

Alternate locations should include location of the Wellness Pavilion at the Doheny site or nearby environs. Provision of a park and ride outside the neighborhood in an area with easy access to the freeway or metro line should be considered.

Topical Issues

The following topical issues must be considered.

Aesthetics

The EIR must examine the scale of the proposed structures in the context of existing on and off campus structures in the area. Light and glare from expanses of glass and additional lighting must be addressed.

Air Quality

The EIR must address operational and construction emissions, including health impacts on the surrounding neighborhood. Increased emissions and hot spots due to increased traffic congestions must be addressed.

Biological Resources

Effects of light and glare and increased noise on area wildlife must be addressed.

Cultural Resources

The EIR must examine how the scale and style of the new structures will affect the overall nature of the historic district.

Geology and Soils

The EIR must include grading plans and cross sections showing landform changes.

Hazards and Hazardous Materials

The EIR must address how any hazardous materials on the site, such as asbestos, will be removed from the site and how propagation of dust will be controlled, whether from the campus itself or from haul trucks.

Effects on emergency evacuation due to construction, special events, or day-to-day operations on the campus must be addressed. This includes evacuation of the campus itself as well as the impairment of evacuation from the surrounding residential neighborhood. The EIR must examine the potential need to evacuate thousands of students, faculty and other staff while surrounding residents would also be attempting to evacuate via the narrow local streets. The EIR must examine shelter-in-place scenarios for the Chalon campus.

Noise

Noise from construction activities and construction vehicles in the neighborhood must be addressed. Nuisance noise from people parking in the neighborhood must also be addressed, especially noise in the early morning or late evening hours.

The EIR must consider increased propagation of noise from the outdoor pool area echoing into the neighborhood. If a roof garden is included, noise from the garden must also be considered, especially if it is used as a venue for events.

Public Services

Effects on emergency response due to narrow roads blocked by construction vehicles or clogged with project traffic must be examined.

Transportation/Circulation

The EIR must address increased numbers of Doheny students and others visiting the Chalon campus to utilize the Wellness facilities.

Conclusion

Thank you for the opportunity to comment. Please keep me informed as the project moves forward.

ENCLOSURE 12

Enclosure
Environment

Whale Fossil Found in Mountains

14-Million-Year-Old Bones Located Above Sepulveda Pass

BY [illegible]

Scientists [illegible] County Museum of Natural History have discovered the fossil remains of a 14-million-year-old whale-beached billions in the Santa Monica Mountains above Sepulveda Pass.

The whale, apparently a forebear of today's blue whale, measured about 85 feet in length, weighed between 8 and 10 tons.

Wrapped securely in a plaster jacket, the fossil was trucked Wednesday to the museum for further study. Once [illegible] under the fossil's [illegible] "not something."

Lawrence G. Barnes, curator of vertebrate paleontology at the museum, said the Santa Monica Mountain whale is of "worldwide significance to the scientific community."

Barnes' coworker, Albert Mytick, said the whale, after its remains are fully examined, may help fill in an important missing link in "the whale list," or whale family tree.

Discovered about 1,600 feet above sea level, the fossil find includes an almost complete head, jaws, flipper bones, part of the vertebrae and sections of the ribs.

The whale was lodged in what is known as the Modello Formation, a long stretch of shale that runs from El Serreno to Point Mugu. The formation is between 11 and 14 million years old and the Santa Monica Mountains whale was buried in one of its oldest levels.

The Modello Formation was, at the time of the whale's demise, part of the ocean floor. The Santa Monica Mountains were formed by volcanic eruption millions of years later.

The volcanic action thrust the shale formation and its entombed whale upward to the height from which it was excavated this week.

The forces of natural erosion—wind and rain—did the rest, uncovering the Santa Monica Mountains whale to the point at which an inquisitive Pepperdine student, Reggie Sully, 22, who was motorcycling in the area, stumbled upon one of the bones.

Sully—who received some public attention last summer when he recovered from a [illegible] Santa Monica Mountains [illegible]

were some of the wooden molds from which Howard Hughes' huge flying boat, the Spruce Goose, were made—took his fossil to the museum.

Barnes told him the bone was not interest, but not significant," unless, that is, Sully could find some more.

Sully did precisely that and museum workers hastened up to the site and began digging in earnest.

It will take a year, perhaps even two, before the Santa Monica Mountains whale is put on display at the museum, Barnes said.

For some time, [illegible]

not Tucker
(per Daily Mariner)
ok: Cost Analyst ?

In Santa Monica Mountains

Brentwood

Student Makes 'Whale' Of A Find

DEC 17 1976

By JOANN KELSO ROBERTS
Evening Outlook Staff Writer

It was a whale of a find for the experts, but it took a novice to dig it up from a very unlikely location.

That's the way the Los Angeles County Museum of Natural History scientists described the discovery of fossil remains of a 12 million-year-old whale in the Santa Monica Mountains.

The find was made by Reggie Sully, a 22-year-old Pepperdine University student with a persistent, inquiring mind and a taste for the unusual.

Sully, who lives in Brentwood, went to an area near Sepulveda Pass to search for miniature fossilized fish which are embedded in layers of shale. When he discovered what he thought was a fossilized bone about five inches in diameter, he took it to Lawrence G. Barnes, curator of vertebrate paleontology at the museum.

Barnes was interested in the specimen, an upper arm bone of a whale, but previous scientific evidence had shown that whale fossils are not found in shale because shale is usually a swamp deposit. He told Sully to bring him more samples.

Later, when Sully turned up with more fossilized whale specimens, Barnes accompanied him to the site, about 1,600 feet above sea level.

During the visit with Barnes, Sully spotted the ribs of what turned out to be about two-thirds of a fossilized body, including an almost complete head, jaws, flipper bones, part of the vertebrae as well as sections of the ribs.

"Some of the ribs are missing because a bulldozer working on a landfill had cut off part of the remains," Sully explained.

About 24 feet in length, the whale is a baleen type having a sieve-like mouth to collect and retain food instead of teeth, much like the grey whale.

Scientists speculate that it died and sank to the bottom of the ocean where it gradually became covered with mud. In its oxygen-free, deep sea grave, the whale became fossilized.

So Sully's whale was found in a marine shale, much different from the shale produced in bog deposits. Marine shale contains much vegetable matter which has turned to coal.

The whale, in geological terms, is relatively young. Whale fossils date back 45 million years, Albert Myrick Jr., Barnes' assistant said. The earliest whales, found in Egypt, did not look like the present day varieties, he added.

The Santa Monica Mountains whale is located in a Modelo Formation, a long stretch of muddy sea bottom which was thrust upward during the formation of the mountains.

But although the shale in the Santa Monicas is considered soft, museum workers found that the shale encasing the whale was so hard that [illegible] hammer were used at times to remove it.

Nevertheless, Sully, who avidly watched the whole retrieval process, said paint brushes were sometimes used because whiskbrooms were too rough for the delicate work.

"It takes skill to remove a specimen properly," said Myrick. "We collect it like it is a baby, enveloping it with a plaster jacket before we take it out of the ground."

After it was contained in plaster, the whale was moved by truck to the museum's warehouse in Vernon where it now rests among a veritable graveyard of hundreds of skulls and skeletons of sea mammals, including present day specimens found dead on local beaches.

The museum has the second largest collection of sea mammal remains in the world, Myrick said. Only Smithsonian Institution's collection in Washington D.C. is larger.

"The whale is a very secretive mammal and we really don't know very much about its habits," said Myrick. "Every specimen we have adds to to our knowledge and the whale that Reggie found is the first big find in that locality."

Meanwhile the Santa Monica Mountains whale won't be put on exhibit for at least two years but a close relative of his is scheduled for public exhibition shortly after the first of the year, museum officials said.

And the young man who gained notoriety in the scientific community because of his discovery still is out in the mountains searching for more fossils.

When Sully came to the museum recently to take another look at the whale, he brought a load of rocks for Barnes to examine.

Who knows . . . someday Sully

Reggie Sully -
479-5448
243 No. Sullain Ave.
Brentwood

Davoodian1

From: **David Diaan** <david@sublimeentertainment.com>
Date: Wed, Aug 10, 2016 at 2:45 PM
Subject: Mount Saint Mary's
To: kathleen.king@lacity.org

Kathleen King

Major Projects - Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

ENV-2016-2319-EIR

Dear Kathleen King,

As a homeowner in Bundy Canyon, I have seen traffic to and from Mount Saint Mary's college north of Sunset Blvd. grow and grow year after year. Students, supply trucks, buses and employees of the college drive carelessly through our narrow streets. These roads were not designed for this kind of traffic. Now the school proposes construction of a HUGE building. This means more heavy trucks, more construction workers and eventually more staff and more students speeding by our homes.

Peaceful enjoyment of our property is becoming more and more impossible. We cannot afford any more traffic on our streets.

What will be done about this?

Please HELP.

Sincerely,

David Davoodian

Davoodian2

DAVID DAVOODIAN

671 North Saltair Ave., Los Angeles, CA 90049

August 5, 2016

Kathleen King
Major Projects _ Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
ENV-2016-2319-EIR

Dear Kathleen King,

As a homeowner at the above address since 1992, I have seen Saltair Ave. north of Sunset traffic to and from Mount Saint Mary's school grow and grow year after year. Since the advent of GPS navigation, even large trucks and school buses unaware of our narrow street, now take Saltair Ave. as a short cut as opposed to Bundy. Often these large vehicles cannot even go through our narrow street and cause traffic to stop completely.

We cannot afford any more traffic on our street. What will be done about this in light of construction on campus and increased traffic by construction trucks, workers and eventually more and more students?

Please HELP.

Sincerely,

David Davoodian

Delmas

Los Angeles, August 13. 2016

Kathleen King
Major Projects - Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: ENV-2016-2319-EIR

Dear Kathleen King,

I have been living in Bundy Canyon since 2007 and year after year, I have seen traffic to and from Mount Saint Mary's college north of Sunset Blvd. grow exponentially. This is very problematic for the people residing in this area.

Students, supply trucks, buses and employees of the college drive carelessly through our narrow streets, which are not designed for this kind of traffic. This year, I witnessed a terrifying accident on North Bundy. My 2 children walk home from school every day and I am really worried about their safety since there are no sidewalks.

Now the school proposes construction of a 38,000 square building. This means more heavy trucks, more construction workers and eventually more staff and more students speeding by our homes.

Peaceful enjoyment of our property is becoming more and more impossible. We cannot afford any more traffic on our streets.

Please help us with this problem.

Sincerely,

Magali Delmas
890 North Bundy Drive,
Los Angeles, CA 90049
Tel: 310-476-3765

Diaan

From: "Nextdoor Kenter" <reply@rs.email.nextdoor.com>
Subject: Re: THEFT ALERT
Date: August 10, 2016 at 2:07:55 PM PDT
To: ira@irastein.com
Reply-To: reply+HE3TEMRYGU3V64DSN5SHKY3UNFXW4X2QJ5JVIXZTGAYDQMZWGMYQ====@brentwoodupperbundy.nextdoor.com

 David Diaan, Brentwood - Upper Bundy

DEAR NEIGHBORS CONCERT WITH THEFT IN OUR AREA. PLEASE KEEP IN MIND THE PROPSED CONSTRUCTION OF A HUGE BUILDING ON MOUNT SAINT MARY'S CAMPUS WILL MEAN MORE STRANGERS DRIVING THROUGH AND MORE EXPOSURE TO ALL KINDS OF TROUBLE. PLEASE TAKE ACTION BEFORE TOO LATE. WRITE A LETTER LIKE BELOW TO THE CITY AS SOON AS POSSIBLE. YOUR SILENCE WILL LEAD TO DISASTER AS IT DID IN THE CASE OF ARCHER SCHOOL...
EMAIL TO : Kathleen King at Dept. of City Planning
Kathleen.king@lacity.org
DATE:
ATTN: Kathleen King
Major Projects - Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
ENV-2016-2319-EIR
Dear Kathleen King,
As a homeowner in Bundy Canyon, I have seen traffic to and from Mount Saint Mary's college north of Sunset Blvd. grow and grow year after year. Students, supply trucks, buses and employees of the college drive carelessly through our narrow streets. These roads were not designed for this kind of traffic. Now the school proposes construction of a HUGE building. This means more heavy trucks, more construction workers and eventually more staff and more students speeding by our homes.
Peaceful enjoyment of our property is becoming more and more impossible. We cannot afford any more traffic on our streets.
What will be done about this?
Please HELP.
Sincerely,

Diamond

Linda Diamond, M.S., CCC
LICENSED SPEECH PATHOLOGIST
615 Hanley Way
Los Angeles, California 90049

Kathleen King
Major Projects - Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
ENV-2016-2319-EIR

Dear Ms. King,
As a homeowner in Kenter Canyon, I have seen traffic to and from Mount Saint Mary's college north of Sunset Blvd. grow and grow year after year. Students, supply trucks, buses and employees of the college drive carelessly through our narrow streets. These roads were not designed for this kind of traffic. Now the school proposes construction of a HUGE building. This means more heavy trucks, more construction workers and eventually more staff and more students speeding by our homes.
Peaceful enjoyment of our property is becoming more and more impossible. We cannot afford any more traffic on our streets.
What will be done about this?
Please HELP.
Sincerely,

Linda Diamond

Dillard

On Fri, Sep 2, 2016 at 3:57 PM, Joyce Dillard <dillardjoyce@yahoo.com> wrote:
Geology and soils in relationship to landslide and liquefaction issues should be addressed thoroughly.

Current NPDES requirements should be reviewed including LA Regional Water Quality Control Board issued Municipal Separate Storm Sewer Systems Permit ORDER NO. R4-2012-0175 NPDES PERMIT NO. C and any Enhanced Watershed Management Plans.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

Ehrman

On Fri, Sep 2, 2016 at 11:35 AM, Ehrman, Jesse <Jesse.Ehrman@warnerbros.com> wrote:

Kathleen King
Major Projects- Dept of City Planning
200 N. Spring Street, Rm 750
LA, CA 90012
ENV-2016-2319-EIR

We are writing to express our concerns about the proposed expansion to the Mount Saint Mary's campus.

Our family lives at 515 N Bundy drive. We have two small children, Max (5) and Arlo (2), and love the neighborhood. We were drawn to the neighborhood's natural beauty, and the abundance of families, and long time residents who make up the community. We were also drawn to the considerate planning of Bundy and Bowling Green, the streets are unique for north of sunset, they have side walks, and foster activities that bring people into their front yards, and not sequestered behind tall hedges and relegated to closed off private spaces. At all hours, its common to see kids playing in the front yards, people walking their dogs, numerous bike riders, etc.

We understand that Mount St Mary's college is part of this community. Its been a fixture for a number of years. The shuttle busses going up and down Bundy are a regular occurrence, and we appreciate how this mitigates traffic and couldn't imagine the alternative. The bus drivers tend to be respectful, observing stop signs etc. We all comfortably coexist, as they are invested in protecting and preserving their relationship with the community. However, the proposed addition threatens to disrupt this harmony. This is primarily a residential area. The addition of the requisite vehicles to build and service an expanded institution will tip the scale and make for a less safe and balanced environment. The streets are not designed for large scale vehicles for building or maintenance. There isn't adequate parking for such service vehicle. The other day, a large PEPSI truck pulled up our street likely to service the university's vending machines or cafeteria. There are not vehicles that belong in a residential neighborhood. They are not part of the community, nor do they have a vested interest in maintaining the safety or integrity of it.

I ask you to kindly consider the residents and the neighbors that would have to endure the construction, and the ongoing operations of a larger commercial institution in our residential neighborhood. This will have a significant impact on the overall tranquility of the neighborhood, quality of life, and compromise the safety and complexion of the environment.

Sincerely,

Katie and Jesse Ehrman

515 n Bundy Dr.

Raines Feldman LLP
Lawyers

Beverly Hills
9720 Wilshire Boulevard, 5th Floor
Beverly Hills, California 90212

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18401 Von Karman Avenue, Suite 360
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VIA FACSMILE TO (213) 978-4656, EMAIL TO kathleen.king@lacity.org and FEDERAL EXPRESS

September 1, 2016

Ms. Kathleen King
Major Projects – Department of City Planning
200 N. Spring Street, Room 7450
Los Angeles, CA 90012
ENV -2016-2319-EIR

Re: Mount Saint Mary's University Chalon Campus Wellness Pavilion (the "Project")
Case No. ENV – 2016-2319-EIR

Dear Ms. King:

This office is counsel to Richard Barry, Monique Barry, Peter Mandell, Sarah Mandell, Hratch Sarkis, Helga Sarkis and Grace Scherrer, all of whom are residents of Grace Lane, which is a street entered off of Chalon Road, a principal arterial through Brentwood and one that provides direct access to the Mount Saint Mary's University Chalon Campus (the "Campus"). Chalon Road is, in fact, the sole point of both vehicular and foot access for our client to their homes on Grace Lane.

Our clients have resided on Grace Lane for many years. The earliest arrived in 1983 and the most recent in 2008. "Grace Lane" is even named for our client, Grace Scherrer, whose family originally developed the street on which our clients reside. We believe these facts say something about our clients' long-term commitment to their neighborhood and the sincerity of their concerns regarding the Project. In light of the foregoing, our clients have a strong interest in issues surrounding the Project and its potentially substantial impacts on their community.

The Project is the subject of an Initial Study, dated on or about August 4, 2016 (the "Initial Study"), prepared under the auspices of the City of Los Angeles pursuant to the terms of the California Environmental Quality Act ("CEQA").

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The Initial Study identifies a number of "Potentially Significant Impacts", all of which our clients trust will be addressed in a comprehensive and detailed manner in the EIR, but the following represent issues about which our clients have particular concerns and which form the principal basis for this submission: (i) Air Quality; (ii) Geology and Soils; (iii) Greenhouse Gas Emissions; (iv) Noise; (v) Public Services; (vi) Transportation/Circulation; and (vii) Utilities.

The Project may be located in an interior portion of the Campus, but the Campus itself is part of a larger community that can accurately be described as a quiet, residential neighborhood. Grace Lane is a part of that residential neighborhood and its residents, which include a number of young children, have a substantial interest in maintaining the pristine nature of their community.

The Initial Study acknowledges the Project poses a threat of substantial environmental impacts in a number of categories. To fully assess these impacts, the EIR must analyze each category of "potentially significant effect" in at least three distinct settings: (i) construction; (ii) effects of the Project standing alone; and (iii) effects of any future use of the Project. In order to evaluate this last phase, Mount Saint Mary's University ("MSM") must also disclose now any changes it proposes to seek in its CUP and any other changes to physical footprint and use of the Campus beyond replacing existing structures with the Project.

A. Questions the EIR Must Address Regarding the Construction Phase.

1. Air Quality and Greenhouse Gas Emissions:

The construction phase, particularly from the standpoint of our clients, will generate significant and substantial truck and other construction vehicle traffic that will pass along Chalon Road and immediately in front of Grace Lane. This traffic will generate numerous air-borne contaminants which the EIR must address. What steps will MSM take to protect residents such as our clients from the pollutants, dirt, dust and odors associated with operating construction equipment both on and off-site during the construction?

The Project includes demolition of at least two long-standing structures on the Campus. Has MSM investigated whether the to-be-demolished structures contain asbestos, lead, mercury or other carcinogens or hazardous materials and if so, what steps will be taken to ensure the demolition takes into consideration containment measures for all of these substances?

2. Noise:

The construction and use of construction equipment including truck, vehicle and other heavy machinery will substantially increase noise levels along Chalon Road and at Grace Lane during the construction phase. How will MSM buffer or otherwise protect residents, including our clients, from the noise?

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What additional restrictions beyond those contemplated in the Initial Study should be imposed on construction hours/days and on off-site parking, including along Chalon Road, given the size and scope of the Project?

3. Pubic Services:

How will the Project have a "Potentially Significant Impact" on fire and police protection as indicated in the Initial Study and what specific steps will be taken by MSM to address these impacts, including without limitation, ensuring clear and unmitigated access along Chalon Road and to Grace Lane during construction?

What, if any, will be the adverse impacts on response times for emergency and non-emergency vehicles providing police, fire and other life/safety services to surrounding residents? Our clients are particularly concerned about this issue since Chalon Road from Norman Place and the entrance to MSM is barely passable in certain areas by normal sized vehicles when cars are parked on both sides of the street (as is common during school hours), and may not be passable at all by larger emergency or construction vehicles in those circumstances. Fire in the Bundy Canyon, a "red flag zone", is a real danger, especially as drought conditions continue to affect the area. To responsibly protect life and property, the EIR should consider the prohibition of any parking on Chalon Road during periods of construction. The EIR should also consider other times when parking is to be prohibited, e.g., on Tuesdays, which is garbage pickup day for the area, or during hours when MSM runs their larger buses.

By agreement with neighbors, MSM currently runs its buses and encourages its students to travel in a basically east to west fashion from Norman Place to Bundy Drive. Specifically, regular daily MSM traffic proceeds southwest on Chalon Road from the intersection of Norman Place and Chalon Road to the northeast of MSM's entrance and from the MSM entrance on Chalon Road to the northwest down a narrow and windy hill road to Bundy Drive. During construction, what will be the route for ingress and egress of construction vehicles to/from the Campus? What steps will MSM take to enforce the selected route, and what impact will that route have on the ability of fire and emergency vehicles to travel along Chalon Road, including at Grace Lane? To place in perspective, if a construction vehicle is unable to pass the northeast portion of Chalon Road between MSM's entrance and Norman Place due to the presence of parked vehicles (as referenced above), the vehicle will have no other choice than to take the Bundy Drive to Chalon Road route. This route will be "against traffic", a process difficult enough when attempted by normal

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sized vehicles, but likely impossible without other accommodations, including the introduction of flagmen and, in all circumstances, adding to substantial delays. How will the normal flow of traffic be affected during mornings hours when students and buses are arriving, and during the afternoon hours when students and buses are departing, and how will this disruption of traffic impact: (i) emergency vehicles response times to Grace Lane and Chalon Road, and (ii) emergency exit times from the residents of Grace Lane and Chalon Road?

Without careful planning, the situation could easily arise where morning traffic approaches MSM's entrance on Chalon Road from both directions, preventing egress by residents of Grace Lane during an emergency. During the afternoon, when MSM traffic is exiting in both directions along Chalon Road, this scenario will repeat, again resulting in emergency vehicles being unable to reach Grace Lane. In a scenario where an emergency vehicle is already on Grace Lane, or residents of Grace Lane simply want to leave their street for convenience or need to leave in an emergency, such as a fire, even a single construction truck or other piece of heavy equipment outside the MSM entrance could prevent departure.

What affect will MSM's bus system have on public services as outlined above? Are there any planned increases in the number or size of buses to be used during the construction period? Will limitations be placed to prevent larger buses and construction vehicles from being on the affected roads at the same time?

Construction sites often lead to an increase in crime, including residential burglary and home intrusions, and such increases have been seen in the area during much less intensive residential construction. Given the size and scope of the Project as well as its planned duration, what steps will MSM take to minimize effects on crime and public safety?

MSM has been known to either store or leave unattended debris, including flammable materials, in the northeast portion of their open field along Chalon Road near Norman Place. While residents have objected and continue to object to this practice, does MSM intend to allow such materials to be present in this location during construction? If the answer is yes, the EIR must consider the increased risk of fire and how emergency vehicles will be able to respond in that event.

4. Transportation/Circulation:

The use of construction equipment, including trucks, vehicles and heavy machinery will substantially increase the complexity of traffic and parking issues in an already congested area. The fact of existing congestion is

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already evidenced by the parking on Chalon Road from the Campus to Chalon's intersection with North Norman Place to the northeast. It is not uncommon during school hours that every single parking spot is occupied on this section of the road.

Should all construction related parking be prohibited from Chalon Road which, as referenced above, is already highly used by students and residents? Given the detailed discussion above under "Public Services", it is our client's strongly held view that all parking along Chalon Road should be prohibited during construction.

What security or other personnel will MSM employ to ensure traffic exiting or entering the site (and in other appropriate locations along Chalon Road) is held so as to permit residential non-construction traffic priority use of Chalon, particularly during the hours of 7:30 - 9:30 a.m. and 3:30-6:30 p.m.?

How will MSM repair damage to Chalon Road and other local streets, which damage will undoubtedly be caused by the use of trucks and other heavy machinery?

What additional restrictions should be imposed on trucks, other construction vehicles and buses in order to minimize adverse traffic effects?

With respect to bus travel, current arrangements with MSM require students and buses to approach the campus on Chalon Road from Norman Place, following a basic east to west path and to exit the campus on Chalon Road toward Bundy Drive, following a basic west to east path. Are construction vehicles going to follow this protocol? If parking on Chalon Road prevents construction vehicles from following these paths, and they are forced to enter MSM the opposite way on Bundy Drive, what impact will this have on traffic proceeding northwest on Chalon Road to Bundy Drive? How will MSM handle traffic entering the Campus from both directions on Chalon Road, and how will it prevent congestion that could restrict ingress and egress to/from Grace Lane?

5. Utilities:

Are there sufficient water supplies to service the Project and if not where will the required supplies be obtained and at what impact on neighborhood residents, including those along Chalon Road and Grace Lane?

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Will MSM's existing solid waste disposal needs be sufficient to accommodate the Project and if not what changes will be required?

B. Questions Relating to Project When Completed.

1. Air Quality and Greenhouse Gas Emissions:

The discussion in the "Construction" section above regarding this subject is incorporated at this point by reference as though set forth in full. The concerns expressed and questions raised regarding air-borne contaminants apply with equal force and effect to operation of the Project after completion.

2. Geology and Soils:

What effect will the Project have on drainage and runoff, especially to properties located along Chalon Road and Grace Lane?

Will the planned parking structure create any subsurface issues that could adversely impact nearby buildings and residences?

3. Land Use:

What restrictions on hours of operation should be placed on the Project consistent with the CUP so as to lessen the burden created by the Project on nearby residences, including those along Chalon Road and Grace Lane?

In the Initial Study, MSM makes a number of representations regarding outside use of the Project, which our clients will insist MSM abide when the Project is completed and after. In that regard, while MSM indicates the limited uses it will make of the Project for outside event associated with MSM's own function, what are MSM's intentions regarding rental of the Project to third parties?

MSM represents that all outside events exceeding 50 people in attendance will be served by on-campus valet parking. Notwithstanding this representation, the EIR should also address the impact on traffic from such events, including from bus or van traffic that may be required to serve larger events. With respect to bus/van traffic, will it be controlled by MSM or by outside parties that may be unfamiliar with the traffic routes and narrow roads in the area of Campus?

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The Project is styled as a "Wellness" facility. Will it be used by outside patients for treatment, and if so for what kind of treatment? If at all, to what degree will it be used for this purpose and what will be the impact on traffic and parking as a result of such use?

4. Noise:

   What buffering and landscape screening should surround the proposed gymnasium, exercise and cycling rooms in order to dampen noise from operations?

   What dampening noise materials should be used in the construction?

   What restrictions on hours of operation should be placed on the Project, particularly after hours and during weekends to limit the additional noise that will be created by operation of the Project and contemplated uses ancillary to the Project?

5. Public Services:

   The discussion above in the "Construction" section regarding this subject is incorporated at this point by reference as though set forth in full. The concerns expressed and questions raised regarding the impact on public services apply with equal force and effect to operation of the Project after completion.

   What are the impacts of any of the proposed or contemplated new uses on public services, including on proposed new weekend and summer uses?

6. Transportation/Circulation:

   What impact will operation of the Project have on already overburdened streets and off-campus parking?

   Given the current amount of parking on Chalon Road, should additional parking be required as a part of the Project? While 53 spaces are being added to the Campus, the reality is there is insufficient Campus parking as demonstrated by the amount of parking on Chalon Road and Norman Place. It is not uncommon for there to be 90 cars parked on Chalon Road; 53 parking spots clearly will not solve the current problem, so how can it be expected to address the larger problem to be presented by a new 38,000

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square foot building and ancillary facilities? This issue should be addressed in the EIR.

Will operation of the Project result in increased car trips to the Campus? This is particularly concerning because weekend use of the Project is planned, including for summer day-camps and other identified special events.

What will be the effect on parking along Chalon Road and other neighboring roads from operation of the Project?

What restrictions should be imposed to mitigate and minimize "potentially adverse impacts" on traffic and parking?

The discussion in the "Construction" section above regarding "Transportation/Circulation" is incorporated at this point by reference as though set forth in full. The concerns expressed and questions raised regarding transportation and circulation apply with equal force and effect to operation of the Project after completion, except for aspects associated just with the presence of construction vehicles/equipment as well as any damage or health/safety issues arising solely in connection with the construction phase of the Project.

7. Utilities:

The discussion in the "Construction" section above regarding this subject is incorporated at this point by reference as though set forth in full. The concerns expressed and questions raised regarding air-borne contaminants apply with equal force and effect to operation of the Project after completion.

C. Questions Regarding Future Use.

Attachment B to the Initial Study presents MSM's explanation of checklist determinations made in the Initial Study itself. Insofar as the intended use of the Project does not change from that presented in the Initial Study, the EIR should address the potential significant impacts presented by the checklist, as supplemented by submissions of other interested parties including our clients. However, things change, and if MSM contemplates an expanded use of the Project beyond that referenced in the Initial Study, it is incumbent on MSM to disclose those matters now so they can be addressed in the EIR.

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Further, MSM has made a number of commitments regarding use of the Project as set forth in Attachment B, all of which should be the subject of conditions of Project approval, if at all. These matters include but are not limited to maintaining current enrollment levels at the Campus at approximately 1,561 students[1]; limiting the number of "Future Campus Events" (including potential new events) pursuant to the representations made in the Initial Study; not expanding Summer Sports Camps, any Health and Wellness Speaker Series' and Other Wellness/Sports Events/Activities beyond those represented in the Initial Study or as otherwise determined by the EIR to be permissible; not reducing the number of parking spaces on the Campus even though enrollment might permit a reduced number; and providing valet parking under the circumstances represented in the Initial Study, which means among other things, exclusively on campus.

If MSM contemplates any changes regarding use of the Project as presented in Attachment B, the details of those changes should be disclosed now, so they can be fully considered in the EIR.

Finally, given our client's long experience with transportation and circulation conditions surrounding the Campus, it is our client's view that barring extraordinary findings in the EIR suggesting otherwise, the appropriate way to handle parking and street issues is to prohibit parking on Chalon Road during the school day and allow permit parking only for residents and their guests during evening and weekends along the south side of Chalon Road; no parking on the north side.

We look forward to preparation of a detailed and comprehensive EIR that will examine all "potentially significant impacts" and mitigation measures, thereby providing a basis for determining the precise terms under which the Project may proceed, if at all.

[TEXT CONTINUES AND SIGNATURE ON NEXT PAGE]

[1] The Initial Study states: "[MSM] has consistently been below the maximum student enrollment cap and has no intention of taking steps to increase enrollment at the Chalon campus." Use of word "intention" is deeply concerning since it suggests there could be a change in policy. Such change should not be permitted and MSM should be bound by its commitment not to increase enrollment as a condition to approval of the Project.

Direct: 424.239.2512
Fax: 424.239.1766
raltman@raineslaw.com

On behalf of our clients, thank you for your consideration of this submission.

Very truly yours,

Ronald E. Altman
of RAINES FELDMAN LLP

REA: mee

cc: Clients
Hon. Mike Bonin

Fischer

On Wed, Aug 31, 2016 at 2:29 PM, Cheryce Poon <cmpoon1@yahoo.com> wrote:
Hello,

I received a letter regarding this project and request for any comments.

One of my comments includes increased traffic, noise and pollution by the people needed to complete this project (i.e. construction, architects, design, etc). How will this be dealt with and this would affect house prices if one were to sell during the construction time period.

Another comment is: With the increased traffic, comes increased speeders. How will this be dealt with? This has been an ongoing problem with the students from Mount Saint Mary's and there has never has been any satisfactory resolution. Perhaps have police or hired security enforce speed limits?

Cheryce Fischer

Fredricks

From: <cu4t444@aol.com>
Date: Wed, Aug 24, 2016 at 7:53 PM
Subject: MSM Expansion
To: bundycanyonevents@gmail.com, councilmember.bonin@lacity.org

I have lived in my home in the 400 block of North Bundy for 55 years. The streets in this area were laid out in the 1030's and 40's. My home was built in 1938. There is now an enormous amount of traffic on these narrow streets - so much so that on most days, even in the only 2 lanes accommodating north and southbound traffic, cars must pull over to allow those on the opposite side to pass. This makes Bundy, in effect, one lane.

Now, MSM tells us that we must allow their massive construction trucks, bulldozers, cement mixers and contract vans to add to this mix. Not only this but with the expansion of the student body the increased number of students, teachers, building and grounds keepers as well as event audiences will add traffic as a permanent condition on our streets and in our neighborhood. The ability of emergency vehicles to respond in our area will be greatly diminished.

My family is completely opposed to this expansion! If MSM wishes to go forward with this expansion they should build an off ramp from the 405 freeway that goes directly to the college both for construction purposes and for the increased traffic that they will permanently generate. Bundy homeowners should not have to subsidize and live with the results of their expansion.

Sincerely,
Mrs. Shirley Fredricks

Glickman1

From: **Roger Glickman** <glickman@mac.com>
Date: Tue, Aug 16, 2016 at 10:46 AM
Subject: Proposed Expansion at Mount St. Mary's
To: kathleen.king@lacity.org
Cc: Bca <bundycanyonevents@gmail.com>, Wendy Glickman <wglickman@mac.com>

Dear Ms. King,

My family is opposed to ANY proposed expansion at Mount St. Mary's. Our life as residents in Bundy Canyon is already unduly negatively impacted by the traffic generated by the university's current use, the scope of which has been allowed to expand beyond what is reasonable for its location. We are constantly bothered by the noise, congestion and danger (from speeding young students in particular) generated by the seemingly ever increasing flow of automobile, truck, bus and shuttle van traffic through our narrow residential streets. Any construction and/or expansion at Mount St. Mary's will only exacerbate these issues.

Roger Glickman
575 N. Bundy Drive
Los Angeles, CA 90049

Glickman2

On Mon, Aug 29, 2016 at 10:56 AM, Wendy Glickman <wglickman@me.com> wrote:

Ms King:

I am a resident living on Bundy Drive. I am vehemently opposed to the expansion of Mt. St. Mary's. The traffic we endure every day is unbearable and unsafe.

I understand that traffic is everywhere in Los Angeles, but please don't make our neighborhood carry more of the burden than the 3 schools we already have (Archer, Brentwood & Mt. St. Mary's).
Please don't let Mt. St. Mary's expand, they have a downtown campus that can be easily utilized for their needs.

Thank you,
Wendy Glickman

Grant

Karin Grant 808 Lockearn St L.A. CA 90049

Would like to know if you'd ever consider having your school buses pick-up & deliver ""locals""?"

ENVIRONMENTAL ISSUES & IMPACTS

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report?

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

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

Offer more and practical access to the facilities.

Invite neighbors to events on the campus.

Works harder to stop speeders and littering from cars.

Stage construction trucks before rushhour traffic and or weekends

Jacobs

CONTACT INFORMATION (Optional, please print clearly)

Name: Rob Jacobs Representing Agency or Organization: _____

Address: 700 Halliday Ave City/State/Zip: 90049

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Julien

On Mon, Aug 15, 2016 at 4:35 PM, Laurie Julien <lauriesjulien@gmail.com> wrote:
Kathleen,

Please see the below e-mail, that I neglected to address to you as well.

Begin forwarded message:

From: Laurie Julien <lauriesjulien@gmail.com>
Subject: FIRE HAZARD ON NORMAN PLACE AT CHALON
Date: August 15, 2016 at 4:33:54 PM PDT
To: lafdbrush@lacity.org, councilmember.bonon@lacity.org

Dear Fire Department and Councilmember Bonon:

We have a serious and dangerous fire hazard condition that has been in existence since June at the top of Bundy Canyon at Chalon. (See prior email from my neighbor below.) Since at least June, Mount St. Mary's has maintained several DRY piles of wood chips and debris on its property, which borders many private residences and the Getty Center, and has refused to clean up the mess, which is ACTIVELY THREATENING THE SAFETY of our community. This is August and a high fire zone area. The piles of DRY wood chips must be removed. Mount St. Mary's previously stated that the chips are wet, but that is FALSE. The chips have been DRY every day for the past few weeks (when I began checking). There is no doubt that if I maintained a similar pile of dry wood chips and debris, the city would require me to remove it at once. Why the different standard that poses the SAME FIRE RISK to the community?

Please respond immediately! I have contacted several media outlets and they are investigations as well.

Thank you,

Laurie Julien, Esq.
310-266-3355

On 6/30/16, 3:21 PM, "Stefanie Michaels" <stefaniemichaels@gmail.com> wrote:

Hello LAFD,
I wanted to write you and send you these images. They were taken this morning at the top of North Norman Place and Chalon Drive in Brentwood/90049. This is off of Norman place from Bundy Drive and North of Sunset.

I am a member of the Bundy Canyon Association. Our members are keeping a close eye on our canyon, since we had a fire on this hill a few years back, and are in the red zone, which as you know is dangerously dry.

It seems that Mount St. Mary's college has decided to dump their cuttings

into a pile as shown on the lower part of their property, near homes and the back entrance and property to the Getty.

Most worrisome is the plight of our canyon, a severe fire danger, and winds that can blow this material all over our streets and homes. We are amazed at this blatant disregard from MSM to the neighbors, especially with such a high fire season at hand.

We wanted to file a complaint and have them on notice from LAFD to immediately clean this area for our safety.

Can you please let me know how soon this can be handled as this is of the utmost concern and needs immediate attention.

Thank you,
Stefanie Michaels

Koslow

From: <Ronkoslow@aol.com>
Date: Wed, Aug 10, 2016 at 8:29 PM
Subject: Mount Saint Mary Proposed Development
To: Kathleen.king@lacity.org

Dear Ms. King,

As a homeowner in Bundy Canyon, I have seen traffic to and from Mount Saint Mary's college north of Sunset Blvd. increase steadily year after year. Students, supply trucks, buses and employees of the college drive carelessly through our narrow, winding streets. These two lane roads were not designed for this volume of traffic. Now the school proposes construction of a HUGE fitness center. This means more heavy trucks, more construction workers and eventually more staff and more students speeding past our homes and congesting our streets...Peaceful enjoyment of our property is being jeopardized. We cannot afford to have any more traffic on our narrow residential streets.
What will be done about this?
Please HELP!

Yours Truly,

Ron Koslow
1014 N. Bundy Dr.
Los Angeles, Ca. 90049

ENVIRONMENTAL ISSUES & IMPACTS

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report?

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

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

Traffic is a huge concern. The construction trips up and down Chalon road will significantly impact our ability to leave our homes in the morning, driving kids to schools. It will also impact our ability to return home. Consider limiting hours of operation for construction trucks & noise to 10 am – 4 pm each weekday. No noise or construction traffic on weekends.

Krasovki

CONTACT INFORMATION (Optional, please print clearly)

Name: Olga Krasovski Representing Agency or Organization: self

Address: 11972 Chalon Rd City/State/Zip: 90049

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Lechtolz

From: **Ann Lecht** <annlecht@hotmail.com>
Date: Fri, Aug 26, 2016 at 5:26 PM
Subject: Mount St. Mary's Expansion ENV-2016-2319-EIR
To: "Kathleen.king@lacity.org" <Kathleen.king@lacity.org>
Cc: "bundycanyonevents@gmail.com" <bundycanyonevents@gmail.com>

Dear Ms. King,

I am one of the residents in Upper Bundy Canyon and am writing on behalf of my family and myself regarding the proposed construction of Mount St. Mary's new sports/wellness center.

As a homeowner, I have seen traffic going to and from the college continue growing year after year. Increasing numbers of students, supply trucks, buses and employees of the college drive carelessly and sometimes even recklessly through our narrow streets. These residential roads were never designed for this kind of relentless traffic.

Now the school proposes construction of a new HUGE multistory building. According to the architect's projections, it will take at least two years. This means more heavy trucks, more construction workers and eventually more permanent students and staff speeding by our homes.

Over the years, our community has watched Mount St. Mary's grow by breaking their operational CUP from 1984. At that time they were approved to build the current parking structure with a cap of 1072 students. In 1984 enrollment was at 750 students. Presently, per Mount St. Mary's President's letter of November 2015, there are 1600 enrolled students at Chalon campus. This clearly violates their current CUP of no more than 1072 students by 528 enrollees, which is 49% more than the approved permit.

While Chalon campus is willfully violating its enrollment permit, we have had extensive neighborhood safety issues caused by student drivers, escalating congestion on our canyon streets from enormous Mount St. Mary's buses, vans, delivery trucks, commuter student traffic and more. There has been deterioration of our wildlife on their migration corridor from the Getty to Kenter Canyon. As you well know, there is a lot of young children in our neighborhood, and the increasing traffic is endangering them as well. Peaceful enjoyment of our property is becoming more and more impossible.

In addition, our canyon is Red Zone/high fire risk, our streets are narrow and windy. In view of the landlocked geography and topography of Bundy canyon, everyone's safety will be further jeopardized if a new 38,000 building is constructed.

It is simply dangerous and irresponsible to allow further expansion of Mount St. Mary's Chalon campus and increase its enrollment.

Thank you in advance for taking our canyon's concerns under careful advisement.

Sincerely,

Ann Lechtholz

Leiweke

On Sun, Aug 21, 2016 at 8:06 AM, Bern <bleiweke@gmail.com> wrote:
As a resident of brentwood for nearly 20 years, I want to express my concern and opposition to the proposed project.

I have seen the degradation and the negative impact that Mount Saint Mary's as had on our neighborhood.

My concern is for my grandchildren and the many pedestrians who can no longer safely cross our street because of the reckless, destructive, and catastrophic speed of the staff, the students, the bus drivers and the many vendors servicing the large campus. Our elderly neighbors have barely made it across the street at times because of the many cars and buses. Cars parked in front of our home have found their side mirrors left dangling because large trucks have hit them and failed to stop.

As further proof my gate on Bundy and Benmore Terrace was completely destroyed after a female student from the school and her friends crashed into it because they lose control going too fast while it was raining. Their lack of insurance added to the problem and expensive repairs. Mount St. Mary's would not even return phone calls to discuss the situation. When students have been asked to slow down, the response has often been abrasive and insulting.

The school has been unresponsive and dishonest in their commitments to help fix these ongoing issues and shown no evidence of being a good neighbor.

I am on record saying I do not support any further growth of this campus. Further, if they are allowed to go forward with their entitlement-

1. They need to commit to a comprehensive public workshop process that mandates a traffic management plan that not only limits the hours and times that people can access their site but also completely protect the neighbors and residents. Without the great community we provide and the properties we own their campus would be worthless.

2. They need to be good neighbors and commit to a **TMP that is joined to their environmental impact report that commits financially to a minimum amount of dollars that is supporting traffic cops, traffic redirect to other streets, mandatory busing programs that limit the amount of cars that go through our neighborhood and streets**.

3. They need to financially commit to capital improvements to Bundy as a whole from the wear that will happen to it and they have to allocate dollars to our existing infrastructure especially at sunset and the various streets their staff and students use to leave campus where we see the most frustrating and dangerous points of friction with their presence. IF they do not commit to tangible, meaningful and specific capital dollars that directly impact the mitigation of the traffic implication then they should not be allowed and should except diligent lawsuits that verify they are not fulfilling the EIR standards and good neighborhood policy for growth.

4. Further they need to be transparent with the homeowners and provide information regarding all of the building projects on the campus, the number of students, the number of vendors and other impactful information.

Respectfully submitted,
Bernadette Leiweke

Sent via handheld device. Please disregard spelling, grammar and brevity.

Lyon

On Thu, Sep 1, 2016 at 9:57 PM, Mary Lyon <maryglyon@yahoo.com> wrote:
Greetings, Ms. King,

I live on North Bundy Drive, five blocks north of Sunset, near where Bundy and Bowling Green merge, heading up the canyon.

I am *dismayed* to hear about the plans for aggressive expansion of Mount St. Mary's. I've lived in this location since 1962, a year after the infamous Bel-Air Fire decimated much of the Westside canyons. I've been around long enough to observe a PROFOUND increase in traffic, speeding, and congestion. This stems from several causes very much including Mount St. Mary's University.

There are numerous long, cumbersome Mount St. Mary's buses going up and down the street multiple times a day and often into the mid-late evening as well. A lot of them are empty. They compound the problems for a roadway that's already over-stressed from the sheer volume of residents' cars, students' cars, gardeners with their large, wide pickup trucks, construction trucks, construction crewmembers' cars, utility trucks, and more.

Bundy Drive north of Sunset is a narrow street, ***NOT*** a major thoroughfare! It's a two-mile, two-way road from Sunset to Chalon, with the Norman Place fork about halfway up. Both Bundy and Norman Place are already too narrow to accommodate the current traffic volume. MSM's planned expansion will only add to the strain on the local infrastructure. Those big buses are too wide and too long, and overwhelm this low-key residential canyon drive. We can barely cope with what there is.

We've already seen our lives complicated, and in some cases placed in actual danger. I personally witnessed one bottle-neck directly in front of our nextdoor neighbor's house. Cars were parked on BOTH sides of the street, further narrowing the road. The main choke-point was a Mount St. Mary's bus that was too big to squeeze to one side so opposing traffic could pass. TWO lines of cars formed: one behind the bus and the other approaching from the opposite direction. Nobody wanted to move, so nobody *could* move. Much honking and shouting ensued, before someone was finally willing to back up and loosen the vehicular noose.

Many of us who park along the curb have lost side mirrors from side-swiping speeders, who don't stop to leave a note or otherwise claim responsibility. It's happened to two different cars of mine.

Crossing the street is increasingly difficult and dangerous. I've observed pedestrians having to race across the street to beat fast oncoming traffic. I had to shout "slow down!" to one woman speeding north in her large black Escalade, in a hurry. She almost ran over my husband who was trying to

cross the street. She shouted back at me that "you don't have to stop for pedestrians going uphill on a canyon road."

Bundy Drive is so crowded and congested nowadays that it's not a drive at all. It's an obstacle course. Exactly what we ***DO NOT*** need: more cars, trucks, and double the number of those large lumbering buses. Isn't there some way to rethink this? Or downsize it so the anticipated growth on the MSM campus is at least *somewhat* more manageable?

I wish I could support this expansion, but I cannot. It may be an upgrade for The Mount, but it's a *definite* downgrade for the rest of us neighbors farther down Bundy.

Sincerely,

Mary Lyon
524 North Bundy Drive
Los Angeles, CA 90049

Maupil_Chiccarelli

From: **Emily Maupin** <maupin99@gmail.com>
Date: Thu, Aug 11, 2016 at 5:49 PM
Subject: Mount St. Mary's expansion
To: Kathleen.king@lacity.org

ATTN: Kathleen King
Major Projects - Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
ENV-2016-2319-EIR

Dear Ms. King,

As a homeowner on Bundy Drive, I have seen the traffic to and from Mount Saint Mary's college north of Sunset Blvd. grow every year. Students, supply trucks, buses and employees of the college drive recklessly on our streets. There are blind curves they careen around. The posted speed limit is 25 MPH, and it is rarely ever adhered to.You can see these students texting as they speed. We walk our dogs and our children here. We have driveways we must back out from. It is now dangerous to be on our street. These roads were not designed for this kind of traffic.

The expansion that the school has planned is ludicrous. It will mean more heavy trucks, more construction workers, as well as more staff and more students speeding by our homes. They are also renting their site out on the weekends, which not only means more speeding traffic, but includes buses that do not know that they are unable to fit on some of our small streets. This expansion will also have a terrible effect on the wildlife we share our canyon with.

This is ruining our ability to enjoy our property and our neighborhood. I am sick of jumping out of the way of speeding vehicles. I hope you can help.

Sincerely,

Emily Maupin & Joe Chiccarelli

Mendelsohn

On Tue, Aug 16, 2016 at 8:27 PM, King Mendelsohn <kmmend@verizon.net> wrote:
Kathleen King
Major Projects – Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
ENV-2016-2319-EIR

Dear Ms. King,

I am writing to express the concern that my wife and I have regarding the proposed construction at Mount St. Mary's College. We live at 862 N Norman Place, directly on the path that any vehicles must take to get to the College. The proposed building (though I don't find it esthetically pleasing or in keeping with the existing structures at the College) will apparently fulfill a pressing need at the college for more fitness and recreation facilities. And as long as it does not lead to increased enrollment at the College, in itself it does not seem to pose any environmental threat to our neighborhood.

However, what does concern us is the traffic that will be generated during the construction of such a large building. Even small projects involving new home construction or renovation in the area North of our home result in a great increase in traffic along Norman Place. The much larger proposed project at the College will inevitably require multiple trips by heavy trucks carrying building materials of all kinds, as well as the multiple workers required to complete such a project.

We hope that this issue will be given careful consideration during the development of the Environmental Impact Report, and that plans can be developed to mitigate the serious traffic-related concerns that we have.

Thank you for your attention.

Sincerely,

King M Mendelsohn
862 N Norman Place
Los Angeles, CA 90049
310-472-5060

Michaels

From: **Stefanie Michaels** <stefaniemichaels@gmail.com>
Date: Wed, Aug 10, 2016 at 2:06 PM
Subject: Regarding Mount St. Mary's EIR/NOP
To: Kathleen.king@lacity.org

Hello Ms. King,

Thank you for taking the time to send out the EIR/NOP regarding Mount St. Mary's.

I am part of the Bundy Canyon Association, which represents 545 homes north of Sunset, between Barrington and Bowling Green. I myself live at the top of Norman Place and Chalon.

Over the years, we have noticed an increase in MSM students, cars, trucks, etc. on our tiny streets, and there have been several accidents, property damage, loss of animal life, and a disruption of the wildlife migration area of lion, deer, coyote and other creatures, that starts from the Getty, across MSM onto the canyons, further west, such as Kenter Canyon. (It is usually not until breaks or summer, when the college is quieter, do we see this migration take place again. When we moved here some 15 years ago, that migration was more of a common occurrence).

Some of our BCA members have also brought attention to the city, that Mount St. Mary's is in violation of their CUP- 1072 students, based off of a 1984 parking structure that was built/CUP. We understand, from a letter signed by Mount St. Mary's president in late 2015, that they currently have 1600 students on campus.

Our members are also extremely worried about the dangerous red-flag zone in which we live in. And, as one of our Brentwood fireman stated, we are living in a tinderbox. A few years ago, there were two fires, one on Sepulveda, and one right here at the top of Norman Place and Chalon. The Getty and MSM student and faculty, along with Carondolet Center on the MSM campus evacuated, using Norman Place and Bundy, and created such a dangerous situation of congestion, no residents could evacuate their driveways, and the fire trucks had an issue getting up Norman and to the fire.

There is currently a wood chip pile at Norman Place and Chalon on MSM property, that was put there by MSM, and has been there since the beginning of summer. After BCA members contacted MSM, the fire department, and Councilman Bonin's office, it is now August, and the pile sits there. In this red flag zone. In this dangerous fire season. Next to our homes.

This is how Mount St. Mary's operates. With lack of concern for the community. We can't trust them on many levels, especially with this fire hazard they have created, and their CUP issue.

And, they want to add students.

After attending BHA/Brentwood Homeowners Association meetings, I learned that they want to do more than add a "Wellness Facility", but increases enrollment to 2200 students.

Our tiny roads can't handle the onset of delivery trucks, MSM Busses, facility and student vehicles as it is, and they want to increase their student body? And, construct a 38,000 square foot facility, which will bring even more students, faculty and staff from their other location to use the facility? This is not even noting the construction phase they plan on for expansion.

I strongly appose this proposal for Mount St. Mary's expansion on the Chalon campus. They are putting us all at risk with fire, jeopardizing wildlife, and ruining our quality of life in Bundy Canyon.

Thank you,

Stefanie Michaels

Michaels_BCA

On Thu, Aug 25, 2016 at 4:47 PM, BCA <bundycanyonevents@gmail.com> wrote:
Hi Kathleen,
This is one of the founders of Bundy Canyon Association, Stefanie Michaels.
We have asked some members to send us their thoughts. There are several emails I will be forwarding.

We would love the opportunity to meet with you and talk about these issues. As you can see, from those who have written you, and the notes we are forwarding, we have a lot of upset neighbors over the proposed MSM expansion.

We did have a fire up here in 2009. Because 300 vehicles exited and evacuated MSMU, neighbors could not get out of their driveways, myself and family included.

Thank you,
Stefanie Mihcaels
Buddy Canyon Association
Bundycanyon.org

Mohaber

From: **David Mohaber** <dmohaber@yahoo.com>
Date: Tue, Aug 23, 2016 at 8:53 PM
Subject: Re: Mount St Mary's expansion
To: kathleen.king@lacity.org
Cc: David Mohaber <dmohaber@yahoo.com>

Dear Kathleen King,

I have lived at 844 Norway Lane since 2005, and before that on North Bowling Green Way since 1977.

Traffic to and from Mount Saint Mary's college north of Sunset Blvd. has grown year after year.
Students racing to campus as early as 5 AM and traffic jams in the afternoons on Barrington and Sunset make peaceful living in our neighborhood very difficult.

The streets in this area were never designed to handle this much traffic.
Peaceful enjoyment of our property is becoming more difficult. We cannot afford any more traffic on our narrow residential streets. We cannot accept any more expansion of that campus or more construction.

If the college wants to increase it enrollment then it must find a different access rout to the campus.

Sincerely,

David Mohaber

On Tuesday, August 23, 2016 8:50 PM, David Mohaber <dmohaber@yahoo.com> wrote:

Dear Kathleen King,

I have lived at 844 Norway Lane since 2005, and before that on North Bowling Green Way since 1977.

Traffic to and from Mount Saint Mary's college north of Sunset Blvd. has grown year after year.
Students racing to campus as early as 5 AM and traffic jams in the afternoons on Barrington and Sunset make peaceful living in our neighborhood very difficult.

The streets in this area were never designed to handle this much traffic.
Peaceful enjoyment of our property is becoming more difficult. We cannot afford any more traffic on our narrow residential streets. We cannot accept any more expansion of that campus or more construction.

If the college wants to increase it enrollment then it must find a different access rout to the campus.

Sincerely,

David Mohaber

Nagy

On Fri, Sep 2, 2016 at 3:02 PM, One Birdie <onebirdie1170@gmail.com> wrote:

TO: Kathleen King

Major Project- Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

Email: kathleen.king@lacity.org

Subject: Case Number: ENV-2016-2319-EIR, Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Dear Ms. King,

I reside on Sunset Blvd. between Saltair Ave. and Barrington Ave. in the Brentwood area of Los Angeles. While most of the comments and concerns that I am submitting are a direct copy of the Bundy Canyon Association's material (I participated in a drafting session for the BCA's submission), I have added my own personal voice to the overriding issue/concern in the beginning of this email so as to highlight my greatest concern.

I am deeply concerned about the fact that Mount Saint Mary's University Chalon Campus has a documented history of not complying with the Conditional Use Permits they have agreed to in the past and the City of Los Angeles has not held them accountable to those CUP's. The last CUP that was signed by all parties was in 1984 (as far as accessible public documents reveal) and per that CUP they should have considerably less students than they currently acknowledge as their enrollment numbers for this campus. As a part of the City's due diligence, I would ask that the city review the current CUP under which Mt. St. Mary's Chalon Campus should be operating and ensure that there is complete compliance.

From an average citizen's standpoint, there is no moving forward with the upcoming EIR process for a new project unless the school is currently in compliance with its current agreement with the City. It seems to me that if you have an entity that is not living up to the very standard it set forth for themselves with approval by the City of Los Angeles, then how can anyone in the surrounding community trust that Mt. St. Mary's Chalon Campus and the City of Los Angeles will enter into a agreement that will be abided by and duly enforced? Those of us living in the area that is directly impacted by Mt. St. Mary's exponential enrollment growth and well-documented non-compliance of their CUP know very well that this school will continue to grow at an unacceptable and unpermitted rate and style for the neighborhood in which it resides with little or no oversight by the City.

The cumulative community impact of what has become a steady, non-compliant increase in enrollment at Mt. St. Mary's Chalon Campus, along with what is expected to occur with this pending project and other major projects in the immediate area, is best addressed by the Bundy Canyon Association's concerns listed below. Please address the following concerns and issues below as if they were my own.

Below you will find the complete list of comments and concerns as compiled by the Bundy Canyon Association:

These comments are submitted in response to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Mount Saint Mary's University Chalon Campus Wellness Pavilion Project, Case Number: ENV-2016-2319-EIR (SCH 2016081015) and are submitted on behalf of the Bundy Canyon Association.

The project entails demolition of the existing fitness center, facilities management building, tennis courts and pool on a 3.8-acre portion of the 45-acre Mount Saint Mary's University site. and the construction of a Wellness Pavilion and swimming pool. The Wellness Pavilion would be a two-story, approximately 38,000 sq. ft. multi-use building, which would house a recreation and practice gym, multi-purpose rooms, exercise rooms, physical therapy lab, dance and cycling studios, offices and support space (i.e. lockers, showers, restrooms, equipment storage, and mechanical spaces).

Project Background

The Mount Saint Mary's facility was originally approved in 1928. Minutes for Petition 3066 include a statement from "the sisters" that they would have between 100 and 200 students, with a maximum cap of 500. A January 1984 staff report for City Plan Case No. 4072 CU to allow a new residence hall indicated that the college had maintained a constant enrollment of 700 to 750 (Page 2) and there were no plans to increase the number of students (Page 1). It is not clear how or if the increase above 500 students was granted.

Later the same year, in July 1984, the Planning Commission approved construction of a parking garage at what was then Mount Saint Mary's College under Case No. 4072 CU. Under conditions of approval adopted for Case No. 4072 CU at that time, at least ¼ parking space was to be provided for each student (Condition 3), and on-site parking was capped at 268 spaces, effectively capping enrollment at 1,072 students. However, the IS states that 561 parking spaces are provided on campus (p. A-6)

Documents available for review via the City's on-line Zoning Information and Map Access System and from Piper Tech show no major changes in permitted activity levels since 1984.

According to the Initial Study (IS p. A-10), the project would not entail any increase in enrollment at the Chalon campus of Mount Saint Mary's University. The IS then states that the deemed approved enrollment cap at the Chalon campus is 2,244 students and that the facility has consistently been below the maximum student enrollment cap. In light of continued growth of student enrollment and lack of documentation regarding changes in the allowable cap over time, this statement must be verified based on fully documented approvals.

The IS also references a requirement for valet parking for events with more than fifty attendees (p. A-6). It is not clear when this condition was imposed. In order to adequately assess the impact of currently requested project approvals on the community, a full review of past approvals must be provided, including any conditions of approval adopted at the time of the approvals. Any changes in current conditions of approval must be identified and potential impacts of any changes must be examined.

Project Site

The IS references the 45-acre campus (p. A-2). Figure A-1 shows the "Project Site" to be just a portion of the total campus, and the "Project Site" is described in relation to other areas of campus (P. A-5). It is not clear whether or not the area to be redeveloped is a separate lot from other portions of the campus. If it is not a separate lot, how is the area included in the "Project Site" defined?

It is not clear what the size of the "Project Site" is, though reference is made to 3.8 acres. Identification of the size of the site is essential to an evaluation of whether the proposed floor area ratios and lot coverage would be appropriate and would be compatible with the surrounding area. The EIR must be clear as to whether any mitigation measures or conditions imposed on the project apply to the campus as a whole or to just the "Project Site". In order to avoid confusion, it may be preferable to refer to the area to be redeveloped as the "development area" or some other name that makes it clear whether any discussion or condition applies to all or just a portion of the campus.

Project Description

The project description must include not only physical improvements but operational characteristics, including hours of operation. The description must be consistent and complete. For example, while a roof garden is not included in the project description, Section XV indicates that a roof garden would provide outdoor recreation space (p. B-32). The IS states that natural light would be "harvested" using large expanses of glass and skylights (A-34) but then says that glazing would be "protected from direct sunlight with deep overhangs to mitigate glare and reduce solar radiation" (p. A-35.

Facility Users

As noted in the IS, Mount Saint Mary's operates at another location known as the Doheny campus. The EIR must address increased visits to the Chalon campus Wellness facility by students enrolled in programs at Doheny, focusing on traffic and parking.

The EIR must address any re-alignment of activities between the Doheny and Chalon campuses or student bodies as a result of the proposed project. Will any programs now being conducted at the Doheny campus be relocated to the Chalon campus?

It is not clear if any of the Wellness facilities will be used for training of students in physical therapy or other health care fields or whether this would involve treatment of off-campus individuals. This must be addressed along with associated impacts on traffic and related factors.

Use of the proposed athletic facilities must be limited to students and faculty. Outside use of the proposed athletic facilities must not be permitted.

Events

The EIR must address both campus events and external events, listing the type, number, and anticipated attendance at events. Attendance must be capped at no more than the attendance numbers used in the EIR analyses. All events must be required to end fifteen minutes before the latest regularly scheduled shuttle leaves the campus and no event must be permitted to begin prior to the arrival of the first shuttle of the day. Start and end times for events must be offset

from peak traffic hours. Project alternatives must include a prohibition of external events and a prohibition on rental of campus facilities for filming.

Circulation and Parking

The IS notes the availability of 107 on-street parking spaces within one quarter mile of the campus (p. A-6). Parking in the neighborhood is not a legitimate solution to meeting campus parking demand. The proposed new facilities have the potential to exacerbate this problem.

The campus is on a hill and is not in close proximity to any bus stop. It is thus reasonable to ban walk-ons in order to discourage parking in the neighborhood. A parking restriction should be considered, allowing only residents and their guests to park on streets surrounding the campus.

It is not clear whether any Doheny students park at the Chalon campus or on streets around the campus to take the shuttle to the Doheny campus. The EIR must address impacts of any Doheny students using the Chalon Campus and surrounding area as a sort of "park-and-ride".

Planning and Zoning

The subject property is located in the RE-40-1-H Zoning District. In accordance with Los Angeles Municipal Code Section 12.21.1:

> No building or structure shall be erected or enlarged which exceeds the total floor area, the number of stories or the height limits hereinafter specified for the district in which the building or structure is located. …
>
> … In the RA, RE, RS, and R1 Zones in Height District No. 1, located in a Hillside Area, as defined in Section 12.03 of this Code, no Building or Structure shall exceed the height limits established in Paragraph (d) of Subdivision 10 of Subsection C. of Section 12.21 of this Code.

In accordance with Section 12.21.C.10(d):

> No portion of a Building or Structure shall be erected or enlarged which exceeds the envelope height limits as outlined in Table 12.21 C.10-4

In accordance with Table 12.21.C.10-4, maximum allowable height would be 30 or 36 feet, depending on roof slope. While elevations of the proposed structures are provided, roof slope is not defined. The EIR must identify roof slope and the normally required height limitation.

The proposed structure would be 42 feet in height. The IS suggests that the additional height can be approved in connection with a Plan Approval for a deemed-approved conditional use. This is inappropriate. As noted the Los Angeles Superior Court in Donald Kottler; and Marlene Kottler v. City of Los Angeles; Central Area Planning Commission of the City of Los Angeles, in addressing the inappropriate granting of a zoning "adjustment":

> The "adjustment" provided for in LAMC section 12.28 is "a permit to build a structure or engage in an activity that would not otherwise be allowed under the zoning ordinance ... ". Neighbors in Support of Appropriate Land Use v. County of Tuolumne (2007) 157 Cal. App.4th 997, 1007; see also Hamilton v. Board of Supervisors of Santa Barbara County

(1969) 269 Cai.App.2d 64, 66. In other words, it is a variance. Under the plain terms of the City's own charter any such variance could only be made after the ZA made five findings relating to the need for a special exception to the zoning requirements. See Los Angeles City Charter§ 562(c); Petitioners RJN, Ex. 1, p. 5. Accordingly, Respondents erred when they approved a variance without making the required findings under City Charter section 562(c).

… Condition use permits, on the other hand, relate to the permitted use of a property, not the size or design features of the buildings on that property. See Essick v. City of Los Angeles (1950) 34 Cal.2d 614, 623 ("[A] .conditional use is a separate and distinct concept from a variance and ... is granted for a public or quasi-public purpose within the terms of the ... ordinance itself rather than to obviate the 'practical difficulties, unnecessary hardships or results inconsistent with the general purposes of the zoning regulations' as applied to individual property owners, which must be shown before a variance may be granted .... ").

Thus, a variance would be required for the additional height. In accordance with Los Angeles City Charter Section 562(c), a variance could only be granted if all of the following findings could be made:

(1) that the strict application of the provisions of the zoning ordinance would result in practical difficulties or unnecessary hardships inconsistent with the general purposes and intent of the zoning regulations;

(2) that there are special circumstances applicable to the subject property such as size, shape, topography, location or surroundings that do not apply generally to other property in the same zone and vicinity;

(3) that the variance is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property in the same zone and vicinity but which, because of the special circumstances and practical difficulties or unnecessary hardships, is denied to the property in question;

(4) that the granting of the variance will not be materially detrimental to the public welfare, or injurious to the property or improvements in the same zone or vicinity in which the property is located; and

(5) that the granting of the variance will not adversely affect any element of the General Plan.

Project Alternatives

As noted above, alternatives must include no use of the facilities for external events and no filming. An operational alternative should consider operations consistent with the 1984 approvals, the last known documented approval for campus operations, i.e. 268 parking spaces.

Alternate locations should include location of the Wellness Pavilion at the Doheny site or nearby environs. Provision of a park and ride outside the neighborhood in an area with easy access to the freeway or metro line should be considered.

Topical Issues

The following topical issues must be considered.

Aesthetics

The EIR must examine the scale of the proposed structures in the context of existing on and off campus structures in the area. Light and glare from expanses of glass and additional lighting must be addressed.

Air Quality

The EIR must address operational and construction emissions, including health impacts on the surrounding neighborhood. Increased emissions and hot spots due to increased traffic congestions must be addressed.

Biological Resources

Effects of light and glare and increased noise on area wildlife must be addressed.

Cultural Resources

The EIR must examine how the scale and style of the new structures will affect the overall nature of the historic district.

Geology and Soils

The EIR must include grading plans and cross sections showing landform changes.

Hazards and Hazardous Materials

The EIR must address how any hazardous materials on the site, such as asbestos, will be removed from the site and how propagation of dust will be controlled, whether from the campus itself or from haul trucks.

Effects on emergency evacuation due to construction, special events, or day-to-day operations on the campus must be addressed. This includes evacuation of the campus itself as well as the impairment of evacuation from the surrounding residential neighborhood. The EIR must examine the potential need to evacuate thousands of students, faculty and other staff while surrounding residents would also be attempting to evacuate via the narrow local streets. The EIR must examine shelter-in-place scenarios for the Chalon campus.

Noise

Noise from construction activities and construction vehicles in the neighborhood must be addressed. Nuisance noise from people parking in the neighborhood must also be addressed, especially noise in the early morning or late evening hours.

Public Services

Effects on emergency response due to narrow roads blocked by construction vehicles or clogged with project traffic must be examined.

Transportation/Circulation

The EIR must address increased numbers of Doheny students and others visiting the Chalon campus to utilize the Wellness facilities.

Conclusion

Thank you for the opportunity to comment. Please keep me informed as the project moves forward.

Regards,

Bethany Nagy
onebirdie1170@gmail.com

Natker

From: **Andy Natker** <anatker@haagenco.com>
Date: Thu, Sep 1, 2016 at 4:43 PM
Subject: Mount Saint Mary's Health Center
To: "kathleen.king@lacity.org" <kathleen.king@lacity.org>

Good Evening Kathleen,

My wife Roslyn Natker and I are residents and home owner at 1501 N. Bundy Drive in Brentwood at the corner of Bundy Drive and Chalon Rd in the Upper Bundy community. We are in support of the proposed health center development at Mount Saint Mary's University. We strongly believe that this project has minimal environmental impacts for our community and neighborhood . The size of the development is appropriate for the University and it's students and faculty. It's a very needed project for the educational benefits that Mount Saint Mary's University provides to replace a facility that is too small and too antiquated for the students and faculty. Mount St Mary's has always been a good neighbor and they have cooperated and helped in maintaining a quality of life in the Brentwood community.

I believe this proposed Health center is not going to cause an increase in local traffic, noise, pollution, dust etc once it's built and open. Of course there will be trucks and other vehicles used in the construction of this Health Center, however the environmental impacts on the neighborhood will be minimal and only during the construction period and not once it's built. I would recommend a traffic study to be prepared as part of the draft EIR to help mitigate any traffic congestion during busy times and a soils report that would have the contractor to try and "balance" the removal and use of fill for the construction of this development.

Sincerely,

Andrew Natker and Roslyn Natker

1501 N. Bundy Drive

Los Angeles, CA 90049

Pouladian

From: **delara pouladian** <delarap26@hotmail.com>
Date: Thu, Aug 25, 2016 at 9:46 AM
Subject: Questions%20and%20concerns%20for%20BCA
To: BCA <bundycanyonevents@gmail.com>

Hi I am one resident in bundy dr.
We are strongly against new mouth Mary project this little
Quite residential so far turn upside down with traffic not just student lots lots
Commercial car and truck how many house each month have to be turn down
And make new one is not any law and regulation in our street.
And two resident is not make up for all bundy dr. So we will still and strongly
Fighting for this problem is not have benefit for nobody just collage.
(By the way what happened to block party we though will be each year)
God luck and hope all will be solve. Delara 1043 bundy dr.☺

Reuben

On Wed, Aug 17, 2016 at 5:52 PM, Timothy Reuben <treuben@rrbattorneys.com> wrote:

Dear Ms. King,

I attended the public scoping meeting for the Mount St. Mary's Chalon Campus Project yesterday with my wife Stephanie Blum Reuben. We are residents who live with our family in the immediate area on Norman Place. We waited attempting to speak with you but you were engrossed for a lengthy period in a conversation with an elderly gentleman who kept your attention, so we ultimately gave up and left. The purpose of this letter is to provide a comment—indeed a protest—regarding the proposed project at Mt. St. Mary's.

We strongly contend that the project will cause massive traffic to the area which is already seriously overwhelmed by traffic. It will also cause massive noise pollution and particle pollution. It will create a massive impact on the area which cannot be sufficiently mitigated. We oppose the project.

Interestingly, no one we spoke to denied the significant traffic impact during construction. Nor did anyone have any answers as to how to effectively mitigate the impact on the property owners and inhabitants of the surrounding area. This is particularly true in light of the other large development at the Archer School near Sunset and Barrington going on during a portion of the same period, and the entire Sunset corridor from Bundy to the freeway will be impacted by that. Adding Mt. St. Mary's 2 year construction plan (which is optimistic), will create a living nightmare for the local citizens who call the area home. Particularly in light of the limited access to the campus, we will be struggling and miserable for at least two years if this project is approved.

We do not believe an EIR which recommends approval of this project could stand up in court. We hope that this oppressive project will not lead us there.

RRB
REUBEN RAUCHER & BLUM
ATTORNEYS AT LAW

Timothy D. Reuben
Managing Principal
10940 Wilshire Boulevard, 18th Floor | Los Angeles, California 90024
Telephone: (310) 777-1990 | Facsimile: (310) 777-1989
www.rrbattorneys.com | tdr@rrbattorneys.com

On Tue, Aug 16, 2016 at 10:12 PM, Zhila Ross <zhila.ross@yahoo.com> wrote:
Dear Ms. King,
It was very nice meeting you today. Please use the letter below and discard my first email.
Thank you,
Zhila Ross

Bill and Zhila Ross
1331 Norh Bundy Dr.
Los Angeles, CA 90049
zhila.ross@yahoo.com

August 16, 2016

Kathleen King
Major Projects- Dept. of City Planning
200 N. Spring St. Room 750
Los Angeles, Ca. 90012
ENV-2016-2319-EIR

Dear Ms. King,

Mount Saint Mary's College (MSMC) is located in the heart of an upscale residential neighborhood. When my husband and I were looking for a house to buy, I was particularly picky about the air quality due to the severe allergies that I suffer from the car fumes. We picked north Bundy because it seemed quiet and secluded and suitable for our walks and for raising our family. My husband and I were willing to pay the high premium price for our house-and subsequently for the high yearly property taxes-because we wanted to send our kids to the good public schools in the area and we thought that living in a nice area with no traffic and clean air was worth the cost. Unfortunately, for the last sixteen years the air quality and traffic on our street have consistently worsened due to the traffic from MSMC. Both myself and my two sons suffer from the allergy to the exhaust fumes every time we walk or bike on our street. Our twelve year old boys can not have a safe bike ride on the loop (Bundy, Chalon, Norman, Bundy) due to young drivers from the college who act as if they are driving on a racetrack, or the service trucks, or worse than all the shuttle drivers who put the burden of safety on our kids. They are negligent drivers and never heed to the residents.

Enrollment:
I understand that according to an existing Conditional Use Permit, the number of students should not have exceeded 1072 (750 students enrolled at the time of CUP). Currently 1600 students are enrolled. **What are the means of enforcing the conditions of approvals? How do we know that MSMC would adhere to any conditions set by the City or any other authorities? They have violated their previous commitments and will do so with any future ones. An additional proposed 53 parking spaces will be an invitation for future enrollment increases.**

Water Runoff:
The northern part of Bundy Canyon (from 1000 block on) has always faced severe flooding issues with surface water runoff. **Construction of a 38,000 two-story building (at least additional 20,000 sf of non-porous surface) and a new parking deck for 279 stalls will result in drastic additional load to the water runoff.** This will be a disaster for our street.

Additional Traffic:

The college is planning to use the proposed facilities for the club sports teams practices. This means additional traffic load to our residential neighborhood by the students from the downtown campus, coaches, and the service people. Although your report stated that games will not be held in the proposed facilities, history has shown that MSMC does not adhere to its commitments or the conditions of approval. If they build such facilities, they will hold games here too! Imagine the additional traffic load caused by the games on our narrow streets. The Wellness Pavilion will also drastically add to the traffic caused by students from the downtown campus, trainers, service people, maintenance people, additional administration, therapists, etc. **Our streets are not designed to take such huge traffic loads. Any restrictions imposed by the conditions of approval are deemed to be violated by the college as evidenced in the past behavior by the college.**

Air Quality:
The pollution caused by the construction vehicles, demolition and construction equipment, additional students, instructors and administrators, team club practices and games...will adversely affect the air quality of our street. We will not be able to walk or bike in our own upscale neighborhood any more.

Wildlife and Biological Resources:
The site of the proposed construction is in the heart of Santa Monica mountains. A structure of this magnitude will adversely affect the wildlife surrounding it.

Density (Land Use and Planning):
38,000 square feet of building and a parking deck accommodating under 300 parking stalls, will impose additional load equivalent to many many houses. This will adversely affect the life quality in this supposedly quaint neighborhood of zones RE-40 and RE-15.

Greenhouse Gas Emissions:
Operation of heavy duty mechanical equipment will contribute to additional greenhouse gas emissions.

Public Services:
As it is, most of the times our fire safety vehicles are dispatched to the emergencies at the college. Additional facilities and additional services will only adversely affect that. Our police and fire departments are already compromised.

Infrastructure (Utilities and Service Systems):
Our infrastructure is designed to service single families with low density. They are not designed to accommodate high loads of a college, let alone additional facilities.

Aesthetics:
when it comes to the architectural style, the existing buildings of the MSMC campus are mostly in harmony with one another. The proposed Wellness Pavilion, however, is an eyesore and in stark contrast with the rest of the campus buildings.

Conclusion:
For the above reasons and for the adverse effects that this proposed project can bring to Upper Bundy, we request that the City of Los Angeles deny any new developments at Mount Saint Mary's College.
Best regards,

Bill and Zhila Ross

Ross2

From: **Zhila Ross** <zhila.ross@yahoo.com>
Date: Fri, Sep 2, 2016 at 3:18 PM
Subject: Re: ENV-2016-2319-EIR (Revised)
To: Kathleen King <kathleen.king@lacity.org>

Dear Ms. King,

1. I was wondering since the EIR's are paid by the applicants (Mount Saint Mary's in this case), if they ever not come back with negative declaration. Another words, is it true that all projects get approved?

2. I also have a very practical alternative to the building of the Wellness Center:

Since the construction and the existence of the Wellness Center will have numerous adverse effects on the neighborhood and the environment around it, I suggest that Mount Saint Mary's instead of spending approx. $300/sf on the construction of the 38,000 sf Center and additional approx. $50/sf on 90,000 sf parking deck that would approximately add up to $16,000,000, spend a fraction of that and buy bicycles for their students so they too, like our kids, can do their physical activity in a cleaner air and less traffic environment.

Best regards,

Zhila Ross

ENVIRONMENTAL ISSUES & IMPACTS

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report?

- ☐ Aesthetics
- ☐ Agriculture and Forest Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Geology and Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards and Hazardous Materials
- ☐ Hydrology/Water Quality
- ☐ Land Use and Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population and Housing
- ☐ Public Services
- ☐ Recreation
- ☒ Traffic/Transportation
- ☐ Utilities/Service Systems

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

I live across from mt. St. Mary on 1100 Grace Ln. the problem we have is with parking on both side of Chalon Rd. the street is not wide enough for ~~the~~ their wide buses. So when I'm driving down Chalon and I met one of this buses, it's a very tight squeez .. this gat to stop! Do something about this.

Solution:

1. Have student park on one side only.
2. Don't charge so much for student to park at the college. ($375.00 a semester) ~~they~~
3. Post signs that say - 3 hrs. limit parking.

It's bad enough that there ~~are~~ accepting so many student and causing a bottle neck on Sunset Blvd.

Scherrer

CONTACT INFORMATION (Optional, please print clearly)

RECEIVED
CITY OF LOS ANGELES
AUG 25 2015
ENVIRONMENTAL UNIT

Name: GRACE SCHERRER Representing Agency or Organization: _____

Address: 1160 GRACE LN. LA. 90049 City/State/Zip: _____

Schirripa 8/7/16

Dear Kathleen,

Joe Schirripa

my family members are long time residents on the street that will be directly impacted by the MSMU project. Case #ENV 2016.23A EIR We support the project and ask you to approve it. MSMU is a credit to our community J Schirripa

915 Norman Place
Los Angeles, California 90049

Schulman

On Mon, Aug 29, 2016 at 12:09 PM, TONI SCHULMAN <tmsjas@gmail.com> wrote:

Ms. King,

I am writing to you as a long term resident of Brentwood and thank you in advance for your time on this subject.

My husband and I are **totally opposed** to this new project being proposed by MSMU. We believe that it will have a long lasting negative impact on the neighborhood. We want to keep Brentwood a safe and wonderful neighborhood.

The amount of traffic that is already in place from the University is disruptive and often dangerous. There are many young families that live here and the traffic is often over the speed limit and street signs are ignored. Adding construction to this mayhem could mean the end of the beautiful homes and lives here.

As one who lives on Bundy, I have had to install mirrors across the street to ensure that I am not hit by a speeding car when I try to leave my driveway.

Again, thank you for your time and attention to this impending crisis in our quiet neighborhood.

--
Toni M. Schulman

Shelton

From: **James Shelton** <ginginhs@aol.com>
Date: Tue, Aug 30, 2016 at 12:30 PM
Subject: Mt St Marys Construction Project
To: kathleen.king@lacity.org

To whom it may concern.

I have lived in this neighborhood for over 25 years. Traffic was not an issue, or ever discussed at the time we moved into the neighborhood. You were able to go up and down Sunset ANY time of the day without an incident . TODAY, I am not able to leave my house after 3 without a major traffic jam. With the addition of schools in the area and ALL of the office buildings that have been built in Santa Monica over the years, it is nearly impossible to make your way around the west side of town in the afternoon. It is now becoming mornings too. SO.....NO.....I DO NOT want ONE more project in the area, ONE more car going up and down the street OR another truck coming in for construction. Our beautiful quite neighborhood has been RUINED by traffic.

I witnessed the ARCHER school moving into the neighborhood and promising everything.(i.e....no more traffic,; carpooling etc) That was a joke..... and now 10 years later they want more and construction is going to begin soon. To have ANOTHER project in this tiny little neighborhood would be a DISASTER.

Thank you for listening.

Stein

From: **Ira Stein** <ira@irastein.com>
Date: Wed, Aug 10, 2016 at 4:12 PM
Subject: Fwd: More construction? More problems!
To: kathleen.king@lacity.org
Cc: Nextdoor Kenter <reply@rs.email.nextdoor.com>, Mike Bonin <mike.bonin@lacity.org>

Dear Ms. King
I would like to know YOUR position regarding the proposed construction on the Mount Saint Mary's campus in West Los Angeles.
Perhaps you drive Sunset Blvd. during traffic hours so you know the devastating effect it has on the lives of the daily commuters.
Now that we have the problem given to us by the Archer School, let me ask you…….
If you lived in this area, what would you do?What would be your position?
Additionally, we are having a very serious problem with auto. break ins. Its now out of control. I'm certain many residents have notified you of this.
I believe there will be a direct correlation between what's being proposed at (Archer and Saint Mary's) and the future reduction in the quality of life in this area.
I'm near Sunset and Kenter. I've had one auto theft and one attempted home robbery while I was home. A simple drive from Kenter to the 405 FRWY. approx. 2 miles has taken me two hours several times. ENOUGH!!!
Let's see what you do. We've already seen what Mr Bonin did.
Ira Stein
524 No. Greencraig Rd. 90049
310 476-6082

Stiebel

From: **Arlene Stiebel** <amstiebel@aol.com>
Date: Wed, Aug 24, 2016 at 6:57 PM
Subject: Buddy Canyon Association
To: bundycanyonevents@gmail.com

Just build a road directly from Sepulveda up to M St M that bypasses Brentwood completely. The Getty could donate the land or there could be an easement. Construction vehicles could then have access that would not impact us. Subsequently, the gate on Chalon could be closed as the Getty fire road is now, and students could be directed to use the Sepulveda access. That way, M St M could be cut off from our neighborhood, and whatever they choose to do would be up to them and the city and the county to determine (environmental impact, wildlife, etc.).

Seems like a win-win to me!

Arlene

Sunshine

From: **Debra Sunshine** <debrasunshine@yahoo.com>
Date: Fri, Aug 26, 2016 at 12:48 PM
Subject: MSMU Proposal
To: Kathleen.king@lacity.org
Cc: bundycanyonevents@gmail.com

Dear Ms. King:

We are writing in opposition to the proposed 38,000 square foot building and parking deck on the Mt. St. Mary's Chalon Campus (MSMU) in my neighborhood. Such a proposal raises huge traffic and safety concerns for our neighborhood.

MSMU is proposing a student enrollment cap of 2,244 students, yet they are already in breach of their student cap of 1072 (with 1600 currently enrolled students) which was promised in 1984. While well-intentioned I am sure, the school simply can't be trusted with their enrolment promises.

This neighborhood is already at maximum capacity. Daily we have accidents caused by people (many of them students/employees) speeding down Bundy and Norman. My mother's car was totaled in front of our house while she came to care for our new baby. Stop signs are totally ignored and brutal road rage incidents are now commonplace. Not to mention with the changing natural environment, fire is an increased danger in our Red Zone/high fire risk area. The canyon cannot support more people who would need to evacuate in a fire.

While our quality of life would suffer for a finite period during construction of the proposed structures, we would not endure more traffic and an increased student population at MSMU.

Please consider those of us who have made Bundy Canyon our permanent home over those who will take their degree and leave.

Thank you,
Debra and Randall Sunshine

Tippl

From: <tomson9@yahoo.com>
Date: Tue, Aug 16, 2016 at 3:47 PM
Subject: Mount Saint Mary's Expansion
To: kathleen.king@lacity.org, bundycanyonevents@gmail.com

August 15, 2016

Kathleen King
Major Projects - Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
ENV-2016-2319-EIR

Dear Kathleen King,

As a homeowner in Bundy Canyon, I have seen traffic to and from Mount Saint Mary's college north of Sunset Blvd. grow and grow year after year. Students, supply trucks, buses and employees of the college drive carelessly through our narrow streets. These roads were not designed for this kind of traffic. Now the school proposes construction of a HUGE building. This means more heavy trucks, more construction workers and eventually more staff and more students speeding by our homes.
Peaceful enjoyment of our property is becoming impossible. We cannot afford any more traffic on our streets.

What will be done about this?

Please HELP.

Sincerely,

Laura Tippl
10.5 year Bundy Canyon resident

Tomson

On Thu, Aug 25, 2016 at 4:58 PM, BCA <bundycanyonevents@gmail.com> wrote:
Another member who photographed one of our streets at 4:15.
Thank you,
Stef

---------- Forwarded message ----------
From: <tomson9@yahoo.com>
Date: Thu, Aug 25, 2016 at 4:22 PM
Subject: Traffic leaving the canyon 4:15 pm
To: Bundy Canyon Association <info@bundycanyon.org>

Sent from my iPhone

Trapnell

From: <charlestrapnell@yahoo.com>
Date: Sat, Aug 27, 2016 at 9:27 AM
Subject: Re Mount St. Mary"s construction project
To: "kathleen.king@lacity.org" <kathleen.king@lacity.org>
Cc: Bernadette Leiweke <bleiweke@me.com>

Dear Ms King,

I am disturbed by the proposal to build additional facilities at the Mount. As you pointed out the existing problems we have faced for years will be exacerbated hugely with these new and extended uses of the property. The numbers and carelessness of the youthful drivers speeding down the narrow streets already causes the residents constant concern for their personal safety and frequently results in property destruction as well. For example, some months ago my car was completely demolished when I had a visitor and, in order to make a parking space available for my guest, I had to park on the street. A huge delivery truck, returning from the Mount, was unable to negotiate the space available to him because a student, returning to the school, was driving recklessly and the trucker was unable negotiate the space he should have had to pass her; thus, taking the lesser of two evils, plowed into my car in order to avoid hitting her.

On several other occasions during my tenure at this location I have been compelled to run across the street because of a fast moving car with a student driver, which is something of a challenge for a 94 year old codger who is suppose to feel somewhat more secure in a basically homelike neighborhood.

Thus, I can only surmise that the additional traffic generated by the proposed additions will only decrease the feeling of safety I had anticipated when I moved to this location rather than to a bustling traffic-infested corridor with all the noise and danger they promise to impose on the residents.

Charles F. Trapnell
12220 Benmore Terrace
Los Angeles, Ca. 90049

Waxman

On Fri, Sep 2, 2016 at 1:33 PM, Thelma Waxman <thelma.waxman@gmail.com> wrote:
Dear Ms. King,

I am writing to you as a private citizen who lives on 11840 Chaparal Street just a few blocks south from Mt. St. Mary's. My family and I have lived here for over 20 years and have seen traffic, especially cut through traffic on Chaparal and Barrington, increase tremendously. As the attached picture shows there are days when the line of cars on Chaparal is so long, I cannot leave my driveway. Chaparal, like most of the streets around it North of Sunset, is a narrow, non-conforming street with no sidewalks and was not meant to be a thoroughfare.

In 2012 I attended a meeting my neighbors on North Barrington Avenue arranged with the then new president, Ms. Ann McElaney-Johnson, of Mt. St. Mary's to discuss the increase in traffic on Barrington and other streets from Mt. St. Mary's students and vendors. While sympathetic to our plight, there wasn't much the President could do. (In fact, she related a story that the movers who brought her stuff out from North Carolina used WAZE and found themselves stuck on Benmore Terrace because the street is so narrow and winding!)

As Mt. St. Mary's undertakes a new project, I would ask that the EIR consider a traffic mitigation measure that would limit the use of the small streets north of Sunset to access the School during peak hours. Similar to the School's directive to enter the campus from Norman Place, the School should develop a mandatory, enforceable plan that would prohibit students, faculty, staff or guests from arriving or leaving the campus during peak hours from Benmore Terrace or Saltair off of Bundy Drive. This measure would impact drivers who leave campus and turn up Benmore Terrace or Saltair to Barrington to get to Sunset during the afternoon peak hours and prohibit cars in the am who take Barrington to Benmore or Saltair to access Bundy Drive. This policy could be enforced by making sure each student, staff or faculty member that drives to school registers their car and has a permit so violators can be identified. In addition, as a condition of doing business with the School, all vendors would have to agree and sign a traffic policy outlining delivery times and routes to the School.

I appreciate your consideration and would like to be added to the distribution list for all notices and documents.

Thank you.

Thelma Waxman
11840 Chaparal Street
Los Angeles, CA 90049

Weiskopf

From: **Evelyn Lanner Weiskopf** <lannerweiskopf@gmail.com>
Date: Wed, Aug 24, 2016 at 8:36 PM
Subject: I'm fed up with all this traffic!
To: "bundycanyonevents@gmail.com" <bundycanyonevents@gmail.com>
Cc: Manuel Weiskopf <mweiskopf1@yahoo.com>

To whom it may concern,

We are residents of Bundy Canyon and are appalled at the fact that a school as busy and large as Mt. St Mary's exists on a residential 2 lane street like ours.

To think of adding more traffic, more congestion and more pollution to an already impacted area such as ours is beyond absurd. People are constantly speeding, we have no sidewalks, parents and nannies with strollers walk on our streets and fear for their lives and those of the children in their care. I personally envision a future where my child will never be able to walk to the bus or to Barrington Court on her own because the streets are only becoming more crowded and dangerous.

Please consider the damage any more growth will do to our area. This is not a neighborhood for a Universty and we should stop the expansion while we can.

Thank you for your time,

Evelyn Lanner Weiskopf

Yard

On Tue, Aug 16, 2016 at 3:59 PM, Jay Yard <jayyard@strategicpartners.net> wrote:

Kathleen King
Major Projects- Dept. of City Planning
200 N. Spring St. Room 750
Los Angeles, Ca. 90012
ENV-2016-2319-EIR
Fax: 213-978-4656

Dear Ms. Kathleen King,

Due to business meetings with clients I am unable to attend the meeting being held tonight to discuss the proposed expansion plans at Mt. St. Mary's for a new 38,000 sq. ft. building with an accessory parking deck. I am not in favor of this expansion of the campus and the resulting additional traffic and headaches this will definitely cause the community and want to voice my strong concerns and objection to this project.

This will bring the total parking up to 279 spaces and by adding the additional 53 spaces student enrollment will increase and add to an already very congested area. I have lived at my home on 418 N. Bundy since 2000 and have seen first hand extensive neighborhood safety issues caused by student drivers, accidents, and more and more congestion on our canyon streets from enormous Mount St. Mary's buses, vans, delivery trucks, commuter student traffic and visitors to the campus. Some days I can barely get out of my driveway onto Bundy to go to work in the morning with all the traffic!

Mount St. Mary's has a history of repeatedly breaking promises to limit student growth and stay within caps as agreed upon going back to 1984. At that time it was 1072 students. It is now at 1600 and from what I understand from the new cap being requested is at 2,244. This is a residential neighborhood that is already very heavily congested and cannot absorb any additional traffic. Allowing such a project is irresponsible and dangerous to the community. It will also affect our property values.

If Mount St. Mary's wants to expand let them find another location and open a new campus in an area that can properly handle the amount of traffic generated by such a large student body. Our canyon is Red Zone/high fire risk and our streets are narrow and were never intended to handle this amount of volume. We simply cannot afford any additional expansion effort and the resulting increase in student enrollment at the Chalon campus.

I look forward to your response.

Sincerely,

Joseph Jay Yard

418 N. Bundy Drive

Los Angeles, CA 90049