DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

ROBERT L. AHN
CAROLINE CHOE
RICHARD KATZ
JOHN W. MACK
SAMANTHA MILLMAN
VERONICA PADILLA
DANA M. PERLMAN

JAMES K. WILLIAMS
COMMISSION EXECUTIVE ASSISTANT II
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP
DIRECTOR
(213) 978-1271

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

JAN ZATORSKI
DEPUTY DIRECTOR
(213) 978-1273

KEVIN KELLER
DEPUTY DIRECTOR
(213) 978-1211

FAX: (213) 978-1275

INFORMATION
http://planning.lacity.org

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proposes to construct a Wellness Pavilion (the "Project") at its Chalon Campus ("Campus") to replace the existing outdated fitness, recreation, and wellness facilities located on the Campus.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.

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. 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.

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:

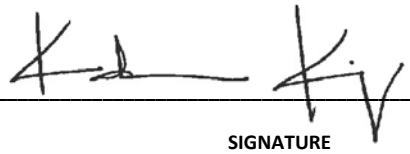
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ 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

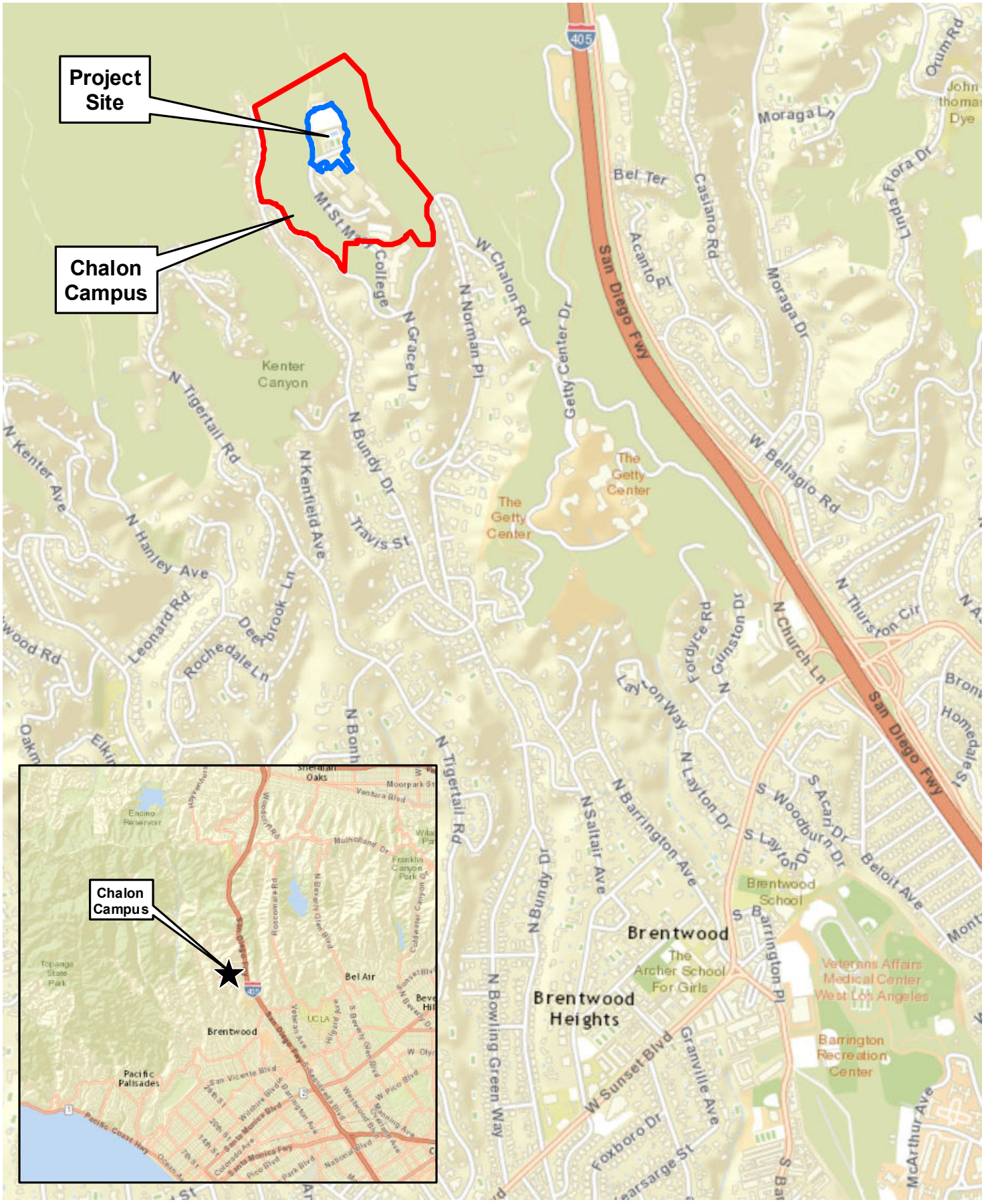
This initial study is organized into three sections as follows:

- 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.



PCR

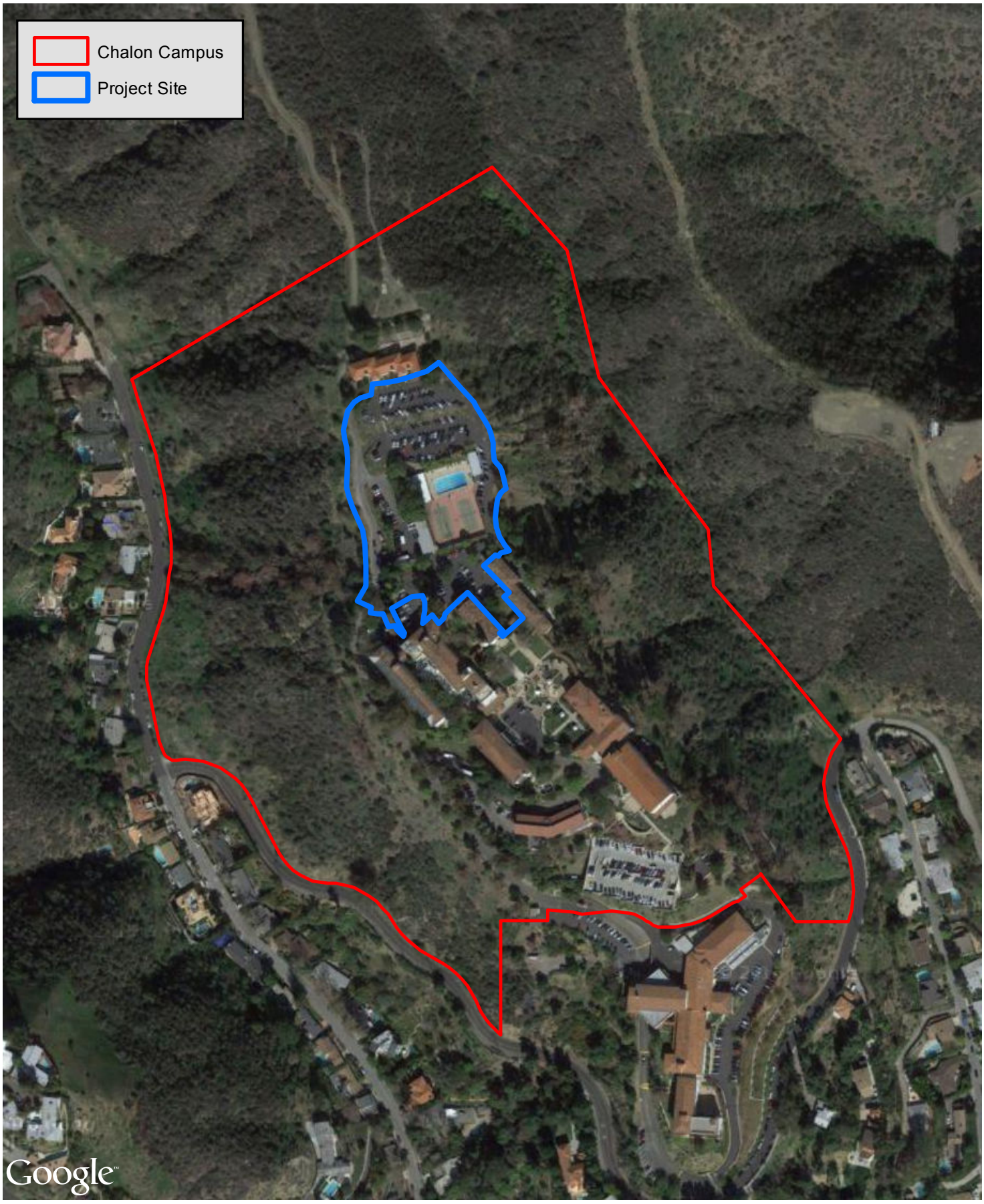
Regional and Local Vicinity Map

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*.

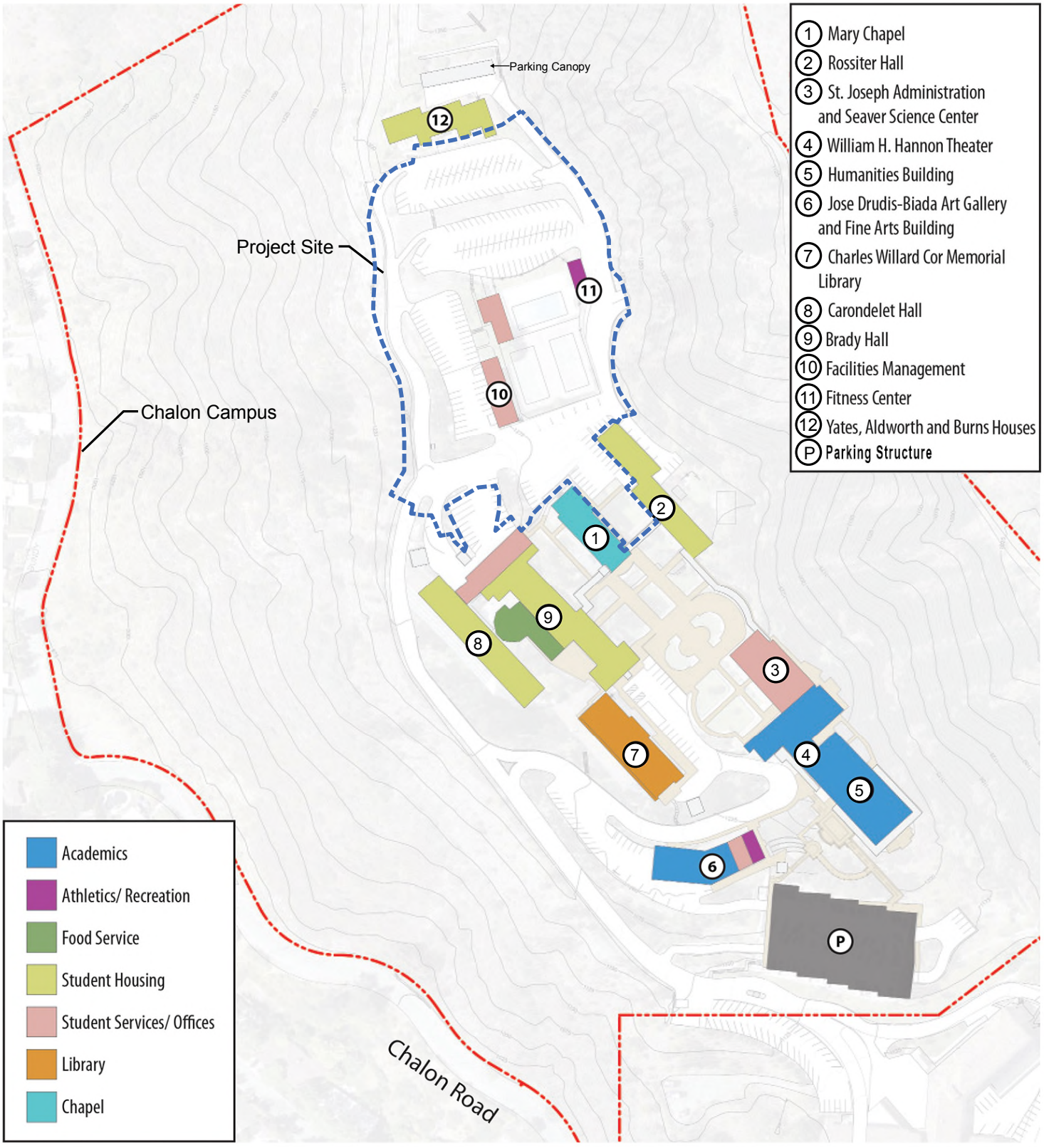
Surface parking lots and a parking structure (Lot A) provide on-site Campus parking, as shown in Figure A-4. A total of 561 parking spaces are provided on the Campus. Figure A-4 also presents an inventory of the existing on-Campus parking supply. The surface parking lots range in size from 5 to 76 spaces, 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

Chalon Campus Exisitng Facilities and Uses

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

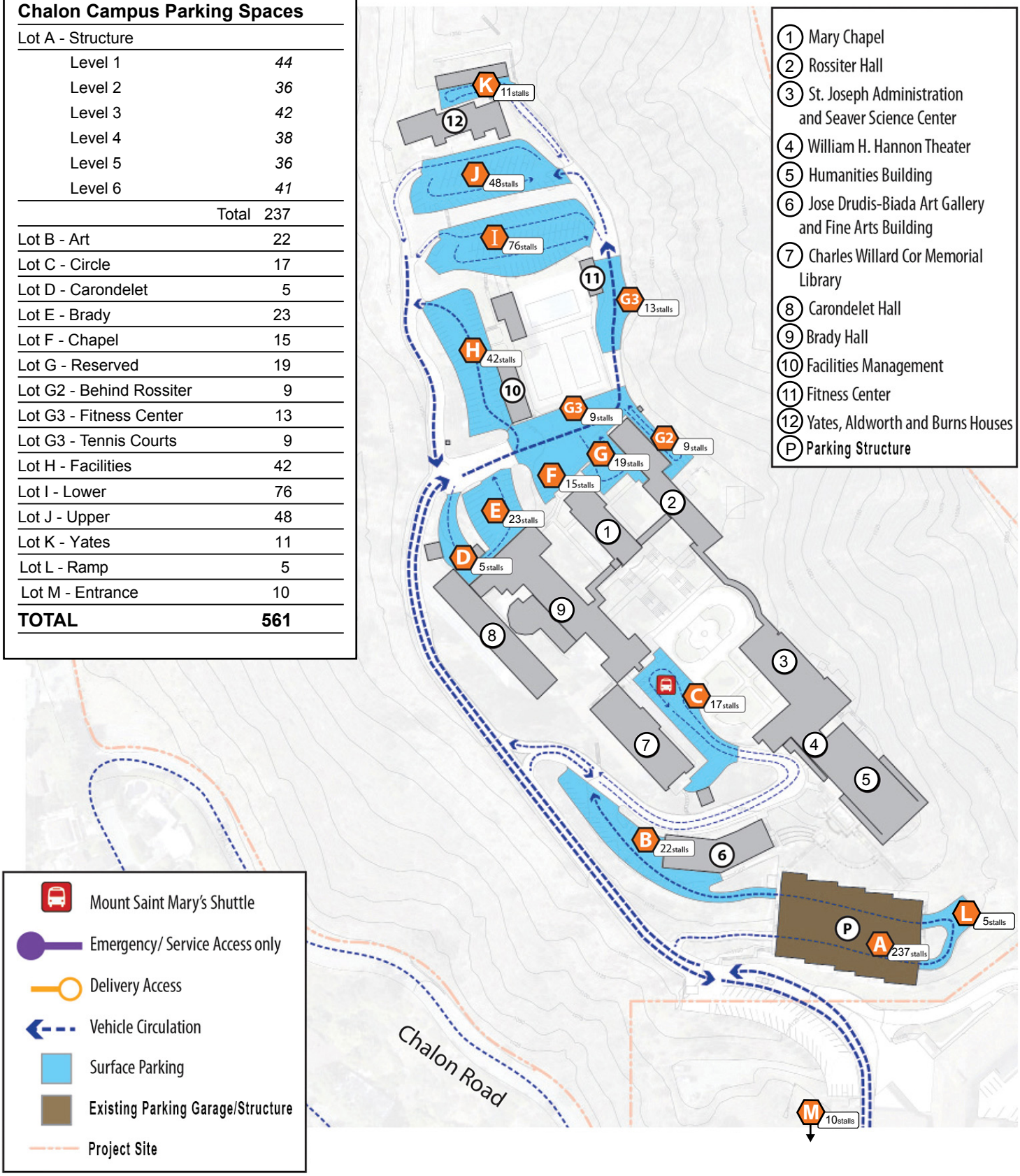
Source: Mount Saint Mary's University, 2016.

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**



PCR

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

N

0 20 Feet

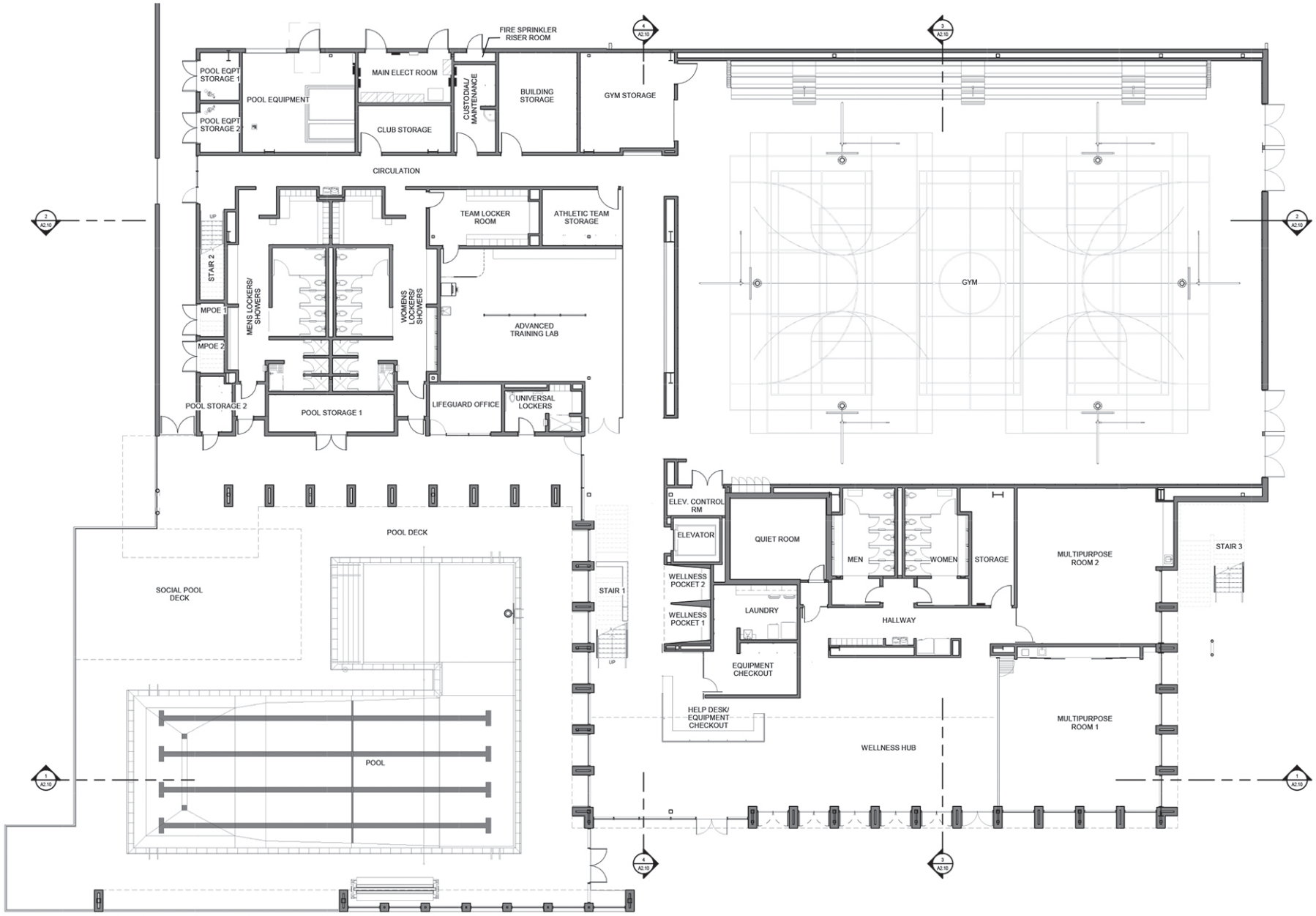
Site Plan

Mount Saint Mary's University Chalon Campus Wellness Pavilion Project

Source: LPA, Inc., 2016.

FIGURE

A-6

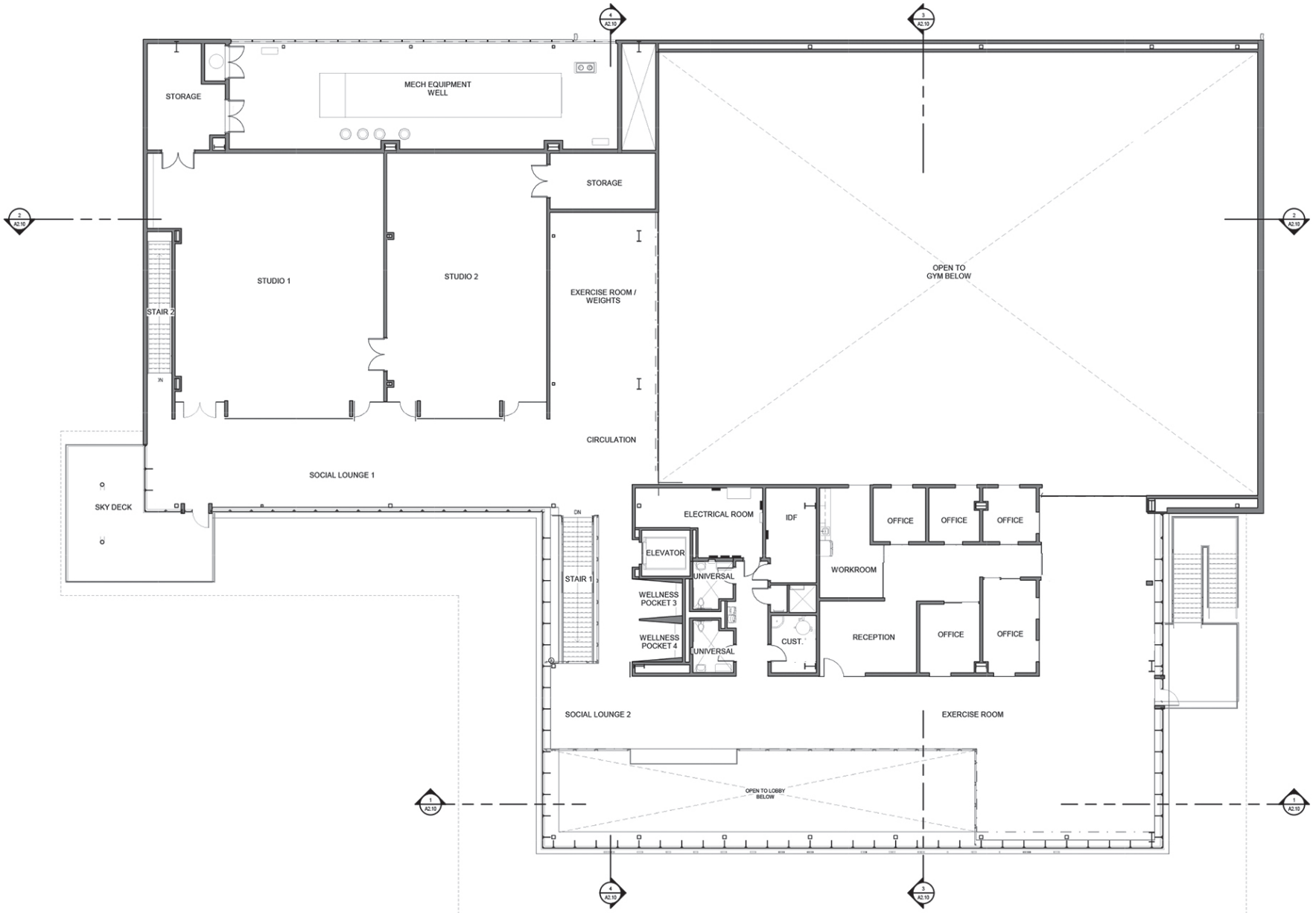


PCR

1st Floor Plan

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

FIGURE
A-7



PCR

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.

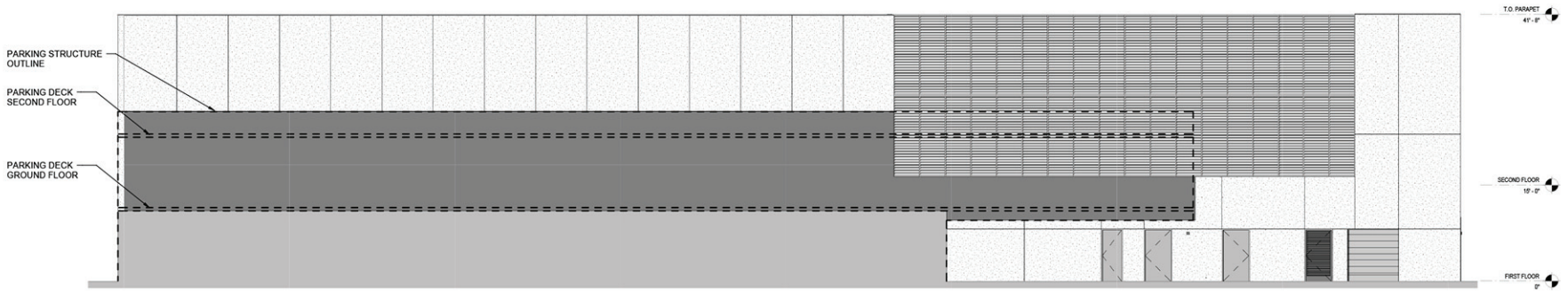
3. Project Architecture and Landscape Design

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

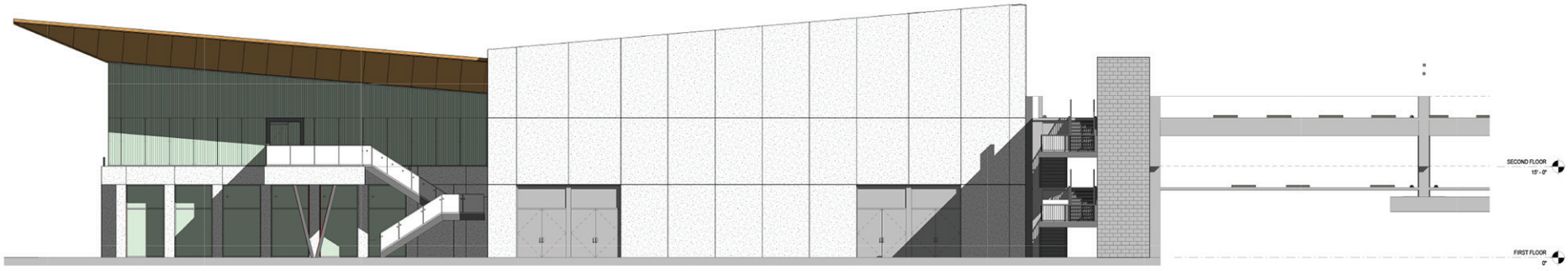
PCR

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

This page intentionally blank.

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.

---

[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.

---

[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.