

### 1.0 INTRODUCTION

The analysis of land use impacts evaluates consistency of the Proposed Project with applicable land use plans, policies, and regulations as well as physical compatibility of Proposed Project uses with the existing mix and distribution of surrounding land uses.

### 2.0 REGULATORY FRAMEWORK

Development on the Loyola Marymount University (LMU) campus is governed by the land use planning and zoning designations in the City of Los Angeles General Plan, including the Framework Element, the Westchester-Playa del Rey Community Plan, and the City of Los Angeles Municipal Code. The Proposed Project site is also located within the Los Angeles County Airport Land Use Plan and the six-county planning area of the South California Association of Governments (SCAG), which is responsible for preparing the Regional Comprehensive Plan and Guide, Regional Transportation Plan, and the Compass Growth Vision Report. The campus is included within SCAG's City of Los Angeles Subregion. Policies contained in each of these plans that pertain to the Proposed Project are discussed below.

#### 2.1 SCAG

##### 2.1.1 SCAG Regional Comprehensive Plan and Guide

The LMU campus is located within the six-County region that comprises the SCAG Planning Area. SCAG is a joint powers agency with numerous responsibilities pertaining to regional issues, including the preparation of regional planning documents such as the Regional Comprehensive Plan and Guide.<sup>1</sup> The Regional Comprehensive Plan and Guide contains an overview of plans prepared by a number of regional agencies that affect local governments or address issues of regional significance, such as growth management, and is intended to serve the SCAG region as a framework for a 20-year horizon. It includes input from each of the 13 subregions that make up the Southern California region (which comprises Los Angeles, Orange, San Bernardino, Riverside, Imperial, and Ventura counties). SCAG adopted the Regional Comprehensive Plan and Guide in 1996; it has also prepared and accepted the 2008 Regional Comprehensive Plan,<sup>2</sup> but has advised that the 1996 Regional Comprehensive Plan and Guide remains the operative document for planning and environmental review purposes at this time.

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<sup>1</sup> Southern California Association of Governments, *Regional Comprehensive Plan and Guide*, (1996).

<sup>2</sup> SCAG, *2008 Regional Comprehensive Plan*, (2008).

Adopted Regional Comprehensive Plan and Guide policies related to land use are contained primarily in Chapter 2, Growth Management. These growth management policies encourage local land use actions that could ultimately lead to the development of an urban form that will minimize development costs, save natural resources, and enhance the quality of life in the region. Specific growth management policies are divided into four main categories: (1) growth forecasts; (2) improving the regional standard of living; (3) maintaining the regional quality of life; and (4) providing social, political, and cultural equity. The policies of the Regional Comprehensive Plan and Guide and an analysis of Project consistency are presented in **Table IV.H-2, SCAG Regional Comprehensive Plan and Guide Policies.**

### **2.1.2 SCAG Regional Transportation Plan**

In addition to the Regional Comprehensive Plan and Guide, SCAG has prepared and accepted the 2008 Regional Transportation Plan.<sup>3</sup> The Regional Transportation Plan is a federal- and state-mandated 20-year transportation plan that envisions the future multi-modal transportation system for the region. In compliance with state and federal requirements, SCAG prepares the Regional Transportation Improvement Program to implement projects and programs listed in the Regional Transportation Plan. Updated every other year, the Regional Transportation Improvement Plan contains a listing of all transportation projects proposed for the region over a six-year period.

The policies of the Regional Transportation Plan and an analysis of Proposed Project consistency are presented in **Table IV.H-3, SCAG Regional Transportation Plan Goals and Policies.**

### **2.1.3 SCAG Compass Growth Vision Report**

In an effort to maintain the region's prosperity, continue to expand its economy, house its residents affordably, and protect its environmental setting, SCAG embarked on a visioning process by soliciting input from public and private stakeholders throughout the region. The 2004 Growth Vision Report represents the outcome of this process.<sup>4</sup> The report contains four principles to promote and maximize regional mobility, livability, prosperity, and sustainability. Decisions regarding growth, transportation, land use, and economic development in the region should support and be guided by these principles. The policies of the 2004 Growth Vision Report and an analysis of Project consistency are presented in **Table IV.H-4, SCAG Growth Visioning Principles.**

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<sup>3</sup> SCAG, *2008 Regional Transportation Plan*.

<sup>4</sup> SCAG, *2004 Growth Vision Report*, 2004.

## 2.2 Los Angeles County Airport Land Use Plan

State law requires the creation of Airport Land Use Commissions to coordinate planning for areas surrounding public airports. In Los Angeles County, the Regional Planning Commission acts as the Airport Land Use Commission and is responsible for the preparation of an Airport Land Use Plan that coordinates the airport planning of public agencies within the county. The Airport Land Use Plan acknowledges that municipalities adjacent to and surrounding airports also have an impact on airport operations through the incorporation of regulations addressing noise and safety into their zoning ordinances and other planning documents.

The Los Angeles County Airport Land Use Commission adopted the Los Angeles County Airport Land Use Plan in December 1991.<sup>5</sup> In the Proposed Project vicinity, the Airport Land Use Plan defines the airport influence area, noise and safety hazard planning boundaries around Los Angeles International Airport (LAX) delineating areas subject to noise impacts and safety hazards, within which certain planning actions require review by the Airport Land Use Commission. The noise hazard boundary shows the area within a 65 Community Noise Equivalent Level (CNEL) contour and the safety hazard boundary defines areas within the Runway Protection Zones (RPZs), within which building height limits are established to provide an unobstructed path for aircraft landings. The Airport Land Use Plan also provides land use compatibility guidelines based on the noise contour lines and also sets height limitations for structures located within 20,000 feet of the nearest point of a runway, to prevent aeronautical hazards.<sup>6</sup>

The LMU campus lies outside the defined Los Angeles International Airport Planning Boundary/Airport Influence Area, which is generally confined to the area south of Manchester Boulevard, approximately 0.25 mile south of the campus.<sup>7</sup>

## 2.3 City of Los Angeles General Plan

### 2.3.1 Framework Element

Land use planning within the City of Los Angeles is governed by the City's General Plan, which consists of eight Elements including the Framework, Transportation, Housing, Noise, Air Quality, Conservation, Safety, and Land Use Elements. The Framework Element, adopted in December 1996 and readopted in

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<sup>5</sup> Los Angeles County Airport Land Use Commission, "Los Angeles County Airport Land Use Plan," (1991).

<sup>6</sup> Los Angeles County Airport Land Use Commission, "Los Angeles County Airport Land Use Plan," Appendix B: Federal Aviation Regulations Part 77.

<sup>7</sup> Los Angeles International Airport - Airport Influence Area, Los Angeles County Airport Land Use Commission. [http://planning.lacounty.gov/assets/upl/project/aluc\\_airport-lax.pdf](http://planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf). 2003.

August 2001, guides the City's long-range growth and development policy, establishing citywide goals, objectives and policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The goals, objectives, and policies of the Framework Element applicable to the Proposed Project, along with an analysis of the Proposed Project's consistency with those goals, objectives and policies, are identified in **Table IV.H-5**.

The Framework Element defines land use categories that describe the character and function of specific areas within the City, including Neighborhood District, Community Center, Regional Center, Downtown Center, and Mixed Use Boulevard. The Long Range Land Use Diagram contained in the Framework does not supply a designation for the LMU campus, but does designate the local area around the intersections of Jefferson and Lincoln Boulevards and Culver and Lincoln Boulevards as a Regional Center. Regional centers are intended to serve as the focal points of regional commerce, identity, and activity, and contain a diversity of uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Additionally, Regional Centers are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. They generally range in Floor-Area Ratio (FAR) from 1.5:1 to 6:1, and are characterized by 6- to 20-story buildings as determined by the applicable community plan. Their densities and functions support the development of a comprehensive and interconnected network of public transit and services.

The LMU campus is currently designated for "L" Low Density Residential uses by the General Plan. According to the Land Use Chapter of the Framework Element, the primary goal for Low Density Residential (Single-Family Residential) areas is to preserve the City's stable single-family neighborhoods. The objectives intended to achieve this goal are: (1) ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development; and (2) allow for the intensification of selected single-family areas that directly abut high-density development as "transitions" between these uses. The neighborhoods east and south of the campus are currently designated for Low and Low-Medium density residential uses.

The Framework is flexible, suggesting a range of uses within its land use definitions, and neither overrides nor supersedes the community plans. However, individual community plans provide the final determinations as to boundaries, land use categories, intensities, and heights that fall within the ranges described by the Framework.

### 2.3.2 Westchester-Playa del Rey Community Plan

The Land Use Element of the General Plan comprises 35 Community Plans. The Proposed Project site is located within the Westchester-Playa del Rey Community Plan Area (“Community Plan” and “Plan Area”), which encompasses the western portion of the City of Los Angeles adjacent to the Los Angeles International Airport (LAX). The Plan Area is generally bounded by Jefferson Boulevard and Centinela Avenue on the north; Los Angeles International Airport on the south; La Brea Avenue, La Cienega Boulevard, and Aviation Boulevard on the east; and Dockweiler State Beach and the Pacific Ocean on the west. By jurisdiction, the Plan Area is also bordered to the north by the City’s Venice Community Plan Area, the unincorporated community of Marina del Rey, the City’s Palms-Mar Vista-Del Rey Community Plan Area, and the City of Culver City; and to the east by the City of Inglewood and the unincorporated Los Angeles County communities of Del Aire, Ladera Heights, and Lennox.<sup>8</sup> Refer to **Figure II-2, Vicinity Map**, in **Section II, Project Description**, for the locations of these communities.

The Community Plan is the official guide to land use planning and future development within the Plan Area. It promotes an arrangement of land use, circulation, and services intended to encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the community. It also seeks to enhance community identity and recognize and promote the unique character of neighborhoods within the Plan Area. The Community Plan has been designed to accommodate the anticipated growth in population and employment of the community to the year 2025. It encourages the preservation of low-density single-family residential areas, the conservation of open space lands, the preservation of environmentally sensitive habitat, and the physical improvement and economic development of downtown Westchester.

Largely developed after World War II, the Plan Area is generally characterized by Low to Low-Medium Density residential uses, with commercial uses concentrated along the major transit corridors of Lincoln Boulevard, Sepulveda Boulevard, Manchester Avenue, and Century Boulevard. The two communities that compose the Community Plan Area are Westchester and Playa del Rey. Westchester is the larger of the two communities in the Plan Area and occupies all but the westernmost portion of the Plan Area. Its established commercial center, aligned along Sepulveda Boulevard, lies approximately 1 mile southeast of the LMU campus and is bounded by Manchester Avenue on the north, Lincoln Boulevard on the south, La Tijera Boulevard and Sepulveda Eastway on the east, and Sepulveda Westway on the west.

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<sup>8</sup> City of Los Angeles, “Westchester-Playa del Rey Community Plan,” *General Plan*, (2004).

Additionally, the Plan Area contains environmentally sensitive areas including the Westchester Bluffs, Ballona Wetlands, and coastal areas, which are designated in the Community Plan for preservation and restoration where feasible.

The LMU campus is designated for “L” Low Density Residential uses in the Community Plan. The neighborhoods surrounding the campus to the west, south, and east are similarly designated for Low Density Residential uses, as is most of the Plan Area north of Manchester Avenue. The area north and northwest of the campus, at the base of the Westchester Bluffs, is contained in the Playa Vista Area D Specific Plan. Land use designations in this area include Commercial (Regional Mixed Use Commercial and Community Commercial), High-Medium Density Multi-Family, and Industrial. Lincoln Boulevard is designated as a Major Highway Class 1. General Plan Land Use designations for the campus and vicinity are shown in **Figure IV.H-1, Loyola Marymount University General Plan Land Use Designations**.

The Community Plan defines several community planning and land use issues and opportunities applicable to the Proposed Project:<sup>9</sup>

- Residential: Need for consistency in land use designations, zoning, and the existing uses.
- Major Opportunity Sites – Loyola Village Community Commercial Center [at the intersection of Lincoln Boulevard and Manchester Avenue]: Capitalize on the area’s location by strengthening linkages between the commercial district, Loyola [Marymount] University, and the park, golf course, and library, to create a commercial district of exceptional vitality.

The Community Plan also sets forth general planning goals and objectives intended to maintain the community’s distinctive character; those applicable to the Proposed Project include:

- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance.
- Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts.
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base.
- Improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements that enhance the appearance of the community.

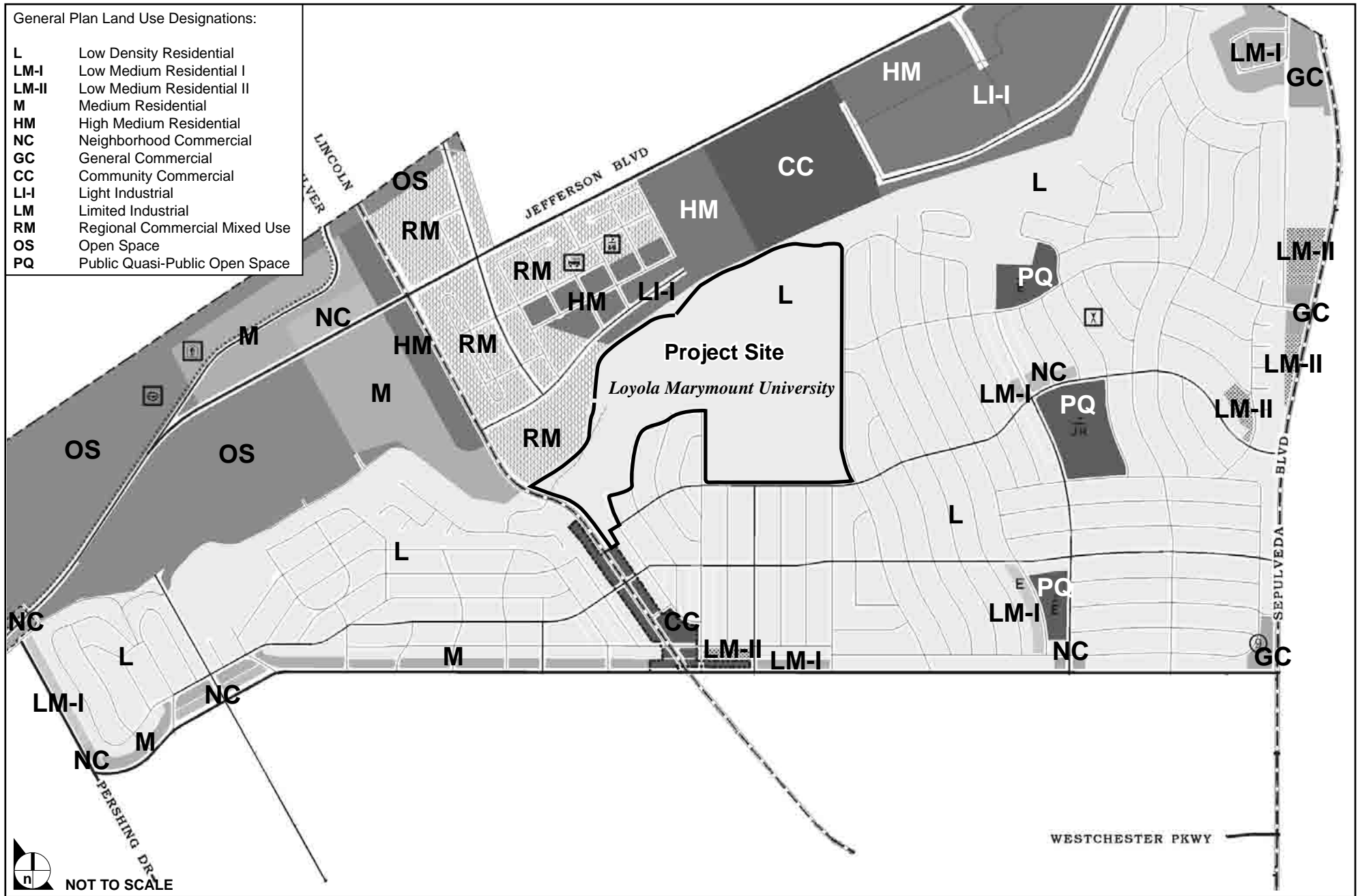
Specific land use policies defined in the Community Plan that are applicable to the Proposed Project are as follows:

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<sup>9</sup> City of Los Angeles, “Westchester-Playa del Rey Community Plan,” I-4 and I-7.

General Plan Land Use Designations:

- L Low Density Residential
- LM-I Low Medium Residential I
- LM-II Low Medium Residential II
- M Medium Residential
- HM High Medium Residential
- NC Neighborhood Commercial
- GC General Commercial
- CC Community Commercial
- LI-I Light Industrial
- LM Limited Industrial
- RM Regional Commercial Mixed Use
- OS Open Space
- PQ Public Quasi-Public Open Space



SOURCE: Westchester / Playa del Rey Community Plan - March 2007, Impact Sciences, Inc. - May 2008

FIGURE IV.H-1

Loyola Marymount University General Plan Land Use Designations

## Residential Objectives

**Objective 1-1:** Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Westchester-Playa del Rey Community Plan Area to the year 2025.

**Policy 1-1.1.** Protect existing stable single family and low density residential neighborhoods, such as Kentwood, from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life.

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

**Policy 1-3.2.** Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets.

**Policy 1-3.3.** Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.

**Objective 1-4:** Provide affordable housing and increased accessibility to more population segments, especially students, the disabled, and senior citizens.

**Policy 1-4.1.** Promote greater individual choice in type, quality, price and location of housing.

**Policy 1-4.3.** Ensure that new housing opportunities minimize displacement of residents.

**Objective 1-5:** Protect established residential neighborhoods from incompatible uses, including multiple family residential uses of substantially higher density, to preserve the residential character of these neighborhoods and protect residents from adverse environmental impacts caused by such uses.

**Policy 1-5.1.** Where possible, do not locate incompatible land uses, including higher density multiple residential uses, within or in close proximity to lower density residential neighborhoods, except where there are adequate buffers, transitional land uses, etc.

**Policy 1-5.2.** The location of institutional uses in residential areas shall be conditioned so as to avoid adverse impacts on the surrounding neighborhood.

**Objective 1-6:** Preserve visual resources in residential areas.

**Policy 1-6.1.** The preservation of existing scenic views from surrounding residential uses, public streets and facilities, or designated scenic view sites should be a significant consideration in the approval of zone changes, conditional use permits, variances, divisions of land and other discretionary permits.

### Schools Objectives

The Community Plan “seeks to coordinate and integrate the development and operation of the University into the greater Westchester-Playa del Rey community to benefit both.” The objective and policies relevant to this are as follows:

**Objective 6-4:** Coordinate and integrate the development and operation of the LMU campus into the surrounding Westchester-Playa del Rey community.

**Policy 6-4.1:** Promote land use compatibility between University facilities and adjacent land uses, with particular attention given to preventing adverse impacts to adjacent residential neighborhoods. Where feasible, mitigate impacts of University uses on adjacent properties through the use of landscaped buffers, setbacks, and/or site and building design.

**Program:** The [Community] Plan strongly encourages Loyola Marymount University to create a Master Plan, in coordination with the City of Los Angeles and the local Neighborhood Council, which will articulate provisions for future growth and improvements to the campus, development phases, and mitigation measures for impacts to the community including traffic, noise, visual considerations, and sensitive habitats.

**Policy 6-4.2:** Protect sensitive terrain and nearby natural habitats, such as blufflines and wetland environments, from potentially adverse impacts during all phases of development and operation of the University.

**Policy 6-4.3:** Minimize traffic impacts to the surrounding Westchester community by locating and maintaining the University’s major vehicular access routes away from adjacent residential neighborhoods.

**Policy 6-4.4:** Enhance the vitality of the Loyola Village commercial district by promoting and strengthening pedestrian linkages and land use connections between it and the University.

**Policy 6-4.5:** Encourage the University to make amenities and services available to the local community, such as libraries, meeting rooms, athletic facilities, lectures, special events, or other appropriate services.

## Transit Improvement Objectives

**Objective 14-2:** Increase work trips and non-work trips made on public transit.

**Policy 14-2.3:** Continue to study and consider future extensions of the Metro Rail Green Line to serve the Westchester-Playa del Rey community and provide rail transit connections to Marina del Rey and possibly other Westside areas, such as Santa Monica, West Los Angeles, etc.

**Program:** The Plan supports the continued study of possible future extensions to the Green Line by the appropriate agencies, including LADOT and MTA. Consideration should be given to establishing future stations to serve LAX, the Century Boulevard/98<sup>th</sup> Street Corridor, Downtown Westchester, Loyola Village, Loyola Marymount University, and Playa Vista.

The Proposed Project's consistency with the Community Plan is analyzed in **Table IV.H-6, Westchester-Playa del Rey Community Plan Land Use Goals and Objectives.**

### 2.3.3 Coastal Transportation Corridor Specific Plan

The City of Los Angeles Coastal Transportation Corridor Specific Plan (Coastal Transportation Corridor Specific Plan), adopted in September 1993 as part of the General Plan, defines transportation-related goals for a defined area of West Los Angeles. The Coastal Transportation Corridor Specific Plan area includes all or portions of the Westchester-Playa Del Rey Community Plan Area, the Palms-Mar Vista-Del Rey Community Plan Area, the Venice Community Plan Area, and the Los Angeles International Airport Interim Plan Area, generally bounded by the City of Santa Monica on the north, Imperial Highway on the south, the San Diego Freeway on the east, and the Pacific Ocean on the west. The Coastal Transportation Corridor Specific Plan defines "Projects" as:

*"Any construction, addition, conversion, change of use, or use of land in C, M, or P zones which requires the issuance of a building, grading or foundation permit and which results in an increase in the number of trips as determined by the Department of Transportation."*

The campus is zoned R4 (Residential-Multiple Dwelling); therefore, the Proposed Project would not be considered a "Project" under the Coastal Transportation Corridor Specific Plan. Therefore, the Coastal Transportation Corridor Specific Plan is not applicable to the Proposed Project and is not discussed further in this analysis.

## 2.4 City of Los Angeles Municipal Code

The City of Los Angeles Municipal Code is a tool to implement the General Plan and provides regulations to preserve public peace, health, and safety.<sup>10</sup> For each defined zone, the Municipal Code identifies the permitted uses and applicable development standards such as density, height, and parking.

A number of entitlements have been granted over time for the campus as LMU has acquired additional land, increased enrollment, and adopted master plans. In July 2004, in connection with the City's Community Plan update process, the City adopted Ordinance No. 175,981, which unified the zoning for the Burns, Leavey, and Hughes Campuses of the LMU campus by making them all [Q]R4-1, (Residential – Multiple Dwelling Zone, Height District 1), with [Q] Qualified Conditions. The R4 zoning designation, according to the Los Angeles Municipal Code, expressly allows education institutions as well as multi-family residences, dormitories, sorority/fraternity houses, churches, hotels, and other uses; however, these uses are limited by the [Q] Qualified Conditions on the campus, listed below. The R4 zone normally corresponds to the High-Medium Density Residential land use designation under the General Plan. However, as previously stated, LMU's existing land use designation, which predates the [Q]R4-1 zoning designation, is Low Density Residential. The City previously found the [Q]R4-1 zoning to be consistent with the General Plan's Low Density Residential designation for the campus, due to the land use limitation of the campus' [Q] Qualified Conditions. **Figure IV.H-2, Loyola Marymount University Zoning Designations**, illustrates the zoning designations for the campus and surrounding land uses.

Three [Q] Qualified Conditions were approved for application to Burns, Leavey, and Hughes Campuses at the time of the zone change in 2004, to ensure compatibility with surrounding uses. The three [Q] conditions state the following:

1. Use of the site shall be limited to Loyola Marymount University or residential uses permitted in the R-1 Zone.
2. Any additional development, expansion, or modification of the University must be consistent with the existing conditional use permits on the site, until a Master Plan is developed, and approved by the Director of Planning.
3. Any development exceeding the enrollment capacity of 7,800 full-time equivalent (FTE) students shall require a preparation of a Master Plan, and the approval of necessary, discretionary entitlements, as determined by the Director of Planning. Detailed discussions for allowed uses, as well as restrictions are included in Article 2, Section 12 of the Los Angeles Municipal Code.

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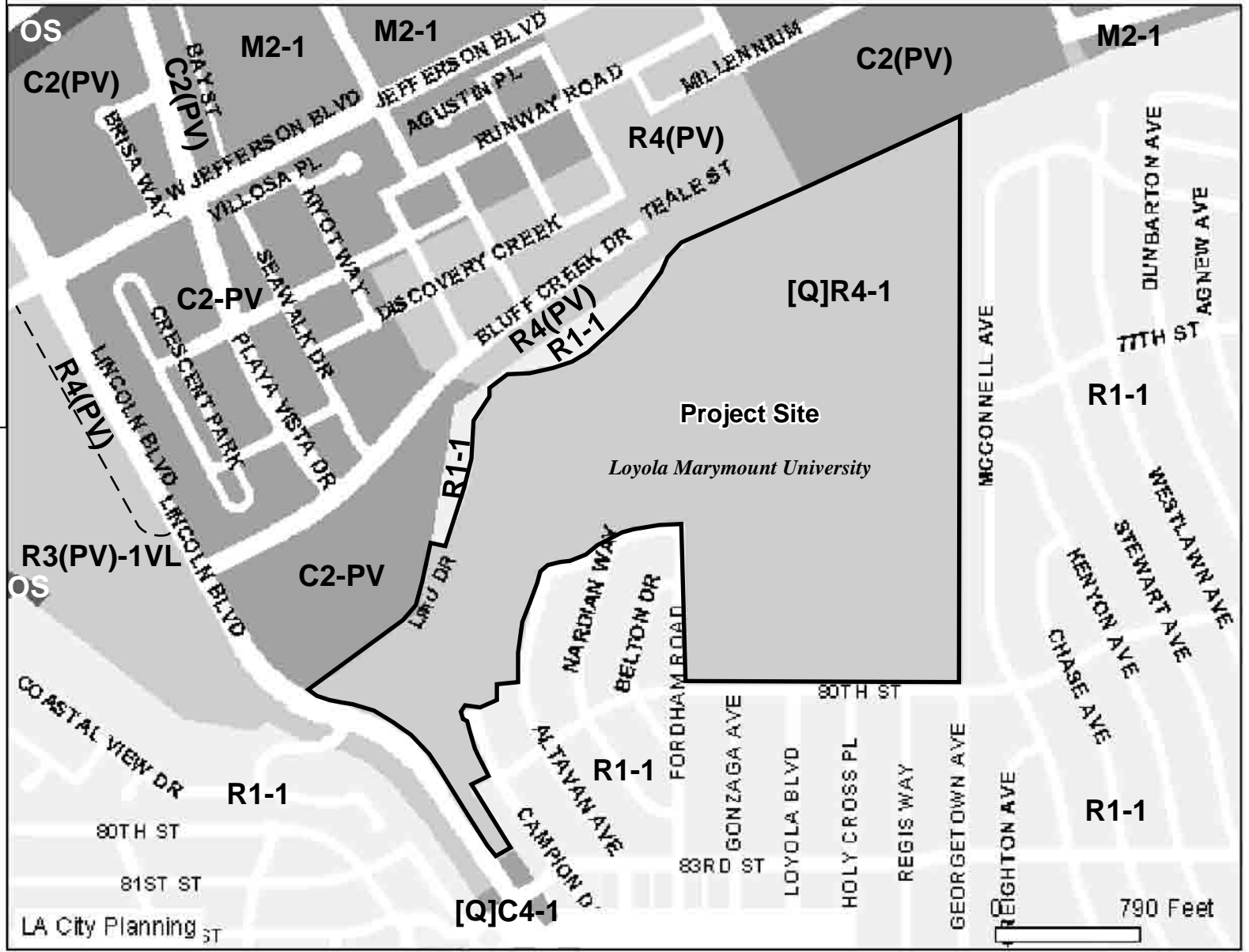
<sup>10</sup> City of Los Angeles, City of Los Angeles Municipal Code: Chapter I, Planning and Zoning, (2008).

City of Los Angeles Zoning Designations:

- R1 One Family Zone
- R3 Multiple Dwelling Zone
- R4 Multiple Dwelling Zone
- C2 Commercial Zone
- C4 Commercial Zone
- M2 Light Industrial Zone
- C2(PV) Commercial Zone - Playa Vista
- OS Open Space

Zoning Designations and Corresponding General Plan Land Use Designations:

- R1 Single-Family Residential
- R3 Medium Residential
- R4 High Medium Residential
- C2 General Commercial
- C4 Community Commercial
- M2 Light Industrial
- C2(PV) Regional Mixed Commercial
- OS Open Space



SOURCE: City of Los Angeles Zoning Information and Map Source (Zimas), and Impact Sciences, Inc, June 2008.

FIGURE IV.H-2

Loyola Marymount University Zoning Designations

Additionally, several [Q] Qualified Conditions were approved for application specifically to Hughes Campus. These [Q] conditions state the following:

4. No structure on the site shall exceed a height of 139 feet above mean sea level. Rooftop mechanical equipment shall not be visible from nearby single-family residences to the east.
5. The floor area of all buildings on the site shall not exceed 500,000 square feet.
6. Detailed development plans shall be submitted to the Department of City Planning for approval prior to the issuance of building permits.
7. A landscape buffer setback along the easterly and southerly property line shall be required. The buffer setback shall contain no buildings or structures (except for retaining walls or fences).
8. All open areas shall be attractively landscaped. All types of plants and irrigation systems shall, to the extent possible, conserve water and be consistent with any water conservation ordinance enacted by the City.
9. A physical barrier of sufficient height and/or width shall be constructed along all property lines abutting residential properties to deter pedestrian access.
10. All signs shall be of an identifying nature only and shall not be of a flashing or animated type.
11. All lighting shall be directed onto the site, and no floodlighting shall be located as to be seen directly by the adjacent residential areas.
12. Vehicular and pedestrian ingress and egress shall be prohibited from W. 78<sup>th</sup> Street, Altavan Avenue, and Campion Drive.
13. Archaeological Site LAN 61 shall be tested by a qualified archaeologist to determine the exact extent of deposits located on site.
14. In consideration of the proximity to Archaeological Site LAN 61, the northern boundary of the site shall be fenced in order to prevent inadvertent incursion during construction.
15. During grading and construction phases, an escape route shall be provided to allow wildlife to migrate to adjacent uninhabited areas.

As discussed above, these [Q] conditions restrict development on the Hughes Campus to a height of 139 feet above mean sea level. Additionally, development on Leavey Campus is limited by CPC 92-0088 to 75 feet in height above adjacent grade. No building height limits are currently imposed on Burns Campus.

## 2.5 City of Los Angeles “Do Real Planning” Guidelines

The City of Los Angeles “Do Real Planning” Guidelines, developed by the City Planning Commission in response to the Department of City Planning’s 2007 Strategic Plan directive and adopted by the City Council in 2007, comprise 14 fundamental planning principles that serve as the Planning Commission’s statement of policy priorities.<sup>11</sup> These principles, which outline a strategy for comprehensive land use planning and are intended to guide future planning action by the City, include demanding a walkable city, requiring density around transit, and locating jobs near housing, among others (all 14 principles are identified in **Table IV.H-7**). In September 2008, the City Planning Department announced that it will implement the principles of the “Do Real Planning” Guidelines in its initiative to rewrite selected provisions of the City’s Zoning Ordinance. Additionally, individual development projects should be consistent with the “Do Real Planning” Guidelines (an analysis of the Proposed Project’s consistency with these 14 principles is provided in **Table IV.H-7**).

## 2.6 Other Applicable Plans

The Proposed Project’s consistency with plans related to other environmental topics is discussed in the relevant topical section. For example, consistency with the South Coast Air Quality Management District Air Quality Management Plan is discussed in **Section IV.B, Air Quality**, and consistency with the Los Angeles County Metropolitan Transportation Authority’s Congestion Management Program is discussed in **Section IV.J, Transportation**.

## 3.0 EXISTING CONDITIONS

### 3.1 Surrounding Land Uses

Loyola Marymount University’s Westchester campus is located in the southwestern portion of the City, approximately 1.25 miles east of the Pacific Ocean and 1 mile north of Los Angeles International Airport (LAX). Westchester generally extends from the Pacific Ocean east to Inglewood and from Ballona Creek on the north to the City of El Segundo and Los Angeles International Airport on the south. Surrounding municipalities and communities include the unincorporated community of Marina del Rey and the City of Los Angeles communities of Venice and Del Rey to the north, City and the unincorporated community of Ladera Heights to the northeast, the City of Inglewood to the east, the City of El Segundo to the south, and the Pacific Ocean to the west. Other institutions of higher learning in the area include Otis College of

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<sup>11</sup> City of Los Angeles Planning Commission, “Do Real Planning.” [http://cityplanning.lacity.org/forms\\_Procedures/do-real-planning-final\\_1.pdf](http://cityplanning.lacity.org/forms_Procedures/do-real-planning-final_1.pdf). 2007.

Art and Design on Lincoln Boulevard near Los Angeles International Airport; the Graduate School of Pepperdine University in northeast Westchester; and Intercontinental College in northern Westchester.

Regional access to Westchester and LMU is provided by the San Diego Freeway (I-405), the Marina Freeway/Expressway (State Highway 90), and Lincoln Boulevard (State Highway 1).<sup>12</sup> The San Diego Freeway/Marina Freeway interchange is approximately 2 miles northeast of the campus.

The campus occupies approximately 142 acres atop the Westchester Bluffs, part of a range of cliffs called the Ballona Escarpment that extends from the coast eastward approximately 3.5 miles to the intersection of Centinela and Sepulveda Boulevards. The bluffs, which rise approximately 120 feet above sea level in the vicinity of the campus, form the northern and northwestern campus boundaries. Teale Street and Playa Vista lie at the foot of the bluffs; Playa Vista is designed to be a mixed-use multi-family residential and community commercial development. Light industry and office uses are located north of Playa Vista, across Jefferson Boulevard. The campus is generally bordered on the east by McConnell Avenue, on the west by Lincoln Boulevard, and on the south by W. 78<sup>th</sup> and W. 80<sup>th</sup> Streets. The campus is suburban in nature and surrounded by low-density, single-family residential neighborhoods to the east, west, and south.

The main LMU entrance is provided via LMU Drive, which is accessed from Lincoln Boulevard. Secondary campus ingress/egress is provided via Loyola Boulevard at W. 80<sup>th</sup> Street along the southern edge of the campus.

### **3.2 Existing Campus**

LMU's Westchester campus was established in 1928 with the development of the 100-acre Burns Campus. The original Burns Campus expanded in the 1990s with the development of a contiguous 27.5-acre property to the west. The Leavey Campus extends from Burns Campus to the bluff edge. Finally, LMU purchased the adjacent Hughes property, including the former Hughes corporate headquarters, in 2000, which provided a physical link between Burns and Leavey Campuses and Lincoln Boulevard to the southwest. This portion of campus, referred to as Hughes Campus since its acquisition, serves as the main LMU entrance via LMU Drive from Lincoln Boulevard. The former Hughes headquarters building houses several colleges and administrative offices, and is now called University Hall.

At present, the campus is developed with approximately 1.65 million gross square feet of academic and administrative uses, and approximately 942,000 gross square feet of residential facilities. The campus also contains approximately 185,000 gross square feet of indoor athletic uses, and approximately 15.2 acres of

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<sup>12</sup> City of Los Angeles General Plan, Westchester-Playa del Rey Community Plan, Generalized Circulation Map.

outdoor athletic facilities. Parking for students, faculty, staff, and visitors is provided in on-campus parking structures and surface lots containing approximately 4,100 spaces.

#### 4.0 ENVIRONMENTAL IMPACT ANALYSIS

The evaluation below addresses whether the Proposed Project is consistent with or would conflict with any applicable land use plans, policies, or regulations identified above. Projects are considered consistent with land use plans and policies if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. A project need not be consistent with every listed policy in a plan to be deemed wholly consistent with the plan.

##### 4.1 Methodology

The land use plan and policy consistency analysis in this section evaluates regional and local plans and policies applicable to Proposed Project uses. This analysis identifies applicable plans and policies and discusses the relationship between the Proposed Project and regulatory framework. At the regional level, the regulatory framework applicable to the Proposed Project includes SCAG's Regional Comprehensive Plan and Guide, Regional Transportation Plan; and Growth Vision Report, and the Los Angeles County Airport Land Use Plan. At the local level, land use on the Proposed Project site is governed by the City of Los Angeles General Plan, including the Westchester Community-Playa del Rey Community Plan and the City of Los Angeles Zoning Code. The analysis of the Proposed Project's physical compatibility with surrounding land uses characterizes the types of land uses in the Proposed Project area, the extent of the area that Project-related uses might impact, and the nature and degree of Project impacts.

##### 4.2 Significance Thresholds

Generally, land use impacts are determined based on a project's consistency with applicable plans and compatibility with surrounding land uses. The *Los Angeles CEQA Thresholds Guide* indicates that the determination of a project's significance in terms of land use consistency and compatibility impacts shall be made on a case-by-case basis, considering the following factors:

- Whether the proposed project is inconsistent with the adopted land use/density designation in the Community Plan, Redevelopment Plan or Specific Plan for the site;
- Whether the proposed project is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans;
- The extent of the area impacted, the nature and degree of impacts and the type of land uses within the area;

- The extent to which existing neighborhoods, communities or land uses would be disrupted, divided or isolated and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

Appendix G of the *State CEQA Guidelines* provides sample questions for use in an initial study to determine a project’s potential for environmental impacts. According to the sample questions included in Appendix G under Section IX Land Use, a project would have a potentially significant impact if it would:

- IX.a) Physically divide an established community;
- IX.b) Conflict with any 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- IX.c) Conflict with any applicable habitat conservation plan or natural community conservation plan.

The Initial Study prepared for the Proposed Project determined that the Proposed Project would have a less than significant impact with regard to sample question IX.a of Appendix G of the *State CEQA Guidelines*. The response to this question is discussed in **Section VII, Effects Found Not to be Significant**. The Initial Study is provided in **Appendix I**.

The factors used in the *Los Angeles CEQA Thresholds Guide* to determine significant land use impacts are inclusive of those provided in Appendix G of the *State CEQA Guidelines*. Therefore, based on these factors, the Proposed Project would have a significant impact on land use consistency and compatibility if:

- LU-1            The Proposed Project would not be consistent with the adopted land use/density designation in the Community Plan or the applicable adopted environment goals and policies contained in the General Plan and other applicable plans;
- LU-2            The Proposed Project would be physically incompatible with other existing land uses in the area; or
- LU-3            The Proposed Project would disrupt, divide or isolate existing neighborhoods, communities, or land uses.

The Initial Study prepared for the Proposed Project determined that the Proposed Project would have no impact related to LU-3 of the City's thresholds, which addresses a project's potential for disrupting, dividing, or isolating a community. Further discussion pertaining to this significance threshold is contained in **Section VII, Effects Found Not to be Significant**.

#### **4.3 Project Design Features**

The proposed LMU Specific Plan would unify LMU's campus, including Burns, Leavey, and Hughes Campuses, under a single set of land use regulations applicable to the entire property. The proposed Specific Plan would regulate development within four Planning Areas on campus: Academic/Residential, Athletic, Campus Core/Open Space, and Buffer/Open Space. These designations would restrict new uses to be developed as shown in **Figure II-5, Proposed Campus Planning Areas**. In addition to delineating Planning Areas, the proposed Specific Plan outlines campus development standards and operational regulations that pertain to building height restrictions and open space requirements, among other regulations.

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

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

**Table IV.H-1  
Proposed Height Restrictions for Height Area 3**

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

<sup>a</sup> For ease of reference, a standard one-story building is 25 feet tall and a standard two-story building is 37.5 feet tall.

#### **4.4 Project Impacts**

Currently, LMU's enrollment cap, as approved by the City in 2000 with a conditional use permit associated with the acquisition of Hughes Campus, is 7,800 FTE students.<sup>13</sup> In Fall 2008, LMU's actual enrollment was 6,868 FTE students. The Proposed Project proposes increasing the existing enrollment from 6,868 FTE to 7,800 FTE students, but would not increase the area of the LMU campus.

Through the Proposed Project, LMU seeks to improve its facilities over a 20-year period in order to meet the educational needs and goals of LMU. The Proposed Project proposes the development of approximately 508,000 net new gross square feet of academic and administrative facilities, and approximately 476,000 net new gross square feet of student residential facilities. The Proposed Project also would add approximately 28,000 net new gross square feet of indoor facilities, 4.8 acres of outdoor athletic facilities, and 5 acres of landscaped open space. The Proposed Project would reconfigure roadways, parking facilities, and pedestrian circulation accommodations, and implement infrastructure upgrades as needed.

New buildings developed on the campus under the Proposed Project would incorporate a number of sustainable design features, as discussed in **Sections II, Project Description, and IV.L.4, Energy**. Several buildings may be developed to achieve or be eligible for LEED (Leadership in Energy and Environmental Design) certification. Additionally, LMU would continue to implement "green" or energy-saving and

<sup>13</sup> FTE is a unit of measurement used to calculate enrollment for academic and master planning purposes, as opposed to student headcount. One undergraduate FTE student is defined as one undergraduate student taking 12 course units, which represents a full course load. Students taking fewer course units are considered to constitute a fraction of an FTE student, whereas students taking more than 12 units constitute more than one FTE student. One graduate FTE student is defined as one graduate student taking nine course units, which represents a full course load. Graduate students taking fewer course units are considered to constitute a fraction of an FTE student, whereas graduate students taking more than nine units constitute more than one FTE student.

environmentally conscious operations already in place on the campus, including a campuswide recycling program and a reclaimed water system for irrigation and other programs discussed in **Section IV.L.4, Energy**.

No off-site improvements are proposed by the Proposed Project. However, LMU supports the Metro Green Line light rail extension and proposes offering a location for a station near the LMU entrance on Lincoln Boulevard. If built, the Metro Green Line is expected to enhance the use of public transportation to and from campus. The Proposed Project also proposes designated bicycle lanes on all primary, secondary, and tertiary campus roads and bicycle parking racks at all new buildings.

To implement this Proposed Project, LMU proposes changing the General Plan designation of the campus from Low-Density Residential to High Density Residential, which permits LMU's educational uses and multifamily residential density. The Proposed Project would also change the zoning of the campus from [Q] R4-1 to R4-1, and establish a Specific Plan for the Westchester campus, which would impose development limitations similar to those currently applicable to the campus through the [Q] Qualified Conditions. A Specific Plan is a planning document for a defined area within the City and is intended to guide proposed development in a manner that would adhere to and implement various goals and policies of the City's General Plan. A Specific Plan defines development standards, including, but not limited to building heights and setback requirements. Allowed land use types are also defined and attributed to particular portions of a Specific Plan area. Areas such as college and university campuses that support a mix of land uses often implement a Specific Plan in order to clarify applicable development standards and guidelines.

As set forth in Section 11.5.7 of Chapter 1 of the City's Municipal Code, a Specific Plan supersedes other development regulations and standards set forth in the Los Angeles Municipal Code for the Specific Plan area. Unless stated otherwise, policies and standards in the Specific Plan are applied in lieu of provisions in the Municipal Code. Wherever a Specific Plan contains provisions that establish regulations including, but not limited to, standards such as height, use, parking, and open space requirements different from those contained in the Municipal Code, the Specific Plan supersedes the Municipal Code.

LU-1 Is the Proposed Project consistent with the adopted land use/density designation in the Community Plan or the applicable adopted environment goals and policies contained in the General Plan and other applicable plans?

The Proposed Project proposes to change the existing "L" Low Density Residential Community Plan land use designation to "HM" High-Medium Density Residential, for compatibility with university uses and LMU's residential density. The High-Medium Density Residential land use designation more accurately

reflects the use of the Proposed Project site as an academic campus with residential uses. Because the proposed General Plan Amendment is intended to reconcile the university uses and the residential density, the Proposed Project would be consistent with the land use and density designations in the Community Plan.

As described above, LMU proposes changing the campus' zoning from [Q]R4-1 to R4-1 and establishing a Specific Plan for the campus, which would impose development limitations similar to the current [Q] Qualified Conditions. The Proposed Specific Plan would unify LMU's Burns, Leavey, and Hughes Campuses under a single, comprehensive set of land use regulations. The Proposed Specific Plan would permit an increase of the existing enrollment from 6,868 FTE students as of Fall 2008 to the previously approved enrollment cap of 7,800 FTE students, but would not increase campus acreage. The Proposed Specific Plan would also permit the upgrade, renovation, and replacement of a substantial portion of the existing campus facilities for a net increase of approximately 508,000 gross square feet of academic and administrative uses, approximately 476,000 gross square feet of residential uses, and approximately 28,000 gross square feet of indoor athletic facilities. The proposed Specific Plan would provide for increased parking, up to 609 additional spaces

Pursuant to California Government Code Section 65454, the proposed LMU Specific Plan must be consistent with the General Plan by furthering the objectives and policies of the General Plan and not obstructing their attainment. As illustrated in **Tables IV.H-5** and **IV.H-6**, below, the proposed LMU Specific Plan would detail and foster the General Plan's development policies, systematically implement the General Plan, and contain defined standards and development criteria that supplement those of the General Plan. Therefore, the proposed LMU Specific Plan would be consistent with the General Plan, and establishment of the proposed LMU Specific Plan would be considered a less than significant land use impact.

As discussed in **Section IV.C, Biological Resources**, the Proposed Project site is not identified as part of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other habitat conservation plan, and therefore, the Proposed Project would not conflict with an adopted habitat conservation plan.

Below is an analysis of the Proposed Project's consistency with SCAG policies from the Regional Comprehensive Plan and Guide, Regional Transportation Plan, and Growth Vision Report; the Los Angeles County Airport Land Use Plan; the City of Los Angeles General Plan, including the Framework Element, and Westchester-Playa del Rey Community Plan; the Los Angeles Municipal Code; and the Los Angeles "Do Real Planning" Guidelines.

#### 4.4.1 SCAG Regional Comprehensive Plan and Guide

**Table IV.H-2**, below, lists the SCAG Regional Comprehensive Plan and Guide policies applicable to the Proposed Project. The analysis shows that the Proposed Project is consistent with the applicable policies of the Regional Comprehensive Plan and Guide. Additionally, SCAG has determined that the Proposed Project is not regionally significant.<sup>14</sup> A project is considered regionally significant if it meets one or more of the criteria listed under Section 15206 of the *State CEQA Guidelines*,<sup>15</sup> involves construction of major transportation or utility infrastructure, or involves preparation of an air quality regulatory plan.

**Table IV.H-2**  
**SCAG Regional Comprehensive Plan and Guide Policies**

<b>Growth Management Chapter Policies</b>		
3.01	The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.	<b>Consistent:</b> The Proposed Project is consistent with population, housing, and employment forecasts for the City of Los Angeles and Westchester-Playa del Rey Community Plan Area. In Fall 2008, LMU's actual enrollment was 6,868 FTE students. The Proposed Project proposes increasing the existing enrollment from 6,868 FTE students to the 7,800 FTE student enrollment cap approved by the City in 2000, and would increase the percentage of undergraduate FTE students housed on campus from approximately 60 to 75 percent through the provision of additional campus housing options. The Proposed Project-related population increase on campus would constitute approximately 1.6 percent of the Community Plan's estimated 2025 total population, and the proposed increase in campus housing is already accounted for in the Community Plan's estimated increase in dwelling units in the Community Plan Area.
3.05	Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.	<b>Consistent:</b> The Proposed Project involves renovating an existing infill development and the Proposed Project site is located in an urbanized part of the City of Los Angeles area that is served by an existing utilities and transportation infrastructure. The Applicant would pay its fair share of necessary off-site infrastructure improvements necessary to implement the Proposed Project.

<sup>14</sup> Correspondence with SCAG, Environmental Planning Division, June 12, 2008.

<sup>15</sup> These criteria include cancellation of a Williamson Act Contract, impact to an area of critical environmental sensitivity, interference with the attainment of regional water quality standards, proximity to a nuclear power plant, and other factors not applicable to the Proposed Project.

Growth Management Chapter Policies		
3.09	Support local jurisdiction's efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.	<b>Consistent:</b> The Proposed Project site is located in an urbanized part of the City of Los Angeles area that is served by an existing utilities and transportation infrastructure. The applicant would pay its fair share of necessary off-site infrastructure improvements necessary to implement the Proposed Project.
3.11	Support provisions and incentives created by local jurisdictions to attract housing growth in job-rich subregions and job growth in housing-rich subregions.	<b>Consistent:</b> The Proposed Project would increase the percentage of undergraduate FTE students housed on campus from approximately 60 to 75 percent through the provision of additional campus housing options, which would serve to help lower the demand for student housing in the surrounding community.
3.12	SCAG shall encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.	<b>Consistent:</b> The Proposed Project is an infill development project located along a major transit corridor (Lincoln Boulevard) in an urbanized part of the City of Los Angeles. Several transit lines currently serve the Proposed Project site. Lincoln Boulevard is currently on the route of several local bus lines and has been identified as a potential location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide locations for a station near the LMU entrance on Lincoln Boulevard. Additionally, the Proposed Project proposes to increase the capacity of the LMU campus to house a greater percentage of FTE students on campus, thereby reducing vehicle miles traveled to and from campus. Furthermore, the Proposed Project seeks to re-establish the original pedestrian focus of the campus by de-emphasizing vehicular circulation on campus and by constructing more pedestrian and bicycle links between all areas of campus.
3.13	Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.	<b>Consistent:</b> The Proposed Project is an infill development project located along a major transit corridor (Lincoln Boulevard) in an urbanized part of the City of Los Angeles. Several transit lines presently serve the Proposed Project site. Lincoln Boulevard is currently on the route of several local bus lines and has been identified as a potential location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard.

Growth Management Chapter Policies		
3.14	Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.	<b>Consistent:</b> The Proposed Project is an infill development project that would increase residential density on campus. The LMU campus is located along a major transit corridor (Lincoln Boulevard) in an urbanized part of the City of Los Angeles. Several transit lines currently serve the Proposed Project site. Lincoln Boulevard is currently on the route of several local bus lines and has been identified as the location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard.
3.15	Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.	<b>Consistent:</b> Lincoln Boulevard has been identified as the location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard.
3.16	Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.	<b>Consistent:</b> The Proposed Project is an infill development project located along a major transit corridor (Lincoln Boulevard) in an urbanized part of the City of Los Angeles. Several transit lines currently serve the Proposed Project site. Lincoln Boulevard is currently on the route of several local bus lines and has been identified as the location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard.
3.23	SCAG shall encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and develop emergency response and recovery plans.	<b>Generally Consistent:</b> Potential Project impacts pertaining to noise are addressed in <b>Section IV.I, Noise</b> , and impacts pertaining to biological resources are addressed in <b>Section IV.C, Biological Resources</b> , and <b>Section IV.G.1, Surface Water Hydrology and Water Quality</b> . As stated in those sections, the Proposed Project would not result in significant impacts to biological resources, but would result in significant and unavoidable noise impacts during construction. However, all feasible mitigation measures would be implemented to reduce off-site noise levels. Furthermore, as discussed in <b>Section IV.D, Geology</b> and <b>Section IV.E, Hazards</b> , impacts related to seismic hazards would be less than significant.

Growth Management Chapter Policies		
3.24	SCAG shall encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.	<b>Consistent:</b> The Proposed Project would increase the percentage of undergraduate FTE students housed on campus from approximately 60 to 75 percent through the provision of additional campus housing options, which would serve to help lower the demand for student housing in the surrounding community.

**4.4.2 SCAG Regional Transportation Plan**

**Table IV.H-3**, below, lists applicable goals and policies from the 2004 Regional Transportation Plan along with an analysis of the consistency of the Proposed Project with each goal and policy. The analysis shows that the Proposed Project is consistent with the applicable land use policies of the Regional Transportation Plan.

**Table IV.H-3  
SCAG Regional Transportation Plan Goals and Policies**

Goals		
1	Maximize mobility and accessibility for all people and goods in the region.	<b>Not Applicable:</b> These core transportation goals are directed toward regional transportation planning. It is beyond the scope of individual projects, such as the Proposed Project, to address the regional transportation issues raised in these policies. However, the Proposed Project is consistent with the intent behind these policies. For example, the Proposed Project site is adjacent to a major transportation corridor within an urban area of Los Angeles. Several transit lines presently serve the Proposed Project site. Lincoln Boulevard is currently on the route of several local bus lines and has been identified as the location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard.
2	Ensure travel safety and reliability for all people and goods in the Region.	
3	Preserve and ensure a sustainable transportation system	
4	Maximize the productivity of our transportation system.	

Goals		
5	Protect the environment, improve air quality and promote energy efficiency	<b>Consistent:</b> The Project would promote energy efficiency through compliance with the Building Energy Efficiency Standards contained in Title 24 of the California Code of Regulations, as well as through implementation of sustainable design features identified in <b>Sections II, Project Description, and L.4, Energy</b> . Moreover, the Proposed Project site is adjacent to a major transportation corridor within an urban area of Los Angeles. Several transit lines currently serve the campus. Additionally, the Proposed Project proposes to house a greater percentage of LMU undergraduate students on campus. These measures would help reduce vehicle miles traveled and associated air pollution. Furthermore, as discussed in <b>Section IV.C, Biological Resources</b> , impacts to sensitive wildlife and plant habitat would be less than significant.
6	Encourage land use and growth patterns that complement our transportation investments	<b>Consistent:</b> The Project site is adjacent to a major transportation corridor within an urban area of Los Angeles. Several transit lines presently serve the Proposed Project site.

4.4.3 SCAG Growth Vision Report

**Table IV.H-4**, below, lists applicable principles from the 2004 SCAG Growth Vision Report and an analysis of the consistency of the Proposed Project with each principle. The analysis shows that the Proposed Project is consistent with the applicable land use policies of the Growth Vision Report.

**Table IV.H-4  
SCAG Growth Visioning Principles**

Principle 1	Improve Mobility for All Residents.	
1.1	Encourage transportation investments and land use decisions that are mutually supportive.	<b>Consistent:</b> The Project site is adjacent to a major transportation corridor within an urban area of Los Angeles. Several transit lines currently serve the Proposed Project site. Lincoln Boulevard is currently on the route of several local bus lines and has been identified as the location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard.
1.2	Locate new housing near existing jobs and new jobs near existing housing.	<b>Consistent:</b> LMU proposes to increase employment of faculty and staff with Proposed Project buildout. As the Proposed Project is an infill development, existing and future jobs on the LMU campus are located in close proximity to housing.

<b>Principle 2</b>		<b>Foster Livability in all Communities</b>
1.3	Encourage transit-oriented development.	<b>Consistent:</b> See response to GV P1.1 above.
1.4	Promote a variety of travel choices.	<b>Consistent:</b> See response to GV P1.1 above.
2.1	Promote infill development and redevelopment to revitalize existing communities.	<b>Consistent:</b> The Project is an infill development project that would replace facilities on the existing LMU campus.
2.3	Promote “people scaled,” walkable communities.	<b>Consistent:</b> As described in <b>Section II, Project Description (subsection 5.6)</b> , the Proposed Project seeks to re-establish the original pedestrian focus of the campus by de-emphasizing vehicular circulation on campus and by constructing more pedestrian links between all areas of campus.
2.4	Support the preservation of stable, single-family neighborhoods.	<b>Consistent.</b> The Proposed Project proposes the establishment of the Loyola Marymount University Specific Plan, which is intended to ensure the compatibility of future operations with surrounding land uses. The Project would minimize adverse impacts to the neighborhood by implementing the proposed Specific Plan’s height/setback restrictions, which are at least as strict as the campus’ existing zoning; concentrates taller buildings away from the campus boundaries; and prohibits development within 39.9 feet of the campus’ southern and eastern boundaries. The current building height limits on Hughes and Leavey Campuses would be maintained and stricter height limitations would be imposed on Burns Campus. All improvements proposed under the Proposed Project would be confined to the existing campus; therefore, no expansion into the surrounding residential neighborhood would occur.
<b>Principle 3</b>		<b>Enable Prosperity for all People</b>
3.1	Provide, in each community, a variety of housing types to meet the housing needs of all income levels.	<b>Consistent:</b> The Proposed Project would increase the percentage of undergraduate FTE students housed on campus from approximately 60 percent to approximately 75 percent through the provision of additional on-campus housing, which would serve to help lower the demand for housing in the surrounding community.

Principle 4		Promote sustainability for future generations
4.2	Focus development in urban centers and existing cities.	<b>Consistent:</b> The Project is an infill development within an urbanized part of the City of Los Angeles. The Proposed Project proposes to replace facilities on an existing campus, and would not expand the campus boundaries.
4.3	Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.	<b>Consistent:</b> The campus is located in a suburban setting within an urbanized part of the City of Los Angeles. The Proposed Project proposes to replace facilities on the existing campus, and would not expand the campus boundaries. With respect to efficient energy use, LMU has a substantial number of “green” or energy-saving and environmentally conscious programs already in place on the campus, including recycling, which significantly reduces waste generation on campus, solar energy generation, use of recycled water, and construction of four LEED-certified buildings including the new William H. Hannon Library. These programs would continue under buildout of the Proposed Project. Furthermore, old, energy-inefficient buildings to be removed on the campus under the Proposed Project would be replaced by new, energy-efficient buildings.
4.4	Utilize “green” development techniques.	<b>Consistent:</b> With respect to efficient energy use, LMU has a substantial number of “green” or energy-saving and environmentally conscious programs already in place on the campus, including recycling, solar energy generation, use of recycled water, and construction of four LEED-certified buildings including the new William H. Hannon Library, scheduled to open in the Fall of 2009. Proposed Project features consistent with this policy are discussed in detail in <b>Section IV.L.4, Energy</b> , and include the use of passive heating/cooling building design strategies, computerized climate control appliances that exceed the minimum efficiency standards, the use of energy-efficient lighting, and other measures.

**4.4.4 Los Angeles County Airport Land Use Plan**

The campus is located approximately 0.25 mile north of the Los Angeles International Airport Planning Boundary/Airport Influence Area, which is identical to the 65 CNEL noise contour line and safety hazard delineation for the Los Angeles International Airport. Implementation of the Proposed Project does not include uses that would affect air traffic patterns and the building heights of all new campus structures

would be below the 500-foot building height threshold that has been established in the Los Angeles International Airport Planning Boundary/Airport Influence Area to preclude interference with aeronautical operations. For these reasons, implementation of the Proposed Project would not conflict with the Los Angeles County Airport Land Use Plan.

#### 4.4.5 City of Los Angeles General Plan – Framework Element

As described above, the Proposed Project proposes to amend the General Plan land use designation from “L” Low Density Residential to “HM” High-Medium Density Residential, which would be consistent with the campus uses, change the campus’ zoning designation to R4-1 and establish a Specific Plan for the LMU campus. The neighborhoods east and south of the campus are presently designated for Low and Low-Medium Density Residential uses. According to the Land Use chapter of the Framework Element, the primary goal for Low Density Residential (single-family residential) areas is to preserve the City’s stable single-family neighborhoods. The objectives intended to achieve this goal are: (1) ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development; and (2) allow for the intensification of selected single-family areas that directly abut high-density development as “transitions” between these uses.

Neighborhoods northwest and west of the campus, in Playa Vista, are designated for Low-Medium and High-Medium Density Residential (multi-family residences). According to the Land Use chapter of the Framework Element, the primary goal for Multi-Family Residential areas is to maintain the City’s stable multi-family residential neighborhoods.<sup>16</sup> The Framework Element establishes guidelines to achieve higher quality multi-family dwellings, such as design character, amenity, and open space. The objective intended to achieve this goal is to provide for the enhancement and stability of multi-family residential neighborhoods and allow for growth in areas where sufficient infrastructure and services exist so that residents’ quality of life can be maintained or improved.

The Proposed Project would not obstruct attainment of the Framework Element’s goals and objectives for the adjacent single-family residences in Westchester and the multi-family residences in Playa Vista. The Project does not propose to expand or otherwise alter the campus boundaries, and all improvements would occur within the existing campus boundaries. Furthermore, improvements on the campus would not conflict with the intensity of uses prescribed by the Framework Element for the area surrounding the nearby intersection of Jefferson Boulevard and Lincoln Boulevard, which has been designated a Regional Center. Additionally, **Table IV.H-5**, below, shows that the Proposed Project is consistent with the

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<sup>16</sup> City of Los Angeles, “General Plan Framework Element: Chapter 3, Land Use, Multifamily Residential,” General Plan Framework, <http://cityplanning.lacity.org/cwd/framwk/chapters/03/03202.htm>. 2008.

applicable goals, objectives and polices of the Land Use, Urban Form and Neighborhood Design, and Open Space and Conservation chapters of the Framework Element. Therefore, impacts related to consistency with the Framework Element would be less than significant.

**Table IV.H-5  
Framework Element Goals, Objectives, and Policies**

<b>Land Use Chapter</b>		
Objective 3.1	Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	<b>Consistent:</b> Through the Proposed Project, LMU seeks to improve its facilities fulfill its mission, enhance the educational experience for students, and improve facilities and programs for students, faculty, and staff, thereby ensuring that LMU continues to be a leading academic institution.
Objective 3.2	Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	<b>Consistent:</b> The Project site is adjacent to a major transportation corridor within an urban area of Los Angeles. Several transit lines currently serve the Proposed Project site. Lincoln Boulevard is currently on the route of several local bus lines and has been identified as a potential location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard. Furthermore, the Proposed Project proposes to increase the capacity of the LMU campus to house a greater percentage of LMU undergraduate students on campus. These students could then walk to classes and other school functions. These measures would thus help reduce vehicle miles traveled and associated air pollution.
Policy 3.2.3	Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	<b>Consistent:</b> The Proposed Project proposes designated bicycle lanes on all primary, secondary, and tertiary campus roads and bicycle parking racks at all new buildings.

Land Use Chapter (continued)		
Policy 3.2.4	Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	<b>Consistent:</b> The Proposed Project would be compatible with the neighboring residential land uses since all proposed improvements would occur within the existing campus boundaries and enrollment would only be increased from the existing 6,868 FTE students as of Fall 2008 to the 7,800 FTE student enrollment cap already approved by the City in 2000. Additionally, the proposed height/setback restrictions would prohibit the construction of new buildings within 39.9 feet of the campus boundaries parallel to McConnell Avenue, W. 80 <sup>th</sup> Street, and Fordham Road, and limit building height to no greater than 75 feet on Burns Campus. The current building height limits on Hughes and Leavey Campuses would be maintained. Furthermore, the Proposed Project would retain the modest, suburban scale of the existing campus and the surrounding uses
Policy 3.2.4 cont'd		through implementation of the proposed Specific Plan, which establishes a more comprehensive set of development standards to unify the existing Burns, Leavey, and Hughes Campuses, and maintain compatibility with surrounding land uses.
Goal 3B	Preservation of the City's stable single-family residential neighborhoods.	<b>Consistent:</b> See response to Policy 3.2.4.
Objective 3.5	Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.	<b>Consistent:</b> See response to Policy 3.2.4.

Urban Form and Neighborhood Design Chapter		
Objective 5.2	Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	<b>Consistent:</b> All proposed improvements associated with the Proposed Project would occur within the existing campus boundaries. Additionally, the campus is accessible from Lincoln Boulevard, which is a major transportation corridor.
Policy 5.7.1	Establish standards for transitions in building height and for on-site landscape buffers.	<b>Consistent:</b> The Proposed Project imposes height restrictions defined by a series of setbacks from the campus boundaries parallel to McConnell Avenue, W. 80 <sup>th</sup> Street, and Fordham Road. These height restrictions would ensure that taller buildings are not built along the campus boundaries along McConnell Avenue, W. 80 <sup>th</sup> Street, and Fordham Road, and that building height gradually increases with distance from these boundaries. The current building height limits on Hughes and Leavey Campuses would be maintained.  Additionally, a landscape buffer setback along the easterly, southerly, and westerly boundaries of Burns Campus would be incorporated. The buffer setback would contain no new buildings.
Open Space and Conservation Chapter		
Goal 6A	An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.	<b>Consistent:</b> The Proposed Project would increase the amount of open space contained on the campus. Furthermore, no encroachment onto the face of the adjacent Westchester Bluffs would occur.
Objective 6.1	Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.	<b>Consistent:</b> See response to Goal 6A.
Policy 6.1.2	Coordinate City operations and development policies for the protection and conservation of open space resources, by preserving natural viewsheds, whenever possible, in hillside and coastal areas.	<b>Consistent:</b> Prominent viewsheds would be preserved with implementation of the Proposed Project, as discussed in greater detail in <b>Section IV.A.1, Aesthetics and Views</b> .

Housing Chapter		
Objective 4.1	Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.	<b>Consistent:</b> The Proposed Project would increase the percentage of undergraduate FTE students housed on campus from approximately 60 to 75 percent through the provision of additional campus housing options, which would serve to help lower the demand for student housing in the surrounding community. Therefore, the Proposed Project would help meet LMU’s future housing demands, while increasing the availability of off-campus housing in the Westchester community.
Objective 4.3	Conserve scale and character of residential neighborhoods.	<b>Consistent:</b> The Proposed Project would be compatible with the neighboring residential land uses since all proposed improvements would occur within the existing campus boundaries. Additionally, the Specific Plan’s proposed height/setback restrictions would prohibit the construction of new buildings within 39.9 feet of campus boundaries parallel to McConnell Avenue, W. 80 <sup>th</sup> Street, and Fordham Road, and would limit new building heights to no greater than 75 feet on Burns Campus. The current building height limits on Hughes and Leavey Campuses would be maintained. Furthermore, the Proposed Project would retain the modest, suburban scale of the existing campus and the surrounding uses through implementation of the proposed Specific Plan, which establishes a more comprehensive set of development standards to unify the campus, and maintain compatibility with surrounding land uses.
<p><i>Note: No goals, objectives, or policies from the Transportation or Infrastructure and Public Services Chapters are applicable to the Proposed Project. The goals, objectives, and policies contained in the Infrastructure and Public Services Chapter are directed towards the actions and long-term planning strategies of City departments and service providers, as opposed to individual development projects. The Transportation Chapter contains no goals, objectives, or policies, but defers to those in the General Plan Transportation Element.</i></p>		

**4.4.6 City of Los Angeles General Plan – Westchester-Playa del Rey Community Plan**

As discussed above, the Proposed Project proposes the establishment of the LMU Specific Plan and a General Plan Amendment to designate the campus as “HM” High-Medium Density Residential, consistent with current uses. **Table IV.H-6**, below, lists Community Plan goals and objectives for residential development, schools, and transit improvements that are applicable to the Proposed Project. The analysis shows that the Proposed Project is consistent with the applicable land use policies of the Westchester-Playa del Rey Community Plan.

**Table IV.H-6  
Westchester-Playa del Rey Community Plan Land Use Goals and Objectives**

<b>Residential Goals</b>		
1	Need for consistency in land use designations, zoning, and the existing uses.	<b>Consistent:</b> The Proposed Project proposes to change the existing “L” Low Density Residential Community Plan land use designation to “HM” High-Medium Density Residential, for compatibility with existing uses and to more accurately reflect use of the Proposed Project site as an academic campus. The Project also seeks a Zone Change from [Q]R4-1 to R4-1; the [Q] conditions would be replaced with a more comprehensive, unified set of standards and guidelines established by the LMU Specific Plan. These standards and guidelines are intended to both meet LMU’s needs and ensure compatibility with surrounding land uses.
<b>Major Opportunity Site Goals</b>		
	Loyola Village Community Commercial Center [at the intersection of Lincoln Boulevard and Manchester Avenue]: Capitalize on the area’s location by strengthening linkages between the commercial district, Loyola [Marymount] University, and the park, golf course, and library, to create a commercial district of exceptional vitality.	<b>Consistent:</b> LMU currently operates the Lion Express shuttle service, which provides transportation from campus to the Loyola Village Community Commercial Center and other destinations (see <b>Section IV.K, Transportation</b> , for further discussion). LMU would continue to operate this service and may seek to enhance the shuttle service by extending hours of operation and/or adding destinations.
<b>General Planning Goals and Objectives: Community Character</b>		
1	Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance	<b>Consistent:</b> The Project proposes to revitalize and improve existing campus uses by enhancing the campus’s positive characteristics including creating more open space, improving facilities, and enhancing pedestrian connectivity. Furthermore, the Proposed Project proposes the establishment of the Loyola Marymount University Specific Plan, which is intended to ensure the compatibility of future LMU operations with surrounding land uses. Development standards proposed as part of the Proposed Project would implement height/setback restrictions that are at least as strict as those permitted by the existing Municipal Code regulations, and would define standards and guidelines applicable, but not limited to, height, use, parking, and open space.

General Planning Goals and Objectives: Community Character (continued)		
2	Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts	<b>Consistent:</b> The Proposed Project site is adjacent to a major transportation corridor within an urban area of Los Angeles. Several transit lines presently serve the Proposed Project site. Lincoln Boulevard is currently on the route of several local bus lines and has been identified as the location of the future Green Line of the Los Angeles Metro. Additionally, if the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard
3	Preserving and strengthening commercial developments to provide a diverse job-producing economic base	<b>Consistent:</b> Although an educational institution is not a commercial use, LMU is one of the major employers in Southern California and in the Westchester-Playa del Rey area. The Proposed Project has as a goal the conversion of current part-time faculty to full-time status, to permanently reduce the number of part-time faculty. Toward this end, the Proposed Project proposes construction of approximately 508,000 net new gross square feet of state-of-the-art academic and administrative facilities, including new faculty offices, to improve the quality of education on campus and attract and retain top faculty.
4	Improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community	<b>Consistent:</b> The Project proposes establishment of the Loyola Marymount University Specific Plan, which would ensure the compatibility of future LMU operations with surrounding land uses. Development standards proposed as part of the Proposed Project would implement height/setback restrictions that are at least as strict as those permitted by current Municipal Code regulations, and would define standards and guidelines applicable to height, use, parking, and open space. Buildings would be arranged to create usable outdoor space, support pedestrian connectivity, and derive their massing, character and scale from the retained LMU buildings, including the heritage buildings such as Xavier Hall, St. Robert's Hall, and Sacred Heart Chapel. campuswide, landscaping would be installed to enhance the scenic character of courtyards, quadrangles, and the campus perimeter.

Residential Objectives		
1-1	<p>Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Westchester-Playa del Rey Community Plan Area to the year 2025.</p> <p><i>Policies</i></p> <p>1-1-1 Protect existing stable single family and low density residential neighborhoods, such as Kentwood, from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life</p>	<p><b>Consistent.</b> The Proposed Project proposes establishment of the Loyola Marymount University Specific Plan, which is intended to ensure the compatibility of future LMU operations with surrounding land uses. Development standards proposed as part of the Proposed Project would implement height/setback restrictions that are at least as strict as those permitted by current Municipal Code regulations, and would define standards and guidelines applicable, but not limited to, height, use, parking, and open space. As such, establishment of a Specific Plan would minimize incompatible uses.</p>
1-3	<p>Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.</p> <p><i>Policies</i></p> <p>1-3-2 Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets.</p>	<p><b>Consistent:</b> Under the Proposed Project, the primary entry and exit for the campus would continue to be provided via LMU Drive, accessed from Lincoln Boulevard, thereby directing traffic away from residential neighborhoods. Loyola Boulevard would remain a secondary, gate-controlled access. See <b>Section IV.K, Transportation</b>, for further discussion of campus ingress/egress and vehicular circulation in the campus vicinity. All improvements proposed under the Proposed Project would be confined to the existing campus; therefore, no expansion into the surrounding residential neighborhood would occur. The Proposed Project would also minimize adverse impacts to the neighborhood by implementing the proposed LMU Specific Plan height/setback restrictions, which concentrates taller buildings away from the campus boundaries parallel to McConnell Avenue, W. 80<sup>th</sup> Street, and Fordham Road, and prohibits development within 39.9 feet of the campus' southern and eastern boundaries.</p>
	<p>1-3-2 Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.</p>	<p><b>Consistent.</b> These factors are addressed in <b>Sections IV.A.1, Aesthetics and Views, IV.J, Public Services, IV K, Transportation, and IV.L, Utilities</b>, of this Draft EIR.</p>
1-4	<p>Provide affordable housing and increased accessibility to more population segments, especially students, the disabled and senior citizens.</p> <p><i>Policies</i></p> <p>1-4.1 Promote greater individual choice in type, quality, price and location of housing.</p>	<p><b>Consistent:</b> The Proposed Project would increase the percentage of undergraduate FTE students housed on campus from approximately 60 to 75 percent through the provision of additional campus housing options, and would do so by constructing more modern housing options with increased amenities.</p>

Residential Objectives (continued)		
	<p>1-4.3 Ensure that new housing opportunities minimize displacement of residents.</p>	<p><b>Consistent:</b> The Proposed Project would increase the percentage of undergraduate FTE students housed on campus from approximately 60 to 75 percent through the provision of additional campus housing options, and would do so without displacing any existing housing. This would serve to help lower the demand for student housing in the surrounding communities.</p>
1-5	<p>Protect established residential neighborhoods from incompatible uses, including multiple family residential uses of substantially higher density, to preserve the residential character of these neighborhoods and protect residents from adverse environmental impacts caused by such uses.</p> <p><i>Policies</i></p> <p>1-5-1 Where possible, do not locate incompatible land uses, including higher density multiple residential uses, within or in close proximity to lower density residential neighborhoods, except where there are adequate buffers, transitional land uses, etc.</p>	<p><b>Consistent.</b> The Proposed Project proposes establishment of the LMU Specific Plan, which is intended to ensure the compatibility of future LMU operations with surrounding residential land uses. Development standards proposed as part of the LMU Specific Plan would implement height/setback restrictions that are at least as strict as those permitted by current Municipal Code regulations, and would define standards and guidelines applicable to the campus such as height, use, and parking regulations. As such, establishment of a Specific Plan would create adequate buffers and transitional land uses.</p>
	<p>1-5-2 The location of institutional uses in residential areas shall be conditioned so as to avoid adverse impacts on the surrounding neighborhood.</p>	<p><b>Consistent.</b> All improvements planned under the Proposed Project would be confined to the existing campus; therefore, no expansion into the surrounding residential neighborhood would occur. The Proposed Project would also minimize adverse impacts to the neighborhood by implementing the proposed LMU Specific Plan height/setback restrictions, which concentrates taller buildings away from the campus boundaries parallel to McConnell Avenue, W. 80<sup>th</sup> Street, and Fordham Road, and prohibits development within 39.9 feet of these boundaries.</p>

Residential Objectives (continued)		
1-6	<p>Preserve visual resources in residential areas.</p> <p><i>Policies</i></p> <p>1-6.1 The preservation of existing scenic views from surrounding residential uses, public streets and facilities, or designated scenic view sites should be a significant consideration in the approval of zone changes, conditional use permits, variances, divisions of land and other discretionary permits.</p>	<p><b>Consistent.</b> As discussed in <b>Section IV.A.1, Aesthetics and Views</b>, the Proposed Project would not significantly obstruct existing scenic views from the surrounding residential neighborhood or public thoroughfares. Views of the Los Angeles Basin offered from Altavan Avenue, W. 78<sup>th</sup> Street and Campion Drive would be retained since a height limit of 139 feet above mean sea level would be maintained on Hughes Campus, ensuring that the heights of any new buildings would be below the at-grade elevation of residences to the east of Hughes Campus. Similarly, the West Bluffs residential development west of Lincoln Boulevard is at a higher elevation than the LMU campus. No other residential locations in the campus vicinity have visual access to long-range, valued view resources over or through the campus. Views of the campus entrance from Lincoln Boulevard would not be adversely affected; the addition of a conference center to University Hall, along with other improvements, would enhance the appearance of the entry sequence. Furthermore, scenic views from Jefferson Boulevard, Playa Vista and other vantage points to the north of the LMU campus would not be adversely affected as improvements on the campus would be concentrated away from the bluff edge. No views from designated scenic vantage points would be adversely impacted.</p>

Schools Objectives		
6-4	<p>Coordinate and integrate the development and operation of the Loyola Marymount University (LMU) campus into the surrounding Westchester-Playa del Rey community.</p> <p><i>Policies</i></p> <p>6-4.1 Promote land use compatibility between University facilities and adjacent land uses, with particular attention given to preventing adverse impacts to adjacent residential neighborhoods. Where feasible, mitigate impacts of University uses on adjacent properties through the use of landscaped buffers, setbacks, and/or site and building design.</p> <p>Program: The [Community] Plan strongly encourages Loyola Marymount University to create a Master Plan, in coordination with the City of Los Angeles and the local Neighborhood Council, which will articulate provisions for future growth and improvements to the campus, development phases, and mitigation measures for impacts to the community including traffic, noise, visual considerations, and sensitive habitats.</p>	<p><b>Consistent.</b> The Proposed Project proposes establishment of the Loyola Marymount University Specific Plan, which is intended to ensure the compatibility of future LMU operations with surrounding land uses. Development standards proposed as part of the Proposed Project would implement height/setback restrictions that are at least as strict as those permitted by current Municipal Code regulations, and would define standards and guidelines applicable, but not limited to, height, use, parking, and open space. Moreover, the Proposed Project and establishment of a Specific Plan is consistent with the Program recommended to implement this policy, which encourages such a master plan.</p>
	<p>6-4.2: Protect sensitive terrain and nearby natural habitats, such as blufflines and wetland environments, from potentially adverse impacts during all phases of development and operation of the University.</p>	<p><b>Consistent.</b> Potential environmental impacts on the Westchester Bluffs at the northern edge of the campus, as well as Playa del Rey wetland habitat, are discussed in further detail in <b>Sections IV.C, Biological Resources, IV.G.1, Surface Water: Hydrology and Water Quality, and IV.G.2, Surface Water Quality.</b> As stated therein, Proposed Project implementation – including construction and subsequent operation – would be required to comply with regulations governing sensitive habitats on, and adjacent to, the campus, thereby avoiding adverse impacts to these resources. Additionally, no construction within, or encroachment of, the face of the Westchester Bluffs is proposed.</p>
	<p>6-4.3: Minimize traffic impacts to the surrounding Westchester community by locating and maintaining the University's major vehicular access routes away from adjacent residential neighborhoods.</p>	<p><b>Consistent.</b> The Proposed Project would maintain LMU Drive, accessed from Lincoln Boulevard, as the primary entry and exit for the campus, thereby directing the majority of campus traffic away from the residential neighborhoods. Loyola Boulevard would remain a secondary, gate-controlled entry. See <b>Section IV.K, Transportation,</b> for further discussion of campus ingress/egress and vehicular circulation in the campus vicinity.</p>

Schools Objectives (continued)		
6-4 cont'd.	6-4.4: Enhance the vitality of the Loyola Village commercial district by promoting and strengthening pedestrian linkages and land use connections between it and the University.	<b>Consistent:</b> LMU currently operates the Lion Express shuttle service, which provides transportation from campus to the Loyola Village Community Commercial Center and other destinations (see <b>Section IV.K, Transportation</b> , for further discussion). LMU would continue to operate this service and may seek to enhance the shuttle service by extending hours of operation and/or adding destinations.
	6-4.5: Encourage the University to make amenities and services available to the local community, such as libraries, meeting rooms, athletic facilities, lectures, special events, or other appropriate services.	<b>Consistent:</b> LMU presently makes a number of its facilities available for use by members of the community, and would continue to do so in the future.
Transit Improvement Objectives		
14.2	<p>Increase work trips and non-work trips made on public transit.</p> <p><i>Policies</i></p> <p>14-2.3: Continue to study and consider future extensions of the Metro Rail Green Line to serve the Westchester-Playa del Rey community and provide rail transit connections to Marina del Rey and possibly other Westside areas, such as Santa Monica, West Los Angeles, etc.</p> <p>Program: The Plan supports the continued study of possible future extensions to the Green Line by the appropriate agencies, including LADOT and MTA. Consideration should be given to establishing future stations to serve LAX, the Century Boulevard/98<sup>th</sup> Street Corridor, Downtown Westchester, Loyola Village, Loyola Marymount University, and Playa Vista.</p>	<p><b>Consistent.</b> Lincoln Boulevard is currently on the route of several local bus lines and has been identified as a potential location of the future Green Line of the Los Angeles Metro. If the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard.</p> <p>Additionally, LMU currently operates the Lion Express shuttle service, which provides transportation from campus to the Loyola Village Community Commercial Center and other destinations (see <b>Section IV.K, Transportation</b>, for further discussion). LMU would continue to operate this service and may seek to enhance the shuttle service by extending hours of operation and/or adding destinations.</p>

#### 4.4.7 City of Los Angeles Municipal Code

The Proposed Project includes a request to change the zoning designation from [Q]R4-1 to R4-1, and to establish the proposed LMU Specific Plan for the approximately 142-acre campus. The proposed LMU Specific Plan would institute new, comprehensive development standards intended to ensure future compatibility with surrounding land uses. The regulations contained within the proposed Specific Plan would supplement or supersede those set forth in the Municipal Code. Wherever the proposed Specific Plan contains provisions that are different from those contained in the Municipal Code (i.e., either more

restrictive or more permissive), the proposed Specific Plan would supersede the applicable provisions of the Municipal Code. Should they be approved and adopted, the requested Zone Change and establishment of the proposed Specific Plan would supersede the Municipal Code and land use impacts would be less than significant.

**4.4.8 Los Angeles City “Do Real Planning” Guidelines**

**Table IV.H-7**, below, lists the 14 principles of the Los Angeles City “Do Real Planning” Guidelines and evaluates Project consistency. The analysis shows that the Proposed Project is consistent with the applicable principles of the guidelines.

**Table IV.H-7  
City of Los Angeles “Do Real Planning” Principles**

Land Use Chapter		
1	Demand a walkable city	<b>Consistent:</b> With Proposed Project buildout, the campus would continue to be accessible via Lincoln Boulevard, which is currently on the route of several local bus lines and has been identified as a potential location of the future Green Line of the Los Angeles Metro. If the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard. Additionally, the Proposed Project seeks to re-establish the original pedestrian focus of the campus by de-emphasizing vehicular circulation on campus and by constructing more pedestrian links between all areas of campus.
2	Offer basic design standards	<b>Consistent:</b> The development standards proposed by the Proposed Project, with respect to building configuration, height, and open space distribution, would ensure that the Proposed Project’s proposed features are consistent with and enhance those existing features that represent the valued aesthetic image of the campus, such as the campus’s scenic views and large areas of landscaped open space.

Land Use Chapter		
3	Require density around transit	<b>Consistent:</b> The Proposed Project would increase the intensity of uses within the existing campus boundaries. As discussed above, the campus is located in an area accessible via public transit and has been identified as a potential location of the future Green Line of the Los Angeles Metro. If the Green Line is extended down Lincoln Boulevard, LMU will offer to provide a location for a station near the LMU entrance on Lincoln Boulevard.
4	Eliminate department bottlenecks	<b>Not Applicable:</b> This principle is directed towards the City.
5	Advance homes for every income	<b>Consistent:</b> The Proposed Project would increase the percentage of undergraduate FTE students housed on campus from approximately 60 to 75 percent through the provision of additional campus housing options.
6	Locate jobs near housing	<b>Consistent:</b> LMU proposes to increase employment of faculty and staff with Proposed Project buildout. As the Proposed Project is an infill development, existing and future jobs on the LMU campus are located in close proximity to housing.
7	Produce green buildings	<b>Consistent:</b> New buildings developed on the campus under the Proposed Project would incorporate a number of sustainable design features, as defined in <b>Sections II, Project Description, and L.4, Energy</b> . Several buildings will be designed to LEED (or equivalent) certification standards. Additionally, LMU would continue to implement “green” or energy-saving and environmentally conscious operations already in place on the campus, including a campus-wide recycling program and a reclaimed water system for irrigation and other programs discussed in <b>Section L.4, Energy</b> .

Land Use Chapter		
8	Landscape in abundance	<b>Consistent:</b> The Proposed Project would enhance the campus and campus perimeter through the installation of landscaping in association with new buildings and facilities, as well as at campus entry points and edges.
9	Arrest visual blight	<b>Consistent:</b> The campus is not located in an area considered to experience visual blight. Furthermore, the LMU campus was recently ranked as the 16 <sup>th</sup> “most beautiful campus” of the top 368 schools in the country by the Princeton Review, based on student ratings of campuses’ beauty. <sup>17</sup> The Proposed Project would enhance the appearance of the campus entry sequence and implement other aesthetic improvements on the campus by replacing obsolete facilities with newer facilities exhibiting more unified architectural standards. The Proposed Project would enhance landscaping along the campus perimeter, which is intended to unify all areas of campus, and complement the adjacent residential neighborhood streetscapes.
10	Neutralize mansionization	<b>Not Applicable:</b> This principle is applicable only to projects that propose the construction of single-family housing.
11	Nurture planning leadership	<b>Not Applicable:</b> This principle is directed toward City Planning Department practices.
12	Identify smart parking requirements	<b>Consistent:</b> The proposed Specific Plan would require that at least 609 additional spaces be provided on campus by Proposed Project buildout.
13	Narrow road widenings	<b>Not Applicable:</b> This principle is applicable only to projects that propose improvements to public roadways.
14	Give project input early	<b>Not Applicable:</b> This principle is directed towards City Planning Department practices.

#### 4.4.9 Summary of Consistency Analysis

As discussed in the analysis above, the Proposed Project would be consistent with applicable SCAG policies, the Los Angeles County Airport Land Use Plan, the City of Los Angeles General Plan Framework Element, the Westchester-Playa del Rey Community Plan, the City of Los Angeles Municipal Code, and the “Do Real Planning Guidelines” following approval of the requested Zone Change and

<sup>17</sup> The Princeton Review, Campus Rankings and Lists: Quality of Life.  
<http://www.princetonreview.com/college-rankings.aspx>. 2008.

adoption of the proposed Specific Plan. Therefore, impacts associated with plan consistency would be less than significant.

LU-2            Would the Proposed Project be physically incompatible with other existing land uses in the area?

Land uses in the vicinity of the Proposed Project area include single-family residences surrounding the campus to the west, south, and east, and multi-family residences and commercial uses in Playa Vista to the north. Commercial uses are also concentrated along Lincoln Boulevard to the southwest, and the Ballona Wetlands are located to the northwest across Lincoln Boulevard. The Proposed Project would not expand the borders of the LMU campus; all improvements planned under the Proposed Project would occur within the existing campus boundaries.

Additionally, the Proposed Project proposes establishment of a Specific Plan that would institute a more comprehensive set of development standards to maintain compatibility with surrounding land uses. These development standards include height and setback restrictions on the campus (see **Table IV.H-1**) that would prohibit the construction of new buildings within 39.9 feet of the campus' southern and eastern boundaries, and would limit new building heights to no greater than 75 feet on Burns Campus. The current building height limits on Hughes and Leavey Campuses would be maintained. The proposed LMU Specific Plan also establishes Planning Areas on the LMU campus that would primarily concentrate athletic uses in the southern portion of Burns Campus, maintain the campus's large expanses of open space, and configure new development to maintain scenic corridors through campus. Therefore, the Proposed Project would retain the modest suburban scale of the existing campus and protect surrounding uses. Other standards intended to minimize incompatibility with adjacent uses include vehicular access restrictions, under which LMU Drive would remain the primary route for visitor and truck traffic; and limitations on noise-generating activities (see **Section IV.I, Noise**). For these reasons, the Proposed Project would be compatible with existing land uses and impacts associated with land use compatibility would be less than significant.

#### **4.5            Project Design Features and Mitigation Measures**

PDF-LU-1        The Proposed Project shall comply with the land use regulations established by the proposed LMU Specific Plan.

No mitigation is required.

#### 4.6 Level of Impact After Mitigation

All Project-specific impacts would be less than significant; therefore, no unavoidable significant land use impacts would result from Proposed Project implementation.

#### 4.7 Cumulative Impacts

As discussed above, implementation of the Proposed Project, on its own, would not result in land use policy inconsistencies or incompatibilities; thus, no significant land use impacts are anticipated. Furthermore, the Proposed Project would serve to implement the applicable policies contained in the land use planning documents governing development on the campus and in the Proposed Project area, including the Westchester-Playa del Rey Community Plan. Moreover, the Proposed Project does not propose to expand the campus beyond its present boundaries, but instead focuses on replacement of obsolete facilities, meeting future academic, administrative and student support needs, increasing campus housing opportunities, and reducing campus-related trip generation, which would reduce off-site impacts.

A cumulative land use impact would occur if implementation of any related projects located within or around the Westchester-Playa del Rey Community Plan Area would collectively result in land uses that are incompatible with existing as well as future uses, or would conflict with applicable land use policies. These related projects, which are identified in **Section III, General Description of Environmental Setting**, are located in the Westchester, Playa del Rey, Mar Vista and Del Rey communities of the City of Los Angeles as well as Culver City and the unincorporated Los Angeles County community of Marina del Rey. No related projects are located in the single-family residential neighborhoods immediately surrounding the LMU campus.

The majority of related projects in the Westchester-Playa del Rey Community Plan Area, including buildout of Playa Vista Phases I and II and the Playa Vista Plant Site, propose multi-family housing, commercial uses, and/or office space concentrated along Jefferson Boulevard, Manchester Avenue, and Sepulveda Boulevard. These arterials are designated by the Westchester-Playa del Rey Community Plan for the development of high-density residential and commercial uses. Since these related projects are proposed within mixed-use corridors that are intended for such development, they would not present land use conflicts arising from incompatibility with the existing single-family residential neighborhoods that comprise the majority of the Community Plan Area. Other related projects in and adjacent to the Community Plan Area include expansion of two existing schools (Westchester Neighborhood School and Westchester Lutheran School), which would not cause a significant change in the land use pattern of the

area. The remaining related projects identified in **Section III** are located outside the Community Plan Area boundaries and are too far from the LMU campus to result in cumulative land use impacts.

All proposed projects within the Westchester and Playa del Rey communities are required to comply with the City's General Plan, Community Plan, and Municipal Code, or obtain approval of a General Plan Amendment, Zone Change, or variance, if necessary. These plans provide guidelines which regulate permitted uses, development density, building heights, site and building design, and transportation and public services/utilities demand. For these reasons and given that related projects identified in the Community Plan Area are consistent with land use patterns designated by the Community Plan, the Proposed Project would have a less than cumulatively considerable contribution to cumulatively significant land use impacts.