

VI. PROJECT ALTERNATIVES

1.0 INTRODUCTION

The *California Environmental Quality Act (CEQA) Guidelines* (Section 15126.6(a)) require an EIR to (1) describe a range of reasonable alternatives to the proposed project, or to the location of the proposed project, that would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and (2) evaluate the comparative merits of the alternatives. Section 15126.6(b) of the *State CEQA Guidelines* directs that this analysis be limited to those alternatives to the project or its location that are capable of avoiding or substantially lessening any significant project impacts, even if those alternative would impede, to some degree, attainment of project objectives, or would be more costly.

The selection and evaluation of alternatives is intended to foster meaningful public participation and informed decision-making. As stated in Section 15126.6(f) of the *State CEQA Guidelines*, the selection of the range of alternatives required in an EIR is governed by a “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Accordingly, an EIR need not analyze alternatives whose effects cannot be reasonably ascertained, or whose implementation might be considered remote or speculative.

Of the range of alternatives that would avoid or substantially lessen any of the significant effects of the project, an EIR need only examine in detail those that the Lead Agency determines could feasibly attain most of the basic project objectives. Section 15126.6(c) of the *State CEQA Guidelines* require an EIR to identify any alternatives considered by the lead agency but rejected as infeasible during the scoping process, and briefly explain the reasons underlying that determination. According to Section 15126.6(f)(1), among the reasons for the elimination of possible alternatives from detailed consideration in the EIR are (1) failure to meet basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts. The determination of feasibility may take into account such variables as site suitability, economic viability, the availability of infrastructure, General Plan consistency, other plan or regulatory limitations, jurisdictional boundaries, and site availability.

Section 15126.6(d) of the *State CEQA Guidelines* state that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed project. Rather, the EIR is required sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project. If an alternative would cause one or more significant impacts in addition to those of the proposed project, analysis of those impacts is to be discussed, but in less detail than for the proposed project.

Section 15126.6(e)(2) of the *State CEQA Guidelines* require the evaluation of a No Project Alternative, to permit the evaluation of project impacts against those of not approving the project, and an evaluation of an alternative location for the project, if feasible. An environmentally superior alternative is to be identified from the alternatives evaluated; if the No Project Alternative is the environmentally superior alternative, then another environmental superior alternative must be identified from among the remaining alternatives.

2.0 OBJECTIVES OF THE PROPOSED PROJECT

Section II, Project Description, sets forth a list of the Applicant's Project Objectives for the Proposed Project. As indicated therein, through the Proposed Project, LMU seeks to improve its campus facilities to accommodate the evolving needs of LMU's academic, administrative, and student-support programs, enhance the educational experience for students, and improve facilities and programs for students, faculty, and staff, within the existing enrollment limits currently in place for LMU. The Proposed Project is intended to guide future campus improvements over the next 20 years. To implement the Proposed Project, LMU is requesting the establishment of the LMU Specific Plan, which would unify the Burns, Leavey, and Hughes Campuses under one set of land use regulations.

The Proposed Project's Key and other Objectives are listed below.

Key Objectives

Key University Objectives

- U-1. Implement LMU's three-fold mission: (1) the encouragement of learning, (2) the education of the whole person, and (3) the service of faith and promotion of justice by creating an updated cohesive campus community and environment with a critical mass of approximately 7,800 full-time equivalent (FTE) students.¹
- U-2. Attain certainty regarding future development on campus by gaining entitlements that allow for measured, well-managed, and sustainable growth over the next 20 years (growth that will further the pursuit of LMU's mission and promote LMU's key university, academic, residential, and sustainability objectives) to facilitate the establishment of a long-term financial plan for the development of the campus, including fundraising from philanthropic sources, grants, and long-term capital dedication.

¹ 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 9 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 students taking more than 9 units constitute more than one FTE student.

- U-3. Ensure the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved housing opportunities on campus, including themed housing.

Key Academic Objectives

- A-1. Replace academic, administrative, athletic, and residential spaces and buildings that are functionally obsolete to create a functionally cohesive environment on campus.
- A-2. Build sufficient state-of-the-art facilities to house future academic, research, and residential uses on campus, to aid in the recruitment and retention of top students, the recruitment of faculty and their conversion from part-time to full-time status, and the creation of the best possible academic community and student social living and learning environment.

Key Residential Objectives

- R-1. Contribute to alleviation of the regional housing shortage through the creation of new student on-campus housing.
- R-2. Increase the percentage of undergraduate FTE students that can be housed on campus from approximately 60 percent to approximately 75 percent through the provision of additional campus housing options.
- R-3. Enhance campus student life by raising the standard of on-campus housing through increased unit size and improved amenities.
- R-4. Foster community and a communal educational environment on campus among the student body by increasing the number of undergraduate FTE students living on-campus and by replacing outdated student housing units with updated social-living units that allow for more communal living and educational exchange.
- R-5. Replace aging student residential rooms and apartments with modern residential accommodations on campus, to improve the educational environment on campus and aid in student recruitment.
- R-6. Address existing community concerns regarding students living off-campus by moving more undergraduate residential students onto campus.

Key Sustainability Objectives

- S-1. Create a sustainable campus environment by incorporating green building and landscaping practices, reducing the production of greenhouse gas emissions and solid waste, and reducing consumption of water, electricity, natural gas, and energy.
- S-2. Move more undergraduate students into campus housing (increasing the percentage of undergraduate residential students from approximately 60 percent of FTE students to

approximately 75 percent) to reduce traffic trips and vehicle miles traveled to and from the LMU campus.

Planning and Design Objectives

- PD-1. Achieve physical improvements in the spatial structure of the campus, and improve pedestrian connections within the campus, to achieve greater integration of academic, administrative, athletic, and residential divisions.
- PD-2. Improve land use compatibility on campus and between the campus and neighboring properties.

Pedestrian and Vehicular Circulation Objectives

- C-1. Minimize LMU-related traffic trips to campus and within campus, through measures that include housing approximately 75 percent of undergraduate FTE students on campus.

Athletic and Open Space Objectives

- AOS-1. Provide sufficient and appropriate open space and athletic facilities to meet demand for instructional, intramural and intercollegiate athletics and informal recreation by students, faculty, and staff, by expanding, increasing access to, and appropriately illuminating LMU's athletic facilities for use during daytime and nighttime hours.

3.0 SELECTION OF ALTERNATIVES

3.1 Significant Project Effects

As identified in **Section IV, Environmental Impact Analysis**, after implementation of required mitigation measures, the Proposed Project would result in the following significant and unavoidable impacts:

3.1.1 Air Quality

3.1.1.1 Construction Emissions – Localized Significance Thresholds (PM₁₀ and PM_{2.5})

As part of the Proposed Project's Air Quality impact analysis, the Proposed Project's construction emissions were evaluated in relation to the South Coast Air Quality Management District's (SCAQMD) recommended localized significance thresholds (LST), which address project construction emissions of specific pollutants and the associated impacts on sensitive receptors in the immediate vicinity of a project site, rather than – as with most other thresholds for air quality impacts – compliance with regional air quality standards. The South Coast Air Quality Management District has defined specific threshold criteria (i.e., concentrations) for fugitive dust, PM₁₀ and PM_{2.5}, as well as for other criteria pollutants, and the thresholds represent the maximum emissions that would not cause or contribute to the exceedance of an applicable state or federal ambient air quality standard. Impacts are calculated based on ambient

concentrations of pollutants for in a project area (the “Source Receptor Area” as defined by the South Coast Air Quality Management District) and distance between the project site and the nearest sensitive receptor.

The localized significance threshold impact analysis prepared for the Proposed Project determined that, assuming the most conservative construction scenarios with overlapping demolition, excavation and grading, and building construction activities in a given portion of campus, construction could generate off-site fugitive dust (PM₁₀ and PM_{2.5}) in excess of the applicable localized significance thresholds, significantly impacting residences and a planned school site adjacent to the campus. That is, construction on Burns Campus could exceed localized significance thresholds for PM₁₀ and PM_{2.5} at residences east, south, and southwest of Burns Campus; construction on Leavey and Hughes Campuses could exceed the localized significance thresholds for PM₁₀ and PM_{2.5} at residences south of Leavey Campus; and construction on Leavey and Hughes Campuses could exceed the localized significance threshold for PM₁₀ at the northeast end of the Los Angeles Unified School District’s (LAUSD’s) planned Playa Vista Elementary School site, west of the LMU campus.

3.1.2 Cultural Resources: Archaeological Resources

3.1.2.1 Cumulative Impacts

Development of the Proposed Project in combination with related projects could contribute to the cumulative loss of archaeological resources within the Proposed Project area. All potential sites are required to be evaluated prior to construction activities. Depending on the outcome of these evaluations, there could be possible effects on archaeological resources. Regulations provide a vehicle for preservation of discovered archaeological resources that would otherwise remain unknown. To the extent individual related projects would be required to comply with applicable laws, the potential disturbance, damage or degradation of unique archaeological resources could be mitigated. Although each project must develop adequate mitigation measures to substantially lessen or avoid impacts on an individual basis, the combined incidental loss of archaeological resources in the Project area may constitute a significant cumulative impact.

3.1.3 Noise

3.1.3.1 Construction Noise

Proposed Project-related construction lasting more than 10 days in a 3-month period and exceeding existing ambient noise levels by 5dB(A) or more at the off-campus residences closest to the campus could result in temporary, but significant and unavoidable, Noise impacts at sensitive residential receptors

adjacent to the campus. These include residences along McConnell Avenue, Fordham Road, Altavan Avenue, W. 78th Street, W. 80th Street, and the northern ends of Nardian Way, Altavan Avenue, and Belton Drive.

3.1.4 Solid Waste

3.1.4.1 Operational Waste Generation

As a result of Proposed Project operations, the campus would dispose of approximately 692 additional tons of solid waste per year to landfills, compared to existing conditions. This increase represents less than 0.1 percent of the 2006 disposal rate of approximately 2.1 million tons to the Sunshine Canyon Landfill, the primary landfill serving the campus. According to the *2006 Annual Report for the Countywide Summary Plan and Siting Element of the Los Angeles Countywide Integrated Waste Management Plan* (2006 Annual Report), Los Angeles County solid waste disposal demand cannot be accommodated beyond the year 2015 based on the continuation of business as usual practices. This estimate does not account for a number of approved and proposed landfill expansions that would significantly expand landfill capacity, which could be made available to the City of Los Angeles, and the Proposed Project, in the future. However, the 2006 Annual Report does not project landfill capacity beyond 2021. For these reasons, it is conservatively assumed that the Proposed Project would result in a potentially significant impact with respect to solid waste at buildout in 2030.

3.1.4.2 Cumulative Impacts

Solid waste generated as a result of operation of the Proposed Project plus related projects could exceed the capacity of landfills serving Los Angeles County during the 20-year timeframe of Proposed Project buildout. While the Proposed Project is anticipated to account for less than 5 percent of this volume of solid waste, and significant expansions of County landfills as well as development of out-of-County landfills are proposed, it is not yet certain when these expanded or new landfills will become operational. Moreover, the County of Los Angeles Department of Public Works 2006 Annual Report does not project landfill capacity beyond 2021, and therefore future capacity beyond that date cannot presently be confirmed.

3.2 Alternatives Selected for Analysis

Five alternative scenarios have been selected for detailed evaluation and comparison to impacts associated with the Proposed Project.

Under *State CEQA Guidelines* Section 15126.6(e)(3), the “No Project” Alternative for a project revising an existing land use or regulatory plan, policy or operation, like the Proposed Project, is the continuation of the existing plan, policy, or operation into the future.

The first “No Project” alternative (Buildout Under Existing Approvals) evaluates impacts that would occur on the Proposed Project site under existing approvals or entitlements. The second “No Project” Alternative (No Buildout, Maintain Campus As Is) assumes no further development would take place on campus, other than general maintenance and upkeep of existing facilities.

In total, five alternatives are evaluated in detail. Each is briefly described below:

- **Alternative 1 – No Project Alternative: Buildout Under Existing Approvals.** This alternative evaluates operation of the LMU campus under existing City of Los Angeles entitlements and approvals. No additional construction is permitted under LMU’s current entitlements. Therefore, under this alternative, the Proposed Project would not be implemented and no additional development on the campus would be undertaken, other than minor improvements required for the general maintenance and upkeep of facilities which do not require further discretionary approvals. However, as permitted under current entitlements, enrollment could increase to the approved cap of 7,800 FTE students and an unlimited increase of faculty and staff would be permitted. (If the increase in faculty and staff is roughly proportional to the increase in students, this increase would be approximately 202 FTE faculty and staff.)² Currently (as of Fall 2008), there are 6,868 FTE students enrolled on campus and approximately 1,500 FTE faculty and staff working on campus. This alternative was selected for its potential to avoid or reduce all potentially significant and unavoidable impacts associated with the Proposed Project.
- **Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is.** This alternative evaluates operation of the LMU campus assuming the continuation of existing conditions. Under this alternative, the Proposed Project would not be implemented and no additional development on the campus would be undertaken, other than minor improvements required for the general maintenance and upkeep of facilities which do not require further discretionary approvals. Additionally, there would be no increase in enrollment on campus or increase in FTE faculty and staff levels. Thus, this alternative assumes a static population of 6,868 FTE students and approximately 1,500 FTE faculty and staff. This alternative was selected for its potential to avoid

² As of Fall 2008, there were 6,868 FTE students and 1,484 FTE faculty and staff. Therefore, there are approximately 216 FTE faculty and staff for 1,000 students, and the resulting increase of 932 FTE students would proportionately represent an increase of 202 FTE faculty and staff. $(1,484 \text{ FTE faculty and staff} / (6,868 / 1,000) \text{ FTE students} = 216 \text{ FTE faculty and staff}; 7,800 \text{ FTE students} / 6,868 \text{ FTE students} = 1.1357 - 1 = 0.1357 \text{ increase factor}; 0.1357 * 1,484 \text{ FTE faculty and staff} = 201.38 \text{ FTE faculty and staff})$

or reduce all potentially significant and unavoidable impacts associated with the Proposed Project.

- **Alternative 3 – No New or Replacement Residential Uses.** This alternative proposes the systematic replacement of academic, administrative, and indoor athletic facilities on campus that are functionally obsolete or substandard, as proposed in the Proposed Project. Similar to the Proposed Project, Alternative 3 would also reconfigure inadequate outdoor athletic facilities and open space areas, roadways, parking facilities, and pedestrian circulation, and would implement infrastructure upgrades as needed. This alternative would permit student enrollment to increase to the previously approved cap of 7,800 FTE students and permit the number of FTE faculty and staff to increase to 1,800, equivalent to the caps proposed under the Proposed Project. However, no new or replacement on-campus housing, nor any off-campus housing, for undergraduate students would be developed. This alternative was selected for its potential to avoid or reduce potentially significant and unavoidable Air Quality, Archaeological, Noise, and Solid Waste impacts associated with the Proposed Project.
- **Alternative 4 – Build New Residential Uses Off-Campus.** This alternative would involve the implementation of a project similar to the Proposed Project, including the systematic replacement of academic/administrative, athletic, and residential facilities on campus that are functionally obsolete or substandard. Similar to the Proposed Project, Alternative 4 would also reconfigure inadequate campus athletic facilities and open space areas, roadways, parking facilities, and pedestrian circulation accommodations, and would implement infrastructure upgrades as needed. This alternative would permit student enrollment to increase to the previously approved cap of 7,800 FTE students and permit the number of FTE faculty and staff to increase to 1,800, equivalent to the caps proposed under the Proposed Project. However, under this alternative, additional housing beyond what is being replaced on campus would be developed off campus. The additional student housing would require 22 acres within one location. However, a search of properties within 10 miles of the campus did not identify a viable site. As no single property or parcel 22 acres in size is available, student housing would need to be disaggregated within three parcels. This alternative was selected for its potential to avoid or reduce potentially significant and unavoidable cumulative Archaeological and construction Noise impacts associated with the Proposed Project.
- **Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in New and Replacement Non-Residential Square Footage.** This alternative would involve the implementation of a project similar to the Proposed Project, including the systematic replacement of academic/administrative, athletic, and residential facilities on campus that are functionally obsolete or substandard. Similar to the Proposed Project, this alternative would also reconfigure inadequate campus outdoor athletic facilities and open space areas, roadways, parking facilities, and pedestrian circulation accommodations, and would implement infrastructure upgrades as needed. However, under this alternative, no additional on-campus housing for undergraduate students would be developed beyond the square footage replacing existing residential uses. Additionally, the square footage of new and replacement academic/administrative and indoor athletic facilities would be reduced by 25 percent compared with the Proposed Project. This alternative was selected for its potential to avoid or reduce potentially significant and unavoidable Air Quality, Archaeological, Noise, and Solid Waste impacts associated with the Proposed Project.

3.3 Alternatives Considered but Rejected as Infeasible

State CEQA Guidelines Section 15126.6(c) states: “The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.” As stated previously, the *State CEQA Guidelines* stipulate that alternatives addressed in an EIR should be feasible, and not remote or speculative. Several scenarios were considered but dismissed from detailed analysis in the EIR because they did not avoid or reduce significant Project Impacts, meet Key and other Proposed Project Objectives, or were infeasible. These are discussed below.

3.3.1 Proposed Project Implementation on an Alternative Site

This alternative assumes the Proposed Project would be implemented on an alternative site on the Westside of Los Angeles, within reasonable proximity to the Westchester campus. LMU would still demolish functionally obsolete facilities on its existing Westchester campus, but all new construction, including residential and non-residential facilities plus outdoor athletic facilities, would be located on the alternative site. Accordingly, LMU would occupy two campuses: existing, older buildings that would be retained on the present Westchester campus, and newly constructed buildings and outdoor athletic facilities on a second campus in an undetermined location.

Proposed Project implementation on an alternative site would avoid significant Air Quality impacts on the residential and planned school uses near the campus and significant Noise impacts on the residential uses near the campus. However, development of an alternative site has the potential to merely transfer Air Quality and Noise impacts, as well as other significant, but mitigable, Proposed Project impacts such as Shade and Shadow, Light and Glare, Biological Resources, Energy, and Transportation, to a new location, since substantial construction would be required at an alternative site. Moreover, given the density of development in the vicinity of campus, the potential, and even likelihood, exists for more sensitive receptors to be affected by construction—related emissions and noise at an off-site location than under the Proposed Project. Proposed Project relocation would not, therefore, necessarily avoid or reduce significant Air Quality and Noise impacts associated with the Proposed Project.

Proposed Project implementation on an alternative site would avoid significant impacts on Archaeological Resources located on LMU’s Westchester campus. Since no sizeable greenfield (i.e., undeveloped) sites are available for development in the vicinity of campus and most alternative locations would likely not have undisturbed archaeological sites, it is unlikely that Proposed Project implementation on an alternative site would result in greater impacts on Archaeological Resources than the Proposed Project, and therefore this alternative’s impacts on such resources would likely be similar to

or less than those of the Proposed Project. However, this alternative would still entail substantial new construction on an alternative site within reasonable proximity of the Westchester campus, and the potential presence of archaeological resources on alternative sites cannot be entirely ruled out. Accordingly, Proposed Project implementation on an alternative site could conceivably result in the loss of resources or their settings on that site. Impacts on Archaeological Resources would therefore still be potentially significant, and a considerable contribution to cumulatively significant impacts would not necessarily be avoided or reduced.

Demolition of existing, functionally obsolete facilities on LMU's Westchester campus could still take place under this alternative, and, in addition, construction on an alternative site could necessitate demolition of existing buildings on that site as part of redevelopment. The same amount of new construction would be needed and take place at an alternative site as under the Proposed Project. Construction-related waste generation could, therefore, conceivably be greater under this alternative than under the Proposed Project, although construction Solid Waste impacts would likely remain less than significant.

With respect to operations, this alternative would construct the same amount of residential and nonresidential square footage as the Proposed Project, merely at a different location within Los Angeles County, and would necessitate waste disposal during subsequent operation at the same landfills. Therefore, the Proposed Project's operational Solid Waste impacts would merely be transferred to the alternative site, but otherwise would be similar to the Proposed Project. This alternative would have a cumulatively considerable contribution to cumulatively significant Solid Waste impacts.

Since this alternative would split campus operations between two sites, necessitating commuting between the sites, it would prevent attainment of Key University Objective U-3, ensuring the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved on-campus housing opportunities. This alternative would allow incomplete attainment of the remaining two Key University Objectives: implementing LMU's three-fold mission by creating an updated, cohesive campus community and environment (Objective U-1), and attaining certainty regarding future development on campus that allows for future growth, the pursuit of LMU's mission, and promotion of its other Key University, Academic, Residential, and Sustainability Objectives (Objective U-2).

Because this alternative would locate all new construction on an alternative site rather than integrating them into LMU's existing Westchester campus, it would allow incomplete attainment of the two Key Academic Objectives: replacing functionally obsolete academic, administrative, athletic, and residential spaces and buildings to create a functionally cohesive environment on campus (Objective A-1), and

building state-of-the-art facilities to house future academic, research, and residential facilities on campus, to aid in the recruitment and retention of students and faculty, and the creation of the best possible academic community and social living and learning environment (Objective A-2).

Because this alternative would not allow the construction of new residential and nonresidential facilities on LMU's campus, it would attain only one of the Proposed Project's six Key Residential Objectives: contributing to the alleviation of the regional housing shortage (Objective R-1). This alternative would prevent attainment of the remaining five Key Residential Objectives, including increasing the percentage of FTE students housed on campus from approximately 60 percent to approximately 75 percent (Objective R-2); enhancing campus student life by raising the standard of on-campus housing (Objective R-3); fostering community and a communal educational environment by increasing the number of FTE undergraduate students living on-campus and by replacing outdated student housing units with updated social-living units (Objective R-4); replacing aging student residential rooms and apartments with modern residential accommodations, to improve the educational environment on campus (Objective R-5); and addressing community concerns regarding students living off-campus by moving more undergraduate residential students onto campus (Objective R-6).

By requiring all new construction to be located on an alternative site and not permitting the replacement of aging facilities on LMU's main campus, this alternative would prevent attainment of Key Sustainability Objective S-2, moving more undergraduate students into on-campus housing to reduce traffic trips and vehicle miles traveled to and from the LMU campus (even a shuttle service between the two campuses would likely not be sufficient to achieve this objective), and would allow incomplete attainment of Key Sustainability Objective S-1, creating a sustainable campus environment incorporating green building and landscape practices, reducing the production of greenhouse gas emissions and reducing the consumption of water, electricity, natural gas, and energy.

Finally, this alternative would prevent attainment of most other stated Project Objectives, including Planning and Design Objectives PD-1 and -2 and Pedestrian and Vehicular Circulation Objective C-1. This alternative would allow incomplete attainment of Athletic and Open Space Objective AOS-1, since Proposed Project implementation on an alternative site would not preclude the construction of new athletic facilities at that location, although it would preclude improvements to existing recreational facilities on LMU's current campus, such as the nighttime lighting of athletic fields.

With respect to feasibility, LMU already owns the existing Westchester campus and it is already developed for university uses. No comparable property suitable for the development of the new and replacement academic, administrative, residential, and athletic uses planned under the Proposed Project exists in the campus vicinity.

This alternative would result in significant and unavoidable Solid Waste impacts, similar to the Proposed Project, and would not necessarily avoid or reduce the Proposed Project's significant and unavoidable construction Air Quality, Archaeological Resource, and construction Noise impacts. Moreover, this alternative prevents attainment of most Key Objectives and all other Project Objectives, and allows incomplete attainment of AOS-1. For this reason, Proposed Project implementation on an alternative site was rejected as a feasible alternative for detailed evaluation and comparison to the Proposed Project.

3.3.2 Alternative to Eliminate Significant Construction-Related Air Quality and Noise Impacts

The localized significance threshold (LST) impact analysis prepared for the Proposed Project determined that, assuming the most conservative construction scenarios with overlapping demolition, excavation and grading, and building construction activities in a given portion of campus, construction could generate off-site fugitive dust (PM₁₀ and PM_{2.5}) in excess of the applicable localized significance thresholds. Specifically, construction on Burns Campus could exceed localized significance thresholds for PM₁₀ and PM_{2.5} at residences east, south, and southwest of Burns Campus; construction on Leavey and Hughes Campuses could exceed the localized significance thresholds for PM₁₀ and PM_{2.5} at residences south of Leavey Campus; and construction on Leavey and Hughes Campuses could exceed the localized significance threshold for PM₁₀ at the northeast end of LAUSD's planned Playa Vista Elementary School site, west of the LMU campus.

Proposed Project construction activities could also result in potentially significant and unavoidable Noise impacts on off-campus residences in several locations adjacent to the campus perimeter. Construction that lasts more than 10 days within any given three-month period and exceeds existing ambient exterior noise levels at sensitive receptors by 5 dB(A) or more is considered significant. Existing background noise levels were determined to range from 56 dB(A) at the southwest corner of Burns Campus to 60.3 dB(A) adjacent to the waste management and recycling area on the east edge of Burns Campus. Proposed Project construction was modeled to potentially generate noise levels between 68 dB(A) and 95 dB(A) as measured 50 feet from noise sources (conservatively assuming simultaneous operation of multiple pieces of equipment at grade, a scenario that is likely to be infrequent in actuality).

Conservatively assuming no intervening buildings or structures on campus that attenuate noise, construction in some areas of campus could potentially increase existing ambient exterior noise levels at off-site residences near the campus perimeter by 5 dB(A) or more. Specifically, construction could result in short-term, but potentially significant and unavoidable, impacts at the following locations: east of Burns Campus along McConnell Avenue; south of Burns Campus along W. 80th Street; southwest of Burns Campus along Fordham Road; and south of Leavey Campus along W. 78th Street, and the portions

of Belton Drive, Nardian Way, and Altavan Avenue north of W. 80th Street. Only the northwest corner of the Burns Campus is sufficiently distant from residential uses to entirely preclude potentially significant Noise impacts on such uses.

Therefore, in order to avoid the Proposed Project's significant and unavoidable construction-related Air Quality and Noise impacts, demolition and construction could not take place anywhere on LMU's campus where such activities would generate emissions that exceed localized significance thresholds for criteria pollutants at off-site residences or the planned LAUSD school site, or where such activities could subject adjacent residences to an increase in ambient exterior noise levels of 5 dB(A) or more for more than 10 days in a three-month period. Accordingly, demolition or construction could take place only in the northwestern corner of Burns Campus, roughly defined as the area bounded by Alumni Mall on the east and LMU Drive on the south. No demolition or construction could take place elsewhere on LMU's campus, including the eastern, central and southern portions of the Burns Campus and Leavey Campuses, or anywhere on the Hughes Campus.

This would greatly reduce, if not eliminate altogether, any opportunities for replacement and net new square footage that could be developed campuswide, since new construction would be limited to a small portion of the overall campus and the Proposed Project building height limits would still be applicable, limiting the development density that could be constructed in this reduced area. Student residential facilities on the east and west sides of the Burns Campus could not be replaced and new student housing could not be built; indoor and outdoor athletic facilities in the southern half of the Burns Campus could not be improved or replaced; and administrative facilities on the Burns Campus could not be replaced. Moreover, this alternative is likely to increase some impacts compared to the Proposed Project, including Archaeological Resources (known archaeological sites in the northwest corner of Burns Campus); Paleontological Resources (fossil-bearing rock units in the northwest corner of Burns Campus; and Historic Resources (significant, unavoidable impacts on historically significant buildings in the northwest corner of Burns Campus dating to the campus's establishment).

Several beneficial project impacts would not be realized under this reduced construction footprint alternative, including those related to Aesthetics (campus perimeter improvements, increased campus perimeter building setbacks); Air Quality (relocation of waste management/recycling area from the eastern edge of Burns Campus); Climate Change (improved energy efficiency associated with replacement buildings and reduced trip generation for student residents); Surface Water Hydrology and Water Quality (improved stormwater runoff quality); operational Noise (relocation of waste management/recycling area from the eastern edge of Burns Campus, reduction in roadway noise because of reduced trip generation for student residents); Traffic and Parking (improved circulation, increased

campus parking supply); and Energy (improved energy efficiency and water conservation associated with replacement buildings and the use of reclaimed water for future irrigation).

Because this alternative would severely limit LMU's ability to improve existing facilities or construct new facilities, it would prevent attainment of all three Key University Objectives, including implementing LMU's threefold mission by creating an updated, cohesive campus community and environment with a critical mass of approximately 7,800 FTE students (Objective U-1); attaining certainty regarding future development on campus that allows for future growth, the pursuit of LMU's mission, and promotion of its other Key University, Academic, Residential, and Sustainability Objectives (Objective U-2); and ensuring the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved on-campus housing opportunities (Objective U-3).

Because of the reduced construction footprint, this alternative would prevent attainment of both Key Academic Objectives: replacing functionally obsolete academic, administrative, athletic, and residential spaces and buildings to create a functionally cohesive environment on campus (Objective A-1), and building state-of-the-art facilities to house future academic, research, and residential facilities on campus, to aid in the recruitment and retention of students and faculty, and the creation of the best possible academic community and social living and learning environment (Objective A-2).

This alternative also would prevent attainment of all six Key Residential Objectives, since very little existing student housing could be replaced or new student housing constructed under this alternative.

By not permitting the replacement of aging facilities on the Westchester campus with new facilities built to current standards, this alternative would prevent attainment of both Key Sustainability Objectives: creating a sustainable campus environment incorporating green building and landscape practices, reducing the production of greenhouse gas emissions and reducing the consumption of water, electricity, natural gas, and energy (Objective S-1), and moving more undergraduate students into on-campus housing to reduce traffic trips and vehicle miles traveled to and from the LMU campus (Objective S-2).

Finally, the reduced construction footprint alternative would prevent attainment of all other stated Project Objectives, including Planning and Design Objectives PD-1 and -2; Pedestrian and Vehicular Circulation Objective C-1; and Athletic and Open Space Objective AOS-1.

For these reasons, the avoidance of significant and unavoidable construction-related Air Quality and Noise impacts, which would entail the elimination of new construction throughout most of the LMU campus, was rejected as a feasible alternative for detailed evaluation and comparison to the Proposed Project.

3.3.3 Alternative to Eliminate Significant Cumulative Solid Waste Impacts

Proposed Project operation was determined to result in a cumulatively considerable contribution to cumulatively significant and unavoidable Solid Waste impacts, potentially exceeding the capacity of landfills serving Los Angeles County during the 20-year timeframe of Proposed Project buildout. Increased waste generation associated with Proposed Project operation would stem from the Proposed Project's net increase in the number of beds on campus and from the net increase in nonresidential square footage (i.e., academic, administrative, and indoor athletic facilities). Specifically, the Proposed Project would house 75 percent of the undergraduate population on campus, compared to 60 percent as of Fall 2008. Since Fall 2008 enrollment was 5,441.8 FTE undergraduate students and the Proposed Project seeks to increase undergraduate enrollment to 5,500 FTE undergraduate students as part of an overall enrollment cap of 7,800 FTE students, this would increase the number of beds on campus from 3,261 to 4,250, or 989 new beds (including beds for faculty and staff living in student residential buildings).

In order to avoid increasing solid waste generation over existing conditions (i.e., Fall 2008 levels), under this alternative it is assumed that LMU would limit its overall enrollment to 5,500 FTE students, including 4,000 FTE undergraduate students and 1,500 FTE graduate students, and would house 75 percent of that reduced number of FTE undergraduate students on campus. Housing for 75 percent of 4,000 FTE undergraduate students would not require the addition of net new beds (that is, the number of beds on campus would remain at no more than 3,261) or the construction of net new residential square footage over existing conditions, although existing residential square footage could be replaced with facilities of comparable sizes. The number of FTE staff and faculty would be capped at 1,200.

The Proposed Project would enable LMU to construct approximately 508,000 net new square feet of academic and administrative facilities and approximately 28,000 net new square feet of indoor athletic facilities. In contrast, under this alternative, the number of net new square feet could not be increased over existing conditions and LMU would be permitted only to replace existing academic, administrative, and indoor athletic facilities with facilities of comparable sizes.

Although this alternative would permit construction of less new square footage and housing of fewer FTE undergraduate students than under the Proposed Project, other components of the Proposed Project could still be implemented under this alternative, including but not limited to, improvements to outdoor athletic facilities, construction of new outdoor athletic facilities, the construction of new parking structures, and the replacement of existing, obsolete buildings with new buildings totaling an equivalent square footage.

Since this alternative would permit less new construction than the Proposed Project, it would result in reduced construction air quality impacts pertaining to localized significance thresholds compared to the Proposed Project. However, impacts from construction air quality would remain potentially significant and unavoidable, since even a reduced amount of construction is likely to result in exceedance of localized significance thresholds at the same sensitive residential receptors and planned LAUSD school that would be affected by the Proposed Project, because of their proximity to parts of campus that could be redeveloped under this alternative.

Noise impacts are also likely to remain significant and unavoidable under this alternative, since, under the Proposed Project, such impacts stem from the potential proximity of construction activities to off-campus residences streets surrounding the campus. Elimination of the Proposed Project's net new square footage would still allow construction of new buildings or other facilities that replace old facilities, or improvements to outdoor athletic facilities, anywhere on campus.

This alternative is likely to result in other impacts similar to, or greater than, those identified as significant, though mitigable, under the Proposed Project. These include Light and Glare (since nighttime lighting of existing and new athletic facilities could still take place on Burns and Leavey Campuses); Climate Change (since trip generation, and therefore Vehicle Miles Traveled and associated emissions would not be reduced through housing an increased percentage of students on campus, and at least some older buildings are likely not to be replaced with more energy-efficient facilities); Biological Resources (since any new construction could still affect nesting birds, monarch butterflies, and protected trees on campus); Paleontological and Archaeological Resources (since construction could still occur in areas of campus with potential for the presence of such resources); Historic Resources (since construction under this alternative could still cause vibration damaging to existing historically significant buildings on campus); Geology (since new buildings and facilities would be subject to the same geological hazards as under the Proposed Project); Hazards (since the demolition of old buildings could still release asbestos, lead-based paint, and PCBs into the atmosphere, and new buildings and paved areas would still be sited within the Methane and Methane Buffer Zones); Traffic (since eliminating the ability to house up to 75 percent of FTE undergraduate students on campus is likely to result in greater trip generation, and therefore potentially significant Traffic impacts during peak hours); and Water Supply and Energy (since at least some older buildings are likely not to be replaced with newer energy-efficient and water-conserving facilities).

Because this alternative assumes reduced student enrollment, a reduced number of FTE faculty and staff, no net new campus residential facilities or increase in the number of students housed on campus, and no net new non-residential square footage, it would severely constrain future growth of the campus. This would prevent attainment of Key University Objective U-3, ensuring the maximum number of students

have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved on-campus housing opportunities. It also would prevent attainment of the Key University Objectives: implementing LMU's three-old mission by creating an updated, cohesive campus community and environment with a critical mass of approximately 7,800 FTE students (Objective U-1), and attaining certainty regarding future development on campus that allows for future growth, the pursuit of LMU's mission, and promotion of its other Key University, Academic, Residential, and Sustainability Objectives (Objective U-2).

The inability under this alternative to construct any net new academic, administrative, and athletic facilities would allow attainment of Key Academic Objective A-1, replacing academic, administrative, athletic, and residential spaces and buildings that are functionally obsolete to create a functionally cohesive environment on campus, but would allow only incomplete attainment of Key Academic Objective A-2, building sufficient state-of-the-art facilities to house future academic, research, and residential facilities on campus, to aid in the recruitment and retention of top students, the recruitment of faculty and conversion from part-time to full-time status, and the creation of the best possible academic community and student social living and learning environment.

The inability under this alternative to construct net new student residential housing on campus, or to house more students than under existing conditions, would prevent attainment of three Key Residential Objectives: contributing to the alleviation of the regional housing shortage (Objective R-1); increasing the percentage of FTE students housed on campus from approximately 60 percent to approximately 75 percent (Objective R-2); and addressing community concerns regarding students living off-campus by moving more undergraduate residential students onto campus (Objective R-6). It would allow incomplete attainment of two Key Residential Objectives: enhancing campus student life by raising the standard of on-campus housing through increased unit size and improved amenities (Objective R-3); and fostering community and a communal educational environment by increasing the number of FTE undergraduate students living on-campus and by replacing outdated student housing units with updated social-living units (Objective R-4). Key Residential Objective R-5, replacing aging student residential rooms and apartments with modern residential accommodations, to improve the educational environment on campus, could be attained under this alternative, since it would not preclude replacement of existing housing with new housing of similar size.

This alternative would allow incomplete attainment of Key Sustainability Objective S-1: creating a sustainable campus environment by incorporating green building and landscaping practices, reducing the production of greenhouse gas emissions and solid waste, and reducing consumption of water, electricity, natural gas, and energy. It would prevent the attainment of Sustainability Objective S-2: Move

more undergraduate students into campus housing (increasing the percentage of undergraduate residential students from approximately 60 percent of FTE students to approximately 75 percent) to reduce traffic trips and vehicle miles traveled to and from the LMU campus.

Finally, while this alternative would allow attainment of Athletic and Open Space Objective AOS-1, it would allow only partial attainment of Planning and Design Objectives PD-1 and -2 and would prevent attainment of Pedestrian and Vehicular Circulation Objective C-1.

For these reasons, the reduction of FTE students, faculty, and staff and the elimination of all net new residential and nonresidential square footage was rejected as a feasible alternative for detailed evaluation and comparison to the Proposed Project.

4.0 EVALUATION OF ALTERNATIVES

In accordance with *State CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in **Section II, Project Description**, would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative after implementation of reasonable mitigation measures are determined for each environmental issue area analyzed in the EIR.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the project are compared for each environmental issue area.
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are substantially attained by the alternative.

Table VI-1, Alternatives Analysis Comparison Summary, below, provides a summary matrix that compares the impacts associated with the Proposed Project with the impacts of each of the proposed alternatives. Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the project, the comparative impact is said to be "Less." Where the alternative's net impact would clearly be more adverse or less beneficial than the project, the comparative impact is said to be "Greater." Where the impacts of the alternative and project would be roughly equivalent, the comparative impact is said to be "Similar."

Potential impacts of the original Proposed Project are characterized as they are in **Section IV, Environmental Impact Analysis**, but are abbreviated as follows in **Table VI-1**: No Impact (NI); Less Than Significant (LS); Less Than Significant After Mitigation (LSAM), and Significant and Unavoidable (SU).

**Table VI-1
Alternatives Analysis Comparison Summary**

| Environmental Issue Area | Project Impacts | Alternative 1 – No Project Alternative: Buildout Under Existing Approvals | Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is | Alternative 3 – No New or Replacement Residential Uses Alternative | Alternative 4 – Build New Residential Off-Campus Alternative | Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in Non-Residential Square Footage |
|---|------------------------|--|---|---|---|--|
| A. AESTHETICS AND VISUAL RESOURCES | | | | | | |
| Aesthetics & Views | | | | | | |
| Aesthetic Character – Construction | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Similar (LSAM) | Less (LSAM) |
| Aesthetic Character – Operation | LS | Greater (NI) | Greater (NI) | Greater (LS) | Similar (LS) | Similar (LS) |
| Obstruction of Views | LS | Less (NI) | Less (NI) | Less (LS) | Similar (LS) | Less (LS) |
| Light & Glare | | | | | | |
| Construction Lighting | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Greater (LSAM) | Less (LSAM) |
| Operational Lighting | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Similar (LSAM) | Less (LSAM) |
| Operational Glare | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Similar (LSAM) | Less (LSAM) |
| Shading | | | | | | |
| Shading | LS | Less (NI) | Less (NI) | Less (LS) | Greater (SU) | Less (LS) |

| Environmental Issue Area | Project Impacts | Alternative 1 – No Project Alternative: Buildout Under Existing Approvals | Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is | Alternative 3 – No New or Replacement Residential Uses Alternative | Alternative 4 – Build New Residential Off-Campus Alternative | Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in Non-Residential Square Footage |
|--|-----------------|---|--|--|--|---|
| B. AIR QUALITY | | | | | | |
| Air Quality | | | | | | |
| Construction Emissions | LS | Less (NI) | Less (NI) | Less (LS) | Greater (SU) | Similar (LS) |
| Construction – Localized Significance Thresholds | SU | Less (NI) | Less (NI) | Less (SU) | Greater (SU) | Similar (SU) |
| Operational Emissions | LS | Greater (LS) | Less (NI) | Greater (LS) | Greater (LS) | Greater (LS) |
| Global Climate Change | | | | | | |
| Global Climate Change – Construction | LS | Less (NI) | Less (NI) | Less (LS) | Greater (LS) | Less (LS) |
| Global Climate Change – Operation | LS | Greater (LS) | Greater (NI) | Greater (LS) | Greater (LS) | Less (LS) |
| C. BIOLOGICAL RESOURCES | | | | | | |
| Biological Resources | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Less (LSAM) | Less (LSAM) |

| Environmental Issue Area | Project Impacts | Alternative 1 – No Project Alternative: Buildout Under Existing Approvals | Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is | Alternative 3 – No New or Replacement Residential Uses Alternative | Alternative 4 – Build New Residential Off-Campus Alternative | Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in Non-Residential Square Footage |
|--|---------------------------------------|--|---|---|---|--|
| D. CULTURAL RESOURCES | | | | | | |
| Paleontological Resources | LSAM | Less (LSAM) | Less (LSAM) | Less (LSAM) | Similar (LSAM) | Less (LSAM) |
| Archaeological Resources | Project Level: LSAM Cumulative: SU | Project Level: Less (LSAM) Cumulative: Less (SU) | Project Level: Less (LSAM) Cumulative: Less (SU) | Project Level: Less (LSAM) Cumulative: Less (SU) | Project Level: Less (LSAM) Cumulative: Less (SU) | Project Level: Less (LSAM) Cumulative: Less (SU) |
| Historical Resources | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Less (LSAM) | Less (LSAM) |
| E. GEOLOGY | | | | | | |
| Geologic Hazards | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Similar (LSAM) | Less (LSAM) |
| F. HAZARDS | | | | | | |
| Hazards and Hazardous Materials – Construction | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Similar (LSAM) | Less (LSAM) |
| Hazards and Hazardous Materials – Operation | LS | Less (LS) | Less (NI) | Similar (LS) | Similar (LS) | Similar (LS) |

| Environmental Issue Area | Project Impacts | Alternative 1 – No Project Alternative: Buildout Under Existing Approvals | Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is | Alternative 3 – No New or Replacement Residential Uses Alternative | Alternative 4 – Build New Residential Off-Campus Alternative | Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in Non-Residential Square Footage |
|---|------------------------|--|---|---|---|--|
| G. SURFACE WATER HYDROLOGY AND WATER QUALITY | | | | | | |
| Surface Water Hydrology & Drainage – Construction | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Greater (LSAM) | Less (LSAM) |
| Surface Water Hydrology & Drainage – Operation | LSAM | Greater (NI) | Greater (NI) | Less (LSAM) | Similar (LSAM) | Less (LSAM) |
| Surface Water Quality – Construction | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Greater (LSAM) | Less (LSAM) |
| Surface Water Quality – Operation | LSAM | Greater (NI) | Greater (NI) | Similar (LSAM) | Similar (LSAM) | Less (LSAM) |
| H. LAND USE | | | | | | |
| Land Use Consistency | LS | Greater (NI) | Similar (NI) | Greater (LS) | Greater (LS) | Greater (LS) |
| I. NOISE | | | | | | |
| Construction | SU | Less (NI) | Less (NI) | Less (SU) | Greater (SU) | Less (SU) |
| Operation | LS | Greater (LS) | Less (NI) | Greater (LS) | Greater (LS) | Greater (LS) |

| Environmental Issue Area | Project Impacts | Alternative 1 – No Project Alternative: Buildout Under Existing Approvals | Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is | Alternative 3 – No New or Replacement Residential Uses Alternative | Alternative 4 – Build New Residential Off-Campus Alternative | Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in Non-Residential Square Footage |
|--|-----------------|---|--|--|--|---|
| J. PUBLIC SERVICES | | | | | | |
| Police Protection – Construction | LSAM | Less (LS) | Less (NI) | Less (LSAM) | Greater (LSAM) | Less (LSAM) |
| Police Protection – Operation | LSAM | Less (LS) | Less (NI) | Greater (LSAM) | Greater (LSAM) | Greater (LSAM) |
| Fire Protection and EMS – Construction | LS | Less (LS) | Less (NI) | Less (LS) | Greater (LSAM) | Less (LSAM) |
| Fire Protection and EMS – Operation | LS | Less (LS) | Less (NI) | Greater (LS) | Greater (LS) | Greater (LS) |
| Recreation and Parks | LS | Greater (LS) | Less (NI) | Greater (LS) | Greater (LS) | Greater (LS) |
| K. TRANSPORTATION | | | | | | |
| Access & Circulation – Construction | LSAM | Less (NI) | Less (NI) | Less (LSAM) | Similar (LSAM) | Less (LSAM) |
| Access & Circulation – Operation | LSAM | Greater (SU) | Less (NI) | Greater (SU) | Greater (SU) | Greater (SU) |
| Parking – Construction | LS | Less (NI) | Less (NI) | Less (LS) | Similar (LS) | Less (LS) |
| Parking – Operation | LS | Greater (SU) | Less (NI) | Similar (LS) | Similar (LS) | Similar (LS) |

| Environmental Issue Area | Project Impacts | Alternative 1 – No Project Alternative: Buildout Under Existing Approvals | Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is | Alternative 3 – No New or Replacement Residential Uses Alternative | Alternative 4 – Build New Residential Off-Campus Alternative | Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in Non-Residential Square Footage |
|----------------------------|-------------------------------------|---|--|--|--|---|
| L. PUBLIC UTILITIES | | | | | | |
| Water Supplies | | | | | | |
| Water Supplies | LS | Greater (LS) | Less (NI) | Greater (LS) | Greater (LS) | Less (LS) |
| Wastewater | | | | | | |
| Wastewater | LSAM | Greater (LS) | Less (NI) | Less (LSAM) | Similar (LSAM) | Less (LSAM) |
| Solid Waste | | | | | | |
| Solid Waste – Construction | LS | Less (NI) | Less (NI) | Less (LS) | Greater (LS) | Less (LS) |
| Solid Waste – Operation | Project Level: SU Cumulative: SU | Project Level: Less (SU) Cumulative: Less (SU) | Project Level: Less (NI) Cumulative: Less (NI) | Project Level: Similar (SU) Cumulative: Similar (SU) | Project Level: Similar (SU) Cumulative: Similar (SU) | Project Level: Less (SU) Cumulative: Less (SU) |
| Energy | | | | | | |
| Electricity | LSAM | Less (LS) | Less (NI) | Greater (LSAM) | Similar (LSAM) | Greater (LSAM) |
| Natural Gas | LSAM | Less (LS) | Less (NI) | Greater (LSAM) | Similar (LSAM) | Greater (LSAM) |

4.1 Alternative 1 – No Project Alternative: Buildout Under Existing Approvals

4.1.1 Description of the Alternative

LMU's Westchester campus originally consisted of the Burns Campus, which was established in 1929. LMU then acquired the Leavey and Hughes portions of campus in 1983 and 2000, respectively. A number of entitlements specific to each of the three portions of the Westchester campus have been granted over time as LMU acquired additional land, increased enrollment, and adopted successive master plans. According to Ordinance 175,981, which was adopted in 2004 and unified the zoning for the Burns, Leavey, and Hughes Campuses, all future development, expansion, or modification of the University use must be consistent with the existing Conditional Use Permits for the property, until such time as a new master plan is approved by the Director of Planning for the City of Los Angeles. This alternative assumes the continuation of entitlements granted over time for the campus. Consequently, differing entitlements would continue to govern development and operations on the Burns, Leavey, and Hughes Campuses.

As entitlements to build additional square footage on campus have been exhausted, this alternative analysis assumes no new development is permitted on campus, other than minor improvements required for general maintenance and upkeep of campus facilities. In comparison, approximately 1,012,000 net new square feet would be permitted campuswide under the Proposed Project. However, since the existing entitlements allow student enrollment up to 7,800 FTE students, this alternative would permit student enrollment to increase to the previously approved cap of 7,800 FTE students, similar to the limit proposed under the Proposed Project. This alternative would also permit an unlimited increase in faculty and staff, as there is no current restriction limiting faculty and staff on campus.

4.1.2 Analysis

4.1.2.1 Aesthetics and Visual Resources

4.1.2.1.1 Aesthetics and Views

Aesthetics

As described above, no additional development would be permitted on campus under existing entitlements. Alternative 1 would only permit minor improvements that are required for the general maintenance and upkeep of facilities and that do not require further discretionary approvals. Since no substantial construction would occur on the campus, this alternative would have no construction-related Aesthetic impact, and would avoid the Proposed Project's short-term, although less than significant, Aesthetic impact during construction.

Since no new development would be permitted under Alternative 1, no changes in the visual character of the LMU campus would occur. Therefore, this alternative would have no visual impacts compared to existing conditions. The Proposed Project would not significantly alter, degrade, or eliminate any features that substantially contribute to the valued visual character of the LMU campus. However, this alternative would preclude several beneficial Proposed Project opportunities to enhance campus character. These include increasing open space acreage campus-wide, the replacement of existing residential facilities with new facilities that would be architecturally complementary of existing and new buildings, and the incorporation of quadrangles, lawns, landscaping, and other amenities. Therefore, Alternative 1 could result in potentially greater Aesthetic impacts than the Proposed Project.

Obstruction of Views

Since Alternative 1 assumes the continuation of the existing buildings and layout on campus, existing views of campus and through campus of important visual resources from off-site vantages would be unchanged under this alternative. Therefore, Alternative 1 would have no View impacts. While the Proposed Project may reduce visual access to open space areas and certain structures on campus from individual residences, the Proposed Project would not substantially obstruct existing views of a valued view resource from a prominent view location (i.e., a public roadway). However, since Alternative 1 would not permit any new development on campus, this alternative would avoid the Proposed Project's less than significant View impacts.

4.1.2.1.2 Light & Glare

Since no substantial construction would occur on the campus, Alternative 1 would have no construction-related Light and Glare impact, and would avoid the Proposed Project's short-term construction-related Light and Glare impact, which would be less than significant with mitigation.

Implementation of the Proposed Project would result in potentially significant, but mitigable, operational Light and Glare impacts associated with the introduction of new nighttime lighting for existing and proposed athletic fields and facilities in the southern portion of Burns Campus and on Leavey Campus. Under Alternative 1, it is assumed that the proposed nighttime lighting of presently unlighted athletic facilities would not take place, nor the construction or lighting of new athletic facilities. New lighting comparable to that already present on the campus, such as building security lighting or upgrades of existing athletic facility lighting, could still be implemented, as long as such lighting does not exceed the City's Municipal Code limits on off-site light levels as measured at sensitive receptors. No new sources of glare would be introduced under this Alternative. Therefore, Alternative 1 would have no operational

Light and Glare impact, and would avoid the Proposed Project's operational Light and Glare impact, which would be less than significant with mitigation.

4.1.2.1.3 Shading

The Proposed Project would result in less-than-significant shading impacts on off-site land uses during the summer and winter solstices, since it would not shade any off-site shade-sensitive uses for more than 3 hours, although some shading of off-site land uses would occur at buildout. Since no new development would take place under Alternative 1, no Shading impacts would occur. Therefore, Alternative 1 would avoid the less than significant Shading impacts associated with the Proposed Project.

4.1.2.2 Air Quality

4.1.2.2.1 Air Quality

No new construction would take place under Alternative 1, precluding major earthmoving activities, the operation of heavy equipment, and other construction activities that could generate emissions. The significant localized air quality emission impacts that would occur during construction of the Proposed Project would be avoided under this alternative. Therefore, this alternative would have no construction Air Quality impacts, and would avoid those associated with the Proposed Project.

Operational impacts are determined mainly by the daily traffic volumes. Campus enrollment would be permitted to increase from 6,868 FTE students to 7,800, with no limit on the number of FTE faculty and staff. Although enrollment could increase under this alternative, no new residential facilities would be constructed. Enrollment could also increase to 7,800 FTE students under the Proposed Project, but approximately 476,000 net new gross square feet, or 989 beds, would be added to campus. Therefore, the number of daily trips generated under this alternative would be considerably greater in comparison to the Proposed Project, as fewer students would be able to live on campus and would instead need to commute to campus. As a result, vehicle trips to and from campus would increase as enrollment increases to the 7,800 FTE student enrollment cap. Since vehicular emissions are dependent on the number of trips, weekday and weekend vehicular sources under Alternative 1 would result in an incremental increase in pollutant emissions, and therefore greater impacts, compared to the Proposed Project. However, since no new development would occur on campus, increases in emissions from stationary sources, primarily those associated with building operation, would be avoided. Operational impacts would be less than significant under the Proposed Project and Alternative 1, but impacts would be greater under Alternative 1 due to the increase in vehicular emissions.

4.1.2.2 Climate Change

Under this alternative, existing uses would remain and no new construction would occur on campus. No construction activity that could contribute to greenhouse gas emissions would occur. Therefore, this alternative would have no construction-related Climate Change impacts and would avoid those associated with the Proposed Project.

The developed square footage on campus would remain unchanged from existing conditions, but considerable increases in vehicle emissions would result from increased trips to and from campus as enrollment increases without a corresponding increase in residential housing constructed on campus, as described above, and the number of staff and faculty increases. Daily traffic volumes would increase as fewer students would be able to live on campus and would instead need to commute to campus resulting in greater mobile source greenhouse gas emissions. Additionally, this alternative would not implement Proposed Project features intended to reduce operational greenhouse gas emissions, including greenhouse gas-reducing transportation, sustainability, water conservation, and energy conservation measures proposed in **Section IV.B.2, Global Climate Change**, to reduce energy consumption and meet or exceed minimum efficiency criteria for the state's most current Energy Conservation Standards for New Residential and Nonresidential Buildings (Title 24, part 6). These Proposed Project features were determined to collectively reduce greenhouse gas emissions per square foot on campus by at least 16 percent. While the Proposed Project would increase the square footage of building space on the campus relative to Alternative 1, the associated increase in greenhouse gas emissions from building energy and water use would be more than offset by the reduced mobile source greenhouse gas emissions from a greater percentage of students living on campus. Therefore, operational Climate Change impacts under this alternative would be less than significant, but impacts would be greater than those associated with the Proposed Project.

4.1.2.3 Biological Resources

Under this alternative, no new construction would occur on the LMU campus. Therefore, Proposed Project-related construction activities which could affect nesting birds, possible overwintering monarch butterflies, and protected trees would not occur. This alternative would have no impact on biological resources and impacts therefore would be less than those associated with the Proposed Project.

4.1.2.4 Cultural Resources

4.1.2.4.1 Paleontological Resources

No new construction would occur on the LMU campus under Alternative 1, although it is assumed that ongoing maintenance and minor projects not subject to environmental review, which could entail some ground disturbance, such as for utility trenching, would still take place. The paleontological technical study prepared for the Proposed Project determined that there is high potential for currently unrecorded fossil sites being encountered during earthmoving activities in areas of campus where Palos Verdes Sand and non-marine terrace cover is found, which is estimated to be at least 35 feet below ground level. As such, even limited ground disturbance under this alternative could potentially disrupt paleontological resources on campus. Therefore, impacts to Paleontological Resources would remain potentially significant, and mitigation applicable to the Proposed Project would be required to reduce impacts associated with this alternative to less than significant levels. However, since construction and the likelihood of disturbance would be substantially reduced, Alternative 1 would result in lesser impacts than the Proposed Project.

4.1.2.4.2 Archaeological Resources

No new construction would occur on the LMU campus under Alternative 1, although it is assumed that ongoing maintenance and minor projects not subject to environmental review, which could entail some ground disturbance, such as for utility trenching, would still take place. As stated in the archaeological technical report prepared for the Proposed Project, ground-disturbing activities in or in proximity to known archaeological sites on campus have the potential to disturb, damage, or degrade archaeological resources or their settings in and around campus. As such, even limited ground disturbance under this alternative has the potential to disturb archaeological resources. Therefore, impacts to Archaeological Resources are potentially significant, but would be reduced to less than significant levels on a project basis with implementation of mitigation applicable to the Proposed Project. The Proposed Project would also result in less than significant project-level impacts with implementation of mitigation. However, since construction and the likelihood of disturbance would be substantially reduced, Alternative 1 would result in lesser impacts than the Proposed Project. Like the Proposed Project, however, this alternative could contribute to a significant cumulative impact to Archaeological Resources due to the additive effects of disturbance to archaeological sites in the Project area. However, since Alternative 1 would involve substantially less construction, this alternative would have a smaller contribution to this cumulative impact than the Proposed Project.

4.1.2.4.3 Historical Resources

Alternative 1 would not result in the removal of any existing buildings or structures and no new construction would occur on campus. Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, and the bluff-face letter "L" are considered potentially historic resources for purposes of CEQA in accordance with the *State CEQA Guidelines*, Section 15064.5(a)(3). Proposed Project construction on campus in close proximity to these historic resources could result in potentially significant, although mitigable, impacts. However, since Alternative 1 would only involve construction required for minor improvements and general maintenance, this alternative would have no impact to Historical Resources, and would avoid the impacts associated with the Proposed Project.

4.1.2.5 Geology

Construction and implementation of the Proposed Project has the potential to result in significant, although mitigable, impacts related to geological hazards, including expansive and corrosive soils, seismically induced shaking, sedimentation and erosion, and slope instability. However, with adherence to applicable building and municipal codes and current local, state, and federal regulatory requirements, no unavoidable significant geological impacts would result from implementation of the Proposed Project. No grading, earthmoving or other construction activities, other than that required for ongoing maintenance and minor projects not subject to environmental review, would occur under Alternative 1. Therefore, this alternative would have no impacts related to Geology, and would avoid the impacts associated with the Proposed Project.

4.1.2.6 Hazards

Some older buildings on campus may contain asbestos-containing materials, lead-based paint, PCBs, and other known hazards and contaminants. Construction activities associated with implementation of the Proposed Project were determined to have the potential to result in the release of these materials during demolition. Additionally, the campus is located partially within a Methane Zone and partially within a Methane Buffer Zone as designated by the Los Angeles Department of Building and Safety, which presents potentially significant, although mitigable, construction impacts. Under Alternative 1, the existing buildings and paved areas on LMU's campus would remain intact and the potential for the release of hazardous materials or methane hazards associated with Proposed Project construction would not occur. Therefore, this alternative would have no construction-related Hazards impacts, and would avoid the impacts associated with Proposed Project construction.

Under the Proposed Project, increased transport, use, storage, and disposal of hazardous materials at LMU would likely occur as a result of the increased number of people on campus and increased square footage of academic, administrative and residential facilities. However, Hazards impacts during operation of the Proposed Project were determined to be less than significant. Alternative 1 would increase the campus population, but would not increase the square footage of campus facilities. Impacts would be less than significant during operation and would be reduced compared to the Proposed Project.

4.1.2.7 Surface Water Hydrology and Water Quality

4.1.2.7.1 Surface Water Hydrology

Under Alternative 1, existing uses would remain and no new development, with associated grading and earthmoving activities, would occur. Therefore, this alternative would have no construction-related Surface Water Hydrology impacts, and would avoid the Proposed Project's construction-related hydrology impacts, which would be less than significant with adherence to National Pollutant Discharge Elimination System (NPDES) requirements.

No major modification of existing stormwater hydrology, including existing hydrology patterns, rates of runoff, and overall runoff volumes, would take place under this alternative. Therefore, Alternative 1 would have no operational impacts compared to existing conditions. With implementation of mitigation, the Proposed Project would result in less than significant operational impacts related to Surface Water Hydrology. However, Alternative 1 would preclude several beneficial Proposed Project opportunities including the alleviation of periodic flooding of the Sunken Garden and the proposed upsizing of underground storm drains approaching or exceeding their recommended design capacities; these drains convey flows from portions of Burns Campus toward the Sunken Garden, and from the Sunken Garden off site. Because Alternative 1 would not realize these potentially beneficial impacts related to Surface Water Hydrology, it would have greater operational impacts than the Proposed Project.

4.1.2.7.2 Surface Water Quality

Under Alternative 1, existing uses would remain and no new development with associated grading and earthmoving would occur. Therefore, this alternative would have no construction-related Surface Water Quality impacts, and would avoid the Proposed Project's construction-related impacts, which would be less than significant with adherence to NPDES requirements.

Since no new buildings or paved areas would be constructed under Alternative 1, the amount of pervious area on campus would remain unchanged from existing conditions. Therefore, the alternative would have no operational impacts related to Surface Water Quality. However, a Standard Urban Stormwater

Mitigation Plan (SUSMP) must be prepared and implemented for all new development. A SUSMP, which would be prepared for the Proposed Project, requires retention and treatment of the first three-quarters of an inch of rainfall on new impervious surfaces whenever possible. This would effectively lower pollutant levels in stormwater discharged from the campus in the future, as Proposed Project buildout takes place. Under this alternative, however, since no new development would be permitted, the benefits of SUSMP compliance associated with the Proposed Project would not be realized. Therefore, this alternative's operational impacts related to Surface Water Quality would be greater than those associated with the Proposed Project.

4.1.2.8 Land Use

The Westchester-Playa del Rey Community Plan of the Los Angeles General Plan presently designates the LMU campus as "L" Low Density Residential, which corresponds to single-family residential zoning designations. The zoning designation for the campus is [Q]R4-1, Residential – Multiple Dwelling Zone. The City previously found that this zoning designation is consistent with the campus's General Plan designation, since the Q conditions applicable to the property limit the uses on campus to those of a university or those uses permitted in the R1 zone. Therefore, Alternative 1, which involves the continued operation of the existing campus according to current entitlements and land use/zoning designations, would have no Land Use impacts.

The Proposed Project includes a request for a Zone Change, a General Plan Amendment, and the establishment of a Specific Plan. The Zone Change being requested would change the zoning of the campus from [Q]R4-1 to R4-1. The General Plan Amendment would change the designation of the campus from Low Density Residential to High-Medium Density Residential, which would be consistent with the new proposed zoning and Specific Plan. The Proposed Project would result in less than significant Land Use impacts. The current Q conditions on the Property would be replaced with more detailed land use restrictions established in the Specific Plan. However, unlike the Proposed Project, Alternative 1 would not implement this Specific Plan, which would contain a more comprehensive set of development standards to maintain compatibility with surrounding land uses, establish more restrictive height limits and setbacks from surrounding uses, establish Planning Areas on campus that would primarily concentrate athletic uses in the southern portion of the Burns Campus, maintain the campus's large expanses of open space, and configure new development to maintain scenic corridors through campus, among others.

Additionally, under this alternative, LMU could still increase its enrollment to the previously approved cap of 7,800 FTE students; however, without construction of new residential buildings, no additional students could live on campus. Since this alternative would result in considerably greater trip generation

than the Proposed Project, it would not be consistent with several General Plan and Southern California Association of Governments (SCAG) policies aimed at reducing vehicle miles traveled. For these reasons, Alternative 1 would result in greater Land Use impacts than the Proposed Project.

4.1.2.9 Noise

Since Alternative 1 assumes no new development, it would result in no construction-related Noise impacts and would avoid the significant and unavoidable construction Noise impacts associated with the Proposed Project. At buildout, this alternative would increase enrollment on campus to 7,800 FTE students, however, the increase in enrollment would not be accompanied by the increase in on-campus housing that would be developed under the Proposed Project. Therefore, this alternative would generate a greater number of vehicle trips to and from campus, and consequently, greater roadway noise, than the Proposed Project. Additionally, under Alternative 1, relocation of the existing recycling and waste management area on the eastern edge of Burns Campus to the enclosed Drollinger Parking Plaza on Leavey Campus would not take place. Therefore, operational Noise impacts under Alternative 1 would be greater than those associated with the Proposed Project.

4.1.2.10 Public Services

4.1.2.10.1 Police Protection

Since Alternative 1 would include no new development, it would have no construction-related Police Protection impacts and would avoid the Proposed Project's less than significant construction-related Police Protection impacts.

Under Alternative 1, the Fall 2008 enrollment of 6,868 FTE students could be increased to the existing approved enrollment cap of 7,800 FTE students, but LMU would not be permitted to provide additional campus housing for students. Therefore, although enrollment could increase, the number of people residing on campus would not increase. Moreover, as LMU has no current cap on FTE faculty and staff, an unlimited increase in FTE faculty and staff would be permitted under this alternative. (However, if the increase in faculty and staff is roughly proportional to the increase in students, this increase would be approximately 202 FTE faculty and staff.) Therefore, Alternative 1 would increase the non-residential population of the campus and, consequently, the demand for Police Protection services, resulting in a less-than-significant impact.

Impacts on Police Protection services were determined to be less than significant after mitigation under the Proposed Project. However, impacts under this alternative would be less than those associated with the Proposed Project since the number of people residing on-campus would be less than under the Proposed Project.

4.1.2.10.2 Fire Protection and Emergency Medical Services

Since Alternative 1 would include no new development, it would have no construction-related impacts related to Fire Protection and Emergency Medical Services, and would avoid the Proposed Project's construction-related impacts.

Under Alternative 1, the Fall 2008 enrollment of 6,868 FTE students could be increased to the existing approved enrollment cap of 7,800 FTE students, but LMU would not be permitted to provide additional campus housing for students. Therefore, although enrollment would increase, the number of people residing on campus would not increase. Moreover, as LMU has no current cap on FTE faculty and staff, an unlimited increase in FTE faculty and staff would be permitted under this alternative. Therefore, Alternative 1 would increase the non-residential population of the campus and, consequently, the demand for Fire Protection and Emergency Medical Services, resulting in a less-than-significant impact.

Impacts on Fire Protection and Emergency Medical Services were determined to be less than significant under the Proposed Project. However, impacts under this alternative would be less than those associated with the Proposed Project since the number of people residing on-campus would be less than under the Proposed Project.

4.1.2.10.3 Recreation and Parks

Under Alternative 1, the Fall 2008 enrollment of 6,868 FTE students could be increased to the existing approved enrollment cap of 7,800 FTE students. The increased FTE student enrollment permitted under this alternative, unaccompanied by the Proposed Project's new intramural and varsity athletic facilities and improvements to existing athletic facilities that would allow for more efficient use (i.e., nighttime lighting), would increase demand for campus athletic facilities without any provisions for meeting that increase in demand. Furthermore, since this alternative would not increase on-campus housing, a greater percentage of students would reside off campus, thereby increasing the potential for usage of off-site public recreational facilities. Accordingly, Alternative 1 would result in greater impacts related to Recreation and Parks than under the Proposed Project. These impacts would, however, remain less than significant.

4.1.2.11 Transportation

The Proposed Project would result in less than significant traffic and parking impacts during construction since construction worker parking would be accommodated off campus and shuttles would be provided to transport workers to and from the campus. Since Alternative 1 proposes no new construction, other than that required for minor improvements and general maintenance, Alternative 1 would have no construction-related Transportation impacts, and would avoid the impacts associated with the Proposed Project.

Under this alternative, LMU could still increase its enrollment from 6,868 FTE students as of Fall 2008 to the previously approved cap of 7,800, although it would not be permitted to house any additional students on campus, and an unlimited increase in faculty and staff would be permitted. Accordingly, this alternative would result in considerably greater trip generation, and associated intersection impacts, compared to the Proposed Project. Traffic impacts would be potentially significant at a minimum of two signalized intersections. Additionally, since no additional parking would be constructed to accommodate the associated increase in the number of vehicles traveling to campus under this alternative, parking impacts would be potentially significant. This alternative would also preclude other potentially beneficial impacts associated with the Proposed Project such as improved campus access and circulation and increased parking supply. Given the above, circulation and parking impacts under this alternative would be greater than those of the Proposed Project and would be significant and unavoidable.

4.1.2.12 Public Utilities

4.1.2.12.1 Water Supplies

Although Alternative 1 would not permit any new development on the LMU campus, enrollment would be permitted to increase to the enrollment cap of 7,800 FTE students, and no limit would be placed on the number of FTE faculty and staff. Additionally, since there would not be an increase in on-campus housing, the water demand associated with on-campus housing would remain the same. Since the campus population would grow under this alternative, the water demand on campus would increase over existing conditions. A number of water conservation features are currently integrated into the existing campus, including a reclaimed water system for irrigation, drought-tolerant landscaping, the “trayless dining” program, and several LEED-certified buildings. Given these existing features, the increased water demand under Alternative 1 is assumed to constitute a less-than-significant impact.

The Proposed Project would also increase water demand above existing conditions due to increased enrollment, residential students, and faculty and staff levels, resulting in a less-than-significant impact. However, in addition to the continued operation of the existing water conservation features on campus,

the Proposed Project would replace existing buildings on campus with buildings that are more water efficient and would incorporate additional water conservation measures into campus operations. Additionally, the greater number of students that would live on campus under the Proposed Project would have access to showers, kitchens, and bathroom facilities that likely use less water than the older housing where they would otherwise likely be residing. Since Alternative 1 would permit enrollment to increase to the same number allowed by the Proposed Project, but would not realize these beneficial Proposed Project opportunities, Alternative 1 would result in greater impacts related to Water Supplies than the Proposed Project.

4.1.2.12.2 Wastewater

Additional wastewater flows associated with Proposed Project buildout could potentially create capacity impacts on wastewater lines such as line 3A, which serves a portion of Burns Campus and is presently near design capacity. City of Los Angeles Department of Public Works guidelines recommend that pipes be upgraded as their flows approach specific design capacities. Since the Proposed Project would, if necessary, upgrade lines approaching design capacity and could decrease current daily wastewater generation by increasing the water-use efficiency per square foot of new building development, the Proposed Project's Wastewater impacts would be less than significant after mitigation.

Under this alternative, no new development would occur. The current enrollment of 6,868 FTE students would be permitted to increase to 7,800; however, no additional students would be able to live on campus. Additionally, an unlimited increase in the number of FTE faculty and staff would be permitted. Due to the increase in faculty and staff levels, and increased student enrollment, this alternative would incrementally increase the amount of wastewater generated on campus over existing conditions, resulting in a less-than-significant impact. However, since this alternative would not realize the increased water-use efficiency of new building development or pipeline upgrades to be implemented by the Proposed Project, the Wastewater impacts of this alternative are anticipated to be greater than those of the Proposed Project.

4.1.2.12.3 Solid Waste

Under Alternative 1, no demolition of buildings or structures would occur. Therefore, this alternative would have no construction-related Solid Waste impacts, and would avoid those less-than-significant impacts associated with the Proposed Project.

Under this alternative, no new development would occur. The current enrollment of 6,868 FTE students would be permitted to increase to 7,800; however, no additional students would be able to live on campus. Additionally, an unlimited increase in FTE faculty and staff would be permitted. Due to the

increase in faculty and staff levels, and student enrollment, this alternative would incrementally increase the amount of solid waste generated on campus over existing conditions. The County of Los Angeles Department of Public Works 2006 Annual Report has determined that at the current rate of disposal, Los Angeles County solid waste disposal demand cannot be accommodated beyond the year 2015, and the report does not project landfill capacity beyond 2021. Therefore, like the Proposed Project, this alternative would result in a significant project-level impact and a cumulatively considerable contribution to cumulatively significant Solid Waste impacts beyond 2015. However, since this alternative would not increase the number of student beds or non-residential square footage on campus, it would have lesser Solid Waste impacts than the Proposed Project.

4.1.2.12.4 Energy

Electricity

Under Alternative 1, the current enrollment of 6,868 FTE students would be permitted to increase to 7,800. Additionally, an unlimited increase in the number of FTE faculty and staff would be permitted. Therefore, this alternative, like the Proposed Project, would incrementally increase the electricity demand on campus over existing conditions. However, Alternative 1 would not replace older, inefficient buildings with more energy-efficient ones, as would the Proposed Project, and therefore inefficient campus buildings would remain in operation. Since this alternative would involve no new development, it would have lesser impacts than the Proposed Project.

Natural Gas

Under Alternative 1, the current enrollment of 6,868 FTE students would be permitted to increase to 7,800. Additionally, an unlimited increase in the number of FTE faculty and staff would be permitted. Therefore, this alternative, like the Proposed Project, would incrementally increase the natural gas demand on campus over existing conditions. However, since this alternative would involve no new development, it would have lesser impacts than the Proposed Project.

4.1.3 Relationship to Project Objectives

Under Alternative 1, Buildout Under Existing Approvals Alternative, previously approved and minor work projects could be implemented. However, no increase in campus facilities' square footage is permitted under existing entitlements. No increase in on-campus housing for the undergraduate population could be realized, although the Fall 2008 enrollment of 6,868 FTE students could be increased to the previously approved cap of 7,800.

Because Alternative 1 would not allow the construction of any replacement or net new residential, nonresidential, or athletic square footage, the alternative would prevent attainment of two of the three Key University Objectives: attaining certainty regarding future development on campus that allows for future growth, the pursuit of LMU's mission, and promotion of its other Key University, Academic, Residential, and Sustainability Objectives (Objective U-2); and ensuring the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved housing opportunities (U-3). Since Alternative 1 would not allow new development of an updated, cohesive campus community, but would allow increased enrollment up to the previously approved cap of 7,800 FTE students, Key University Objective U-1 would be only incompletely attained.

Alternative 1 would prevent attainment of the two Key Academic Objectives: replacing functionally obsolete academic, administrative, athletic, and residential spaces and buildings to create a functionally cohesive environment on campus (Objective A-1), and building state-of-the-art facilities to house future academic, research, and residential facilities on campus, to aid in the recruitment and retention of students and faculty, and the creation of the best possible academic community and social living and learning environment (Objective A-2).

Alternative 1 also would prevent attainment of all six Residential Key Objectives: contributing to the alleviation of the regional housing shortage (Objective R-1); increasing the percentage of FTE students housed on campus from approximately 60 percent to approximately 75 percent (Objective R-2); enhancing campus student life by raising the standard of on-campus housing (Objective R-3); fostering community and a communal educational environment by increasing the number of FTE undergraduate students living on-campus and by replacing outdated student housing units with updated social-living units (Objective R-4); replacing aging student residential rooms and apartments with modern residential accommodations, to improve the educational environment on campus (Objective R-5); and addressing community concerns regarding students living off-campus by moving more undergraduate residential students onto campus (Objective R-6).

By not permitting the replacement of aging facilities on the Westchester campus or an increase in residential square footage, Alternative 1 would prevent attainment of both Key Sustainability Objectives: creating a sustainable campus environment incorporating green building and landscape practices, reducing the production of greenhouse gas emissions and reducing the consumption of water, electricity, natural gas, and energy (Objective S-1), and moving more undergraduate students into on-campus housing to reduce traffic trips and vehicle miles traveled to and from the LMU campus (Objective S-2).

Finally, because no new development or improvements of any kind would be permitted, Alternative 1 would prevent attainment of the remaining Project Objectives, including Planning and Design Objectives PD-1 and -2; Pedestrian and Vehicular Circulation Objective C-1; and Athletic and Open Space Objective AOS-1.

Overall, Alternative 1 would not allow full attainment of any of the 13 Key Objectives; one would be partially attained and the remaining 12 would not be attained at all. Of the remaining four Project Objectives, none would be attained. The majority of Project Objectives, therefore, would not be attained under Alternative 1.

4.2 Alternative 2 – No Project Alternative: No Buildout, Maintain Campus As Is

4.2.1 Description of the Alternative

A “No Buildout, Maintain Campus As-Is” scenario for the No Project Alternative was evaluated in order to compare significant and unavoidable impacts of the Proposed Project against impacts that would occur if the Proposed Project is not approved or implemented and no further development on campus is implemented, other than minor improvements required for general maintenance and upkeep of campus facilities.

Under this alternative, LMU operations would continue and existing facilities would remain in use, but no increase in academic, student support, administrative or student residential square footage would be implemented. The Fall 2008 enrollment of 6,868 FTE students would be maintained, and the Proposed Project increase to the previously approved enrollment cap of 7,800 would not occur. Similarly, FTE faculty and staff would be retained at current levels (approximately 1,500) and would not increase.

Campus facilities would not undergo major upgrades, renovations, or replacement as planned under the Proposed Project. Proposed Project improvements to pedestrian and vehicular circulation and open space and athletic facilities would also not occur. LMU would continue to house approximately 60 percent of its undergraduate enrollment on campus, as at present, but no replacement or net new housing would be developed and no additional students would be housed on campus.

4.2.2 Analysis

4.2.2.1 Aesthetics and Visual Resources

4.2.2.1.1 Aesthetics and Views

Aesthetics

Alternative 2 would only permit minor improvements that are required for the general maintenance and upkeep of facilities and that do not require further discretionary approvals. Since no substantial construction would occur on the campus, this alternative would have no construction-related Aesthetic impact, and would avoid the Proposed Project's short-term, although less than significant, Aesthetic impact during construction.

Since no new development would be permitted under Alternative 2, no changes in the visual character of the LMU campus would occur. Therefore, this alternative would have no visual impacts compared to existing conditions. The Proposed Project would not significantly alter, degrade, or eliminate any features that substantially contribute to the valued visual character of the LMU campus. However, this alternative would preclude several beneficial Proposed Project opportunities to enhance campus aesthetics character. These include increasing open space acreage, the replacement of existing residential facilities with new facilities that would be architecturally complementary of existing buildings and new buildings, and the incorporation of quadrangles, lawns, landscaping, and other amenities. Therefore, Alternative 2 could result in potentially greater Aesthetic impacts than the Proposed Project.

Obstruction of Views

Since Alternative 2 assumes the continuation of existing buildings and layout on campus, existing views of campus and through campus of important visual resources from off-site vantages would be unchanged under this alternative. Therefore, Alternative 2 would have no View impacts. While the Proposed Project may reduce visual access to open space areas and certain structures on campus from individual residences, the Proposed Project would not substantially obstruct existing views of a valued view resource from a prominent view location (i.e., a public roadway). However, since this alternative would not permit any new development on campus, this alternative would avoid the Proposed Project's less than significant View impacts.

4.2.2.1.2 Light & Glare

Since no substantial construction would occur on the campus, Alternative 2 would have no construction-related Light and Glare impact, and would avoid the Proposed Project's short-term construction-related Light and Glare impact, which would be less than significant with mitigation.

Implementation of the Proposed Project would result in potentially significant, but mitigable, operational Light and Glare impacts associated with the introduction of new nighttime lighting for existing and proposed athletic fields and facilities in the southern portion of Burns Campus and on Leavey Campus. Under Alternative 2, it is assumed that the proposed nighttime lighting of presently unlighted athletic facilities would not take place, nor would the construction and lighting of new athletic facilities. New lighting comparable to that already present on the campus, such as building security lighting or upgrades of existing athletic facility lighting, could still be implemented, as long as such lighting does not exceed the City's Municipal Code limits on off-site light levels as measured at sensitive receptors. Additionally, it is assumed that any improvements or maintenance made on campus would be of similar materials and in the same location of those which currently exist. Therefore, Alternative 2 would have no operational Light and Glare impact, and would avoid the Proposed Project's operational Light and Glare impact, which would be less than significant with mitigation.

4.2.2.1.3 Shading

The Proposed Project would result in less than significant shading impacts on off-site land uses during the summer and winter solstices, since it would not shade any off-site shade-sensitive uses for more than three hours, although some shading of off-site land uses would occur at buildout. Since no new development would take place under Alternative 2, no Shading impacts would occur. Therefore, this alternative would avoid the less than significant Shading impacts associated with the Proposed Project.

4.2.2.2 Air Quality

4.2.2.2.1 Air Quality

No new construction would take place under this alternative, precluding major earthmoving activities, the operation of heavy equipment, and other construction activities that could generate emissions. Therefore, this alternative would have no construction-related air quality impacts, and the significant localized threshold (LST) impacts that would occur during construction of the Proposed Project would be avoided.

Under this alternative, the developed square footage on campus, student enrollment (6,868 FTE students), and the number of FTE faculty and staff would remain unchanged, which would keep operational emissions at or near current levels. Therefore, Alternative 2 would have no operational Air Quality impacts and would avoid those associated with the Proposed Project.

4.2.2.2.2 Climate Change

Under this alternative, existing uses would remain and no new construction would occur on campus. No construction activity that could contribute to greenhouse gas emissions would occur. Therefore, this alternative would have no construction-related Climate Change impacts, and would avoid the construction-related Climate Change impacts associated with the Proposed Project.

The developed square footage on campus and enrollment (6,868 FTE students) would remain unchanged from existing conditions, which would prevent increases in operational emissions. However, this alternative would not implement Proposed Project features intended to reduce operational greenhouse gas emissions, including greenhouse gas-reducing transportation and sustainability Project Objectives, water conservation, and energy conservation measures proposed in **Section IV.B.2, Global Climate Change**, to reduce energy consumption and meet or exceed minimum efficiency criteria for the state's most current Energy Conservation Standards for New Residential and Nonresidential Buildings (Title 24, part 6). These Proposed Project features were determined to collectively reduce greenhouse gas emissions per square foot on campus by at least 16 percent. While the Proposed Project would increase the square footage of building space on the campus relative to Alternative 2, the Proposed Project-related increase in greenhouse gas emissions resulting from increased energy and water consumption would be more than offset by the reduced mobile source greenhouse gas emissions resulting from a greater percentage of students living on campus. Therefore, Climate Change impacts under Alternative 2 would be less than significant, but would be greater than impacts associated with the Proposed Project.

4.2.2.3 Biological Resources

Under Alternative 2, no new construction would occur on the LMU campus. Therefore, Proposed Project-related construction activities that could affect nesting birds, possible overwintering monarch butterflies, and protected trees would not occur. This alternative would have no impact on biological resources and impacts would therefore be less than those associated with the Proposed Project.

4.2.2.4 Cultural Resources

4.2.2.4.1 Paleontological Resources

No new construction would occur on the LMU campus under Alternative 2, although it is assumed that ongoing maintenance and minor projects not subject to environmental review, which could entail some ground disturbance, such as for utility trenching, would still take place. The paleontological technical study prepared for the Proposed Project determined that there is high potential for currently unrecorded fossil sites being encountered during earthmoving activities in areas of campus where Palos Verdes Sand or non-marine terrace cover is found, which is estimated to be at least 35 feet below ground level. As such, even limited ground disturbance under this alternative could potentially disrupt paleontological resources on campus. Therefore, impacts to Paleontological Resources would remain potentially significant, and mitigation applicable to the Proposed Project would be required to reduce impacts associated with this alternative to less than significant levels. However, since construction and the likelihood of disturbance would be substantially reduced, Alternative 2 would result in lesser impacts than the Proposed Project.

4.2.2.4.2 Archaeological Resources

No new construction would occur on the LMU campus under Alternative 2, although it is assumed that ongoing maintenance and minor projects not subject to environmental review, which could entail some ground disturbance, such as for utility trenching, would still take place. As stated in the archaeological technical report prepared for the Proposed Project, ground-disturbing activities in or in proximity to known archaeological sites on campus have the potential to disturb, damage, or degrade archaeological resources or their settings in and around campus. As such, even limited ground disturbance under this alternative has the potential to disturb archaeological resources. Therefore; impacts to Archaeological Resources are potentially significant, but would be reduced to less than significant levels on a project basis with implementation of mitigation applicable to the Proposed Project. The Proposed Project would also result in less than significant project-level impacts with implementation of mitigation. However, since construction and the likelihood of disturbance would be substantially reduced, Alternative 2 would result in lesser impacts than the Proposed Project. Like the Proposed Project, however, this alternative could contribute to a significant cumulative impact to Archaeological Resources due to the additive effects of disturbance to archaeological sites in the Project area. However, since Alternative 2 would involve substantially less construction, this alternative would have a smaller contribution to this cumulative impact than the Proposed Project.

4.2.2.4.3 Historical Resources

Alternative 2 would not result in the removal of any existing buildings or structures and no new construction would occur on campus. Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, and the bluff-face letter "L" are considered potentially historic resources for purposes of CEQA, in accordance with the *State CEQA Guidelines*, Section 15064.5(a)(3). Proposed Project construction on campus in close proximity to these historic resources could result in potentially significant, although mitigable, impacts. However, since Alternative 2 would only involve construction required for minor improvements and general maintenance, this alternative would have no impact to Historical Resources, and would avoid the impacts associated with the Proposed Project.

4.2.2.5 Geology

Construction and implementation of the Proposed Project has the potential to result in significant, although mitigable, impacts related to geological hazards, including expansive and corrosive soils, seismically induced shaking, sedimentation and erosion, and slope instability. However, with adherence to applicable building and municipal codes and current local, state, and federal regulatory requirements, no unavoidable significant geological impacts would result from implementation of the Proposed Project. No grading, earthmoving or other construction activities, other than that required for ongoing maintenance and minor projects not subject to environmental review, would occur under Alternative 2. Therefore, this alternative would have no impacts related to Geology, and would avoid the impacts associated with the Proposed Project.

4.2.2.6 Hazards

Some older buildings on campus may contain asbestos-containing materials, lead-based paint, PCBs, and other known hazards and contaminants. Construction activities associated with implementation of the Proposed Project were determined to have the potential to result in the release of these materials during demolition. Additionally, the campus is located partially within a Methane Zone and partially within a Methane Buffer Zone as designated by the Los Angeles Department of Building and Safety, which presents potentially significant, although mitigable, construction impacts. Under Alternative 2, the existing buildings and paved areas on LMU's campus would remain intact and the potential for the release of hazardous materials or methane hazards associated with Proposed Project construction would not occur. Therefore, this alternative would have no construction-related Hazards impacts, and would avoid the impacts associated with Proposed Project construction.

Under the Proposed Project, increased transport, use, storage, and disposal of hazardous materials at LMU would likely result due to the increased number of people on campus and increased square footage

of academic, administrative and residential facilities. However, Hazards impacts during operation of the Proposed Project would be less than significant. Alternative 2 would not increase the campus population and, consequently, would not increase the transport, use, storage, and disposal of hazardous materials on campus. Therefore, Alternative 2 would have no Hazards impacts during operation. Impacts would be reduced compared to those of the Proposed Project.

4.2.2.7 Surface Water Hydrology and Water Quality

4.2.2.7.1 Surface Water Hydrology

Under Alternative 2, existing uses would remain and no new development with associated grading and earthmoving would occur. Therefore, this alternative would have no construction-related Surface Water Hydrology impacts, and would avoid the Proposed Project's construction-related hydrology impacts, which would be less than significant with adherence to NPDES requirements.

No major modification of existing stormwater hydrology, including existing hydrology patterns, rates of runoff, and overall runoff volumes, would take place under this alternative. Therefore, Alternative 2 would have no operational impacts compared to existing conditions. With implementation of mitigation, the Proposed Project would result in less than significant operational impacts related to Surface Water Hydrology. However, Alternative 2 would preclude several beneficial Proposed Project opportunities including the alleviation of periodic flooding of the Sunken Garden and the proposed upsizing of underground storm drains approaching or exceeding their recommended design capacities; these drains convey flows from portions of Burns Campus toward the Sunken Garden, and from the Sunken Garden off site. Because Alternative 2 would not realize these potentially beneficial impacts related to Surface Water Hydrology, this alternative would have greater operational impacts than the Proposed Project.

4.2.2.7.2 Surface Water Quality

Under Alternative 2, existing uses would remain and no new development with associated grading and earthmoving would occur. Therefore, this alternative would have no construction-related Surface Water Quality impacts, and would avoid the Proposed Project's construction-related impacts, which would be less than significant with adherence to NPDES requirements.

Since no new buildings or paved areas would be constructed under Alternative 2, the amount of pervious area on campus would remain unchanged from existing conditions. Therefore, the alternative would have no operational impacts related to Surface Water Quality. However, a Standard Urban Stormwater Mitigation Plan must be prepared and implemented for the Proposed Project, which requires retention and treatment of the first three-quarters of an inch of rainfall on new impervious surfaces whenever

possible. This would effectively lower pollutant levels in stormwater discharged from the campus in the future, as Proposed Project buildout takes place. Under this alternative, however, since no new development would be permitted, the benefits of SUSMP compliance associated with the Proposed Project would not be realized. Therefore, this alternative's operational impacts related to Surface Water Quality would be greater than those associated with the Proposed Project.

4.2.2.8 Land Use

The Westchester–Playa del Rey Community Plan presently designates the LMU campus as “L” Low Density Residential, which corresponds to single-family residential zoning designations. The zoning designation for the campus is [Q]R4-1, Residential – Multiple Dwelling Zone. The City previously found that this zoning designation is consistent with the campus's General Plan designation, since the Q conditions applicable to the property limit the uses on campus to those of a university or those uses permitted in the R1 zone. Therefore, Alternative 2, which involves the continued operation of the existing campus and land use/zoning designations, would have no Land Use impacts.

The Proposed Project includes a request for a Zone Change, a General Plan Amendment, and the establishment of a Specific Plan. The Zone Change being requested would change the zoning of the campus from [Q]R4-1 to R4-1. The General Plan Amendment would change the designation of the campus from Low Density Residential to High-Medium Density Residential, which would be consistent with the new proposed zoning and Specific Plan. The current Q conditions on the Property would be replaced with more detailed land use restrictions established in the Specific Plan. However, unlike the Proposed Project, Alternative 2 would not implement this Specific Plan, which would contain a more comprehensive set of development standards to maintain compatibility with surrounding land uses, establish more restrictive height limits and setbacks from surrounding uses, establish Planning Areas on campus that would concentrate athletic uses in the southern portion of the Burns Campus, maintain the campus's large expanses of open space, and configure new development to maintain scenic corridors through campus, among others. While Alternative 2 would not implement these more restrictive land use controls, since the current zoning and General Plan designation are consistent with each other, Alternative 2 would result in similar Land Use impacts as the Proposed Project.

4.2.2.9 Noise

Since Alternative 2 would include no new development, it would have no construction-related Noise impacts and would avoid the significant and unavoidable construction Noise impacts associated with the Proposed Project. Additionally, no increase in the campus population would occur. Under this alternative, the Fall 2008 enrollment of 6,868 FTE students would be maintained, as would the current

number of FTE faculty and staff (approximately 1,500), and no new campus housing would be provided. Therefore, this alternative would not permanently increase noise levels beyond ambient levels associated with the existing uses. For example, no increase in roadway noise would result since this alternative would not increase the number of vehicle trips to and from campus. Therefore, this alternative would have no operational Noise impacts. However, under this alternative, relocation of the existing recycling and waste management area from the eastern edge of Burns Campus to an enclosed facility on Leavey Campus would not take place. Impacts under this alternative would nonetheless be less than those associated with the Proposed Project.

4.2.2.10 Public Services

4.2.2.10.1 Police Protection

Since Alternative 2 would include no new development, it would have no construction-related Police Protection impacts and would avoid the Proposed Project's less than significant construction-related Police Protection impacts.

Implementation of the Proposed Project would result in new impacts associated with increased demand for police services, because of the increased campus population associated with the increase in FTE students from Fall 2008 levels to the previously approved enrollment cap, and the increase in on-campus housing for students. Under Alternative 2, the Fall 2008 enrollment of 6,868 FTE students would be maintained, as would the current FTE faculty and staff (approximately 1,500), and no new campus housing would be provided. Implementation of this alternative would not increase demand for Police Protection services over existing conditions. Therefore, this alternative would have no operational impacts on Police Protection services, and would avoid the impacts associated with the Proposed Project.

4.2.2.10.2 Fire Protection and Emergency Medical Services

Since Alternative 2 would include no new development, it would have no construction-related impacts related to Fire Protection and Emergency Medical Services, and would avoid the Proposed Project's less than significant construction-related impacts.

Implementation of the Proposed Project would result in new impacts associated with increased demand for these services, because of the increased campus population associated with the increase in FTE students from Fall 2008 levels to the previously approved enrollment cap, and the increase in on-campus housing for students. Under this alternative, the Fall 2008 enrollment of 6,868 FTE students would be maintained, as would the current FTE faculty and staff (approximately 1,500), and no new campus housing would be provided. Implementation of this alternative would not increase demand for Fire

Protection and Emergency Medical Services over existing conditions. Therefore, this alternative would have no operational impacts related to Fire Protection and Emergency Medical Services, and would avoid the less-than-significant impacts associated with the Proposed Project.

4.2.2.10.3 Recreation and Parks

The Proposed Project would add approximately 4.8 net new acres of outdoor athletic facilities and 28,000 net new square feet of indoor athletic facilities at buildout. Under Alternative 2, the current enrollment of 6,868 FTE students, and FTE faculty and staff would be maintained and the percentage of undergraduate students living on campus would remain at 60 percent. Therefore, this alternative would have no Recreation and Parks impacts, and would avoid the impacts associated with the increase in demand for recreational facilities under the Proposed Project. Nevertheless, no new athletic facilities or open space areas would be developed to accommodate this existing demand under this alternative.

4.2.2.11 Transportation

The Proposed Project would result in less than significant traffic and parking impacts during construction since construction worker parking would be accommodated off campus and shuttles would be provided to transport workers to and from the campus. Since Alternative 2 proposes no new construction, other than that required for minor improvements and general maintenance, Alternative 2 would have no construction-related Transportation impacts, and would avoid the impacts associated with the Proposed Project.

Under Alternative 2, campus operations would continue unchanged from existing conditions. Additionally, no increase in the campus population would occur. Under this alternative, the Fall 2008 enrollment of 6,868 FTE students would be maintained, as would the current FTE faculty and staff (approximately 1,500 FTE). Therefore, this alternative would not increase the number of vehicle trips to and from campus, and would have no new operational traffic or parking impacts. However, implementation of this alternative would preclude potentially beneficial impacts associated with the Proposed Project such as improved campus access and circulation, providing more housing on campus to reduce commuter trips by students, and improved parking supply. Nevertheless, operational traffic and parking impacts would be less than those associated with the Proposed Project.

4.2.2.12 Public Utilities

4.2.2.12.1 Water Supplies

Since Alternative 2 would not permit any new development on the LMU campus, nor increase FTE students or FTE faculty and staff levels, the water demand on campus would not increase above existing conditions. Therefore, Alternative 2 would have no impact related to Water Supplies.

The Proposed Project would increase water demand above existing conditions due to increased enrollment and faculty and staff levels, although the impact would be less than significant. While Alternative 2 would not increase water demand above existing conditions, it would also not realize several beneficial Proposed Project opportunities, including the replacement of existing buildings on campus with buildings that are more water efficient and the incorporation of additional water conservation measures into campus operations. Nevertheless, Alternative 2 would avoid the impacts associated with the increase in water demand under the Proposed Project.

4.2.2.12.2 Wastewater

Since no new development or increase in campus population would be realized under Alternative 2, wastewater flows would not increase. Additional wastewater flows associated with Proposed Project buildout could potentially create capacity impacts on wastewater lines such as line 3A, which serves a portion of Burns Campus and is presently near design capacity. City of Los Angeles Department of Public Works guidelines recommend that pipes be upgraded as their flows approach specific design capacities. Since this line has not yet reached capacity, and is unlikely to if no further development occurs on campus, Alternative 2 would have no Wastewater impacts and would avoid the impacts associated with the increase in wastewater generation under the Proposed Project.

4.2.2.12.3 Solid Waste

Under Alternative 2, no demolition of buildings or structures would occur. Therefore, this alternative would have no construction-related Solid Waste impacts, and would avoid those associated with the Proposed Project.

Under this alternative, no new development would occur. The current enrollment of 6,868 FTE students and the current FTE faculty and staff (approximately 1,500) would be maintained, and the percentage of undergraduate students living on campus would remain at approximately 60 percent. Therefore, this alternative would not increase the amount of solid waste generated on campus over existing conditions. As such, this alternative would have no Solid Waste impacts, and would avoid the significant

project-level and cumulatively considerable impacts associated with the increase in solid waste generation under the Proposed Project.

4.2.2.12.4 Energy

Electricity

Alternative 2 would not add facilities to campus or increase the campus population; therefore, electricity demand for this alternative would be unchanged from existing conditions. In contrast, buildout of the Proposed Project would add students, increase FTE faculty and staff, and increase demand for electricity on campus. However, Alternative 2 would not replace older, inefficient buildings with more energy-efficient ones, as would the Proposed Project, and therefore inefficient campus buildings would remain in operation. This alternative would have no Electricity impacts, and would avoid those impacts associated with the increase in electricity demand under the Proposed Project.

Natural Gas

Alternative 2 would not add facilities to campus or increase the campus population; therefore, natural gas demand for this alternative would be unchanged from existing conditions. In contrast, buildout of the Proposed Project would add students, increase FTE faculty and staff, and increase natural gas demand on campus. This alternative would have no Natural Gas impacts, and would avoid those impacts associated with the increase in natural gas demand under the Proposed Project.

4.2.3 Relationship to Project Objectives

Under Alternative 2, No Project Alternative: No Buildout, Maintain Campus As Is, previously approved and minor work projects could be implemented. However, no increase in campus facility square footage, enrollment, or faculty and staff levels would be permitted.

Because Alternative 2 would not allow the construction of any replacement or net new residential, nonresidential, or athletic square footage, and furthermore would not permit an increase in enrollment beyond the Fall 2008 enrollment of 6,868 FTE students, it would prevent attainment of all three Key University Objectives: implementing LMU's three-fold mission by creating an updated, cohesive campus community and environment with a critical mass of approximately 7,800 FTE students (Objective U-1); attaining certainty regarding future development on campus that allows for future growth, the pursuit of LMU's mission, and promotion of its other Key University, Academic, Residential, and Sustainability Objectives (Objective U-2); and ensuring the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty

interaction, and full participation in campus life through increased and improved housing opportunities (U-3).

Because Alternative 2 would not allow the construction of any replacement or net new residential, nonresidential, or athletic square footage, Alternative 2 also would prevent attainment of the two Key Academic Objectives: replacing functionally obsolete academic, administrative, athletic, and residential spaces and buildings to create a functionally cohesive environment on campus (Objective A-1), and building state-of-the-art facilities to house future academic, research, and residential facilities on campus, to aid in the recruitment and retention of students and faculty, and the creation of the best possible academic community and social living and learning environment (Objective A-2).

Maintaining LMU's campus as is under Alternative 2 also would prevent attainment of all six Key Residential Objectives: contributing to the alleviation of the regional housing shortage (Objective R-1); increasing the percentage of FTE students housed on campus from approximately 60 percent to approximately 75 percent (Objective R-2); enhancing campus student life by raising the standard of on-campus housing (Objective R-3); fostering community and a communal educational environment by increasing the number of FTE undergraduate students living on-campus and by replacing outdated student housing units with updated social-living units (Objective R-4); replacing aging student residential rooms and apartments with modern residential accommodations, to improve the educational environment on campus (Objective R-5); and addressing community concerns regarding students living off-campus by moving more undergraduate residential students onto campus (Objective R-6).

By not permitting the replacement of aging facilities on the Westchester campus or an increase in residential square footage, Alternative 2 would prevent attainment of both Key Sustainability Objectives: creating a sustainable campus environment incorporating green building and landscape practices, reducing the production of greenhouse gas emissions and reducing the consumption of water, electricity, natural gas, and energy (Objective S-1), and moving more undergraduate students into on-campus housing to reduce traffic trips and vehicle miles traveled to and from the LMU campus (Objective S-2).

Finally, because no new development would be permitted, Alternative 2 would prevent attainment of the remaining Project Objectives, including Planning and Design Objectives PD-1 and -2; Pedestrian and Vehicular Circulation Objective C-1; and Athletic and Open Space Objective AOS-1.

Overall, Alternative 2 would not allow attainment of any of the 13 Key Objectives or remaining four Project Objectives; the majority of Project Objectives, therefore, would not be attained.

4.3 Alternative 3 – No New or Replacement Residential Uses

4.3.1 Description of the Alternative

As under the Proposed Project, this alternative assumes the systematic replacement of all academic, administrative, and indoor athletic facilities on campus that are functionally obsolete or substandard. This alternative would also reconfigure inadequate outdoor athletic facilities and open space areas, internal campus roadways, parking facilities, and pedestrian circulation accommodations, and would implement infrastructure upgrades as needed. Accordingly, under this alternative, approximately 508,000 net new gross square feet of academic, administrative, and student support facilities, approximately 28,000 net new gross square feet of indoor athletic facilities, and approximately 4.8 net new acres of outdoor athletic facilities would be realized. However, no new or replacement on-campus housing for undergraduate students would be developed under this alternative. The number of FTE students LMU would be permitted to enroll would increase from the Fall 2008 enrollment of approximately 6,868 FTE students to the previously approved enrollment cap of 7,800 (an increase of approximately 932 FTE students). The number of FTE faculty and staff would increase from 1,500 as of Fall 2008 to approximately 1,800.

Similar to the Proposed Project, Alternative 3 is assumed to require 20 years for full implementation following approval by the City of Los Angeles, with buildout anticipated for approximately 2030.

Under the No New or Replacement Residential Uses Alternative, LMU would retain the existing 942,000 gross square feet of existing student residential facilities, and would not construct the 370,000 gross square feet of replacement residential uses or the 476,000 gross square feet of net new residential uses planned under the Proposed Project. Therefore, LMU would continue to house the same number of undergraduate students on campus (in approximately 3,261 beds) as under existing conditions, with no increase in the number of beds or students housed on campus permitted. Older campus housing on the eastern and western sides of Burns Campus could undergo minor upgrades and renovations, but no major improvements or expansion of these residential halls would be permitted.

Table VI-2, Alternative 3 – No New or Replacement Residential Uses Alternative, Summary of Existing and Proposed LMU Campus Facilities, summarizes the existing, to-be-retained, net new, and total gross square footages of facilities under this alternative.

Table VI-2
Alternative 3 – No New or Replacement Residential Uses Alternative
Summary of Existing and Proposed LMU Campus Facilities

| Uses | Existing (gsf/acres) | To Remain (gsf/acres) | To Be Added (gsf/acres) | Total At Buildout (gsf/acres) | Net New (gsf/acres) |
|-------------------------------|---------------------------------|----------------------------------|------------------------------------|--|--------------------------------|
| Academic/Administrative | 1,651,000 | 1,136,000 | 1,023,000 | 2,159,000 | 508,000 |
| Residential | 942,000 | 942,000 | - | 942,000 | - |
| Athletic Facilities (Indoor) | 185,000 | 105,000 | 108,000 | 213,000 | 28,000 |
| Total | 2,778,000 | 2,183,000 | 1,131,000 | 3,314,000 | 536,000 |
| Athletic Facilities (Outdoor) | 15.2 acres | 13.6 acres | 6.4 acres | 20.0 acres | 4.8 acres |
| Open Space | 25.0 acres | 25.0 acres | 5.0 acres ^a | 30.0 acres | 5.0 acres |
| Total | 40.2 acres | 38.6 acres | 11.4 acres | 50.0 acres | 9.8 acres |

^a Since no new residential uses are proposed under this alternative, campus open space could increase.
 gsf = gross square feet

4.3.2 Analysis

4.3.2.1 Aesthetics and Visual Resources

4.3.2.1.1 Aesthetics and Views

Aesthetics

Alternative 3 would reduce proposed development on LMU's campus by a total of approximately 846,000 square feet compared to the Proposed Project. Therefore, this alternative would entail less construction than the Proposed Project, and result in lesser construction-related Aesthetic impacts. Like the Proposed Project, this alternative would result in less than significant construction-related Aesthetic impacts after mitigation.

Since new development would be permitted under Alternative 3, changes in the visual character of the LMU campus would occur. Therefore, like the Proposed Project, this alternative would have less than significant Aesthetic impacts. However, this alternative could preclude some beneficial Proposed Project opportunities, including the replacement of existing residential facilities with new facilities that would be architecturally complementary of existing and new buildings. Therefore, Alternative 3 could result in potentially greater Aesthetic impacts than the Proposed Project.

Obstruction of Views

The majority of new student residential development under the Proposed Project would likely be located on the Burns Campus, where older student housing in need of replacement is presently located and space for additional housing remains. Neither the Proposed Project nor this alternative would substantially obstruct existing views of a valued view resource from a prominent view location, and view impacts under this alternative would, therefore, be less than significant. However, because this alternative would construct fewer buildings than the Proposed Project, view impacts under this alternative may be less than those of the Proposed Project. Thus, impacts would be less than significant and less than or similar to the Proposed Project.

4.3.2.1.2 Light & Glare

Since construction would occur on the campus, Alternative 3, like the Proposed Project, would have potentially significant, but mitigable, construction-related Light and Glare impacts. However, since Alternative 3 would involve less construction, it would reduce the construction-related Light and Glare impacts associated with the Proposed Project.

This alternative would reduce net new development on LMU's campus by a total of approximately 476,000 square feet compared to the Proposed Project. New sources of outdoor lighting would be introduced in association with permitted new facilities, with some potential to increase ambient illumination levels and local skyglow on campus. Illumination of existing athletic fields similar to that under the Proposed Project would still take place under this alternative, and mitigation measures for the Proposed Project would apply to any new lighting proposed under this alternative. As with the Proposed Project, no sources of substantial glare would be anticipated with implementation of Alternative 3. Setback requirements for new buildings from campus property lines would be the same as those proposed under the Proposed Project. However, because of the reduction in development and associated sources of lighting, impacts would be less than those associated with the Proposed Project.

4.3.2.1.3 Shading

No new or replacement on-campus housing for undergraduate students would be developed under this alternative. Setback requirements for new buildings from campus property lines would be the same as those proposed under the Proposed Project. Accordingly, the total building massing on campus would be reduced compared to the Proposed Project and therefore the potential for off-site shading impacts would be incrementally reduced. The Proposed Project would result in less than significant shading impacts on off-site land uses during the summer and winter solstices, since it would not shade any off-site shade-sensitive uses for more than 3 hours. Shading impacts under this alternative would also be less than significant.

4.3.2.2 Air Quality

4.3.2.2.1 Air Quality

No new or replacement on-campus housing for undergraduate students would be developed under this alternative. Therefore, under Alternative 3, construction activities associated with development would be reduced in scale compared to the Proposed Project due to the reduction in residential square footage developed under this alternative. As with the Proposed Project, construction of this alternative would generate pollutant emissions through the use of construction equipment and through haul truck and construction worker trips. Although the overall amount of site preparation and building construction would be less under this alternative compared to the Proposed Project, the construction schedule would be reduced in intensity, although not duration, since buildout is still proposed for 2030, resulting in daily pollutant emissions and fugitive dust from site preparation and construction activities that would be less than those of the Proposed Project. Impacts related to maximum daily conditions, used for evaluating localized significance threshold impacts, would remain significant and unavoidable after mitigation for localized PM₁₀ and PM_{2.5} under this alternative, but would also be less than those associated with the Proposed Project.

Operational impacts are determined mainly by the daily traffic volumes. The number of daily trips generated under this alternative would be higher in comparison to the Proposed Project, as fewer students living on campus would mean increased vehicle trips to and from campus. Since vehicular emissions are dependent on the number of trips, weekday and weekend vehicular sources under Alternative 3 would result in an incremental increase in pollutant emissions compared to the Proposed Project. However, operational impacts would be less than significant under both development scenarios.

4.3.2.2.2 Climate Change

No new or replacement on-campus housing for undergraduate students would be developed under Alternative 3. Therefore, under this alternative, construction activities associated with development would be reduced in scale compared to the Proposed Project due to the reduction in residential square footage developed under this alternative. As with the Proposed Project, construction of this alternative would generate greenhouse gas emissions through the use of construction equipment and through haul truck and construction worker trips. Therefore, Climate Change construction impacts under this alternative would remain less than significant and would be less than the impacts associated with the Proposed Project.

The developed square footage on campus would increase from existing conditions but would be less than the amount under the Proposed Project due to no new or replacement residential housing. Thus, this

alternative would not implement Proposed Project features intended to reduce operational greenhouse gas emissions from existing residential housing that would be replaced under the Proposed Project. These features include greenhouse gas-reducing sustainability Project Objectives, water conservation, and energy conservation measures proposed in **Section IV.B.2, Global Climate Change**. These features would reduce energy consumption and meet or exceed minimum efficiency criteria for the state's most current Energy Conservation Standards for New Residential Buildings (Title 24, part 6). These Proposed Project features were determined to collectively reduce greenhouse gas emissions per square foot on campus by at least 16 percent. Daily traffic volumes would increase as fewer students would be able to live on campus and would instead need to commute to campus resulting in greater mobile source greenhouse gas emissions. While the Proposed Project would increase the square footage of building space on the campus relative to Alternative 3, the associated increase in greenhouse gas emissions from building energy and water use would generally be offset by the reduced mobile source greenhouse gas emissions from a greater percentage of students living on campus. Therefore, Climate Change impacts under this alternative would remain less than significant but would be greater than the impacts associated with the Proposed Project.

4.3.2.3 Biological Resources

Proposed Project construction activity could result in potentially significant impacts on common nesting bird species, which are regulated under the Fish and Game Code of California and the Migratory Bird Treaty Act; on the monarch butterfly, which is considered a sensitive species and may overwinter on the Campus. Additionally, two protected tree species exist on the campus, coast live oak and western sycamore, and impacts are governed by the Los Angeles Municipal Code, which requires a permit for encroachment or removal of specimen trees. With mitigation, Proposed Project impacts would be reduced to less than significant levels. Since a reduced amount of construction would be permitted under this alternative compared to the Proposed Project, impacts on nesting birds, possible overwintering monarch butterflies, and protected trees would be less than those associated with the Proposed Project. However, impacts would remain potentially significant and mitigation measures applicable to the Proposed Project would also apply to this alternative to reduce impacts to less than significant levels.

4.3.2.4 Cultural Resources

4.3.2.4.1 Paleontological Resources

The paleontological study prepared for the Proposed Project determined that there is high potential for currently unrecorded fossil sites being encountered during earthmoving activities in areas of campus where Palos Verdes Sand or non-marine terrace cover is found, which is estimated to be at least 35 feet

below ground level. As such, construction under this alternative could potentially disrupt paleontological resources on campus. Therefore, impacts under this alternative would be potentially significant, and mitigation applicable to the Proposed Project would be required to reduce impacts to less than significant levels. However, since this alternative would involve less construction and reduce the likelihood of disturbance, impacts would be less than those associated with the Proposed Project.

4.3.2.4.2 Archaeological Resources

As stated in the archaeological technical report prepared for the Proposed Project, ground-disturbing activities in or in proximity to known archaeological sites on campus have the potential to disturb, damage, or degrade archaeological resources or their settings in and around campus. Therefore, impacts to Archaeological Resources are potentially significant, but would be reduced to less than significant levels on a project basis with implementation of mitigation applicable to the Proposed Project. The Proposed Project would also result in less than significant project-level impacts with implementation of mitigation. However, since construction and the likelihood of disturbance would be reduced, Alternative 3 would result in lesser impacts than the Proposed Project. Like the Proposed Project, however, Alternative 3 could contribute, albeit to a reduced degree, to a significant cumulative impact on Archaeological Resources because of the additive effects of disturbance to archaeological sites in the Project area.

4.3.2.4.3 Historical Resources

Similar to the Proposed Project, Alternative 3 does not propose to substantially alter, convert, or rehabilitate Xavier Hall, St. Robert's Hall, or Sacred Heart Chapel such that the integrity or significance of these resources would be reduced. Any renovations that would be made to these potentially historic resources would be made in compliance with the Secretary of the Interior's Standards. However, Proposed Project construction on campus in close proximity to these resources could result in potentially significant, although mitigable, impacts. This alternative would also result in potentially significant impacts, and mitigation applicable to the Proposed Project would be applicable to this alternative. However, since this alternative would involve less construction and reduce the likelihood of disturbance of potentially historical resources, impacts would be less than those associated with the Proposed Project.

4.3.2.5 Geology

Construction and implementation of the Proposed Project have the potential to create significant impacts with respect to geological hazards and sedimentation and erosion. However, with adherence to applicable building and municipal codes and current local, state, and federal regulatory requirements, Proposed Project impacts on Geology would be less than significant.

Like the Proposed Project, Alternative 3 would have less than significant Geology impacts with adherence to applicable building and municipal codes and current local, state, and federal regulatory requirements. However, since Alternative 3 would reduce the amount of construction activity and would entail less development potentially subject to geologic hazards, impacts associated with Alternative 3 would be less than those associated with the Proposed Project.

4.3.2.6 Hazards

Some older buildings on the campus may contain asbestos-containing materials, lead-based paint, PCBs, and other known hazards and contaminants. Construction activities associated with implementation of the Proposed Project have the potential to result in the release of these known contaminants during demolition. Additionally, the campus is located partially within a Methane Zone and partially within a Methane Buffer Zone as designated by the Los Angeles Department of Building and Safety, which presents a potentially significant construction impact. However, these impacts would be reduced to less than significant levels with adherence to applicable building and municipal codes and current local, state, and federal regulatory requirements.

Like the Proposed Project, Alternative 3 would result in potentially significant, but mitigable, Hazards impacts, and would be required to comply with applicable building and municipal codes and current local, state, and federal regulatory requirements. However, this alternative would reduce the amount of construction activity that could result in a release of hazardous materials and would, therefore, incrementally reduce impacts associated with the Proposed Project. Nevertheless, this alternative could preclude some beneficial Proposed Project opportunities to remove hazardous materials on campus through the replacement of existing residential facilities which may contain asbestos-containing materials, lead-based paint, PCBs, or other known hazards and contaminants, with new facilities which would not contain these materials.

Under the Proposed Project, increased transport, use, storage, and disposal of hazardous materials at LMU would likely result due to the increased number of people on campus and increased square footage of academic, administrative and residential facilities. However, Hazards impacts during operation of the Proposed Project would be less than significant with mitigation. Alternative 3 would increase the campus population and, consequently, the transport, use, storage, and disposal of hazardous materials on campus. Therefore, Alternative 3 would also result in less than significant Hazards impacts during operation, which would be similar to those of the Proposed Project.

4.3.2.7 Surface Water Hydrology and Water Quality

4.3.2.7.1 Surface Water Hydrology

Like the Proposed Project, Alternative 3 would involve grading and earthmoving activities. However, since it would reduce the amount of construction, this alternative would have less construction-related impact on Surface Water Hydrology than the Proposed Project, which was determined to have less-than-significant impacts.

Similar to the Proposed Project, operation of this alternative would involve permanent modifications to existing Surface Water Hydrology, including patterns and rates of runoff and overall runoff volumes. However, construction under this alternative would require less grading and earthmoving than under the Proposed Project and would therefore result in fewer permanent changes to existing Surface Water Hydrology characteristics, resulting in less impacts than the Proposed Project. Like the Proposed Project, impacts would be less than significant after mitigation.

4.3.2.7.2 Surface Water Quality

This alternative assumes less grading and earthmoving than under the Proposed Project, and therefore would reduce construction-related Surface Water Quality impacts compared to the Proposed Project. Impacts would remain less than significant after mitigation.

Construction of only non-residential facilities under this alternative could increase the amount of pervious surfaces on campus through which stormwater could readily infiltrate underlying soil compared to the Proposed Project, since fewer buildings would be constructed than under the Proposed Project. However, a Standard Urban Stormwater Mitigation Plan must be prepared and implemented for all new development, which requires retention and treatment of the first 0.75 inch of rainfall on new impervious surfaces whenever possible. This would effectively lower pollutant levels in stormwater discharged from the campus in the future, as Proposed Project buildout takes place. Less new development would be permitted under this alternative and impacts on Surface Water Quality would be similar to those under the Proposed Project, since any new development would still be subject to compliance with the requirements of a Standard Urban Stormwater Mitigation Plan. Impacts under this alternative would be less than significant after mitigation, as with the Proposed Project.

4.3.2.8 Land Use

The Westchester-Playa del Rey Community Plan presently designates the LMU campus as “L” Low Density Residential, which corresponds to single-family residential zoning designations. The zoning

designation for the campus is [Q]R4-1, Residential – Multiple Dwelling Zone. The City previously found that this zoning designation is consistent with the campus’s General Plan designation, since the Q conditions applicable to the property limit the uses on campus to those of a university or those uses permitted in the R1 zone.

Similar to the Proposed Project, Alternative 3 includes a request for a Zone Change, a General Plan Amendment, and the establishment of a Specific Plan. The Zone Change being requested would change the zoning of the campus from [Q]R4-1 to R4-1. The General Plan Amendment would change the designation of the campus from Low Density Residential to High-Medium Density Residential, which would be consistent with the new proposed zoning and Specific Plan. The current Q conditions on the Property would be replaced with more detailed land use restrictions established in the Specific Plan. This Specific Plan would contain a more comprehensive set of development standards to maintain compatibility with surrounding land uses, establish more restrictive height limits and setbacks from surrounding uses, establish Planning Areas on campus that would primarily concentrate athletic uses in the southern portion of the Burns Campus, maintain the campus’s large expanses of open space, and configure new development to maintain scenic corridors through campus, among others. Therefore, Alternative 3 would result in less than significant Land Use impacts.

However, under this alternative, LMU could still increase its enrollment to the previously approved cap of 7,800 FTE students, although it would not be permitted to house any additional students on campus. Due to the increased number of students commuting to and from campus, this alternative would result in considerably greater trip generation than the Proposed Project. Therefore, this alternative would reduce the Proposed Project’s consistency with several General Plan and SCAG policies aimed at reducing vehicle miles traveled. For these reasons, Alternative 3 could result in greater Land Use impacts than the Proposed Project.

4.3.2.9 Noise

Because of the reduction in the amount of demolition and construction permitted under this alternative, construction Noise impacts would be less than those associated with the Proposed Project. However, impacts could remain significant and unavoidable given the proximity of campus to residences.

No new or replacement on-campus housing for undergraduate students would be developed under this alternative, although enrollment would be permitted to increase to 7,800 FTE students. Therefore, this alternative would generate a greater number of vehicle trips to and from campus, and consequently, greater roadway noise, than the Proposed Project. Although Alternative 3 would have greater operational Noise impacts than the Proposed Project, impacts are assumed to remain less than significant.

4.3.2.10 Public Services

4.3.2.10.1 Police Protection

Since Alternative 3 would involve less construction than the Proposed Project, and thus less potential for construction-related vandalism and theft or the need for construction traffic control, it would have incrementally less construction-related Police Protection impacts than the Proposed Project. Impacts would remain less than significant after mitigation, as under the Proposed Project.

Under this alternative, the number of FTE students LMU would be permitted to enroll would increase from the Fall 2008 enrollment of approximately 6,868 FTE students to the previously approved enrollment cap of 7,800 FTE students (an increase of approximately 932 FTE students). The number of FTE faculty and staff would increase from approximately 1,484 FTE students as of Fall 2008 to approximately 1,800 FTE students. Under this alternative, LMU would not provide additional campus housing for students; therefore, although enrollment could increase, the number of people residing on campus would not increase. Operational impacts to Police Protection services were determined to be less than significant under the Proposed Project; impacts under this alternative would remain less than significant. However, impacts under this alternative could be greater than those associated with the Proposed Project, since more students would live off-campus and potentially require LAPD services, and fewer students would reside on campus under where LMU's Department of Public Safety provides first-response Police Protection services for the LMU campus and has a full-service Campus Security Services Department operating around the clock and year-round.

4.3.2.10.2 Fire Protection and Emergency Medical Services

Since Alternative 3 would involve less construction than the Proposed Project, it would reduce the potentially significant, but mitigable, construction-related Fire Protection and Emergency Medical Service impacts of the Proposed Project. Impacts would remain less than significant after mitigation.

Under Alternative 3, the number of FTE students LMU would be permitted to enroll would increase from the Fall 2008 enrollment of approximately 6,868 FTE students to the previously approved enrollment cap of 7,800 FTE students (an increase of approximately 932 FTE students). The number of FTE faculty and staff would increase from approximately 1,484 as of Fall 2008 to approximately 1,800. Under this alternative, LMU would not be permitted to provide additional campus housing for students; therefore, although enrollment could increase, the number of people residing on campus would not increase. Operational impacts to Fire Protection and Emergency Medical Protection services were determined to be less than significant under the Proposed Project; impacts under this alternative would remain less than significant. However, impacts under this alternative could be greater than those associated with the

Proposed Project since more students would live off-campus and potentially require LAFD services and fewer students would reside on campus where LMU's Department of Public Safety maintains an Emergency Preparedness Program and provides support services on campus until Los Angeles Fire Department arrives, via staff that possess current first aid/CPR certification and are trained in light search and rescue.

4.3.2.10.3 Recreation and Parks

Under the Proposed Project and Alternative 3, enrollment would increase to the previously approved cap of 7,800 FTE students (an increase of approximately 932 FTE students), and the number of FTE faculty and staff would increase to approximately 1,800, which would increase demand for recreation and park facilities. Both the Proposed Project and this alternative propose to increase the net area of outdoor athletic facilities by approximately 4.8 acres for a total of approximately 20.0 acres at buildout, and propose to construct approximately 28,000 net new square feet of indoor athletic facilities, which would result in a total of approximately 213,000 gross square feet of indoor athletic facilities. New and enhanced athletic facilities proposed under Alternative 3 would be similar to those proposed under the Proposed Project.

Additionally, the proposed LMU Specific Plan establishes a minimum acreage of outdoor athletic facilities and open space that must be provided on Campus. Proposed Project implementation includes sufficient open space to offset the demand associated with the increase in students and exceed the minimum acreage requirement established by the proposed LMU Specific Plan, and impacts would be less than significant. Under this alternative, no additional students would reside on-campus, but an equivalent net increase in recreation and open space would be provided. Impacts would remain less than significant. However, since this alternative would not increase on-campus housing, a greater percentage of students would reside off-campus than under the Proposed Project, thereby increasing the potential for use of off-site public recreational facilities. For this reason, Recreation and Parks impacts under Alternative 3 could be greater than those associated with the Proposed Project.

4.3.2.11 Transportation

The Proposed Project would result in potentially significant, although mitigable, significant traffic and parking impacts during construction since construction worker parking would be accommodated off campus and shuttles would be provided to transport workers to and from the campus. Alternative 3 would also result in potentially significant but mitigable construction-related Transportation impacts, and would reduce the impacts associated with the Proposed Project since less construction would take place.

Since Alternative 3 would not increase the supply of housing on campus for students, implementation of this alternative would preclude beneficial impacts associated with the Proposed Project related to reduced trip generation because of the reduced number of students commuting to campus. Circulation (intersection) impacts under this alternative would therefore be greater than under the Proposed Project and would be significant and unavoidable. Since this alternative would develop the same number of new parking spaces as the Proposed Project, parking impacts would be similar.

4.3.2.12 Public Utilities

4.3.2.12.1 Water Supplies

Since the campus population and non-residential square footage would increase above existing conditions under Alternative 3, the water demand on campus would also increase. A number of water conservation features are currently integrated into the existing campus, including a reclaimed water system for irrigation, drought-tolerant landscaping, the “trayless dining” program, and several LEED-certified buildings. In addition to the continued operation of the existing water conservation features on campus, Alternative 3 would replace several existing non-residential buildings on campus with buildings that are more water efficient and would incorporate additional water conservation measures into campus operations. Given these features, the increased water demand under Alternative 3 would constitute a less-than-significant impact.

The Proposed Project would also increase water demand above existing conditions due to increased enrollment and faculty and staff levels and building square footage, resulting in a less-than-significant impact. However, Alternative 3 would permit the development of 508,000 net new square feet of academic or administrative uses only, and would not permit replacement of residential uses with newer buildings constructed with more water-efficient systems. The elimination of new residential development on the campus would reduce total campus water demand compared to the Proposed Project but would not allow for the replacement older residential buildings with less water-efficient systems. Moreover, at least some of the students living off campus in LADWP’s service area are likely to live in older buildings possessing fewer water-efficiency features than would be built on LMU’s campus under the Proposed Project. For these reasons, Water Supply impacts under Alternative 3 could be greater than those of the Proposed Project, but would remain less than significant.

4.3.2.12.2 Wastewater

Additional wastewater flows associated with Proposed Project buildout could potentially create capacity impacts on wastewater lines such as line 3A, which serves a portion of Burns Campus and is presently near its design capacity. City of Los Angeles Department of Public Works guidelines recommend that

pipes be upgraded as their flows approach specific design capacities. Since the Proposed Project would, if necessary, upgrade lines approaching design capacity and could decrease current daily wastewater generation by increasing the water-use efficiency per square foot of new building development, the Proposed Project's Wastewater impacts would be less than significant.

This alternative would permit the development of 508,000 net new square feet of academic or administrative uses only, and would not permit replacement of existing residential uses or construction of new residential buildings. This reduction in development would incrementally reduce total campus wastewater generation compared to the Proposed Project. Impacts would be less than those of the Proposed Project and would be less than significant.

4.3.2.12.3 Solid Waste

Under Alternative 3, no demolition of existing residential buildings would be permitted, and therefore construction-related Solid Waste impacts would be less than those associated with the Proposed Project, and would be less than significant.

Under Alternative 3, the current enrollment of 6,868 FTE students would be increased to 7,800 FTE students, while the percentage of undergraduate students living on campus would remain at 60 percent. This alternative would incrementally increase the amount of solid waste generated on campus over existing conditions, but less solid waste would be generated on campus than under the Proposed Project since there would be fewer people living on campus. However, it is assumed that students not residing on-campus would still reside within the County of Los Angeles, merely transferring Solid Waste impacts elsewhere, and impacts would therefore be similar to those of the Proposed Project. The County of Los Angeles Department of Public Works 2006 Annual Report has determined that at the current rate of disposal, Los Angeles County solid waste disposal demand cannot be accommodated beyond the year 2015, and the report does not project landfill capacity beyond 2021. Therefore, this alternative would still result in a cumulatively considerable contribution to cumulatively significant Solid Waste impacts beyond 2015 and would have similar operational Solid Waste impacts to the Proposed Project.

4.3.2.12.4 Energy

Electricity

The anticipated electricity demand of the Proposed Project would increase approximately 6,240.3 Mwh per year over existing uses. Since Alternative 3 would not increase residential uses on campus and would result in a reduced amount of future square footage compared to the Proposed Project, electricity demand on campus would be lower with implementation of this alternative even though this alternative would

not replace older residential buildings with more energy-efficient buildings and systems. However, at least some of the students living off campus in LADWP's service area are likely to live in older buildings possessing fewer energy-efficiency features than would be built on LMU's campus under the Proposed Project. For these reasons, Energy impacts related to electricity consumption under this alternative could be greater than those associated with the Proposed Project but would remain less than significant after mitigation.

Natural Gas

The anticipated natural gas demand of the Proposed Project would be 13,858.61 Mcf annually over existing conditions. Since this alternative would not increase residential uses on campus and would result in a reduced amount of future square footage compared to the Proposed Project, natural gas demand on campus would be lower with implementation of this alternative. However, at least some of the students that would be required to live off campus under this alternative would still reside within the Gas Company's service area, which covers most of southern and central California, and are likely to live in older buildings possessing fewer energy-efficiency features than would be built on LMU's campus under the Proposed Project. For these reasons, Energy impacts related to natural gas consumption under this alternative could be greater than those associated with the Proposed Project but would remain less than significant after mitigation.

4.3.3 Relationship to Project Objectives

Since student enrollment and FTE faculty and staff could increase under Alternative 3, but no new or replacement student housing could be constructed, Alternative 3 would prevent attainment of Key University Objective U-3, ensuring the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved on-campus housing opportunities. It would allow incomplete attainment of the remaining two Key University Objectives: implementing LMU's threefold mission by creating an updated, cohesive campus community and environment with a critical mass of approximately 7,800 FTE students (Objective U-1), and attaining certainty regarding future development on campus that allows for future growth, the pursuit of LMU's mission, and promotion of its other Key University, Academic, Residential, and Sustainability Objectives (Objective U-2).

Because Alternative 3 precludes construction of any replacement or new residential square footage, it would allow incomplete attainment of the two Key Academic Objectives: replacing functionally obsolete academic, administrative, athletic, and residential spaces and buildings to create a functionally cohesive environment on campus (Objective A-1), and building state-of-the-art facilities to house future academic,

research, and residential facilities on campus, to aid in the recruitment and retention of students and faculty, and the creation of the best possible academic community and social living and learning environment (Objective A-2). For the same reasons, Alternative 3 also would prevent attainment of all six Key Residential Objectives: contributing to the alleviation of the regional housing shortage (Objective R-1); increasing the percentage of FTE students housed on campus from approximately 60 percent to approximately 75 percent (Objective R-2); enhancing campus student life by raising the standard of on-campus housing (Objective R-3); fostering community and a communal educational environment by increasing the number of FTE undergraduate students living on campus and by replacing outdated student housing units with updated social-living units (Objective R-4); replacing aging student residential rooms and apartments with modern residential accommodations, to improve the educational environment on campus (Objective R-5); and addressing community concerns regarding students living off campus by moving more undergraduate residential students onto campus (Objective R-6).

Alternative 3 would prevent attainment of Key Sustainability Objective S-2, moving more undergraduate students into on-campus housing to reduce traffic trips and vehicle miles traveled to and from the LMU campus. Since it would not replace old student housing or build additional on-campus housing, and would therefore necessitate more commuter trips to and from campus, it would allow incomplete attainment of Key Sustainability Objective S-1, creating a sustainable campus environment incorporating green building and landscape practices, reducing the production of greenhouse gas emissions and reducing the consumption of water, electricity, natural gas, and energy.

Although no new or replacement housing could be constructed, other components of the Proposed Project could be implemented under Alternative 3; for this reason, it would attain Planning and Design Objective PD-1 and partially attain Objective PD-2. Since the number of students housed on campus would not increase, Alternative 3 would prevent attainment of Pedestrian and Vehicular Circulation Objective C-1. Proposed Project improvements related to athletic facilities could take place, and this alternative would therefore attain Athletic and Open Space Objective AOS-1.

Alternative 3 would not allow full attainment of any of the 13 Key Objectives and, only two of the remaining four Project Objectives would be fully attained under Alternative 3.

4.4 Alternative 4 –Build New Residential Uses Off-Campus

4.4.1 Description of the Alternative

As under the Proposed Project, this alternative assumes the systematic replacement of all academic, administrative, and indoor athletic facilities on campus that are functionally obsolete or substandard. This alternative would also reconfigure inadequate outdoor athletic facilities and open space areas,

internal campus roadways, parking facilities, and pedestrian circulation accommodations, and would implement infrastructure upgrades as needed. Accordingly, under this alternative, approximately 508,000 net new gross square feet of academic, administrative, and student support facilities, approximately 28,000 net new gross square feet of indoor athletic facilities, and approximately 4.8 net new acres of outdoor athletic facilities would be realized.

Residential uses on the LMU campus presently total approximately 942,000 gross square feet, within which LMU houses approximately 60 percent of its undergraduate enrollment (3,261 beds). The Proposed Project would build sufficient additional residential square footage on campus to house approximately 75 percent of its undergraduate population, based upon the previously approved enrollment cap of 7,800 FTE students. This would require the replacement of approximately 370,000 square feet of residential facilities on campus and the addition of approximately 476,000 net new square feet and 989 beds, for a total of approximately 1,418,000 gross square feet and 4,250 beds.

Under this alternative, LMU would retain its newer existing student residential facilities, totaling approximately 572,000 gross square feet; demolish the remainder (approximately 370,000 gross square feet); and replace the demolished residential square footage on campus with newer student residential facilities, up to the pre-existing residential square footage total of 942,000 gross square feet (i.e., no net increase over existing on-campus residential square footage).

The additional proposed 476,000 square feet of new student housing would be constructed on an alternative site of approximately 22 acres in area. However, a search of properties in the vicinity of the campus did not identify any such viable site within 10 miles of the campus. No single property or parcel of 22 acres in size suitable for development of student housing is currently for sale. The proposed new student housing, however, could be disaggregated and developed on more than one site in the area. For example, a review of parcels for sale in the area identified three parcels potentially suitable for development of student housing. Together, the three sites total approximately 19.5 acres. Accordingly, under this alternative, all new housing square footage and beds would be developed by LMU at the three off-campus locations under this alternative, with any existing uses at those sites demolished prior to construction of student housing. LMU would continue to house approximately 60 percent of its undergraduate population on campus, while the additional 15 percent of the undergraduate population would occupy a total of approximately 476,000 square feet of net new housing (approximately 989 beds altogether) that LMU would develop at three off-campus locations, such as the three sites discussed below. Under this alternative, the total square footage of student residential uses would be the same as under the Proposed Project and would accommodate the same number of students.

Site 1 is approximately 4.7 acres and is located at 222 Kansas Street in the City of El Segundo, approximately 4.9 miles south-southeast of campus. Site 1 is currently under construction and is proposed to contain 82,000 square feet of commercial and retail space.³ Adjacent uses include manufacturing to the east, multifamily residential to the northwest, and office and manufacturing uses to the north, west, and south. Site 1 is in a City of El Segundo Medium Manufacturing (MM) Zone with a land use designation of Commercial–Smoky Hollow Specific Plan Area, which precludes residential development; therefore, a general plan amendment and a zone change would be required to implement Alternative 4. A Mitigated Negative Declaration permitting the development of the Segundo Business Park, which would include 84,000 square feet of light industrial, office, and restaurant uses and 55 commercial condominium air space units within five buildings, was approved in February 2009.⁴

Site 2 is approximately 8 acres and is located at 4500 West 116th Street and 11711 Grevillea Avenue in the City of Hawthorne, approximately 6.3 miles southeast of campus. Site 2 is currently not occupied, but is developed with 219,700 square feet of hospital space and a 67,000-square-foot patient tower that is 55 percent completed.⁵ Adjacent uses include single-family and multifamily residential uses to the north, west, and south; and hospital uses and multifamily residential uses to the east. Site 2 is zoned as Hawthorne C-3 (General Commercial) and, therefore, a Conditional Use Permit would be required. However, the development of 116 single-family units has been approved on Site 2.

Site 3 is approximately 6.8 acres and is located at 1449 West 120th Street in an unincorporated area of the County of Los Angeles, approximately 11 miles southeast of campus. Site 3 is currently undeveloped and is overlain by an easement for the City of Los Angeles Water and Power (LADWP) with one electrical tower and some utility boxes. Adjacent uses include the Union Pacific Railroad and the SR-105 Century Freeway to the north; a scrap yard, church, and single-family and multifamily residential uses to the east and west; and single family residential to the south. This site is currently zoned R-1 (Single Family Residential) and A-1 (Agricultural Zone), and would require a general plan amendment and a zone change to implement Alternative 4.

Assuming a proportionate distribution of the proposed new residential development based upon site acreage, Site 1 would be developed with 114,240 square feet and 237 beds, Site 2 would be developed with 195,160 square feet and 406 beds, and Site 3 would be developed with 166,600 square feet and 346 beds.

³ http://elsegundobusiness.com/biz_dev_sbp.htm.

⁴ Minutes of the Meeting of the Planning Commission of the City of El Segundo, California, for Environmental Assessment No. 788, Subdivision No. 08-01, Lot Line Adjustment 08-07, and Smoky Hollow Site Plan No. 08-01, February 26, 2009. <http://www.elsegundo.org/civica/filebank/blobload.asp?BlobID=6142>

⁵ <http://www.loopnet.com/property/15443449/4500-W-116TH-ST/>.

Table VI-3, Alternative 4 – Build New Residential Uses Off-Campus Alternative, Summary of Existing and Proposed LMU Campus Facilities, summarizes the existing, to-be-retained, net new, and total gross square footages of facilities under this alternative.

Table VI-3
Alternative 4 – Build New Residential Uses Off-Campus Alternative
Summary of Existing and Proposed LMU Campus Facilities

| Uses | Existing (gsf/acres) | To Remain (gsf/acres) | To Be Added (gsf/acres) | Total At Buildout (gsf/acres) | Net New (gsf/acres) |
|-------------------------------|-------------------------|--------------------------|----------------------------|-------------------------------------|------------------------|
| Academic/Administrative | 1,651,000 | 1,136,000 | 1,023,000 | 2,159,000 | 508,000 |
| Residential (On-campus) | 942,000 | 572,000 | 370,000 | 942,000 | 0 |
| Residential (Off-campus) | Unknown | 0 | 476,000 | 476,000 | 476,000 |
| Athletic Facilities (Indoor) | 185,000 | 105,000 | 108,000 | 213,000 | 28,000 |
| Total | 2,778,000 | 1,813,000 | 1,977,000 | 3,790,000 | 1,012,000 |
| Athletic Facilities (Outdoor) | 15.2 acres | 13.6 acres | 6.4 acres | 20.0 acres | 4.8 acres |
| Open Space | 25.0 acres | 25.0 acres | 5.0 acres ^b | 30.0 acres | 5.0 acres |
| Total | 40.2 acres | 38.6 acres | 11.4 acres | 50.0 acres | 9.8 acres |

^b Since no new residential uses are proposed on LMU's campus under this alternative, campus open space could increase.
gsf = gross square feet

4.4.2 Analysis

4.4.2.1 Aesthetics and Visual Resources

4.4.2.1.1 Aesthetics and Views

Aesthetics

Alternative 4 would reduce proposed development on LMU's campus by approximately 476,000 gross square feet, but develop new residential uses off site, resulting in the same net new building square footage as the Proposed Project. Therefore, this alternative would entail a similar amount of construction as the Proposed Project, and result in similar construction-related Aesthetic impacts. Like the Proposed Project, this alternative would result in less than significant construction-related Aesthetic impacts.

While this alternative would reduce the number of buildings on campus in comparison to the Proposed Project, additional buildings would be developed on Sites 1 through 3 for off-campus residential uses, all of which would be infill development. Development on these sites would be designed to be visually

consistent with surrounding uses. Therefore, off-campus housing would not significantly alter, degrade, or eliminate any features that substantially contribute to the valued visual character of the communities within which the sites are located. Impacts on Aesthetics would be similar to impacts of the Proposed Project, however some impacts would be transferred off site, and remain less than significant.

Obstruction of Views

As with the Proposed Project, development permitted on campus under this alternative would not substantially modify views of the campus from prominent off-site vantage points. Short-range views would be protected and not obstructed under the existing entitlements for the campus. Sites 1 through 3 are located in highly developed areas, without view access to visually important resources, and would be considered infill development. Additionally, the off campus housing on Sites 1 through 3 would be subject to the height limits at each off campus location. Therefore, off-campus housing is not anticipated to substantially obstruct existing views of a valued view resource from a prominent view location. Therefore, View impacts under this alternative would be similar to impacts associated with the Proposed Project, and would remain less than significant.

4.4.2.1.2 Light & Glare

Since construction of Alternative 4 would take place on LMU's campus as well as at three off-site locations, construction-related lighting would result in potentially significant, but mitigable, Light and Glare impacts. Impacts under Alternative 4 are likely to be greater than those of the Proposed Project since there is the potential for more surrounding land uses to be affected.

Operations under Alternative 4 and the Proposed Project would introduce new sources of outdoor lighting and the potential use of reflective building materials. Additionally, this alternative would introduce new sources of potential light and glare to Sites 1 through 3 where off-campus residential uses would be developed. Sites 1 and 2 are located in highly urbanized areas, are currently developed, and contain existing light sources. Site 3 is undeveloped and implementation of this alternative would result in new sources of light and glare; however, Site 3 is located in a highly urbanized area and already experiences relatively high ambient nighttime light levels. Mitigation measures for the Proposed Project would apply to any new lighting and potential sources of glare proposed under this alternative. With implementation of mitigation, neither the Proposed Project nor this alternative would increase ambient illumination levels on adjacent residential properties in excess of the maximum increase allowed under the applicable Municipal Codes, or generate glare. Therefore, operational Light and Glare impacts under this alternative would be less than significant after mitigation, and similar to impacts associated with the Proposed Project.

4.4.2.1.3 Shading

Since implementation of Alternative 4 would decrease the amount of new development on campus compared to the Proposed Project, shading impacts on shade-sensitive uses adjacent to the campus are anticipated to be less than those associated with the Proposed Project. However, new shadows could potentially affect shade-sensitive uses adjacent to the three off-site locations proposed for student housing. Shade-sensitive land uses adjacent or in close proximity to the three alternative sites include multifamily residential uses to the northwest of Site 1; single-family and multifamily residential uses to the north, west, and south of Site 2; and a church and single-family and multifamily residential uses to the east and west of Site 3, as well as single-family uses residential to the south. Since buildings in this region do not cast shadows to the south, land uses south of the alternative sites would not be shaded by development of the sites. Given the very close proximity of residential uses to the three sites (in some cases, on several sides), and the potential for shading of those uses for more than three consecutive hours, it is likely that this alternative has greater potential for significant shading impacts than the Proposed Project. Development of student housing on these sites would not necessarily be consistent with the applicable municipal codes and thresholds for significance established by the jurisdictions designed to avoid shading impacts. Therefore, this alternative's overall shading impacts could be greater than those of the Proposed Project, and are potentially significant and unavoidable.

4.4.2.2 Air Quality

4.4.2.2.1 Air Quality

Construction activities on campus under this alternative would be of lesser intensity but similar duration compared to those of the Proposed Project, assuming the same buildout timeframe but a decrease in the amount of new development on campus. However, unlike the Proposed Project, this alternative would also require the construction of approximately 476,000 gross square feet of off-campus student residential facilities, which could result in additional construction impacts including potential localized significance thresholds (LST) impacts at those locations. The three off-campus locations have been selected and a description of the potential air quality issues at each location is provided below:

Site 1: 222 Kansas Street, El Segundo, California

This site is located within one-quarter mile of the Chevron oil refinery. Nearby land uses include mixed-use commercial and industrial facilities. Residential land uses are located further to the north and northwest. The SCAQMD does not have specific requirements for residential projects located within 0.25 mile of facilities that emit toxic air contaminants to undergo a health risk assessment to determine the potential for health impacts. Such an analysis would fall under the discretionary authority of the lead

agency. It should be noted that residential land uses currently exist within 0.25 mile of the refinery. Nonetheless, the site's proximity to the refinery could present an air quality issue of concern that does not exist with the Proposed Project.

Site 2: 4500 W 116th Street and 11711 Grevillea Avenue, Hawthorne, California

This site is surrounded by primarily single- and multi-family residential land uses. Depending on the specific location of project development, sensitive receptors could potentially be located within 25 meters of construction activity, including demolition, grading, and excavation.

Site 3: 1449 W 120th Street, Los Angeles, California

This site is located just south of Interstate 105 and the Union Pacific Railroad. Nearby land uses include single- and multi-family residences. Depending on the specific location of project development, sensitive receptors could potentially be located within 25 meters of construction activity, including demolition, grading, and excavation. The California Air Resources Board (CARB) has recommended in its *Air Quality and Land Use Handbook* that sensitive land uses be located at least 500 feet from highways and heavily traveled roadways to minimize the potential for adverse health impacts from motor vehicle exhaust emissions. The location of this site satisfies CARB's recommendation.

This alternative would require demolition of existing uses at one of the three off-site locations, which also could contribute to greater construction impacts than the Proposed Project. Impacts during maximum daily construction emission conditions, those used for evaluating localized significance threshold impacts, would remain significant and unavoidable under this alternative for localized PM₁₀ and PM_{2.5}. Similar to the Proposed Project, this alternative would be required to comply with mitigation that would reduce impacts, although these impacts would remain significant and unavoidable.

Operational impacts are determined mainly by the daily traffic volumes. The number of daily trips generated under this alternative would be higher in comparison to the Proposed Project, as fewer students living on campus would mean increased vehicle trips to and from campus. As vehicular emissions are dependent on the number of trips, weekday and weekend vehicular sources would result in an incremental increase in pollutant emissions compared to the Proposed Project. However, the incremental increase in operational pollutant emissions from additional commuting students living in off-campus housing would not generate emissions that would exceed the SCAQMD thresholds and impacts would be less than significant.

4.4.2.2 Climate Change

This alternative would permit construction of the same total square footage as the Proposed Project, except that approximately 476,000 gross square feet of student residential facilities would be constructed off-site instead of on campus. As with the Proposed Project, demolition of existing buildings on campus would be required, but demolition of buildings on one of the three off-site locations would also be necessary. Additionally, construction of this alternative would generate greenhouse gas emissions through the use of construction equipment and through haul truck and construction worker trips. The location of greenhouse gas emissions would not affect impacts since all greenhouse gas emissions are presumed to affect global, rather than local, climate. However, construction-related Climate Change impacts under this alternative would be greater than the impacts associated with the Proposed Project since it is possible that more demolition would be required, but would remain less than significant.

This alternative would result in the same square footage of developed building space relative to the Proposed Project and would include the same potentially beneficial Proposed Project design features that would serve to reduce greenhouse gas emissions (e.g., the replacement of older, obsolete buildings and facilities with newer energy-efficient and water-conserving facilities). Additionally, the campus would likely provide a shuttle service to and from the off-site locations. However, daily traffic volumes would increase as fewer students would be able to live on campus and would instead need to commute to campus resulting in greater mobile source greenhouse gas emissions, even with a shuttle service that would likely be needed as a mitigation measure. Therefore, although operational impacts under this alternative would be less than significant, impacts would be greater than those associated with the Proposed Project.

4.4.2.3 Biological Resources

Proposed Project construction activity could result in potentially significant impacts on common nesting bird species, which are regulated under the Fish and Game Code and the Migratory Bird Treaty Act, and on the monarch butterfly, which is considered a sensitive species and may overwinter on the campus. Additionally, two protected tree species exist on the campus, coast live oak and western sycamore, and impacts are governed by the Los Angeles Municipal Code, which requires a permit for encroachment or removal of specimen trees. With mitigation, Proposed Project impacts would be less than significant. Since the total amount of construction on campus would be reduced compared to the Proposed Project, this alternative's impacts on nesting birds, possible overwintering monarch butterflies, and protected trees would also be reduced. Site 2 is currently developed and Site 1 is under construction and therefore do not have areas of open space for sensitive species to live. As such, impacts to biological resources at Sites 1 and 2 would be less than significant. Site 3 is currently vacant, is primarily open space, may

contain trees with nesting birds, and may contain protected trees (such as oak trees and walnut trees). Therefore, impacts would remain potentially significant and mitigation measures applicable to the Proposed Project would also apply to this alternative.

4.4.2.4 Cultural Resources

4.4.2.4.1 Paleontological Resources

The paleontological study prepared for the Proposed Project determined that there is high potential for currently unrecorded fossil sites being encountered during earthmoving in areas of campus where Palos Verdes Sand or non-marine terrace cover is found, which is estimated to be at least 35 feet below ground level. Therefore, construction under either this alternative or the Proposed Project could potentially disrupt paleontological resources on campus. Additionally, construction of off-campus residential uses under this alternative could potentially disrupt paleontological resources at off-site locations. According to the paleontological study, several fossil sites in the Palos Verdes Sand and non-marine terrace cover outside the campus boundaries have been found and are known to exist in the cities of El Segundo (Site 1) and Hawthorne (Site 3).⁶ Therefore, impacts to Paleontological Resources would be similar to those of the Proposed Project and would remain potentially significant. Mitigation measures applicable to the Proposed Project would also apply to this alternative.

4.4.2.4.2 Archaeological Resources

Implementation of the Proposed Project has the potential to disturb, damage, or degrade known archaeological resources or their settings in and around campus, and impacts are potentially significant, but would be reduced to less than significant with mitigation. Since Alternative 4 would still construct new facilities on LMU's campus, it would result in disturbance of portions of campus containing or in proximity to designated archaeological sites on campus, and impacts would be potentially significant. However, this alternative would require less construction on campus, and, therefore, result in less potential disturbance of on-campus sites than the Proposed Project.

All three off-campus sites proposed under Alternative 4 to house student residential facilities have been previously disturbed, with Site 1 under construction and Site 2 currently supporting substantial development. While a number of archaeological investigations have been undertaken within 1 mile of Site 1, only one has identified a site of archaeological significance, north of El Segundo on LAX property.

⁶ City of El Segundo. *Segundo Business Park Initial Study*. December 2008. City of Hawthorne. *Ramona Gardens Initial Study*. December 2006. The Ramona Gardens Project's name has changed to Prestige Villas Project.

No known or recorded archaeological sites are present on Site 1.^{7,8} Prior environmental documentation for Site 2 indicates that there are no known or recorded archaeological resources on the site.⁹ Site 3, while not presently developed, has been disturbed and may have been used for dumping, and is not indicated in the County's General Plan as the site of a known cultural resource.¹⁰

Off-campus residential uses proposed under this alternative would not be sited in close proximity to designated archaeological sites. Therefore, this alternative's impacts would be less than those of the Proposed Project, although they would remain potentially significant since the potential presence of archaeological resources on any of the sites cannot be entirely ruled out. Mitigation measures applicable to the Proposed Project would also apply to this alternative.

Like the Proposed Project, however, this alternative could contribute to a significant cumulative impact to Archaeological Resources due to the additive effects of disturbance to archaeological sites in the Project area. However, since Alternative 4 would involve less construction on campus within areas known to contain archaeological resources, this alternative would result in less of a contribution to this cumulative impact than the Proposed Project.

4.4.2.4.3 Historical Resources

No demolition or relocation of Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, or the bluff-face letter "L" would take place under Alternative 4 or the Proposed Project. Excavation, earth moving activities, and possible settlement due to the removal of soil could occur during construction, resulting in potential impacts to adjacent historic resources. However, Alternative 4 would require less construction on campus, and, therefore, would result in less potential disturbance of these resources than the Proposed Project. Off-campus residential uses proposed by this alternative would not be sited in close proximity to historical resources. Available information indicates that the buildings on Site 2 were built in 1952.¹¹ Given that some of the buildings are older than 50 years, the potential exists for them to be historic resources. However, Site 2 does not contain a known historic resource nor are these buildings known to

⁷ City of El Segundo, *El Segundo Circulation Element Update Draft Environmental Impact Report*, Section IV.F, Cultural Resources, p. IV-F-2. June 2004. http://www.elsegundo.org/depts/planningsafety/planning/circulation_eir/IV-F-Cultural-Resources.pdf.

⁸ City of El Segundo. *Segundo Business Park Initial Study*. December 2008.

⁹ City of Hawthorne, *Ramona Gardens Initial Study*, December 2006. (Note: The Ramona Gardens Project's name has been changed to The Prestige Villas Project.)

¹⁰ County of Los Angeles, *2008 Draft County of Los Angeles General Plan Update*, General Plan Map 6.8: Historical and Cultural Resource Sites, http://planning.lacounty.gov/view/general_plan_maps.

¹¹ City of Hawthorne, *Ramona Gardens Initial Study*, December 2006. (Note: The Ramona Gardens Project's name has been changed to The Prestige Villas Project.)

carry any historic designation.^{12,13} Therefore, impacts would be less than those of the Proposed Project, although they would remain potentially significant. Mitigation measures applicable to the Proposed Project would also apply to this alternative.

4.4.2.5 Geology

Construction and implementation of the Proposed Project could result in potentially significant impacts related to geological hazards, including expansive and corrosive soils, seismically induced shaking, sedimentation and erosion, and slope instability. Alternative 4 would decrease the amount of new development on campus, but would be subject to additional impacts at the off-campus housing sites. Since the off-campus residential uses proposed by this alternative are located within 10 miles of campus, it is assumed that these uses would be subject to similar geological hazards. Site 1 is located within the Venice Quadrangle and is not located in an area known for liquefaction or earthquake-induced landslides.¹⁴ Sites 2 and 3 are located within the Inglewood Quadrangle and are not located in areas known for liquefaction or earthquake-induced landslides.¹⁵ According to the Federal Emergency Management Agency (FEMA), neither of Sites 1 through 3 are located within a 50-year or 100-year flood zone.¹⁶ Therefore, Alternative 4's impacts related to Geology would be similar to those of the Proposed Project, and would be less than significant with mitigation. Similar to the Proposed Project, this alternative would be required to adhere to applicable building and municipal codes and current local, state, and federal regulatory requirements.

4.4.2.6 Hazards

Construction of both the Proposed Project and this alternative would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. Demolition and the associated hazards due primarily to the release of asbestos-containing materials and lead from lead-based paint may be similar on Site 2, which is currently developed. Site 3 is currently undeveloped so it does not pose this issue. Alternative 4 would decrease the amount of construction on campus, but would also involve construction at the off-campus housing sites. Since the same amount of construction would be undertaken, potential construction-related hazards impacts would be similar, although if the hazardous materials are present in the potential alternative

¹² Existing structures are not listed by the State of California's Office of Historic Preservation as a historic resource. (State of California, Office of Historic Preservation Website. <http://ohp.parks.ca.gov>. 2009.)

¹³ City of Hawthorne, *Ramona Gardens Initial Study*, December 2006. (Note: The Ramona Gardens Project's name has been changed to The Prestige Villas Project.)

¹⁴ State of California, *Seismic Hazard Zones: Venice Quadrangle*.

¹⁵ State of California, *Seismic Hazard Zones: Inglewood Quadrangle*.

¹⁶ Federal Emergency Management Agency. Flood Map Viewer.

sites, impacts would remain potentially significant. Mitigation applicable to the Proposed Project would be required to reduce construction impacts associated with this alternative to a less than significant level.

Both the Proposed Project and Alternative 4 would increase the campus population and, consequently, the transport, use, storage, and disposal of hazardous materials on campus and at off-campus housing locations. Therefore, Alternative 4 would also result in less than significant operational Hazards impacts, which would be similar to those of the Proposed Project.

4.4.2.7 Surface Water Hydrology and Water Quality

4.4.2.7.1 Surface Water Hydrology

Site 1 is under construction, Site 2 is currently developed, and Site 3 is undeveloped. Construction under this alternative would require more grading and earthmoving activity since these activities would take place on LMU's campus as well as on three off-site properties, resulting in potentially greater construction-related changes in existing hydrology patterns, rates of runoff, and overall runoff volumes. While Alternative 4 would reduce construction, and consequently, hydrology impacts on the campus, it would likely create new impacts at the off-campus housing sites. Accordingly, this alternative would result in greater construction-related Surface Water Hydrology impacts than the Proposed Project. Impacts would be less than significant after mitigation.

Like the Proposed Project, this alternative would realize potentially beneficial impacts related to Surface Water Hydrology on the campus, including the alleviation of periodic flooding of the Sunken Garden and the proposed upsizing of underground storm drains approaching or exceeding their recommended design capacities; these drains convey these flows from portions of Burns Campus toward the Sunken Garden, and from the Sunken Garden off site. This alternative would also implement similar upgrades, if necessary, at the sites of off-campus housing. Therefore, operational Surface Water Hydrology impacts would be similar to those associated with the Proposed Project, and would be less than significant with mitigation.

4.4.2.7.2 Surface Water Quality

Construction under this alternative and the Proposed Project would require more grading and earthmoving activity since these activities would take place on LMU's campus as well as on three off-site properties, resulting in greater construction-related water quality impacts. While Alternative 4 would reduce construction on the campus and, consequently, hydrology impacts on the campus, it would create new impacts on the off-campus housing sites. Accordingly, this alternative would have greater

construction-related Surface Water Quality impacts than the Proposed Project. Impacts would be less than significant after mitigation.

Both the Proposed Project and this alternative would increase the amount of pervious surfaces on campus through which stormwater could readily infiltrate underlying soil. This alternative could also increase pervious surfaces at the off-campus housing sites, except for Sites 1 and 3, which would experience a decrease in the amount of pervious surfaces. Additionally, a SUSMP must be prepared and implemented for all new development. A SUSMP requires retention and treatment of the first three-quarters of an inch of rainfall on new impervious surfaces whenever possible. This would effectively lower pollutant levels in stormwater discharged from the campus and the off-campus housing sites in the future. Therefore, the operational impacts would be less than significant and similar to those associated with the Proposed Project.

4.4.2.8 Land Use

The Westchester–Playa del Rey Community Plan presently designates the LMU campus as “L” Low Density Residential, which corresponds to single-family residential zoning designations. The zoning designation for the campus is [Q]R4-1, Residential – Multiple Dwelling Zone. The City previously found that this zoning designation is consistent with the campus’s General Plan designation, since the Q conditions applicable to the property limit the uses on campus to those of a university or those uses permitted in the R1 zone.

Similar to the Proposed Project, Alternative 4 includes a request for a Zone Change, a General Plan Amendment, and the establishment of a Specific Plan. The Zone Change being requested would change the zoning of the campus from [Q]R4-1 to R4-1. The General Plan Amendment would change the designation of the campus from Low Density Residential to High-Medium Density Residential, which would be consistent with the new proposed zoning and Specific Plan. The current Q conditions on the Property would be replaced with more detailed land use restrictions established in the Specific Plan. This Specific Plan would contain a more comprehensive set of development standards to maintain compatibility with surrounding land uses, establish more restrictive height limits and setbacks from surrounding uses, establish Planning Areas on campus that would primarily concentrate athletic uses in the southern portion of the Burns Campus, maintain the campus’s large expanses of open space, and configure new development to maintain scenic corridors through campus, among others.

Site 1 is in a Medium Manufacturing (MM) Zone and would require a general plan amendment and a zone change. Site 2 is zoned C-3 (General Commercial), which would allow student housing with the approval of a conditional use permit. Site 3 is currently zoned R-1 (Single Family Residential), and would

require a general plan amendment and a zone change to implement this alternative. With approval of the requested General Plan and zoning changes, student housing developed at off-campus locations would be generally compatible with surrounding uses.

Uses adjacent to Site 1 include manufacturing to the east, multifamily residential to the northwest, and office and manufacturing uses to the north, west, and south. Uses adjacent to Site 2 include multifamily and single family residential to the north, west, and south; and hospital uses and multifamily residential to the east. Uses adjacent to Site 3 include the Union Pacific Railroad and then the SR-105 Century Freeway to the north; a junk yard, church, and single and multifamily residential to the east and west; and single family residential to the south. Based on land uses adjacent to Sites 1 through 3, there is an increased potential for incompatibility with adjacent land uses than for the Proposed Project.

However, under this alternative, LMU could still increase its enrollment to the previously approved cap of 7,800 FTE students, although it would not be permitted to house any additional students on campus. Since this alternative would result in considerably greater trip generation than the Proposed Project, this alternative would reduce the Proposed Project's consistency with several General Plan and SCAG policies aimed at reducing vehicle miles traveled.

For these reasons, Alternative 4 could result in greater Land Use impacts than the Proposed Project.

4.4.2.9 Noise

Although construction activities and associated noise impacts on sensitive receptors surrounding the campus would be reduced under Alternative 4, noise would be generated during construction of off-campus housing. Sensitive receptors, such as single- and multi-family residential, a hospital, and a church, are located adjacent to the off-campus housing locations. Construction of off-campus housing would involve the use of similar construction equipment as the Proposed Project. However, construction of this alternative would generate greater noise and ground-borne vibration impacts during peak construction activities since these impacts would occur at multiple locations and therefore would likely impact a greater number of people. Given the close proximity of the off-campus housing sites to noise-sensitive residential receptors (all three sites), a hospital (Site 2), and a church (Site 3), construction noise impacts would be greater to those associated with the Proposed Project, and would remain significant and unavoidable.

Since Alternative 4 would house students at off-campus locations that would then be required to commute to LMU's campus, it would generate a greater number of vehicle trips to and from campus, and consequently, greater roadway noise impacts, than the Proposed Project. Roadway noise impacts are assumed to remain less than significant.

Currently, the off-campus Site 2 is developed with 219,700 square feet of hospital space. Off-campus Site 1 is under construction and is proposed to contain 82,000 square feet of commercial and retail space. Off-campus Site 3 is currently undeveloped, with the exception of an electrical tower and some utility boxes. Noise levels for residential areas are typically between 48 and 52 dB(A) CNEL. Campus housing at the off-site locations would be compatible with the adjacent residential uses. Given the urban locations of the three properties proposed for off-campus student housing, and given that noise generated by such housing would typically range from 48 and 52 dB(A) CNEL, operation of off-campus housing would not be expected to cause ambient noise levels in the surrounding area to increase by 3 dB(A) in CNEL to or within the “normally unacceptable” or “clearly unacceptable” categories as identified in **Table IV.I-3**, or by 5 dB(A). Therefore, the introduction of new student residential uses at the off-campus locations would have less than significant noise impacts. However, overall, operational Noise impacts associated with this alternative would be greater than those associated with the Proposed Project because of increased roadway noise.

4.4.2.10 Public Services

4.4.2.10 Police Protection

Since Alternative 4 would involve more demolition than the Proposed Project, albeit the same amount of construction, it would have greater construction-related Police Protection impacts than the Proposed Project. However, these impacts would be dispersed throughout the Cities of El Segundo and Hawthorne, and in unincorporated Los Angeles County, thereby dispersing the demand for Police Protection services among several law enforcement agencies. Impacts on Police Protection services would be greater than the Proposed Project, but would remain less than significant after mitigation.

Since implementation of the Proposed Project would not substantially increase the population to officer ratio or the crime/incident rate within the Los Angeles Police Department’s (LAPD) Pacific Division, impacts on Police Protection services were determined to be less than significant. Additionally, the LMU Department of Public Safety provides Police Protection services for the LMU campus and has a full-service Campus Security Services Department, which helps offset the Proposed Project’s demand on the City’s police services. However, under this alternative, approximately 476,000 gross square feet of residential uses (or approximately 989 beds) would be developed off campus instead of on campus. Off-campus residential uses would be detached from campus and located farther from the LMU Department of Public Safety’s jurisdiction and the City of Los Angeles Police Department service area. Therefore, this alternative would slightly increase demand on the El Segundo Police Department, the Hawthorne Police Department, and the Los Angeles County Sheriff’s Department.

As discussed above, Site 1 would be developed with approximately 114,240 square feet and 237 beds, Site 2 would be developed with approximately 195,160 square feet and 406 beds, and Site 3 would be developed with approximately 166,600 square feet and 346 beds. According to the Southern California Association of Governments, the City of El Segundo had 16,768 residents in 2003.¹⁷ As this Alternative would add 237 beds or 237 people to the City's population on Site 1, this alternative would increase the population by 1.4 percent. According to the Southern California Association of Governments, the City of Hawthorne had 87,748 residents in 2003. As this Alternative would add 406 beds or 406 people to the City's population on Site 2, this alternative would increase the population by 0.5 percent. According to the Southern California Association of Governments, the unincorporated portion of Los Angeles County had 55,566 residents in 2003. As this Alternative would add 346 beds or 346 people to this portion's population on Site 3, this alternative would increase the population by 0.6 percent. This Alternative, therefore, would result in minor increases to the populations of the respective communities and result in less-than-significant impacts on the local police and sheriff departments.

Police Protection impacts under this alternative would be greater than those associated with the Proposed Project because more students would live off campus and potentially require Police Protection services from LAPD or other City police departments, and fewer students would reside on campus where LMU's Department of Public Safety provides first-response Police Protection services for the LMU campus and has a full-service Campus Security Services Department, which helps offset demand for municipal Police Protection services. However, since the increase in the population and projected increase in demand would be relatively minor, impacts would still be less than significant after mitigation.

4.4.2.10 Fire Protection and Emergency Medical Services

Since Alternative 4 would involve the same overall amount of construction as the Proposed Project, it would have similar construction-related impacts related to Fire Protection and Emergency Medical Services as the Proposed Project; however, these impacts would be spread among the Cities of El Segundo and Hawthorne and in unincorporated Los Angeles County. These impacts would remain less than significant and be greater than the Proposed Project as greater impacts to other Fire Protection and Emergency Medical services would result.

Both the Proposed Project and this alternative would permit enrollment up to the approved cap of 7,800 FTE students, and propose approximately 1,800 FTE faculty and staff. However, as discussed above, Alternative 4 would result in a population increase of approximately 1.4 percent in the City of El Segundo, 0.5 percent in the City of Hawthorne, and 0.6 percent in the unincorporated portion of Los

¹⁷ Southern California Association of Governments. 2008. *Integrated Growth Forecast: Adopted 2008 RTP Growth Forecast, by City*. Los Angeles, CA.

Angeles County in the vicinity of Site 3. While this alternative would result in impacts to the cities of El Segundo and Hawthorne, and unincorporated Los Angeles County, where none would exist with the Proposed Project, these impacts would be minor and would not result in a significant impact.

Impacts on Fire Protection and Emergency Medical services were determined to be less than significant under the Proposed Project; impacts under this alternative would be greater than the Proposed Project, but would remain less than significant.

4.4.2.10 Recreation and Parks

Both the Proposed Project and this alternative would add approximately 4.8 net new acres of outdoor athletic facilities, 5 acres of landscaped open space, and 28,000 net new gross square feet of indoor athletic facilities on campus to meet the demands of the increased FTE student enrollment. Impacts on Recreation and Parks were determined to be less than significant under the Proposed Project. However, since this alternative would not increase on-campus housing, a greater percentage of students would reside off campus, thereby increasing the potential for usage of off-site public parks in the cities of El Segundo and Hawthorne and in unincorporated Los Angeles County, instead of campus facilities. Therefore, impacts under this alternative would be greater than those associated with the Proposed Project, but would remain less than significant.

4.4.2.11 Transportation

All construction activities on-campus associated with this alternative would be conducted in accordance with Section 41.40 of the Los Angeles Municipal Code, as is the case with the Proposed Project. However, construction at the three off-campus sites proposed for student housing facilities would be conducted in accordance with the applicable jurisdiction's municipal code.

In the case of the Proposed Project, the transport of heavy-duty construction equipment onto the campus would be minimized (i.e., organized to require as few trips as possible) to reduce disruption on campus, and construction equipment would subsequently be accommodated on campus for the duration of construction. Construction-worker parking under the Proposed Project would be accommodated at an off-campus site to minimize the number of construction-related traffic trips onto campus. Under Alternative 4, construction worker parking would be provided on-site or at an off-site location in the vicinity of each off-campus housing site. A shuttle service would transport workers to and from the construction sites in the morning and afternoon. Likewise, under this alternative, construction equipment would be transported to the alternative project sites as efficiently as possible.

As with the Proposed Project, construction of this alternative could cause traffic disruptions due to an increase in truck traffic associated with removal or import of fill materials and delivery of construction materials. However, a Construction Traffic Management Plan and other applicable construction plans required by the jurisdictions of the off-campus locations would be implemented to minimize disruption to the public street system. With implementation of this plan, in-street construction impacts would be less than significant and similar to construction-related traffic impacts associated with the Proposed Project.

Alternative 4 would likely require a shuttle to and from off-site locations to the main campus. However, since this alternative would not increase the supply of housing on-campus for students, implementation of this alternative would preclude beneficial impacts associated with the Proposed Project related to reduced trip generation from the reduction in students commuting to campus. Circulation (intersection) impacts of this alternative would therefore be greater than under the Proposed Project and would be significant and unavoidable. This alternative also would be subject to the parking requirements of each regulating municipality. Since this alternative would develop a similar amount of new parking spaces as the Proposed Project, parking impacts would be similar to those of the Proposed Project.

4.4.2.12 Public Utilities

4.4.2.12.1 Water Supplies

Since the campus population and overall building square footage (including the off-campus housing) would increase under Alternative 4, the water demand would increase above existing conditions with this alternative. A number of water conservation features are currently integrated into the existing campus, including a reclaimed water system for irrigation, drought-tolerant landscaping, the “trayless dining” program, and several LEED-certified buildings. In addition to the continued operation of the existing water conservation features on campus, Alternative 4 would replace several existing non-residential buildings on campus with buildings that are more water efficient and would incorporate additional water conservation measures into campus operations. Additionally, this alternative assumes that off-campus housing would incorporate similar efficiency measures. However, off-campus housing proposed by this alternative would not necessarily have access to the reclaimed water system for irrigation that would be used on campus. As a result, Alternative 4 would consume more potable water than the Proposed Project, and would have greater impacts on Water Supplies in the cities of El Segundo and Hawthorne and in unincorporated Los Angeles County than the Proposed Project. Nonetheless, due to the numerous water saving measures to be integrated into the proposed residential building and the fact that two of the alternative sites are already developed, the increased water demand associated with Alternative 4 remains less than significant.

4.4.2.12.2 Wastewater

Additional wastewater flows associated with Proposed Project buildout could potentially create capacity impacts on wastewater lines such as line 3A, which serves a portion of Burns Campus and is presently near its design capacity. City of Los Angeles Department of Public Works guidelines recommend that pipes be upgraded as their flows approaches specific design capacities.

Both the Proposed Project and this alternative would develop and replace a similar total square footage of academic/administrative, residential, athletic, and open space uses, although this alternative would develop some of the residential uses off campus. Both the Proposed Project and Alternative 4 could decrease current daily wastewater generation by increasing the water-use efficiency per square foot of new building development. Additionally, Alternative 4 assumes that off-campus housing would incorporate similar efficiency features. Therefore, total wastewater generation would be similar. It is anticipated that any necessary connections to local pipes would be made and pipes would be upgraded to accommodate the wastewater flows associated with off-campus residential uses, per the respective Cities' and County requirements and guidelines. Impacts would be similar to those of the Proposed Project, and would be less than significant.

4.4.2.12.3 Solid Waste

Alternative 4 would permit the demolition of existing residential buildings on campus, as well as off-site buildings such as those at Site 2. As with the Proposed Project, this alternative would comply with AB 939 and all state, regional, and local regulations with regard to waste reduction. However, the total amount of demolition and construction waste would be greater than the Proposed Project as Site 2 is developed with multiple buildings. Construction-related Solid Waste impacts would be greater than the Proposed Project; however impacts would remain less than significant.

The Proposed Project and Alternative 4 would generate similar increases in the quantity of solid waste generated within Los Angeles County, however, new student housing developed under Alternative 4 would generate waste at off-campus locations rather than on campus. The County of Los Angeles Department of Public Works *2006 Annual Report for the Countywide Summary Plan and Siting Element of the Los Angeles Countywide Integrated Waste Management Plan* has determined that at the current rate of disposal, Los Angeles County solid waste disposal demand cannot be accommodated beyond the year 2015, and the report does not project landfill capacity beyond 2021. Therefore, this alternative, like the Proposed Project, would result in a cumulatively considerable contribution to cumulatively significant solid waste impacts if the campus continues operations beyond 2015.

4.4.2.12.4 Energy

Electricity

The anticipated electricity demand of both the Proposed Project and Alternative 5 would increase approximately 6,240.3 Mwh per year over existing uses. Since this alternative would result in the same amount of future square footage as the Proposed Project, electricity demand would also be the same. Impacts would be similar, and would be less than significant.

Natural Gas

The anticipated natural gas demand of both the Proposed Project and this alternative would be approximately 611,840 Mcf of gas per year. Since this alternative would result in the same amount of future square footage as the Proposed Project, natural gas demand would also be the same. Impacts would be similar, and would be less than significant.

4.4.3 Relationship to Project Objectives

Because Alternative 4 would not allow an increase in student housing square footage or the number of students housed on LMU's Westchester campus, it would prevent attainment of the Proposed Project's Key University Goal U-3, ensuring the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved housing opportunities. Alternative 4 would allow incomplete attainment of the remaining two Key University Objectives: implementing LMU's three-fold mission by creating an updated, cohesive campus community and environment with a critical mass of approximately 7,800 FTE students (Objective U-1), and attaining certainty regarding future development on campus that allows for future growth, the pursuit of LMU's mission, and promotion of its other Key University, Academic, Residential, and Sustainability Objectives (Objective U-2).

Because Alternative 3 precludes construction of net new on-campus residential square footage, it would allow incomplete attainment of the two Key Academic Objectives: replacing functionally obsolete academic, administrative, athletic, and residential spaces and buildings to create a functionally cohesive environment on campus (Objective A-1), and building state-of-the-art facilities to house future academic, research, and residential facilities on campus, to aid in the recruitment and retention of students and faculty, and the creation of the best possible academic community and social living and learning environment (Objective A-2).

Since no increase in student residential facilities on the Westchester campus would be allowed, but housing would be constructed off site, Alternative 4 would allow incomplete attainment of Key Residential Objective R-3, enhancing campus student life by raising the standard of on-campus housing. Alternative 4 would not attain the remaining five Residential Objectives: contributing to the alleviation of the regional housing shortage through the creation of new student on-campus housing (Objective R-1); increasing the percentage of FTE students housed on campus from approximately 60 percent to approximately 75 percent (Objective R-2); fostering community and a communal educational environment by increasing the number of FTE undergraduate students living on-campus and by replacing outdated student housing units with updated social-living units (Objective R-4); replacing aging student residential rooms and apartments with modern residential accommodations on campus, to improve the educational environment on campus (Objective R-5); and addressing community concerns regarding students living off-campus by moving more undergraduate residential students onto campus (Objective R-6).

While this Alternative would permit new residential and nonresidential facilities to be constructed, these residential uses would be located off campus, leading to more trips and associated vehicle emissions. Thus, Alternative 4 would allow incomplete attainment of Key Sustainability Objective S-1, creating a sustainable campus environment incorporating green building and landscape practices, reducing the production of greenhouse gas emissions and reducing the consumption of water, electricity, natural gas, and energy. Alternative 4 would not attain Key Sustainability Objective S-2, moving more undergraduate students into on-campus housing to reduce traffic trips and vehicle miles traveled to and from the LMU campus.

Alternative 4 would allow incomplete attainment of Planning and Design Objectives PD-1 and -2; would prevent attainment of Pedestrian and Vehicular Circulation Objective C-1; and would fully attain Athletic and Open Space Objective AOS-1.

Alternative 4 would not fully attain any of the 13 Key Objectives; six would be incompletely attained and seven would not be attained at all. Of the remaining four Project Objectives, two would be incompletely attained; one would be fully attained; and one would not be attained at all. Overall, the majority of Project Objectives would not be attained under Alternative 4.

4.5 **Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in New and Replacement Non-Residential Square Footage**

4.5.1 **Description of Alternative**

The Proposed Project would construct approximately 846,000 gross square feet of new housing (476,000 net new square feet), for a total at buildout of approximately 1,418,000 gross square feet. In contrast, under Alternative 5, older, functionally obsolete student residential facilities on campus would be demolished, as under the Proposed Project (approximately 370,000 gross square feet) and LMU could replace this demolished residential square footage with an equivalent amount, but no net new residential square footage or beds could be built. The total student residential square footage and number of residential students on campus would therefore remain unchanged from existing conditions (approximately 942,000 gross square feet and 3,261 residential students).

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

Alternative 5 also assumes a 25 percent reduction in the square footage of replacement and net new non-residential facilities (i.e., academic, administrative, and indoor athletic facilities) on campus, compared to the Proposed Project. The Proposed Project plans the demolition of approximate 595,000 gross square feet of functionally obsolete non-residential facilities and construction of 1,131,000 gross square feet (536,000 net new square feet), for a total at buildout of 2,372,000 gross square feet of non-residential facilities. Under this alternative, the square footage of non-residential facilities to be demolished would remain the same as under the Proposed Project, but only 848,250 gross square feet of new facilities would be constructed, for a total at buildout of 2,089,000 gross square feet of non-residential facilities.

Similar to the Proposed Project, this alternative assumes construction and reconfiguration of inadequate outdoor athletic facilities and open space areas, roadways, parking facilities, and pedestrian circulation accommodations on campus, as well as infrastructure upgrades as needed.

Table VI-4 summarizes existing square footage as well as square footage to be retained and added under this alternative.

Table VI-4
Alternative 5 – Replacement of Existing Residential Uses and 25 Percent Reduction in New and Replacement Non-Residential Square Footage Alternative
Summary of Existing and Proposed LMU Campus Facilities

| Uses | Existing (gsf/acres) | To Remain (gsf/acres) | To Be Added (gsf/acres) | Total At Buildout (gsf/acres) | Net New (gsf/acres) |
|-------------------------------|-------------------------|--------------------------|----------------------------|-------------------------------------|------------------------|
| Academic/Administrative | 1,651,000 | 1,136,000 | 767,250 | 1,903,250 | 252,250 |
| Residential | 942,000 | 572,000 | 370,000 | 942,000 | 0 |
| Athletic Facilities (Indoor) | 185,000 | 105,000 | 81,000 | 186,000 | 1,000 |
| Total | 2,778,000 | 1,813,000 | 1,218,250 | 3,031,250 | 253,250 |
| Athletic Facilities (Outdoor) | 15.2 acres | 13.6 acres | 6.4 acres | 20.0 acres | 4.8 acres |
| Open Space | 25.0 acres | 25.0 acres | 5.0 acres ^a | 32.0 ^a acres | 5.0 ^a acres |
| Total | 40.2 acres | 38.6 acres | 11.4 acres | 50.0 acres | 9.8 acres |

^a Since no new residential uses are proposed under this alternative, campus open space could increase.

gsf = gross square feet

4.5.2 Analysis

4.5.2.1 Aesthetics and Visual Resources

4.5.2.1.1 Aesthetics and Views

Aesthetics

Alternative 5 would reduce proposed development on LMU's campus by approximately 758,750 gross square feet compared to the Proposed Project. Therefore, this alternative would entail less construction than the Proposed Project, and result in less construction-related Aesthetic impacts. Like the Proposed Project, this alternative would result in less than significant construction-related Aesthetic impacts after mitigation.

Since new development would be permitted under Alternative 5, changes in the visual character of the LMU campus would occur. However, neither the Proposed Project nor this alternative would significantly alter, degrade, or eliminate any features that substantially contribute to the valued visual character of the LMU campus. This alternative could preclude some beneficial Proposed Project opportunities to enhance campus character and open space through the development of additional residential facilities that would be architecturally complementary of new and existing, buildings and

would incorporate quadrangles, lawns, landscaping, and other amenities. Nonetheless, impacts would generally be similar to those of the Proposed Project and would remain less than significant.

Obstruction of Views

The majority of new student residential development under the Proposed Project is likely to be constructed on the Burns Campus, where older student housing in need of replacement is presently located and space for additional housing remains. Under Alternative 5, the majority of replacement student residential development would also likely be constructed on Burns Campus. However the amount of residential development would be reduced by approximately 476,000 gross square feet compared to the Proposed Project. Accordingly, this alternative could slightly reduce potential impacts on westward-facing views from off-site residential uses east of campus as compared to the Proposed Project. Additionally, the amount of nonresidential construction would be reduced by approximately 282,750 gross square feet. Neither the Proposed Project nor this alternative would substantially obstruct existing views of a valued view resource from a prominent view location. However, since new development would be substantially reduced, view impacts under this alternative would be less than those associated with the Proposed Project.

4.5.2.1.2 Light & Glare

Since construction would occur on the campus, Alternative 5, like the Proposed Project, would have potentially significant, but mitigable, construction-related Light and Glare impacts. However, since Alternative 5 would involve less construction, it would reduce the construction-related Light and Glare impacts associated with the Proposed Project.

Implementation of the Proposed Project would introduce new permanent sources of outdoor lighting to the LMU campus. Sky glow and spillover onto surrounding properties is possible, resulting in potentially significant Light and Glare impacts. Similar to the Proposed Project, this alternative would introduce new sources of outdoor lighting to the LMU campus. Illumination of existing athletic fields similar to that under the Proposed Project would still take place under this alternative, and mitigation measures for the Proposed Project would apply to any new lighting proposed under this alternative. Setback requirements for new buildings from campus property lines would be the same as those proposed under the Proposed Project. However, because of the reduction in development and associated ambient lighting, impacts would be less than those associated with the Proposed Project.

4.5.2.1.3 Shading

Under Alternative 5, no additional on-campus housing for undergraduate students would be developed beyond what is being replaced under the Proposed Project, and the square footage of new and replacement academic/administrative and indoor athletic facilities would be reduced by 25 percent compared with the Proposed Project. Accordingly, the total building massing on campus would be reduced compared to the Proposed Project, and therefore the potential for off-site shading impacts would be incrementally reduced. The Proposed Project would result in less than significant Shading impacts on off-site land uses during the summer and winter solstices, since it would not shade any off-site shade-sensitive uses for more than 3 hours. Shading impacts under this alternative would also be less than significant and would therefore be comparable to the less-than-significant impacts associated with the Proposed Project.

4.5.2.2 Air Quality

4.5.2.2.1 Air Quality

Under this alternative, construction activities associated with development would be reduced in scale compared to the Proposed Project. Construction activities would be incrementally less than under the Proposed Project due to the reduction in academic, athletic, and residential square footage developed under this alternative. As with the Proposed Project, construction of this alternative would generate pollutant emissions through the use of construction equipment and through haul truck and construction worker trips. The overall amount of site preparation and building construction would be less under this alternative compared to the Proposed Project. However, pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis, as the intensity of these activities could decrease compared to the Proposed Project. However, impacts during maximum conditions, those used for measuring significance, would be similar to those of the Proposed Project and would be significant and unavoidable for localized PM₁₀ and PM_{2.5}. Similar to the Proposed Project, this alternative would be required to comply with mitigation that would reduce impacts, although these impacts would remain significant and unavoidable.

Operational impacts are determined mainly by the daily traffic volumes. The number of daily trips generated by this alternative would be higher in comparison to the Proposed Project, as fewer students living on campus would create more commutes to and from campus. As vehicular emissions are dependent on the number of trips, weekday and weekend vehicular sources would have an incremental increase in pollutant emissions compared to the Proposed Project. However, operational impacts would

be slightly greater than the Proposed Project, but, as with the Proposed Project, would have a less-than-significant impact.

4.5.2.2 Climate Change

This alternative would reduce the total amount and intensity of construction activity and would therefore incrementally reduce impacts as compared to the Proposed Project. Therefore, construction-related Climate Change impacts under this alternative would be less than significant, and would be less than the impacts associated with the Proposed Project.

The developed square footage on campus would increase over existing conditions but would be less than the amount under the Proposed Project. Similar to the Proposed Project, this alternative would implement Proposed Project features intended to reduce operational greenhouse gas emissions. These features would reduce energy consumption and meet or exceed minimum efficiency criteria for the state's most current Energy Conservation Standards for New Residential Buildings (Title 24, part 6). These Proposed Project features were determined to collectively reduce greenhouse gas emissions per square foot on campus by at least 16 percent. However, this alternative would result in reduced residential and nonresidential building square footage. Therefore, operational Climate Change impacts under this alternative would be less than significant and would be less than the impacts associated with the Proposed Project.

4.5.2.3 Biological Resources

Proposed Project construction on campus could result in potentially significant impacts on common nesting bird species, which are regulated under the Fish and Game Code of California and the Migratory Bird Treaty Act, and on monarch butterflies, which are considered a sensitive species and may overwinter on campus. Additionally, two protected tree species exist on the campus, coast live oak and western sycamore, and impacts are governed by the Los Angeles Municipal Code, which requires a permit for encroachment or removal of specimen trees.

This alternative would reduce the amount of construction activity that could affect nesting birds, possible overwintering monarch butterflies, and protected trees and would therefore incrementally reduce impacts on those resources as compared to the Proposed Project. However, impacts would remain potentially significant under this alternative. Similar to the Proposed Project, this alternative would be required to comply with mitigation that would reduce impacts to less than significant levels.

4.5.2.4 Cultural Resources

4.5.2.4.1 Paleontological Resources

Proposed Project construction in areas of campus where Palos Verdes Sand or non-marine terrace cover is found, which is estimated to be at least 35 feet below ground level, could result in potentially significant impacts to unrecorded paleontological resources. However, this alternative would reduce the amount and intensity of construction activity that could potentially disturb paleontological resources and would therefore incrementally reduce impacts on those resources as compared to the Proposed Project. Nevertheless, impacts would remain potentially significant under this alternative. Similar to the Proposed Project, this alternative would be required to comply with mitigation that would reduce impacts to less than significant levels.

4.5.2.4.2 Archaeological Resources

As stated in the archaeological technical report prepared for the Proposed Project, ground-disturbing activities in or in proximity to known archaeological sites on campus have the potential to disturb, damage, or degrade archaeological resources or their settings in and around campus. This alternative would reduce the amount and duration of construction activity that could disturb archaeological resources on the campus, and would therefore incrementally reduce impacts on those resources as compared to the Proposed Project. However, impacts would remain potentially significant under this alternative. Similar to the Proposed Project, this alternative would be required to comply with mitigation that would reduce impacts to less than significant levels.

Like the Proposed Project, this alternative could contribute to a significant cumulative impact to Archaeological Resources due to the additive effects of disturbance to archaeological sites in the Project area. However, since Alternative 5 would involve less construction, this alternative would have a smaller contribution to this cumulative impact than the Proposed Project.

4.5.2.4.3 Historical Resources

Proposed Project construction on campus in close proximity to Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, and the bluff-face letter "L" could result in potentially significant impacts to historic resources, which are considered historic resources for purposes of CEQA, in accordance with the *State CEQA Guidelines*, Section 15064.5(a)(3). Alternative 5 would reduce the amount of construction activity that could affect Xavier Hall, St. Robert's Hall, Sacred Heart Chapel, and the bluff-face letter "L," and would therefore incrementally reduce impacts on those resources as compared to the Proposed Project.

However, impacts would remain potentially significant under this alternative. Mitigation applicable to the Proposed Project would apply to this alternative.

4.5.2.5 Geology

Construction and implementation of the Proposed Project could potentially create significant impacts with respect to geological hazards and sedimentation and erosion. However, with adherence to applicable building and municipal codes and current local, state, and federal regulatory requirements, no unavoidable significant geological impacts would result from implementation of the Proposed Project.

Like the Proposed Project, Alternative 5 would have less than significant Geology impacts with adherence to applicable building and municipal codes and current local, state, and federal regulatory requirements. However, this alternative would reduce the amount of construction activity that could generate potential geological impacts and entail less development potentially subject to geologic hazards, and would therefore incrementally reduce potential impacts associated with the Proposed Project.

4.5.2.6 Hazards

Demolition of older buildings under the Proposed Project could result in the release of asbestos-containing materials, lead from lead-based paint, and other known hazards and contaminants present in buildings on campus, which is a potentially significant hazards impact. Additionally, the campus is located partially within a Methane Zone and partially within a Methane Buffer Zone, as designated by the Los Angeles Department of Building and Safety, which also presents a potentially significant construction impact. However, these impacts would be reduced to less than significant levels with adherence to applicable building and municipal codes and current local, state, and federal regulatory requirements.

Alternative 5 would also involve the demolition of existing buildings and the construction of new facilities. Like the Proposed Project, Alternative 5 would result in potentially significant, but mitigable, Hazards impacts, and would be required to comply with applicable building and municipal codes and current local, state, and federal regulatory requirements. However, this alternative would reduce the amount of construction activity that could release hazardous materials, particularly methane. Therefore, this alternative would incrementally reduce impacts associated with the Proposed Project.

Under the Proposed Project, increased transport, use, storage, and disposal of hazardous materials at LMU would likely result due to the increased number of people on campus and increased square footage of academic, administrative and residential facilities. However, Hazards impacts during operation of the Proposed Project would be less than significant with mitigation. Alternative 5 would increase the campus

population and, consequently, the transport, use, storage, and disposal of hazardous materials on campus. Therefore, Alternative 5 would also result in less than significant Hazards impacts during operation, which would be similar to those of the Proposed Project.

4.5.2.7 Surface Water Hydrology and Water Quality

4.5.2.7.1 Surface Water Hydrology

Like the Proposed Project, Alternative 5 would involve grading and earthmoving activities. Therefore, this alternative would have construction-related Surface Water Hydrology impacts. However, it would reduce the amount of construction compared to the Proposed Project and therefore reduce the Proposed Project's construction-related hydrology impacts, which would be less than significant after mitigation.

At buildout, the Proposed Project would not significantly impact surface water hydrology. Because of the reduced development footprint, this alternative would likely increase the amount of pervious surfaces on campus and would therefore incrementally reduce the Proposed Project's changes to existing hydrology patterns, rates of runoff, and overall runoff volumes. Similar to the Proposed Project, compliance with NPDES and City requirements that would include Best Management Practices (BMPs) during the operational life of the project would be implemented. Operational impacts would be less than significant with mitigation under this alternative, but would be less than those associated with the Proposed Project.

4.5.2.7.2 Surface Water Quality

Alternative 5 assumes less grading and earthmoving than under the Proposed Project, and therefore would reduce construction-related Surface Water Quality impacts compared to the Proposed Project. Impacts would remain less than significant after mitigation.

Proposed Project implementation would not significantly impact surface water quality. This alternative would increase the amount of pervious surfaces on campus and would therefore incrementally reduce surface water quality impacts as compared to the Proposed Project. Impacts would be less than significant under this alternative, and less than those associated with the Proposed Project. Similar to the Proposed Project, NPDES and Standard Urban Stormwater Management Plan requirements, City grading regulations, and additional mitigation would ensure that surface water quality impacts remain less than significant after mitigation.

4.5.2.8 Land Use

The Westchester-Playa del Rey Community Plan presently designates the LMU campus as "L" Low Density Residential, which corresponds to single-family residential zoning designations. The zoning

designation for the campus is [Q]R4-1, Residential – Multiple Dwelling Zone. The City previously found that this zoning designation is consistent with the campus’s General Plan designation, since the Q conditions applicable to the property limit the uses on campus to those of a university or those uses permitted in the R1 zone.

Similar to the Proposed Project, Alternative 5 includes a request for a Zone Change, a General Plan Amendment, and the establishment of a Specific Plan. The Zone Change being requested would change the zoning of the campus from [Q]R4-1 to R4-1. The General Plan Amendment would change the designation of the campus from Low Density Residential to High-Medium Density Residential, which would be consistent with the new proposed zoning and Specific Plan. The current Q conditions on the Property would be replaced with more detailed land use restrictions established in the Specific Plan. This Specific Plan would contain a more comprehensive set of development standards to maintain compatibility with surrounding land uses, establish more restrictive height limits and setbacks from surrounding uses, establish Planning Areas on campus that would primarily concentrate athletic uses in the southern portion of the Burns Campus, maintain the campus’s large expanses of open space, and configure new development to maintain scenic corridors through campus, among others. Therefore, Alternative 5 would result in less than significant Land Use impacts.

However, under this alternative, LMU could still increase its enrollment to the previously approved cap of 7,800 FTE students, although it would not be permitted to house any additional students on campus since no increase in residential square footage or beds would be developed. Due to the increased number of students commuting to and from campus, this alternative would result in considerably greater trip generation than the Proposed Project. Therefore, this alternative would reduce the Proposed Project’s consistency with several General Plan and SCAG policies aimed at reducing vehicle miles traveled. For these reasons, Alternative 5 could result in greater Land Use impacts than the Proposed Project.

4.5.2.9 Noise

Because of the reduction in the amount of construction permitted under this alternative, construction Noise impacts would be less than those associated with the Proposed Project. However, impacts could remain significant and unavoidable given the proximity of campus to residences.

No additional on-campus housing for undergraduate students would be developed under this alternative, although enrollment would be permitted to increase to 7,800 FTE students. Therefore, this alternative would generate a greater number of vehicle trips to and from campus, and consequently, greater roadway noise, than the Proposed Project. Although Alternative 5 would have greater operational Noise impacts than the Proposed Project, impacts are assumed to remain less than significant.

4.5.2.10 Public Services

4.5.2.10.1 Police Protection

Since Alternative 5 would involve less construction than the Proposed Project, it would reduce the construction-related Police Protection impacts of the Proposed Project. However, impacts would remain less than significant after mitigation.

The Proposed Project would increase the number of enrolled students to 7,800 FTE students, and increase the number of FTE faculty and staff to 1,800, which would increase demand for Police Protection services. Since, under Alternative 5, more students would live off-campus and potentially require Police Protection services from LAPD or other City police departments, and fewer students would reside on campus where LMU's Department of Public Safety provides first-response Police Protection services for the LMU campus and has a full-service Campus Security Services Department, which helps offset demand for municipal Police Protection services. Alternative 5 would have incrementally greater impacts on Police Protection services than the Proposed Project, but impacts would remain less than significant after mitigation.

4.5.2.10.2 Fire Protection and Emergency Medical Services

Since Alternative 5 would involve less construction than the Proposed Project, it would reduce the construction-related Fire Protection and Emergency Medical Service impacts of the Proposed Project. Impacts would remain less than significant.

The Proposed Project would increase enrollment to 7,800 FTE students and increase the number of FTE faculty and staff to 1,800, which would increase demand for Fire Protection and Emergency Medical Services on campus. However fewer students would reside on campus, where LMU's Department of Public Safety maintains an Emergency Preparedness Program and provides support services on campus until Los Angeles Fire Department arrives, via staff that possess current first aid/CPR certification and are trained in light search and rescue.

Therefore, operation of Alternative 5 would have greater Fire Protection and Emergency Medical Service impacts than the Proposed Project. As with the Proposed Project, this alternative would be required to meet the requirements of the Municipal Code and operational impacts would remain less than significant.

4.5.2.10.3 Recreation and Parks

The Proposed Project would permit enrollment to increase to 7,800 FTE students and the number of FTE faculty and staff to increase to 1,800, which would increase demand for recreation and park facilities. Additionally, the proposed LMU Specific Plan establishes a minimum acreage of outdoor athletic facilities and open space that must be provided on campus. Proposed Project implementation would add approximately 4.8 net new acres of outdoor athletic facilities, and 28,000 net new gross square feet of indoor athletic facilities on campus upon buildout, which would offset the demand associated with the increase in students and exceed the minimum acreage established by the proposed LMU Specific Plan. Impacts would be less than significant.

Alternative 5 would also permit enrollment to increase to 7,800 FTE students, but would not increase the number of beds on campus. Therefore, more students would reside off campus under this alternative than under the Proposed Project, thereby increasing the potential for usage of off-site public recreational facilities. Additionally, this alternative would develop 27,000 less net new gross square feet of indoor athletic facilities than the Proposed Project. Further, the restriction on increasing residential square footage could preclude some beneficial Proposed Project opportunities to enhance campus open space through the development of new student residential facilities that would incorporate quadrangles, lawns, landscaping, and other amenities. For these reasons, impacts to Recreation and Parks would be greater than those associated with the Proposed Project. Nonetheless, because open space and recreational facilities built under this alternative would exceed the minimum acreage established by the proposed LMU Specific Plan, impacts would remain less than significant.

4.5.2.11 Transportation

The Proposed Project would result in less than significant traffic and parking impacts during construction since construction worker parking would be accommodated off campus and shuttles would be provided to transport workers to and from the campus. Alternative 5 would also result in construction-related Transportation impacts, but would reduce the impacts associated with the Proposed Project since less construction would be required.

Since this alternative would not increase the supply of housing on campus for students, implementation of this alternative would preclude beneficial impacts associated with the Proposed Project related to reduced trip generation from the reduction in students commuting to campus. Circulation (intersection) impacts under this alternative would therefore be greater than under the Proposed Project and would be significant and unavoidable.

This alternative would provide sufficient parking to meet demand and therefore, parking impacts would be similar to the Proposed Project, and less than significant. Operational impacts of this alternative would remain less than significant, but would be greater than under the Proposed Project.

4.5.2.12 Public Utilities

4.5.2.12.1 Water Supplies

Since the campus population and non-residential square footage would increase above existing conditions under Alternative 5, the water demand on campus would also increase. A number of water conservation features are currently integrated into the existing campus, including a reclaimed water system for irrigation, drought-tolerant landscaping, the “trayless dining” program, and several LEED-certified buildings. In addition to the continued operation of these existing water conservation features on campus, Alternative 5 would replace several existing buildings on campus with buildings that are more water efficient and would incorporate additional water conservation measures into campus operations. Given these features, the increased water demand under Alternative 5 would constitute a less-than-significant impact.

The Proposed Project would also increase water demand above existing conditions due to increased enrollment and faculty and staff levels and building square footage, resulting in a less-than-significant impact. However, Alternative 5 assumes a 25 percent reduction in the square footage of replacement and net new non-residential facilities compared to the Proposed Project, and no net new residential square footage or beds. This reduction in development would incrementally reduce total campus water demand compared to the Proposed Project. Impacts would be less than those of the Proposed Project and would be less than significant.

4.5.2.12.2 Wastewater

Additional flows associated with Proposed Project buildout could potentially create capacity impacts to wastewater lines such as line 3A, which runs through the middle of the Burns Campus. City of Los Angeles Guidelines require pipes to be upgraded as their flows approach capacity. Similar to the Proposed Project, compliance with standard City of Los Angeles Guidelines would reduce potential Proposed Project impacts to less than significant levels.

The reduction in development associated with this alternative would incrementally reduce total campus wastewater generation compared to the Proposed Project. Similar to the Proposed Project, this alternative would involve new development on the Burns Campus, and potential capacity impacts to existing wastewater lines on campus may result. However, with compliance with standard City of Los Angeles

Guidelines, both Alternative 5 and the Proposed Project would have less-than-significant impacts on wastewater generation.

4.5.2.12.3 Solid Waste

Under Alternative 5, the same amount of demolition planned for the Proposed Project would be undertaken. However, this alternative would reduce the amount of waste generated during construction activities. Therefore construction-related Solid Waste impacts would be less than those associated with the Proposed Project, and would be less than significant.

The Los Angeles County Department of Public Works' 2006 Annual Report has determined that based on the continuation of business as usual practices, Los Angeles County solid waste disposal demand cannot be accommodated beyond the year 2015. Despite anticipated significant expansions, because it is not yet certain when these expansions will become operational and serve the City of Los Angeles, and since the Los Angeles County Department of Public Works does not project solid waste need and capacity beyond the existing 15-year planning period (2006–2021), it is conservatively assumed that the Proposed Project would result in a significant and unavoidable project-level impact and cumulatively considerable contribution with respect to solid waste at buildout in 2030.

Under Alternative 5, the current enrollment of 6,868 FTE students would be increased to 7,800, while the percentage of undergraduate students living on campus would remain at 60 percent. Therefore, this alternative would incrementally increase the amount of solid waste generated on campus over existing conditions. However, since this alternative would not increase the number of beds on campus and develop less new square footage than the Proposed Project, it would incrementally reduce the operational Solid Waste impacts associated with the Proposed Project. However, for the reasons discussed above, significant and unavoidable impacts to solid waste would remain under this alternative both at the project and cumulative levels.

4.5.2.12.4 Energy

Electricity

Proposed Project buildout is estimated to result in an annual net increase in electricity demand of approximately 6,240.3 MWh when compared to current uses. Proposed Project energy demand is within the anticipated service capacity of the Los Angeles Department of Water and Power (LADWP) at buildout, and impacts to electric service would be less than significant. Because Alternative 5 would replace residential uses on-campus, and would result in a reduction in nonresidential square footage compared to the Proposed Project, electricity demand on-campus would be lower with implementation of

this alternative. However, at least some of the students living off-campus in LADWP's service area under Alternative 5 are likely to live in older buildings possessing fewer energy-efficiency features than would be built on LMU's campus under the Proposed Project. For these reasons, Energy impacts related to electricity consumption under Alternative 5 could be greater than those associated with the Proposed Project but would remain less than significant after mitigation.

Natural Gas

The anticipated natural gas demand of the Proposed Project would be 13,858.61 Mcf annually over existing conditions. Proposed Project natural gas demand is within the anticipated service capacity of the Southern California Gas Company at buildout, and impacts to natural gas service would be less than significant. Because Alternative 5 would replace residential uses on-campus and would result in a reduction in nonresidential square footage compared to the Proposed Project, natural gas demand on campus would be lower with implementation of this alternative. However, at least some of the students that would be required to live off-campus under this alternative would still reside within the Gas Company's service area, which covers most of southern and central California, and are likely to live in older buildings possessing fewer energy-efficiency features than would be built on LMU's campus under the Proposed Project. For these reasons, Energy impacts related to natural gas consumption under Alternative 5 could be greater than those associated with the Proposed Project but would remain less than significant after mitigation.

4.5.3 Relationship to Project Objectives

Since Alternative 5 could construct replacement housing but no new residential housing, and could construct fewer academic, administrative, and athletic facilities than under the Proposed Project it would allow incomplete attainment of two of the three Key University Objectives: implement LMU's threefold mission by creating an updated, cohesive campus community and environment with a critical mass of approximately 7,800 FTE students (Objective U-1), and attain certainty regarding future development on campus that allows for future growth, the pursuit of LMU's mission, and promotion of its other Key University, Academic, Residential, and Sustainability Objectives (Objective U-2). Since no increase in housing would be permitted on the campus and LMU could not house up to 75 percent of undergraduate students as under the Proposed Project, Alternative 5 would prevent attainment of Key University Objective U-3: ensure the maximum number of students have opportunities to experience and contribute to LMU's social living and learning environment, student and faculty interaction, and full participation in campus life through increased and improved housing opportunities.

Because Alternative 5 precludes the construction of any net new residential facilities and reduces the square footage of nonresidential uses to be constructed, it would allow incomplete attainment of the two Key Academic Objectives: replace functionally obsolete academic, administrative, athletic, and residential spaces and buildings to create a functionally cohesive environment on campus (Objective A-1), and build state-of-the-art facilities to house future academic, research, and residential facilities on campus, to aid in the recruitment and retention of students and faculty, and the creation of the best possible academic community and social living and learning environment (Objective A-2).

Since Alternative 5 would replace existing residential facilities, it would attain one of the Key Residential Objectives: replace aging student residential rooms and apartments with modern residential accommodations on campus, to improve the educational environment on campus (Objective R-5). However, because this alternative would not allow the construction of net new residential facilities, it would prevent attainment of the remaining five Key Residential Objectives: contribute to the alleviation of the regional housing shortage (Objective R-1); increase the percentage of FTE students housed on campus from approximately 60 percent to approximately 75 percent (Objective R-2); enhance campus student life by raising the standard of campus housing (Objective R-3); foster community and a communal educational environment by increasing the number of FTE undergraduate students living on campus and by replacing outdated student housing units with updated social-living units (Objective R-4); and address community concerns regarding students living off campus by moving more undergraduate residential students onto campus (Objective R-6).

Since Alternative 5 would allow existing residential facilities to be replaced, a reduced amount of nonresidential square footage to be constructed, and other Proposed Project components, such as outdoor athletic facility improvements, to be implemented, it would incompletely attain Key Sustainability Objective S-1: creating a sustainable campus environment incorporating green building and landscape practices, reducing the production of greenhouse gas emissions and reducing the consumption of water, electricity, natural gas, and energy. It would prevent attainment of Key Sustainability Objective S-2: move more undergraduate students into on-campus housing to reduce traffic trips and vehicle miles traveled to and from the LMU campus.

Alternative 5 would attain Planning and Design Objective PD-1 and partially attain Objective PD-2; it would not attain Pedestrian and Vehicular Circulation Objective C-1, since the elimination of net new student housing would prevent a reduction in traffic trips and vehicle miles traveled to and from the campus. Finally, because it would reduce the square footage of new indoor athletic facilities by 25 percent, Alternative 5 would incompletely attain Athletic and Open Space Objective AOS-1, provide sufficient and appropriate open space and athletic facilities to meet demand for instructional athletics, intramural and intercollegiate athletics, and informal recreation by students, faculty, and staff, by

expanding, increasing access to, and appropriately illuminating LMU's athletic facilities for use during daytime and nighttime hours.

Overall, Alternative 5 would not attain seven and incompletely attain five of the 13 Key Objectives. Overall, most of the Key Project Objectives, therefore, would not be attained under Alternative 5.

5.0 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the *State CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The *State CEQA Guidelines* also state that should it be determined that the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an environmentally superior alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes the No Project Alternative – Buildout Under Existing Approvals; No Project Alternative – No Buildout, Maintain Campus As-is; No New or Replacement Residential Alternative; Build New Residential Uses Off Campus Alternative; and Replacement of Existing Residential Uses and 25 Percent Reduction in New and Replacement Non-Residential Square Footage Alternative.

A summary of the environmental impacts anticipated under each alternative compared to the environmental impacts associated with the Proposed Project is provided in **Table VI-1**. A more detailed description of the potential impacts associated with each alternative is also provided above. Pursuant to Section 15126.6(c) of the *State CEQA Guidelines*, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the project.

Of the alternatives analyzed in the Draft EIR, the No Project-No Buildout, Maintain Campus As-is Alternative is considered the overall environmentally superior alternative, since it would eliminate or reduce the vast majority of the significant or potentially significant impacts occurring under the Proposed Project to levels that are less than significant. However, this alternative would not meet most of the Key University, Academic, Residential, or Sustainability Objectives, or the other Project Objectives related to Planning and Design, Pedestrian and Vehicular Circulation, and Athletic and Open Space.

In accordance with the *State CEQA Guidelines* lines requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 5, Replacement of Existing Residential Uses and 25 Percent Reduction in New and Replacement Non-Residential Square Footage, would be the environmentally superior alternative. Because Alternative 5 would reduce the amount of new construction permitted, but would still allow construction of new facilities throughout the campus, it would incrementally reduce the Proposed

Project's significant, unavoidable, impacts related to construction-related Air Quality emissions, Archaeological Resources, construction Noise, and Solid Waste. Alternative 5 would not, however, reduce any of these impacts to less than significant levels.

Because it would necessitate a reduction in the amount of new facilities and campus improvements, Alternative 5 would not fully attain any of the 13 Key Objectives; five would be incompletely attained and eight would not be attained at all. Of the remaining four Project Objectives, one would be fully attained; two would be incompletely attained; and one would not be attained at all. The majority of Project Objectives, therefore, would not be attained under Alternative 5.