

Appendix B
Appendix G Modifications

Appendix B: Appendix G Modifications

1. Introduction

The California Natural Resources Agency adopted revisions to the CEQA Guidelines (Guidelines) that became effective on December 28, 2018. The revisions to the Guidelines included revisions to the Guidelines' Appendix G—Environmental Checklist Form (Appendix G). The revisions to Appendix G were adopted largely to reduce redundancy, provide additional clarity, and align Appendix G with California appellate court and Supreme Court decisions and changes to the Public Resources Code. The revised Guidelines, including the revised Appendix G Environmental Checklist, apply prospectively and only to steps in the CEQA process not yet undertaken by the effective date of the revisions.¹ The revised Guidelines do not apply to CEQA documents that were sent out for public review (i.e., released for public review and comment) before the effective date of the revised Guidelines.² The Draft EIR's initial 48-day public review period commenced on April 12, 2018 and was scheduled to end on May 29, 2018. A 15-day extension was added to the public review period extending the review date until June 13, 2018 for a total of 63 days. Therefore, the revisions to Appendix G do not apply to the Draft EIR or this Final EIR. Nonetheless, for informational purposes only, a discussion of the revised Appendix G Environmental Checklist Form, as it relates to the analysis provided in the Draft EIR and this Final EIR, is provided below.

2. Modifications to Appendix G of the CEQA Guidelines

As discussed above, the revisions to Appendix G were adopted largely to reduce redundancy, provide additional clarity and to align Appendix G with California appellate court and Supreme Court decisions and changes to the Public Resources Code. An overview of the modifications to Appendix G is provided below by environmental topic, along with an explanation of how the modified Appendix G questions have been addressed in the Draft EIR, including within the Initial Study, provided as Appendix A-1 of the Draft EIR. A discussion of the modified Appendix G questions with respect to Alternative 5, including ways in which the modified Appendix G questions have been addressed in this Final EIR, is also included below.

- **Aesthetics** (Checklist Item I): Modifications to checklist questions clarify that in urbanized areas such as the Project Site, visual character and quality of public views are not considered, apart from a determination of a project's consistency with regulations that govern scenic quality. (Checklist Question I.c) No modifications were made to Checklist Questions I.a, I.b, and I.d. As discussed in

¹ CEQA Guidelines Section 15007(b)

² CEQA Guidelines Section 15007(c)

detail in Section IV.A, Aesthetics, of the Draft EIR as to the Project, and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR, as to Alternative 5, the Project and Alternative 5 would be consistent with the requirements of Checklist Questions I.a through I.d. Modifications to the checklist question provide for an exemption under Section 21099, but this is not applicable to either the Project or Alternative 5 since the Project Site is not located within a transit priority area.

- **Agriculture and Forestry Resources** (Checklist Item II): This checklist item was not updated as part of the modifications. The checklist questions, which are not applicable to the Project or Alternative 5, were responded to in the Initial Study, included as Appendix A-1 of the Draft EIR.
- **Air Quality** (Checklist Item III): Checklist questions were modified to delete Checklist Question III.b regarding violation of air quality standards, modify Checklist Question III.c (now III.b) to remove language regarding the release of emissions which exceed quantitative thresholds for ozone precursors as pertaining to cumulative increases in criteria pollutants, and to modify Checklist Question III.e (now III.d) regarding odors. All of the questions in the updated Appendix G checklist are addressed in Section IV.B, Air Quality, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR, as to Alternative 5.
- **Biological Resources** (Checklist Item IV): Checklist Question IV.c has been modified to remove the reference to Section 404 of the Clean Water Act. All of the questions in the updated Appendix G checklist have been addressed in Section IV.C, Biological Resources, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR, as to Alternative 5. The updates to Appendix G do not affect the analysis of biological resources provided therein.
- **Cultural Resources** (Checklist Item V): Modifications to checklist questions consist of a minor word change to Checklist Question V.a and moving Checklist Question V.c, which relates to paleontological resources, to Section VII, Geology and Soils, of the Appendix G checklist. All of the questions in the updated Appendix G checklist have been addressed in Section IV.D, Cultural Resources, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5.
- **Energy** (New Checklist Item VI): The modifications include energy as a separate subsection and incorporate language from Appendix F of the CEQA Guidelines. Checklist questions pertinent to wasteful or unnecessary consumption of energy (Checklist Question VI.a) and conflict with a state or local plan for renewable energy (Checklist Question VI.b) were addressed in Chapter VIII, Energy

Conservation and Infrastructure, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5.

- **Geology and Soils** (Checklist Item VII): Checklist questions have been modified to focus on both the direct and indirect adverse effects associated with geologic hazards and expansive soils and to move the analysis of paleontological resources to this topic from the Cultural Resources subsection (new Checklist Question VII.f). All of the questions in the updated Appendix G checklist have been addressed in Section IV.C, Geology and Soils, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5.
- **Greenhouse Gas Emissions** (Checklist Item VIII): Checklist questions were not changed as part of the modifications. All of the questions in the updated Appendix G checklist have been addressed in Section IV.F, Greenhouse Gas Emissions, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR Alternative 5.
- **Hazards and Hazardous Materials** (Checklist Item IX): Checklist questions were revised to delete Checklist Question VIII.f regarding safety hazards associated with proximity to a private airstrip and to clarify that Checklist Question VIII.g (formerly Checklist Question VIII.h) addresses impacts associated with wildland fires. All of the questions in the updated Appendix G checklist have been addressed in the Initial Study, included as Appendix A-1 of the Draft EIR. All issue areas, including physical interference with an adopted emergency response plan and direct or indirect exposure to the risk of wildfire fires, were determined to be less than significant and further analysis in the Draft EIR was not required. As discussed in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR, issues regarding hazards and hazardous materials would be the same under Alternative 5.
- **Hydrology and Water Quality** (Checklist Item X): Former checklist questions IX.a, IX.b. and IX.c were revised to provide clarification and eliminate redundancy. Former Checklist Questions IX.d through IX.j were eliminated and replaced with new Checklist Question X.d related to flooding and X.e related to implementation of a water quality control plan. The checklist questions related to water quality, groundwater, and hydrology are addressed in Section IV.G, Hydrology and Water Quality, of the Draft EIR as to the Project, and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5. Impacts related to flooding are responded to in the Initial Study included as Appendix A-1 of the Draft EIR.

- **Land Use and Planning** (Checklist Item XI): Former Checklist Question X.b has been revised to focus on conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (new Checklist Question XI.a). Former Checklist Question X.c has been deleted, as it addressed habitat conservation plans, which are already addressed under the Biological Resources checklist questions. All of the questions in the updated Appendix G checklist have been addressed in Section IV.H, Land Use, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5.
- **Mineral Resources** (Checklist Item XII): The checklist questions were not updated as part of the modifications. These questions are not applicable to the Project or Alternative 5 and are responded to in the Initial Study, included as Appendix A-1 of the Draft EIR.
- **Noise** (Checklist Question XIII): Former Checklist Questions XII.a and XII.b were revised in Checklist Question XIII.a and XIII.b to focus on impacts associated with the generation of noise and vibration noise levels. In addition, former Checklist Questions XII.c, XII.d, and XII.f were deleted, as they were redundant, and Checklist Question XII.e was revised as Checklist Question XIII.c. Modified Checklist Questions XIII.a and XIII.b are fully addressed in Section IV.I, Noise, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5. Former Checklist Question XII.e (now XIII.c) is not applicable to the Project or Alternative 5 and is addressed in the Initial Study, included as Appendix A-1 of the Draft EIR.
- **Population and Housing** (Checklist Item XIV): Former Checklist Question XIII.a was clarified in XIV.a, to focus on potential impacts associated with unplanned growth, and Checklist Questions XIII.b and XIII.c were combined into Checklist Question XIV.b. The checklist question regarding population and housing is not pertinent to the Project or Alternative 5 and was responded to in the Initial Study, included as Appendix A-1 of the Draft EIR.
- **Public Services** (Checklist Item XV): These checklist questions were not updated as part of the modifications. The pertinent checklist questions regarding police and fire services are responded to in Sections IV.J.1, Public Services—Fire Protection and IV.J.2 Police Protection, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5. Checklist questions related to Public Services, including Libraries, Schools, Parks, and Other Public Facilities, are responded to in the Initial Study, included as Appendix A-1 of the Draft EIR, and would similarly be non-applicable to Alternative 5.

- **Recreation** (Checklist Item XVI): This checklist question was not updated as part of the modifications and is not pertinent to the Project or Alternative 5. The applicable checklist questions XVI.a, and XVI.b are responded to in the Initial Study, included as Appendix A-1 of the Draft EIR and would be the same under Alternative 5.
- **Transportation** (Checklist Item XVII): Former Checklist Questions XVI.a and XVI.f were combined into new Checklist Question XVII.a, and clarified to focus on conflicts with a program, plan, ordinance, or policy addressing the circulation system. Former Checklist Question XVI.c regarding airport traffic safety was eliminated, as airport traffic safety is already addressed under the Hazards and Hazardous Materials questions, discussed above. Former Checklist Question XVI.d (now Checklist Question XVI.c) was revised to add “geometric” for clarity. All of the topics in these questions were addressed as part of the analyses within Section IV.K, Transportation/Traffic, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5.

Checklist Question XVI.b was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. Starting on July 1, 2020, changes to the CEQA Guidelines took effect which require local agencies to analyze traffic impacts using vehicle miles traveled (VMT) instead of LOS, the method used in the Draft EIR’s Traffic Study. To implement the use of VMT, the Los Angeles Department of Transportation (LADOT) has developed Transportation Assessment Guidelines (TAG) screening criteria that apply to any project that did not receive its entitlements prior to July 1, 2020. LADOT’s TAG screening criteria provide that a project is not required to analyze VMT if it does not generate a net increase of 250 or more daily vehicle trips. As explained below, both the Project and Alternative 5 will generate an average of less than 250 weekday vehicle trips per day across an entire year, and therefore fall below the threshold LADOT uses to determine whether a VMT analysis is required for a project.

A VMT analysis, unlike LOS and street segment analyses, is not concerned with a worst-case impact on a given day, but rather looks to total VMT and its impact on greenhouse gas emissions. Unlike an office or residential project that adds new daily vehicle trips as a result of workers driving to and from work or residents driving to and from their homes, the Project and Alternative 5 will not add vehicle trips on a daily basis. Instead, the Project and Alternative 5 would add vehicle trips only on those days on which an Other Wellness/Sports Activities event, Health and Wellness Speaker Series event, or a Summer Sports Camp will be held on Campus.

LADOT specifically determined that Alternative 5 does not meet the VMT analysis threshold of 250 daily trips because, based upon the frequency of new events and new daily trip caps, Alternative 5 will generate approximately only 81 average daily weekday vehicle trips under a worst-case scenario. Using the same methodology that was approved by LADOT to make this determination with respect to Alternative 5, the Project would generate approximately 205 average daily weekday vehicle trips under a worst-case scenario, also falling below the 250 weekday vehicle trips per day threshold.

Alternative 5 reduces the Project's approximately 205 average daily weekday vehicle trips by more than half, to 81, through a reduction in the frequency of new Wellness Pavilion events and the incorporation of new traffic Project Design Features (PDFs) that would reduce trip generation. Alternative 5's operational changes and new traffic PDFs are fully discussed in Chapter III, Revisions, Clarifications, and Corrections of this Final EIR. Alternative 5 restricts Other Wellness/Sports Activities events to a maximum of 12 times per year, as compared to 48 times per year under the Project, thereby reducing the number of days when any new vehicle trips will be generated. Alternative 5 also incorporates new PDFs PDF-TRAF-12 and PDF-TRAF-14, restricting total daily outside guest vehicle trips for the Wellness Pavilion on days when an Other Wellness/Sports Activities and Health and Wellness Speaker Series event is held to 310, and total daily Wellness Pavilion vehicle trips on days when a Summer Sports Camp is held to 236 trips. Alternative 5 also includes PDF-TRAF-18, which requires total vehicle trips for the Campus to remain below the levels of 2016 baseline trip counts taken for the Campus. New trips generated by Alternative 5 during the school year will be generated only by outside guests of new events, which generally will be the same or similar user groups as outside guests who come to the Campus for existing events (friends and family of students and faculty, faculty of other institutions in the Los Angeles area, members of the community, etc.), and drawn from approximately the same geographic area. During the summer, Alternative 5's new trips will be generated by campers and staff of Summer Sports Camps, with many of the campers expected to be from the surrounding community and no further than the geographic area of current outside guests who visit the Campus and MSMU students, faculty, and staff. Because the outside guests who will generate Alternative 5's new trips will be drawn from the same or closer geographic area as existing users, the new trips should be, on average, of approximately the same length as existing trips. Because overall trip lengths are not being increased by either the Project or Alternative 5, yet PDF-TRAF-18 will reduce total trips to Campus, total VMT generated by the Campus, inclusive of all VMT generated by Alternative 5, will be below 2016 levels.

- **Tribal Cultural Resources** (Checklist Item XVIII): Applicable checklist questions were not updated as part of the modifications and are responded to in Section IV.L, Tribal Cultural Resources, of the Draft EIR as to the Project and in Section 1,

Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5.

- **Utilities and Service Systems** (Checklist Item XIX): Former checklist questions were revised to reduce redundancy. Specifically, Checklist Question XVIII.a was eliminated, as wastewater treatment was already addressed in former Checklist Question XVIII.e (now Checklist Question XIX.c). In addition, former Checklist Questions XVIII.b and XVIII.c were combined to address all infrastructure types in one question (now Checklist Question XIX.a) and to include the addition of telecommunications. Former Checklist Question XVIII.d regarding water supply was also updated to clarify that the analysis of water supply should include reasonably foreseeable future development during normal, dry and multiple dry years. Former Checklist Questions XVIII.f and XVIII.g regarding solid waste impacts were also clarified in new Checklist Questions XIX.d and XIX.e.

With regard to telecommunications, the Project and Alternative 5 would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. In addition, on-site and off-site construction work associated with utilities was addressed within the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5. Installation of new telecommunications infrastructure would be within the scope of the construction impacts analyzed in the Draft EIR and would be addressed by implementation of the Construction Management Plan under both the Project and Alternative 5. Thus, impacts would be less than significant for both the Project and Alternative 5. All of the remaining topics (i.e., water, wastewater, and solid waste) raised in these questions are already covered in Sections IV.M.1, Utilities and Service Systems—Wastewater; IV.M.2, Utilities and Service Systems—Water; and IV.M.3, Utilities and Service Systems—Solid Waste, of the Draft EIR as to the Project and in Section 1, Subsection d), *Evaluation of Impacts*, of Chapter III, Revisions, Clarifications, and Corrections of this Final EIR as to Alternative 5.

- **Wildfire** (New Checklist Item XX): This checklist topic was individually added as part of the Appendix G update. Wildfire concerns pertain to projects that are located in, or near, state responsibility areas or lands, classified as very high fire

hazard severity zones (VFHSZs). Because of the hilly topography, population density, and the proximity to natural brush hillside areas within the Santa Monica Mountains, the Brentwood Community to the north of Sunset Boulevard is classified as a Very High Fire Hazard Severity Zone (VHFSZ). The VHFSZ designation includes the entire Campus and adjacent area. Therefore, the following section addresses the four wildfire thresholds that would be pertinent to the Project or Alternative 5 and indicates how fire truck access would be provided under Alternative 5, as represented in Figure 1 (Appendix B), *Alternative 5, Fire Truck Access*, below. As under the Project, fire truck access would be provided around the perimeter of the Project Site.

XX. Wildfire. If located in or near state responsibility area or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact.

Historic Wildland Fires in the Vicinity of the Campus

Brush fires are a major threat to life and property throughout the region due to unique fuel, terrain, and climatic conditions. This hazard is especially great when dry “Santa Ana” winds arrive, usually in the fall and winter seasons, as evidenced by the recent 2019 “Getty” Wildfire and 2017 wildfires referred to as the “Skirball Fire” in the Bel Air neighborhood of the City of Los Angeles, the “Creek Fire” in the Sylmar neighborhood of the City of Los Angeles, and the “Thomas Fire” in Ventura and Santa Barbara Counties. The “Getty” Fire affected approximately 745 acres in the Brentwood neighborhood, destroying 10 residential structures and damaging 15 residential structures.³ The “Skirball Fire” affected approximately 422 acres in the Bel Air neighborhood, destroying six structures and damaging 12 structures.⁴ The “Creek Fire” affected the area four miles east of Sylmar in the San Gabriel Mountains, burning 15,619 acres, destroying 123 structures, and damaging 81 structures.⁵ The November 2020 Brentwood Brush Fire is the most recent fire in the area around the Campus. The Brentwood Brush Fire caused the temporary closure of I-405 but did not result in any structural damage.

³ Los Angeles Fire Department, Getty Fire, <https://www.lafd.org/news/getty-fire> accessed March 18, 2021.

⁴ Los Angeles Fire Department, Skirball Fire Update, <http://www.lafd.org/news/skirball-fire-update>, accessed February 22, 2018, as cited in the Hollywood Community Plan Draft EIR Update, November 2018.

⁵ National Wildfire Coordinating Group, InciWeb Incident Information System, Creek Fire, <https://inciweb.nwccg.gov/incident/5669/>, accessed February 22, 2018, as cited in the Hollywood Community Plan Draft EIR Update, November 2018.

Emergency Response Plans and Emergency Evacuation Plans

Adopted emergency response plans and emergency evacuation plans applicable to the City of Los Angeles, including the Campus, include the City of Los Angeles Emergency Operations Plan and the Los Angeles County Operational Area Emergency Response Plan (OAERP). The OAERP defines responsibilities and provides guidance to agencies and jurisdictions within the County Operational Area on how to interface with the Operational Area Coordinator during emergencies and disasters.⁶ The City's Emergency Operations Plan and Annexes identify roles, responsibilities and required actions for various City departments, particularly LAFD and the LAPD. MSMU also maintains its own Emergency Response Plan⁷ and a Chalon Wildfire Emergency Plan. MSMU's Chalon Wildfire Emergency Plan has been developed in consultation with LAFD to ensure appropriate action during wildfires.⁸ In addition, both the Project and Alternative 5 would comply with all applicable Los Angeles Fire Code standards, as explained in Section IV.J.1, *Fire Protection*, of the Draft EIR, and in Section 1, Subsection d), *Evaluation of Impacts*, Chapter III, Revisions, Clarifications, and Corrections, of this Final EIR.

In addition to their emergency response plans, both the City and County also designate Disaster Routes, which are freeway, highway or arterial routes pre-identified for use during emergencies. Disaster routes are not the same as evacuation routes. The Evacuation Annex of the City's Emergency Operation Plan provides that "[p]rimary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County."⁹ Disaster routes are used to bring emergency personnel, equipment, and supplies to impacted areas, while evacuation routes are used to move an affected population out of an impacted area. The closest County-designated primary (i.e. freeway) Disaster Route to the Project Site is I-405, and the closest secondary (i.e. street) Disaster Routes are Sepulveda Boulevard and San Vicente Boulevard.¹⁰ City-designed Disaster Routes in the vicinity of the Campus include these same County Disaster Routes, along with Sunset Boulevard.¹¹ No County or City-designated Disaster Routes border the Campus.

⁶ OAERP, p. 20

⁷ MSMU's Emergency Response Plan is discussed in detail in Section IV.J.1, Fire Protection Services, of the Draft EIR, pages IV.J.1-18 to IV.J.1-19. As discussed therein, a component of the Emergency Response Plan is the existing, on-Campus Command Center, consisting of a Watch Commander, MSMU Incident Commander, Patrol Officer, Main Gate Officer, and Community Relations Officer who provide continuous, round-the clock security to ensure personal safety of students, fire prevention, evacuation management, and other duties. Watch Commanders are responsible for conducting vehicle patrols both on Campus and in the immediate surrounding area, responding to Campus emergencies as well as regular non-emergency calls for service. The 24-hour Command Center monitors MSMU's automatic fire/life/safety systems and receives emergency calls from within the Campus.

⁸ <https://www.msmu.edu/media/website/content-assets/msmuedu/home/student-life/campus-security/documents-/ExecSummary-ChalonWildfire.pdf>

⁹ Los Angeles Emergency Operations Plan, May 2018 Evacuation Functional Support Annex p. 19

¹⁰ <https://dpw.lacounty.gov/dsg/DisasterRoutes/>

¹¹ City of Los Angeles General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H, November 26, 1996

Construction

The Project and Alternative 5's PDF-TRAF-1 through PDF TRAF-6 (which have been consolidated and expanded into a revised PDF-TRAF-1 for Alternative 5) require the development of a construction traffic management plan. A key feature of the construction management plan is ongoing coordination with the City and emergency service providers throughout the entire construction period to ensure adequate access is maintained to the Project Site and neighboring residences at all times. The construction management plan also requires the contractor to maintain access for land uses in proximity to the Project Site during construction, to minimize obstruction of through traffic lanes on surrounding public streets, and coordination of construction activity with related projects to further minimize construction traffic impacts. The implementation of the construction traffic management plan under both the Project and Alternative 5 would ensure uninterrupted access on external roads to avoid emergency response and evacuation impairment.

In the event of a wildfire in the vicinity of the Campus during construction, construction workers would follow the same protocols described for other Campus occupants under "Operation," below.

Further, neither the Project nor Alternative 5 would disrupt access to primary or secondary designated Disaster Routes along I-405, Sepulveda Boulevard, San Vicente Boulevard, or Sunset Boulevard, retaining regional access for emergency response during construction. Nor would the Project or Alternative 5 disrupt access to any interstate, highway, or primary arterial, thus preserving access to all designated primary evacuation routes during construction.

Therefore, construction of either the Project or Alternative 5 would not impair the County's OAERP or the City's Emergency Operations Plan during construction, and impacts would be less than significant.

Operation

Both the Project and Alternative 5 involve the construction of a new Wellness Pavilion within the Project Site, a fully developed site located entirely within the existing Campus. The Project and Alternative 5 would not expand the boundaries of the existing physical Campus, nor involve any construction or development in any areas that are currently undeveloped. The Project and Alternative 5 would bring additional outside guests to the Campus to attend events held at the Wellness Pavilion only on those specific days when events are held, but would not increase vehicle trips to the Campus on a daily basis. Neither the Project nor Alternative 5 involve changes to circulation patterns on routes that would be used by LAFD or any other emergency services during the response to a wildfire.

In the event of a wildfire in the vicinity of the Campus, MSMU's Chalon Wildfire Emergency Plan, developed in coordination with LAFD, calls for the implementation of a "shelter in place" policy. MSMU's shelter in place policy is consistent with that of other

institutions of higher education near wildlands such as Pepperdine University in Malibu, which has successfully employed a shelter in place policy for wildfires since 1993.¹² Sheltering in place calls for Campus occupants, including outside guests attending events at the Wellness Pavilion, to relocate to safe locations on the Campus and remain there until LAFD deems it safe to leave and provides an “all clear.” Occupants would stay inside an enclosed building with windows shut to prevent sparks from entering the building, and inflammable objects would be moved away from windows to prevent combustion. Lights would be kept on within occupied buildings to make them easier to see under smoky conditions. In the event that a fire emergency occurred during a large event at the Wellness Pavilion, MSMU’s shelter in place protocols would ensure that individuals, including outside guests, are all gathered at a safe location on Campus under the direction and protection of LAFD.

As with activities anywhere on Campus, activities at the Wellness Pavilion would be canceled if an evacuation order is issued prior to an event, whether preemptive by MSMU or ordered by the LAFD for the Brentwood community. The need to cancel or postpone Wellness Pavilion events would be evaluated on a case-by-case basis in consultation with MSMU Incident Commanders and/or on information provided by the LAFD/LAPD Unified Command Post. As such, there would be no traffic associated with the Project or Alternative 5 during announced evacuation or shelter in place periods, neither the Project nor Alternative 5 would conflict with the evacuation plans or protocols contained in either the County OAERP or the City Emergency Operations Plan, and impacts would be less than significant.

Further, as with construction, during operation neither the Project nor Alternative 5 would disrupt access to primary or secondary designated Disaster Routes along I-405, Sepulveda Boulevard, San Vicente Boulevard, or Sunset Boulevard. Nor would operation of either the Project or Alternative 5 impair firefighter vehicular access to the Campus or surrounding neighborhood. Fire truck access would be retained through the Project Site to the Mount Saint Mary’s Fire Road. In addition, Alternative 5’s fire lane, as shown in **Figure 1, Alternative 5 Fire Truck Access**, would be a continuous circle and would not dead-end or require a cul-de-sac turn-around. The Project would similarly provide fire truck access around the perimeter of the Project Site, would not require a cul-de-sac turn-around, and overall Fire access under the Project would be similar to the Alternative 5 access as illustrated in Figure 1. (As the location of the Project site and site plan would be slightly different under Alternative 5, i.e., located to the north and no longer include a two-story parking structure and instead provide new surface parking, Figure 1 shows the site plan under Alternative 5). Neither the Project nor Alternative 5 involve changes to circulation that would affect the way that LAFD or other emergency personnel would access either the Campus or the surrounding neighborhood during a wildfire emergency. Further, neither the Project nor Alternative 5 include any changes to fire hydrants on the Campus or in the surrounding area, or any other changes that would affect the way that LAFD would access fire hydrants during a wildfire emergency. As a result, operation of

¹² <https://emergency.pepperdine.edu/shelter-in-place/>

either the Project or Alternative 5 would not impair emergency response and access plans contained in either the County OAERP or the City Emergency Operations Plan, and impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less than Significant Impact.

The Project is located within a VHFHSZ on a ridge on the south flank of the Santa Monica Mountains and surrounded on three sides by natural open space and wildland. The Project Site is separated from direct interface with open space to the north by the Yates, Aldworth and Burns Houses (an on-Campus residence hall complex), but is directly exposed to wildland dropping from steep hillsides to the east and west. Also, as with all hillside areas within the City of Los Angeles, the Project Site is exposed to seasonal Santa Ana winds. Although it is located near wildlands, the Project Site is a currently developed portion of the Campus, and neither the Project nor Alternative 5 involve the physical extension of the Campus or related development into existing wildlands. The Project Site is not immediately surrounded by natural vegetation. The Project and Alternative 5 would change existing use patterns within the Project Site through the construction of the Wellness Pavilion, but the Project Site itself is already the site of activity, including activity associated with existing surface parking lots, tennis courts, and a pool. As such, neither the Project nor Alternative 5 would result in physical changes that are anticipated to change the behavior of any wildfires in the area.

As noted above, the Project Site is located in a VHFHSZ. Because it is located in a VHFHSZ, the entire Campus, including the Project Site, must comply year-round with the requirements of Fire Code Section 57.322, which requires brush clearance within 200 feet of any structure. LAFD performs microenvironment weather analysis to check for irregular weather patterns and changes, which alerts LAFD to conditions such as windy days combined with low humidity. LAFD uses a Burning Index¹³ to determine when to call a Red Flag Day.¹⁴ A Red Flag Day is when the potential for a fast-moving brush fire is extremely high, when wind speeds are 25 mph or more and the humidity is 15 percent or less. On those days, illegally parked cars in VHFHSZ areas may be towed if their presence would prevent roadway access needed by LAFD.

LAFD also has a significant air response ready to deploy, including water-dropping helicopters, and the mission of LAFD Air Operations includes brush fire suppression.¹⁵ LAFD also has access to additional helicopters, fixed-wing aircraft, bulldozers, and fire engines through mutual aid agreements with the state, County, and other cities in the

¹³ A Burning Index is a number used by the National Oceanic and Atmospheric Administration to describe the potential amount of effort needed to contain a single fire in a particular fuel type within a rating area.

¹⁴ LAFD, <https://ers.lafd.org/redflag/>, accessed March 22, 2021

¹⁵ LAFD, <https://www.lafd.org/about/special-operations/air-operations>, accessed March 22, 2021

region. In addition to attacking wildfires from the sky, LAFD also has ground resources such as fire engines and trucks. The “shelter in place” policy discussed above was developed in coordination with LAFD, and in consideration of the variety of fire-fighting resources available, including air response. LAFD’s air resources can be used to defend the Campus during a wildfire while Campus occupants are sheltering in place.

Construction

Chapter 33 of the City’s Fire Code provides requirements designed to reduce risk of fire ignition during construction. These include, but are not limited to, prohibition of smoking except in areas approved by the LAFD, refueling of equipment in appropriate locations, preparation of a fire prevention program, and designation of fire watch personnel during occurrence of hazardous construction activities. Through compliance with these regulations, construction of either the Project or Alternative 5 would not exacerbate wildfire risks, thereby not exposing project occupants, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

Operation

The Project and Alternative 5 would be required to comply with Fire Code provisions applicable to projects in a VHFHSZ. These regulations, which address building materials and construction methods, are intended to reduce exterior wildfire exposure. In addition to specific building materials and construction methods, both the Project and Alternative 5 would be further required to install a complete hydraulically calculated automatic sprinkler system consistent with the Fire Code.

The Fire Code also requires the management of hazardous vegetation and fuel, as well as maintenance of defensible space in wildland-urban interface areas, and both the Project and Alternative 5 would comply with these requirements. The purpose of these measures is to reduce the severity of potential exterior wildfire exposure to buildings and to reduce the risk of vegetation fire spreading to buildings. Through compliance with all applicable standards and regulations and LAFD recommendations, neither the Project nor Alternative 5 would exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts with respect to this threshold would be less than significant.

Because it is located in a VHFHSZ, the entire Campus, including the Project Site, must comply year-round with the requirements of Fire Code Section 57.322, which require brush clearance within 200 feet of any structure. Consistent with these requirements, MSMU currently implements brush clearance a minimum of 200 feet from the foundations of existing buildings. Under either the Project or Alternative 5, the fuel reduction area adjacent to the Project Site would be extended to maintain a 200-foot distance from the broader foundation footprint of the Wellness Pavilion. Because the required fuel reduction area would expand under either the Project or Alternative 5 as compared to existing conditions, wildfire risks as a result of unmodified natural vegetation conditions would marginally decrease under either the Project or Alternative 5.

In addition to compliance with the requirements of the Fire Code, other fire safety considerations implemented at the Campus would apply to the Project or Alternative 5. MSMU currently bans, and will continue to ban, the outdoor incineration of all construction or vegetative waste materials on Campus. In addition, any smoking by employees, students, guests, or construction workers is currently and will continue to be relegated to the Circle, which is separated from adjacent open space by surrounding, existing buildings and is not located within the Project Site. Therefore, no smoking is or would be permitted within the Project Site under the Project or Alternative 5.

In addition to specific Fire Code regulations, under both the Project and Alternative 5, the Wellness Pavilion would incorporate the following design features related to fire safety, at the recommendation of LAFD:

- a. Boxed-in eaves
- b. Single pane, double thickness (minimum 1/8" thickness) or insulated windows
- c. Non-wood siding
- d. Exposed wooden members shall be two inches nominal thickness
- e. Noncombustible finishes

All eaves would be boxed in, windows would be aluminum consisting of one-inch insulated glass units. No wood siding would be used, no exposed wood would be used, and all finishes would be non-combustible. The overhang, a major design component of the Wellness Pavilion, would be an enclosed construction feature and not be directly vulnerable to fire exposure (as would open rafters). Windows throughout the building would be double glazed. The Wellness Pavilion's structural materials would be non-combustible and include concrete slab on grade, steel, glass, and concrete and would not contain any exterior wood components. Surface finishes would be non-combustible plasters.

Finally, as discussed under threshold (a) above, MSMU's Chalon Wildfire Emergency Plan, developed in coordination with LAFD, calls for the implementation of a "shelter in place" policy in the event of a wildfire in the vicinity of the Campus. As discussed above, there would be no traffic associated with the Project or Alternative 5 during announced evacuation or shelter in place periods, and neither the Project nor Alternative 5 would therefore increase danger to project occupants or neighboring residents as a result of increased traffic on existing evacuation routes in the area.

Through the incorporation of these design features, operation of either the Project or Alternative 5 would not exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less than Significant Impact.

The Project and Alternative 5 would be constructed within an existing developed portion of the Campus and would not require incursions into wildland or affect wildland by the permanent or temporary installation of new roads, fuel breaks, power lines, water sources, other utilities to serve the Wellness Pavilion. The southern portion of the Project Site is crossed from east to west by a Los Angeles Department of Water and Power (LADWP) line that services the region. Although this line runs through the Project Site, power for the Wellness Pavilion would be provided through an existing underground power vault, located at the north side of Brady Hall. All power sources to the new building would be below grade and would not require an extension to, or any direct use of, the existing overhead power line. The Project and Alternative 5 would not require the extension of any overhead power lines.

Because the Project or Alternative 5 would be served entirely by underground utility lines and existing on-site services, including water services, neither the Project nor Alternative 5 would require the construction or maintenance of any new roads, fuel breaks, or utility lines through wildland or that would directly affect wildland. Because neither the Project nor Alternative 5 would require the installation or maintenance of new infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts to the environment, impacts would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less than Significant Impact.

The loss of vegetation and root systems in open space as a result of wildfire has the potential to destabilize soils under saturated conditions. Loss of natural vegetation and root systems can also increase surface water runoff during heavy rainstorms since the ability of soils to retain and absorb water would be reduced. Such conditions have the potential to increase flooding and debris flow.

The Project Site and Campus are located along a ridge crest, with steep slopes to the east and west that descend into canyons. Because of this topography, runoff that could cause flooding generally flows over the top of the slopes rather than across the Campus. The Project Site's location at the top of the ridge, and not on a hillside, also means that it is not generally at risk of landslides. Because of this, post-wildfire flooding and landslides are not anticipated to adversely impact the Campus, including the Project Site.

Construction

During construction of the Wellness Pavilion under either the Project or Alternative 5, prior to the installation of drainage improvements on the Project Site, existing down drains and storm drains would be cleared of debris and discharge to locations where the water will not adversely affect slopes to the east and west. Concrete swales and down drains would be cleared of debris to allow runoff to flow towards existing outlet devices. The contractor would implement storm water pollution prevention practices during construction, including sandbags, plastic sheeting, asphalt berms, etc., that would divert water away from slopes during construction. Therefore, existing conditions with respect to runoff onto the adjacent slopes are expected to improve during construction, and construction of the Project or Alternative 5 would not result in runoff associated with post-fire slope instability or drainage changes, exposing people or structures to significant risks. Impacts would be less than significant during construction.

Operation

Risks of post-wildfire flooding and landslide in the vicinity of the Project Site are primarily on the slopes to the east and west. The Project Site is a completely developed site, and existing improvements on the Project Site consist primarily of several surface parking lots and two tennis courts, which, as generally impermeable surfaces, result in partially undirected surface flow of runoff that could contribute to flows down the east and west slopes. The Project and Alternative 5 would implement drainage changes on the Project Site, including those required by the City's Low Impact Development Ordinance, that would divert runoff away from the slopes and into the Campus storm drainage system. Under the Project and Alternative 5's rainwater collection system, as discussed in Section IV.G, Hydrology and Water Quality, and of the Draft EIR, Chapter III, Corrections and Additions, of this Final EIR, surface water would be redirected away from slope edges and towards suitable disposal locations such as storm drain inlets and area drains. Runoff directed through the Campus storm drainage system would flow along curbs on Chalon Road down to Bundy Drive, and into the City's storm drainage system. According to the hydrology study prepared by KPFF Consulting Engineers in consultation with the City of Los Angeles, Department of Public Works, Engineering Division, Street Sewer and Stormwater Design, no flooding conditions exceeding existing capacity have been observed or identified in the Chalon Road/Bundy Drive collection system or in the storm drain at Bundy Drive and La Casa Lane.

The Project and Alternative 5 would therefore reduce uncontrolled stormwater flowing over the tops of slopes that could contribute to slope instability by diverting water from the nearby slopes and into the Campus storm drainage system. Controlling surface flows would reduce the risk to structures and people located at the bottom of the slopes to the east and west relative to existing conditions. Therefore, operation of the Project or Alternative 5 would not result in runoff associated with post-fire slope instability or drainage changes, exposing people or structures to significant risks. Impacts would be less than significant during operation.

LEGEND

-  (N) FIRE HYDRANT
-  (E) FIRE HYDRANT
-  PROPOSED FIRE DEPARTMENT CONNECTION
-  PROPOSED BACKFLOW PREVENTION DEVICE
-  PROPOSED POST INDICATOR VALVE
-  WIDENED FIRE TRUCK ACCESS ROUTE (20'-0" WIDE)
-  EXISTING FIRE TRUCK ACCESS ROUTE
-  LIMIT OF WORK
-  POOL DECK - OPEN TO SKY
-  FIRE SUPPLY LINE - 225' MAX. LENGTH

GENERAL NOTES

1. APPROVED NUMBERS OR ADDRESSES SHALL BE PROVIDED IN SUCH A POSITION AS TO BE PLAINLY VISIBLE AND LEGIBLE FROM THE STREET OR ROAD FRONTING THE PROPERTY PER C.O.L.A.F.C. SECTION 505.1
2. PROVIDE FIRE ACCESS ROADWAY SIGNS OR OTHER APPROVED NOTICES OR MARKINGS IN ACCORDANCE WITH C.O.L.A.F.C. SECTION 503.3
3. POST INDICATOR VALVES, FIRE DEPARTMENT CONNECTIONS AND ALARM BELL SHALL BE LOCATED ON THE ADDRESS/ACCESS SIDE OF THE STRUCTURE
4. FIRE PROTECTION, INCLUDING FIRE APPARATUS, ACCESS ROADS, AND WATER SUPPLIES FOR FIRE PROTECTION SHALL BE INSTALLED AND MADE SERVICABLE PRIOR TO AND DURING TIME OF CONSTRUCTION. CFC CHAPTER 14
5. ALL DECORATIVE MATERIALS SHALL BE MAINTAINED IN A FLAME RETARDANT CONDITION (CCR T-19, SEC. 1.14, 3.08, 3.21 AND CFC SEC. 1103.3, 2501.5, 2501.6)
6. LANDSCAPE SHALL MAINTAIN A MINIMUM 3'-0" CLEARANCE AROUND FIRE DEPARTMENT EQUIPMENT (CONNECTIONS, HYDRANTS, AND FIRE DEPARTMENT CONNECTIONS)

FIRE EXTINGUISHERS

1. AT LEAST ONE FIRE EXTINGUISHER WITH A MINIMUM RATING OF 4-A-20B:C SHALL BE PROVIDED OUTSIDE OF EACH MECHANICAL, ELECTRICAL, OR BOILER ROOM. CFC 1002, UFC STANDARD 10-1, CCR T-19, SEC. 3-29
2. PROVIDE A MINIMUM OF ONE 2-A-10B:C CLASSIFICATION FIRE EXTINGUISHER WITHIN 75 FEET OF TRAVEL DISTANCE FOR 6000 SF OR PORTION THEREOF ON EACH FLOOR. CFC STANDARDS 10-1 AND CCR T-19, SEC. 3-29

