

FINDINGS OF FACT

I INTRODUCTION

The 2010 Final Supplemental Environmental Impact Report (Final Supplemental EIR) for the West Los Angeles College 2009 Facilities Master Plan Update (proposed project) identified (as compared to the 2005 FEIR) one additional potentially significant environmental impacts that could result from the implementation of the proposed project. However, the Los Angeles Community College District (LACCD) finds that the inclusion of certain mitigation measures as part of project approval will reduce most, but not all, of the additional potential significant effect to less-than-significant levels. Significant Environmental impacts identified in the 2005 FEIR remain. Those impacts that are not reduced to a less-than-significant level are identified and overridden due to specific economic, legal, social, technological, or other feasibility considerations. As required by the California Environmental Quality Act (CEQA), LACCD, in adopting these Findings of Fact and Statement of Overriding Considerations (Findings), also adopts a Mitigation Monitoring and Reporting Program (MMRP) for the proposed project. LACCD finds that the MMRP, which is incorporated by reference and made a part of these findings and is attached, meets the requirements of Public Resources Code Section 21081.6 by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the proposed project. In accordance with CEQA and the CEQA Guidelines, LACCD adopts these findings as part of the certification of the Final Supplemental EIR for the proposed project. Pursuant to Public Resources Code Section 21082.1(c)(3), LACCD also finds that the Final Supplemental EIR reflects the LACCD's independent judgment as the lead agency for the proposed project.

II ENVIRONMENTAL DOCUMENTATION BACKGROUND

The LACCD Board of Trustees certified the Final Environmental Impact Report (Final EIR) for the West Los Angeles College (WLAC) Facilities Master Plan (2005 Facilities Master Plan) on January 12, 2005. The 2005 Facilities Master Plan consisted of the addition of 699,765 square feet of space to WLAC, including the addition of a Media Center (Media Arts), new classroom and administration buildings (Science and Math, Student Services/Administration, general Classroom, Student Services/IT High Tech Classroom), plant operations and two new parking structures (some of these buildings were not funded at the time the 2005 FEIR was approved). The 2005 Facilities Master Plan also included plans for air conditioning, infrastructure upgrades, landscaping and security upgrades. Under the 2005 Facilities Master Plan, student enrollment was projected to reach 18,904 students by 2022.

III FINDINGS REQUIRED UNDER CEQA

Public Resources Code Section 21081 and CEQA Guidelines Section 15091 require that a public agency, prior to approving a proposed project, identify significant impacts of the proposed project, and make one or more of three allowable findings for each of the significant (including potentially significant) impacts.

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. (CEQA Guidelines Section 15091, subd. (a)(1));
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (CEQA Guidelines Section 15091, subd. (a)(2)); and

- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final environmental impact report. (CEQA Guidelines Section 15091, subd. (a)(3)).

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Supplemental EIR for the proposed project as fully set forth therein. For each of the significant impacts associated with the proposed project, the following sections are provided:

Description of Significant Effects – A specific description of the environmental effects identified in the EIR, including a conclusion regarding the significance of the impact.

Mitigation Measures – Identified mitigation measures or actions, that are required as part of the proposed project.

Finding – One or more of three specific findings in direct response to CEQA Guidelines Section 15091.

Reference – A notation on the specific section in the EIR, which includes the evidence and discussion of the identified impact.

For the environmental impacts identified in the EIR to be less than significant, a statement explaining why the impacts are less than significant is provided.

IV DESCRIPTION OF THE PROPOSED PROJECT

In November 2008, voters approved Measure J that included \$3.5 billion in bonds to upgrade class facilities at the nine Los Angeles Community College District's campuses. In light of these additional funds, a number of the unfunded facilities/buildings in the College's 2005 Master Plan have been able to move forward. These bond funds have also provided the College an opportunity to make some minor revisions to the proposed physical improvements. The resultant changes to the 2005 Master Plan are presented in the 2009 West Los Angeles Facilities Master Plan.

Updates are proposed to the 2005 West L.A. College Facilities Master Plan (Master Plan). The 2009 Master Plan would add an additional 72,653 sq. ft. of space. The 2009 Master Plan includes: a revised, larger Physical Education structure (Allied Health and Wellness Building); new central plant; demolition of additional modular classrooms; relocation of the media center (Watson Center); a revised, larger Technology Learning Center (TLC), smaller student services building, replacement of soccer with softball field, smaller reconfigured North Parking Structure (Lots 1 and 2), and internal street changes. Since 2005 on-line student attendance has increased, such that future year projections result in fewer total enrolled students and much fewer on campus students (10,998 in 2022 compared to 18,904 analyzed in the previous EIR). In conjunction with the proposed changes to the Master Plan the Draft Supplemental EIR revised the mitigation measures identified in the 2005 FEIR to address recent construction practices and experiences as well as the effectiveness of mitigation to address specific, identified significant adverse environmental impacts.

V ENVIRONMENTAL EFFECTS FOUND TO BE NO IMPACT OR LESS-THAN-SIGNIFICANT

LACCD determined that the proposed project would have less-than-significant impacts in the following environmental topic areas:

A. AESTHETICS (Visual Resources)

1. Scenic Views and Vistas (Draft Supplemental EIR p. 3.2-6)

LACCD finds that the proposed project would have less-than-significant impacts related to scenic views and vistas. As discussed in the Draft Supplemental EIR, Subsection Scenic Views and Vistas, in Section 3.2 Aesthetics (Visual Resources), while the new buildings (ranging in height from 25 feet (Student Union) to 59 feet 6 inches (Allied Health) to 135 feet (Teaching Learning Center) would be visible from surrounding areas, the structures would not result in significant adverse visual impacts to existing or potential future public views from the Baldwin Hills or existing residential neighborhoods located to the north and east.

The completion of the structural and landscaping elements of the proposed Master Plan would introduce views of building on-campus visible between landscaping, but would not result in the creation of significant adverse impacts views from Stocker Street or from the limited number of private residences with potential northerly views of the campus. Implementation of the Master Plan would not result in significant adverse visual impacts on the views from the southwest entry-point vicinity. The proposed Master Plan's buildings, parking structures, and landscaping elements that would become visible in views from the Freshman Drive vicinity would not result in significant adverse visual impacts to either public street or private residential views directed toward the campus.

B. AGRICULTURAL RESOURCES

1. Agricultural Resources (Draft Supplemental EIR p. 3.3-2)

LACCD finds that the proposed project would have less-than-significant impacts related to agricultural resources. The College's land is partially zoned A2 (Agricultural), however, there are no active agricultural uses on- or off-site. In addition, there is no known unique or prime farmland on the site. Thus, there would be no impact to agricultural uses or zones.

C. AIR QUALITY

1. Operational Air Quality (Draft Supplemental EIR p. 3.4-13)

LACCD finds that the proposed project would have less-than-significant impacts related to operational air quality. As discussed in the Draft Supplemental EIR, Subsection Operation, p. 3.4-13 operation of the proposed project would result in emissions of VOC, NO_x, CO, SO_x, and PM₁₀ from area sources on the campus (building expansion) that would be below SCAQMD thresholds, resulting in a less-than significant impact.

Proposed development of the Master Plan would increase vehicle trips to the campus compared to today but not as much as anticipated in the 2005 FEIR. The 2005 FEIR found these increased emissions (as

well as the potential for significant localized CO concentrations) would be below SCAQMD significance thresholds and the impact would be less than significant.

D. HISTORIC RESOURCES

1. Historic Resources (Draft Supplemental EIR p. 3.6-1)

LACCD finds the proposed project would have no impacts related to historic resources. As discussed in the Draft Supplemental EIR p. 3.6-1, no historic resources exist on the College campus or immediately adjacent areas; therefore, no impacts to historic resources would occur.

E. HYDROLOGY

1. Ground Water (Draft Supplemental EIR p. 3.11-11)

LACCD finds the proposed project would have no significant impacts related to ground water. As discussed in the Draft Supplemental EIR p. 3.11-11, the construction and operation of facilities proposed under the Master Plan would use water from the local water purveyor and not from local groundwater supplies. Therefore, no impact to groundwater supplies would occur.

F. LAND USE AND ZONING

1. Consistency with Planning and Zoning (Draft Supplemental EIR p. 3.12-8)

LACCD finds the proposed project would have less than significant impacts related to land use and zoning. As discussed in the Draft Supplemental EIR p. 3.12-8, the College falls within two different County zoning land use designations: R-1 (Single Family Residential) and A2 (Agricultural) zoning classifications. The A-2 Zone allows Colleges and Universities, subject to approval of a Conditional Use Permit (Los Angeles County Planning and Zoning Code 22.24.150). Under state law, buildings and facilities on LACCD college campuses are generally subject to zoning limitations imposed by the local jurisdiction, in this case the County of Los Angeles. By two-thirds vote of the District's Board of Trustees, however, the District may elect to exempt classroom facilities from local zoning control. Any new facilities that would not fully comply with current zoning and that are not exempted by the District Board would require a variance, conditional use permit, or zone modification from the County of Los Angeles.

The proposed Watson Center, Student Union, North Parking Structure, Allied Health and Wellness, Technical Learning Center (and possibly the Community Center) would be 40 to 72 in height above grade and consequently would exceed the height limit in the zoning code of 35 feet and would require variances or conditional use permits or an exemption. Given the location of these structures and their distance from off-campus residential uses, these structures are unlikely to result in impacts on offsite uses and would not materially conflict with the intent of the zoning code.

G. POPULATION EMPLOYMENT AND HOUSING

1. Population, Employment and Housing (Draft Supplemental EIR p. 3.14-4)

LACCD finds the proposed project would have less than significant impacts related to population, employment and housing. As discussed in the Draft Supplemental EIR p. 3.14-4 the anticipated increase

in the number of employees at the College under the proposed project would not be inconsistent with local plans or population projections and would not substantially increase the demand for housing in the project area. Impacts related to construction of the secondary access road are no longer an issue as the roadway has been completed.

VI. ENVIRONMENTAL IMPACTS FOUND TO BE LESS-THAN-SIGNIFICANT AFTER MITIGATION

The rationale for the conclusion that a significant impact would occur in each of these issue areas is summarized below.

A. AESTHETICS (Visual Resources)

1. Visual Quality, Character and Resources (Draft Supplemental EIR p. 3.2-6)

a) Significant Environmental Effects

Proposed construction has the potential to impact visual resources. With the incorporation of the Design Guidelines, the project as proposed is expected to be appropriate to its' setting and consistent in scale and design with, and in scale with the surrounding development. Less than significant impacts to the visual quality, character, and resources of the campus would occur.

b) Mitigation Measures

V-1: New buildings and renovations to existing buildings shall adhere to the standards, criteria, and guidelines in the 2009 Master Plan to ensure compatibility and cohesion in terms architectural design, scale, massing, and siting. Reflective, mirrored, or dark glass shall not be installed on the exteriors of the new buildings on the campus. Additionally, proposed Master Plan projects and improvements shall comply with the 2009 Master Plan.

V-2: The District has developed and will continue to abide by the formal landscaping plan (set forth in the 2009 Master Plan) that includes provisions mandating the replacement (when necessary), retention, and maintenance of all existing trees along all portions of the College's perimeter. The District further agrees to implement all aspects of the landscaping designs set forth in this EIR and the College's Master Plan, including the planting of indigenous and drought resistant trees, shrubs, and plants.

V-3: New trees have been and will continue to be planted to fill any gaps on Freshman Drive, Sophomore Drive, and Stocker Street and along the perimeter of the College campus. New trees, lighting, and landscaping shall comply with the 2009 Master Plan. [Landforms and landscapes were installed on the south side of Stocker Street in accordance with the College's Campus Aesthetic and Landscape Guidelines (August 10, 2004), and in consultation with the HOAs representing homeowners in the vicinity of Stocker Street; this landscaping will continue to be maintained.]

V-4: Signage on the campus shall be consistent with the standards set forth in the 2009 Master Plan.

c) Finding

Implementation of Mitigation Measures V-1 through V-4 would ensure that impacts to visual resources would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts related to visual resources would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with visual resources, see, pp. 3.2-6 to 3.2-9 and 3.2-11 to 3.2-12 of the Draft Supplemental EIR.

2. Shade/Glare and Artificial Lighting (Draft Supplemental EIR p. 3.2-10)

a) Significant Environmental Effects

As indicated in the 2005 FEIR, athletic field lighting could significantly increase nighttime light levels and could result in spillover impacts on sensitive residential uses to the west. No substantial changes to athletic field lighting are proposed as part of the 2009 Master Plan compared to what was analyzed in the 2005 FEIR.

b) Mitigation Measures

V-5: A Lighting Plan has been developed for the campus and is incorporated in the 2009 Master Plan. A Sports Field Lighting Plan shall be designed with input from Culver City (if Culver City so desires). Nighttime lighting must be located and designed (including, wherever appropriate, the incorporation of full-cutoff shielded fixtures or three-sided fixtures pointed at least 45 degrees below horizontal) to contain the light within the campus and avoid spillover lighting impacts on off-campus properties and surrounding communities. Use of netting that would create a visual barrier blocking out light and glare from the sports fields shall also be considered. All new lighting shall comply with the lighting standards set forth in the 2009 Master Plan (and the Sports Field Lighting Plan to be developed), and shall meet all requirements of California lighting standards. Once installed, sports field and facilities lighting shall be scheduled to shut off no later than 11 p.m., except in the case of safety and/or emergency situations.

V-6: Appropriate light mitigation measures shall be employed such that light levels that result from the installation of new lighting for the Master Plan buildings (as applicable) experienced by the surrounding communities shall comply with (i) then applicable California standards and (ii) Culver City standards existing as of December 2009, and (iii) LEED and ASHRAE standards as applicable and feasible. All lighting shall provide adequate cut-off features to prevent spill-over light into the surrounding community. All outdoor lighting shall be dark sky compliant as appropriate.

c) Finding

Implementation of Mitigation Measures V-5 and V-6 would reduce the project impacts to a less-than-significant level. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts related to intersection operations would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the

proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

a) Reference

For a complete discussion of impacts associated with shade/glare, see pp. 3.2-10 to 3.2-11 and 3.2-12 to 3.2-13 of the Draft Supplemental EIR.

B. AIR QUALITY

1. Construction Toxic Air Contaminants (Draft Supplemental EIR p. 3.4-9)

a) Significant Environmental Effects

During construction, both trucks and equipment would emit diesel exhaust, which has been declared as a toxic substance by the California Air Resources Board. The potential exists for significant adverse impacts on sensitive receptors, without mitigation. Impacts would be similar to those addressed in the 2005 FEIR.

b) Mitigation Measures

See Mitigation Measures AQ-1 through AQ-24 below.

c) Finding

Implementation of Mitigation Measures **AQ-1** through **AQ-24** would ensure that impacts from construction toxic air contaminants would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts related to construction toxic air contaminants would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with construction emissions, see pp. 3.4-9 to 3.4-10 and 3.4-12 to 3.4-13 of the Draft Supplemental EIR.

C. BIOLOGICAL RESOURCES

1. Impact on Special Status Plant Species and Wildlife (Draft Supplemental EIR p. 3.5-6)

a) Significant Environmental Effects

The secondary access road is complete and associated construction impacts have already occurred and are therefore not further addressed in this Supplemental EIR. Remaining construction activities would occur internal to the (urban) campus and would have potential to disturb nesting birds on campus trees and wildlife in areas immediately adjacent to construction sites. Increased nighttime lighting from campus buildings could disturb nesting birds species on-campus and adjacent properties.

b) Mitigation Measures

BR-1: No ground disturbance, site clearing, or removal of any potential nesting habitat shall be conducted within the typical breeding/nesting season for birds (February 15 to August 30); or

Within 15 days, and again within 72 hours prior to any ground disturbing activities, a qualified biologist shall conduct surveys for nesting birds (including raptors). The surveys shall occur prior to the clearing, removal, or trimming of any vegetation. Surveys shall include areas within 200 feet of construction site boundaries. The biologist must be qualified to determine the status and stage of nesting efforts by all locally breeding bird and raptor species without causing intrusive disturbance.

BR-2: If an active nesting effort is confirmed or considered very likely by the biologist, a fence barrier shall be erected around the nest site to provide a minimum 50- foot barrier between the nest and construction activities. A 200-foot buffer shall be required for any raptor nesting site. No habitat removal or any other work shall be allowed to occur within the fenced nest zone until a qualified biologist confirms that the young have fledged and have left the nest.

See also Measure V-5 above that would reduce lighting impacts on adjacent areas.

c) Finding

Implementation of Mitigation Measures **BR-1** and **BR-2** would ensure that impacts on special status plants and wildlife would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts related to special status species and wildlife would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with special status plant species and wildlife, see pp. 3.5-6 to 3.4-8 of the Draft Supplemental EIR.

D. ARCAEOLOGICAL RESOURCES

2. Archaeological Resources (Draft Supplemental EIR p. 3.4-9)

a) Significant Environmental Effects

Construction excavations have the potential to disturb, alter, or destroy significant archaeological resources that may be present in some project locations.

b) Mitigation Measures

AR-1: In those areas that are not monitored by an archaeologist and/or a culturally affiliated Native American, if buried cultural resources are uncovered during construction, all work shall be halted in the vicinity of the archaeological discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resource.

AR-2: Provisions for the disposition of recovered prehistoric artifacts shall be made in consultation with culturally affiliated Native Americans. The College shall be the final arbiter should disagreement arise over the disposition of the recovered artifacts.

AR-3: In the event of an accidental discovery of any human remains in a location other than a dedicated cemetery, the steps and procedures specified in Health and Safety Code 7050.5, State CEQA Guidelines 15064.5(e), and Public Resources Code 5097.98 shall be implemented.

c) Finding

Implementation of Mitigation Measures **AR-1** through **AR-3** would ensure that impacts on archaeological resources would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts on archaeological resources would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with archeological resources, see pp. 3.7-1 to 3.7-8 of the Draft Supplemental EIR.

E. PALEONTOLOGICAL RESOURCES

1. Paleontological Resources (Draft Supplemental EIR p. 3.8-2)

a) Significant Environmental Effects

Excavation into Pleistocene sediments below a depth of 4 feet could result in the destruction of unique fossil resources—a potentially significant impact.

b) Mitigation Measures

PR-1: A qualified paleontologic monitor shall monitor excavation in areas identified as likely to contain paleontologic resources. These areas are defined as all areas within the College campus where planned excavation will exceed depths of 4 feet. The qualified paleontologic monitor shall retain the option to reduce monitoring if, in their professional opinion, sediments being monitored are previously disturbed. Monitoring may also be reduced if the potentially fossiliferous units, previously described, are not found to be present or, if present, are determined by qualified paleontologic personnel to have low potential to contain fossil resources. The monitor shall be equipped to salvage fossils and samples of sediments as they are unearthed to avoid construction delays, and shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Because the Culver Sand or Inglewood Formation deposits yield small fossils specimens likely to go unnoticed during typical large scale paleontological monitoring, matrix samples from those rock units shall be collected and processed to determine the potential for small fossils to be recovered prior to substantial excavations in those rock units. If this sampling indicates these units do possess small fossils, a matrix sample of up to 6,000 pounds of rock shall

be collected at various locations, to be specified by the paleontologist, within the construction area. These matrix samples shall also be processed for small fossils.

PR-2: Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates.

PR-3: Specimens shall be curated into a professional, accredited museum repository with permanent retrievable storage.

PR-4: A report of findings, with an appended itemized inventory of specimens, shall be prepared. The report and inventory, when submitted to the College, will signify completion of the program to mitigate impacts to paleontologic resources.

c) Finding

Implementation of Mitigation Measures **PR-1** through **PR-4** would ensure that impacts on paleontological resources would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts on paleontological resources would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with paleontological resources, see p. 3.8-2 of the Draft Supplemental EIR.

F. GEOLOGY, SOILS AND SEISMICITY

1. Soil Erosion, Alteration of Topography, Unstable Slopes, Ground Rupture, Strong Ground Shaking, Liquefaction, Lateral Spreading, Unsuitable Soil Conditions, Earthquake-induced Flooding, Seismically Induced Settlement, Subsidence/Uplift, Methane Gas (Draft Supplemental EIR p. 3.9-3)

a) Significant Environmental Effects

Soil Erosion: Most of the native soils onsite, as well as fill slopes constructed with native soils have a moderate to high susceptibility to erosion. These materials, especially the Culver Sand, would be particularly prone to erosion during the grading phase, especially during heavy rains. The implementation of industry standard storm water pollution control Best Management Practices would reduce soil erosion impacts to a less than significant level.

Alteration of Topography: Campus grading activity has created a series of cut/fill pads that step down in elevation from east to west (Sophomore Drive to Freshman Drive). No substantial further alteration of the topography is anticipated.

Unstable Slopes: There is a nil to very low risk of a landslide hazards.

Ground Rupture: The possibility of ground rupture on and around the campus is considered nil to very

low.

Strong Ground Shaking: Strong earthquake-induced ground shaking could be triggered by seismic activity on any of the faults within 30 miles of the project area, resulting in significant damage to structures in the proposed project area.

Liquefaction: The southwest corner of the campus and where the secondary access road meets Jefferson Boulevard have moderate to high potential for liquefaction, the San Pedro Formation area has a low potential, and the remainder of the site has a low to moderate potential. Consequently construction of project improvements in the southwest corner of the campus and near Jefferson Boulevard could be subject to a potentially significant liquefaction hazard.

Lateral Spreading: In areas within the Master Plan area covered by soils developed by the unconsolidated deposits from alluvium, colluvium, landslide debris and slope wash, and which are underlain by liquefiable alluvium, lateral spreading hazard is potentially significant.

Unsuitable Soil Conditions: Expansion potential of soil within the Master Plan area varies from very low for soils developed in sandy materials to very high for soils developed on lean clay units. Expansive soils are characterized by their ability to undergo significant volume change (shrink and swell) due to variation in soil moisture content. Potential impacts could include unacceptable settlement or heave of structures, concrete slabs supported-on-grade, and pavements supported on these types of soil. The impact from unsuitable soils is potentially significant.

However the impact can be reduced to a less than significant level provided that appropriate mitigation measures are implemented in design and construction of proposed facilities.

Slope Failure/Landslides: The landslide hazard zones according to the California Geological Survey (CGS) are to the east of the College campus, therefore the potential for a landslide is very low.

Earthquake-Induced Flooding: Since no dams, large bodies of water or water storage facilities are located upstream of the project area, this hazard is not anticipated.

Seismically Induced Settlement: Low to moderate compressibility would be expected from the existing fill and the alluvium. Due to the fairly large fill, alluvial/colluvial thicknesses, settlement amounts may vary from location to location.

Subsidence/Uplift: While there is no evidence to suggest that the project site has been subject to adverse effects from subsidence and/or uplift due to oil reservoir pressurization issues, this subject warrants further investigation.

Methane Gas: There is no evidence that nearby oil field re-pressurization is causing the migration of methane gas from deep geologic units toward the College campus. However, CGS Note 48 specifically requires that methane gas hazards be addressed.

b) Mitigation Measures

GE-1: Erosion control measures shall be implemented and shall include the placement of sandbags around basins; the use of proper grading techniques; appropriate sloping, shoring, and bracing of the construction site; and covering or stabilizing topsoil stockpiles.

- GE-2:** All earthwork and grading shall meet the requirements of the State of California Building Code, Title 24, part 2, volume 1, and shall be performed in accordance with the recommendations in the geotechnical investigation conducted for each proposed project at the West Los Angeles campus. All earthwork and grading shall comply with County grading requirements under the County of Los Angeles Building code, Title 26, Part 2, Volume 1.
- GE-3:** All excavation and shoring systems shall meet the minimum requirements of the Occupational Safety and Health Administration (OSHA) standards.
- GS-1:** Site-specific geotechnical investigations shall be performed by qualified licensed professionals before final design of any structures, and recommendations provided in these reports shall be implemented, as appropriate.
- GS-2:** Design and construction of structures for the proposed project shall conform to all applicable provisions of the California State Architect, which follow guidelines set forth in the 2001 CBC. The CBC is based on the 1997 UBC and sets forth regulations concerning proper earthquake design and engineering.
- GS-3:** Materials susceptible to liquefaction in structural areas shall be removed and recompacted, if practical. Where appropriate, subdrains shall be provided for control of groundwater levels to reduce liquefaction potential.
- GS-4:** Materials susceptible to lateral spreading in structural areas shall be removed and recompacted.
- GS-5:** The geotechnical investigation of proposed facilities shall fully characterize the presence and extent of corrosive, expansive, or loose compactable soil. Based on the collected data, appropriate mitigation shall be designed. Mitigation options could include the following: removal of unsuitable subgrade soils and replacement with engineered fill, installation of cathodic protection systems to protect buried metal utilities, use of coated or nonmetallic pipes, such as concrete or PVC, that are not susceptible to corrosion, construction of foundations using sulfate-resistant concrete, support of structures on deep-pile foundation systems, densification of compactable subgrade soils with in-situ techniques, and placement of moisture barriers above and around expansive subgrade soils to help prevent variations in soil moisture content.
- GS-6:** Removal and recompaction of unsuitable materials, including loose alluvium and colluvium, shall be conducted during grading operations. Removal of loose materials, generally the upper 5 to 10 feet below natural ground surface, and replacement with an engineered fill shall mitigate the potential for seismic settling.
- GS-7:** Proposed new structures shall comply with all design and monitoring techniques for pile foundations, reinforced mat foundations, and settlement/uplift monuments, developed during the CGS review process. At a minimum the applicant shall consult with the CGS in advance to solicit input regarding the investigation tasks. Unless otherwise approved by the CGS, investigation tasks shall include the following:
1. The investigation shall review and analyze DOGGR records, including annual reports, related to the Baldwin Hills, Inglewood, oil field with respect to measured subsidence or uplift to determine the magnitude and location of effects.
 2. As dictated by the results of this review, existing aerial photographs, geologic maps, and

other available imagery of the area, such as SAR and GPS elevations, shall be reviewed to assess the potential for active subsidence or uplift and the potential for faults to pass through the project site that could serve as locations for future differential movement.

3. Considering steps 1 and 2, the investigation shall determine the likelihood, location, and magnitude, if any, of future subsidence or uplift effects within the project site.

GS-8: Proposed new structures shall comply with all methane hazard design and monitoring techniques developed during the CGS review process. At a minimum the applicant shall consult with the CGS in advance to solicit input regarding the investigation tasks. Unless otherwise approved by the CGS, investigation tasks shall include the following:

1. The investigation shall review and analyze DOGGR records related to the Inglewood oil field with respect to measured methane gas releases in the vicinity of the field and determine the magnitude and location of these releases (if any).
2. The investigation shall review other existing reports on this subject that may have been conducted for other projects in Culver City, the City of Los Angeles, or Los Angeles County, in the vicinity to assess the potential for active methane gas release from conduits such as faults, fracture zones, previously abandoned wells, undocumented wells, or dry holes.
3. Considering steps 1 and 2, the investigation shall determine the likelihood, location, and magnitude, if any, of future methane gas releases within the project site.
4. If sufficient evidence is developed to suggest methane gas potential within the project site, a site-specific methane gas study shall be performed by a DSA/CGS approved consultant at the project site to characterize the levels of methane and other volatile gases that may be present at the site and evaluate the level of impact that hazardous gases might have on the proposed project.

c) Finding

Implementation of Mitigation Measures **GE-1** through **GE-3** and **GS-1** through **GS-8** would ensure that impacts on geology, solids and seismicity would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts on geology, soils and seismicity would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with geology, soils and seismicity, see p. 3.9-3 to 3.9-8 of the Draft Supplemental EIR.

G. HAZARDOUS MATERIALS

1. Hazardous Materials (Draft Supplemental EIR p. 3.10-12)

a) Significant Environmental Effects

Areas on campus where hazardous materials were stored or used are not expected to pose a significant hazard during construction. Demolition or remodeling of older structures on the campus could potentially result in exposure and mobilization of asbestos-containing material and/or lead-based paint contaminants, a potentially significant impact. If encountered or exposed during construction at the campus, oil field gas (commonly methane) or Volatile Organic Compounds could pose a hazard to construction workers and others in the vicinity, a potentially significant impact.

Potential impacts associated with construction of the secondary access road are no longer an issue as the roadway is complete.

b) Mitigation Measures

HM-1: Soil sampling and analysis shall be performed to determine the extent of potential contamination beneath all USTs, clarifiers, elevator shafts, and subsurface hydraulic lift structures when on-site demolition or construction activities would affect a particular structure. This could eliminate construction delays associated with the unexpected discovery of contaminated soil. An adequate number of soil samples shall be collected and analyzed for those compounds that were stored in each structure.

HM-2: Prior to construction of proposed Master Plan projects, the College shall obtain a satisfactory closure letter from all appropriate public agencies for those hazardous chemicals and hazardous waste storage areas on the campus that have been identified as areas of concern by regulatory agencies.

HM-3: Prior to renovation or demolition activities, all related asbestos survey and abatement documents shall be reviewed and, if necessary, complete asbestos and lead-paint surveys shall be performed. All asbestos-containing materials and lead-based paint shall be removed in accordance with all applicable local, state, and federal regulations.

HM-4: Soil gas sampling and testing shall be performed in and around several buildings within the southern central portion of the property due to the presence of Vickers 2, #18. In addition, a soil gas survey shall be conducted in all subterranean basements, tunnels, or other subsurface structures throughout the school. Select soil gas samples shall be pre-screened in the field with an organic vapor analyzer and then tested for methane, an odorless explosive gas. Approximately 20–30 borings (5- to 15- feet bgs) and sampling points shall be completed throughout the campus. In addition, air samples shall be collected from all tunnels and basements, if present, after the structures have been isolated for several days.

HM-5 If additional abandoned oil wells are located on-site, each well shall be uncovered and inspected for proper abandonment. Soil samples shall be collected around the well and reservoir, if any, and tested for total recoverable petroleum hydrocarbons, heavy metals, cyanides, and VOCs. The well shall then be re-abandoned, if necessary. Methane gas and VOC surveys of any subsurface structures (i.e., tunnels or basements) beneath the property site shall also be conducted if the

presence of abandoned wells is identified. Buildings within 25 feet of an active, abandoned or idle oil well (200 feet if the well has not been properly abandoned) shall be designed according to recommendations prepared by a licensed civil engineer and approved by the California Division of the State Architect (DSA).

HM-6: If contaminated soil or air exceeding regulatory limits is encountered as result of HM- 1, HM-4, or HM-5 above, a remediation plan shall be developed in consultation with the appropriate regulatory authorities, including DTSC and RWQCB. Remediation identified shall be completed.

HM-7: To assess the possible presence of “constituents of concern” in the surface water, water samples shall be collected from the drainage pond, and soil and soil vapor samples in the vicinity of the oil wells, wellhead vaults, former sumps, and former petroleum processing, storage, and handling facility. The soil samples shall be analyzed for diesel and heavy oil, SVOCs and the soil vapor samples shall be analyzed for SVOCs and methane. Clean up shall be undertaken in accordance with applicable regulations and signed off by DTSC.

HM-8: All hazardous waste shall be stored and ultimately disposed of in a lawful manner and through appropriate procedures that do not create a hazard to the public or the environment. All chemicals used on campus shall be properly stored in labeled containers.

HM-9: Each clarifier shall be regularly inspected (on a yearly basis or when the solids are pumped, whichever is more frequent) for cracks. If the interior lining of the clarifier is degraded or there is an indication that the clarifier is leaking or could have leaked, then an environmental assessment may be warranted around the clarifier. All clarifiers shall be cleaned and resealed if there is visual evidence of cracks or degradation of the interior concrete lining.

c) Finding

Implementation of Mitigation Measures HM-1 through HM-9 would ensure that impacts from hazardous materials would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts on hazardous materials would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with hazardous materials, see p. 3.10-9 to 3.10-12 of the Draft Supplemental EIR.

H. HYDROLOGY AND WATER QUALITY

1. Surface Water Resources and Drainage (Draft Supplemental EIR p. 3.11-7)

a) Significant Environmental Effects

Construction of Master Plan facilities would generate pollutants that would be discharged via irrigation and stormwater runoff into surface water resources. Increases in impervious surface would increase surface runoff and potential pollutant loads on surface water resources. Construction and operation of

facilities proposed under the Master Plan would not substantially alter the drainage pattern. However, to accommodate increased stormwater flows due to increases in impervious surfaces, the proposed sports fields would also be used as a detention basin. The proposed project site lies outside the 100-year floodplain.

b) Mitigation Measures

SW-1: In accordance with the NPDES permit requirements, a SWPPP shall be developed for the proposed Master Plan construction projects. The SWPPP shall identify BMPs, which could include:

- temporary soil stabilization: sandbag barriers, straw bale barriers, sediment traps, and fiber rolls;
- temporary sediment control: hydraulic mulch, hydroseeding, and geotextiles;
- wind erosion control: portable water and straw mulch;
- tracking control: street sweeping and entrance/outlet tire washing;
- non-stormwater management: clear water diversion and dewatering; and
- waste management and materials pollution control: vehicle and equipment cleaning, concrete waste management, and contaminated soil management.

To reduce potential water quality impacts to surface waters, the College would implement BMPs to comply with Standard Urban Storm Water Mitigation Plan (SUSMP) requirements that may be imposed on the College by the relevant permittees under the Los Angeles Large MS4 Permit.

SW-2: As may be required under the Los Angeles Large MS4 Permit, a SUSMP shall be developed for the proposed Master Plan projects. Proposed facilities and improvements shall comply with the following SUSMP design guidelines to reduce polluted runoff from new parking lots and impervious surfaces:

- reduce impervious land coverage of parking area;
- filter runoff before it reaches the storm drain system;
- treat runoff before it reaches the storm drain system; and
- ensure adequate operation and maintenance of treatment systems, particularly sludge and oil removal.

In compliance with the SUSMP design guidelines, BMPs identified in the California Storm Water Best Management Practices Handbooks produced by the LACDPW shall be implemented. All redevelopment shall also be subject to BMPs as required by the SUSMP. Examples of BMPs include use of oil/water separators, infiltration basins, catch basins, and vegetated swales and strips. As may be required, the Master Plan projects shall comply with the Los Angeles County Low-Impact Development Ordinance that took effect January 1, 2009 (County Code Section 12.84).

SW-3: The design of the new sports field(s) shall include sufficient detention capacity to detain at least 6,000 cf of storm flows.

c) Finding

Implementation of Mitigation Measures **SW-1** through **SW-3** would ensure that impacts on surface water resources, drainage and flood hazards would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts on surface water resources, drainage and flood hazards would be mitigated to a less-than-significant level.

As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with surface water resources, drainage and flood hazards, see p. 3.11-7 through 3.11-12 of the Draft Supplemental EIR.

I. MINERAL RESOURCES

1. Mineral Resources (Draft Supplemental EIR p. 3.13-1)

a) Significant Environmental Effects

Petroleum products extraction wells do not occur on the campus, although pipelines may exist on or in the vicinity of the campus. Impacts related to construction of the secondary access road are no longer an issue as the roadway has been completed.

b) Mitigation Measure

MR-1 The College shall consult with the owner/operator of any oil pipelines that may be affected by construction activities. If possible, pipelines shall be relocated or replaced when not in use or when the least disruption to oil conveyance activities would occur.

c) Finding

Implementation of Mitigation Measure MR-1 would ensure that impacts on mineral resources would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts on mineral resources would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with mineral resources, see pp. 3.13-1 to 3.13-2 of the Draft Supplemental EIR.

J. NOISE

1. Operational Noise (Draft Supplemental EIR p. 3.15-2)

a) Significant Environmental Effects

As discussed in the 2005 FEIR traffic noise levels would increase in the immediate area of the (now completed) secondary access road as compared to today. Future traffic is anticipated to be less than that analyzed in the 2005 FEIR because of increase in on-line learning, resulting in lesser operational noise (traffic) impacts than discussed in the 2005 FEIR. As discussed in the 2005 FEIR these increases would

not exceed the County of Los Angeles or Culver City Noise Standards for interior and exterior noise levels. Operation of the Recycling Center at its new location would not result in increased noise levels compared to the previous location. Special events including sporting events proposed by the College could result in increase in noise levels in the vicinity of the residential neighborhoods to the west, but would not differ significantly as compared to today.

b) Mitigation Measures

N-6: Operational activities, including the recycling center, shall comply with applicable California and existing noise standards of Los Angeles County and the City of Culver City.

N-7: Operational noise-generating activities at the Recycling Center shall be limited to the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday.

N-8: A permanent wall is under construction (1,350 linear feet) along the south side of the secondary access road to reduce noise from operational traffic.

N-9: Evaluate in the final design, and implement where feasible, measures to minimize sound transmission from the football field to the adjacent residential neighborhoods. These measures may include:

- constructing the bleachers with noise-attenuating design features to the extent feasible including solid backing that rises above the seated audience to block sound).
- new public address systems shall have speakers that are oriented away from adjacent residences and with a maximum amplified sound level of 60 dBA at the property line of adjacent residential uses.
- prohibiting audience member use of air horns, cowbells, and other tonal sound generating devices.
- taking reasonable steps to keep the community informed about public access to College facilities, campus activities, and other events taking place on campus via the campus Web site.
- limiting the number of organized American football games (of any level – college, high school, or other) played on campus to no more than 26 games during any calendar year.

N-10: The use of all College facilities shall continue to be governed by the applicable District and College policies and procedures, including but not limited to the rules for conduct on campus, Civic Center Permits, and Permits for Use.

N-11: The District shall prohibit organized sporting, entertainment, public service, religious, and similar events on or about the College campus before 8:00 a.m., and after 10:00 p.m. Sunday through Thursday, and after 11:00 p.m. Fridays and Saturdays. The District shall take reasonable steps to minimize, to the maximum extent feasible, the noise impacts of campus sporting, entertainment, public service, religious, and similar events on adjacent residential neighborhoods.

N-12: The District shall identify an employee/employees or authorized agent(s) to serve as a the College's Community Liaison who shall be available to respond to questions or concerns from the surrounding community concerning campus operations (campus activities and other matters relating to the College campus and the roads surrounding the campus) and construction activities on the campus and facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to such matters. The Community Liaison shall be available during business hours (8:00 am to 5:00 pm Monday through Friday excluding official holidays) to respond to community concerns

in a timely manner. The Community Liaison shall have authority to initiate a response on behalf of the College and the District in foreseeable matters and, without limiting the generality of the foregoing, shall have the authority to terminate an event in accordance with District rules and regulations.

The District shall identify an employee or authorized agent to serve as the College's Special Events Liaison, who shall be available onsite to respond to community concerns in a timely manner during special events. Any questions or concerns from the surrounding community concerning the College campus special event activity during the time such activity is taking place shall be addressed by calling the College campus Sheriff's Office. Sheriff's Office staff will assess the question or concern and, as appropriate, cause the Special Events Liaison to take necessary actions.

N-13: No special event (i.e. an event not normally associated with operation of WLAC and its facilities) shall be permitted on the College campus or the surrounding roads unless the organization sponsoring the event has designated a special event coordinator who will be on-site during the event and who will have authority to deal with all complaints concerning the event. Any questions or concerns from the surrounding community concerning the College campus special event activity during the time such activity is taking place shall be addressed by calling the College campus Sheriff's Office. Sheriff's Office staff will assess the question or concern and, as appropriate, cause the Special Events Liaison to take necessary actions.

N-14: As feasible, all special events shall be noticed at least two weeks in advance on the WLAC website. At the same time notice shall be given to the City of Culver City which will, as resources allow, disseminate electronically to all interested City of Culver City residents that have signed up on the City's website to receive such notices, that a new notice for a special event has been posted on the WLAC website. At a minimum, the notice shall indicate date, time, nature of activity, duration and anticipated size of the event.

N-15: Each special event coordinator holding outdoor activities shall be provided with a written notice prior to commencement of their event reminding the special event coordinator that residents live close to the College campus. The special event coordinator shall be provided with LACCD and WLAC rules and regulations. Violation of such rules and regulations shall be grounds for immediate termination of the event.

c) Finding

The 2005 FEIR found that operational noise impacts including noise from increased activity related to operation of the recycling enter, special events, including sporting events, would not be significant under CEQA (conditions analyzed in the 2005 FEIR would not substantially change as a result of the 2009 Master Plan). Nonetheless, in response to public concern, the College acknowledges that noise from recycling, special events and activities has resulted in noise complaints from nearby residences. Accordingly, the College agreed to implement the above measures (N-5 through N-15). Implementation of Mitigation Measures N-5 through N-15 would ensure that operational noise impacts would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that operational noise impacts would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with operational noise, see pp. 3.15-5 and 3.15-6 through 3.15-7 of the Draft Supplemental EIR.

K. PUBLIC SERVICES

1. Police protection, Emergency vehicles, Fire Protection, Schools, Libraries, Parks/Recreational Facilities (Draft Supplemental EIR p. 3.16-7)

a) Significant Environmental Effects

Police Protection: Construction of the project could impair emergency access and response times. The proposed Master Plan would increase the number of students enrolled at the College (although less on campus students than anticipated in the 2005 FEIR), and would result in a corresponding increase in the number of on campus crimes.

Emergency Vehicles: Additional traffic generated by the project could decrease police and fire and other emergency vehicle response times.

Fire Protection: Operation of the project would increase building floor space; the new buildings, if not compliant with LA County Fire Codes could pose a significant fire risk.

Schools: During construction, on-campus academic facilities and the Child Development Center could be adversely affected by noise and air pollution generated. However, these impacts would be temporary and short-term.

Libraries: Libraries would not be affected by the proposed project.

Parks/Recreational Facilities: The proposed project would include the construction of recreational equipment, sports fields and courts, and landscaped green spaces to accommodate the projected enrollment, and would not increase the use of local parks. No potential significant impacts would occur.

b) Mitigation Measures

PS-1: The College shall regularly notify the Los Angeles County Fire Department (LACoFD) and Culver City Fire Department (CCFD) of project construction activities and schedules.

PS-2: Each element of the project shall include security features, such as lighting, signage, etc. Security system designs shall be submitted to the Los Angeles County Sheriff's Department (LASD) for review and comment.

PS-3: Upon completion of each structure, the College shall provide the LASD and Culver City Police Department (CCPD) with a diagram of each building, including access routes and additional information that might facilitate police response.

FP-1: The College shall regularly notify the LACoFD and CCFD of project construction activities and schedules.

Project design features and code compliance measures recommended by LACoFD relative to fires safety are clarified and disclosed in detail below. These measures or other measures with equivalent efficacy as approved by LACoFD shall be incorporated into the project design to ensure operational impacts would be less than significant. These measures do not apply to existing development on the site.

FP-2: Development of the proposed project shall comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and hydrants.

FP-3: The proposed project shall be subject to all specific fire and life safety requirements for the construction phase identified by LACoFD during building fire plan check.

FP-4: Every building constructed shall be accessible to fire department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width, unobstructed, and clear to the sky. The roadway shall be extended to within 150 feet of all portions of exterior walls when measured by an unobstructed route around the exterior of the building.

FP-5: When a bridge is required to be used as part of a fire access road, it shall be constructed and maintained in accordance with nationally recognized standards and designed for a live load sufficient to carry a minimum of 75,000 pounds.

FP-6: The maximum allowable grade shall not exceed 15 percent except where the topography makes it impractical to keep with such grade, and then an absolute maximum of 20 percent will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topography difficulties, shall be no more than 17 percent. Grade breaks shall not exceed 10 percent in 10 feet.

FP-7: The College shall coordinate with LACoFD to determine adequate fire-flow rates for the project. Fire flows shall be based on the size of the buildings, their relationship to other structures, property lines, and types of construction used. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:

- No portion of a lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
- No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
- Additional hydrants will be required if hydrant spacing exceeds specified distances.

FP-8: Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A fire department-approved turning area shall be provided for all driveways exceeding 150 feet in length. All on-site driveways shall provide a minimum unobstructed width of 25 feet clear to the sky. The on-site driveway is to be 150 feet of all portions of the exterior walls of the first story of any building. Driveway width for nonresidential developments shall be increased when any of the following conditions will exist:

- Provide 28 feet in width when a building has three or more stories or is more than 35 feet in height above access level. Also, for using fire truck ladders, the centerline of the access roadway shall be located parallel to and within 30 feet of the exterior wall on one side of the proposed structure.
- Provide 34 feet in width when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
- Provide 42 feet in width when parallel parking is allowed on each side of the access roadway/driveway.

- “Fire Lanes” are any ingress/egress roadway/driveway with paving less than 34 feet in width and will be clear to the sky. All “Fire Lanes” will be depicted on the final map.
- For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with fire department-approved signs stating “NO PARKING – FIRE LANE” in three-inch-high letters. Driveway labeling is necessary to ensure access for fire department use.

FP-9: All access devices and gates shall meet the following requirements:

- Any single gate opening used for ingress and egress shall be a minimum of 26 feet in width clear to the sky.
- Any divided gate opening (when each gate is used for a single direction of travel, i.e., ingress or egress) shall be a minimum width of 20 feet clear to the sky.
- Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
- All limited access devices shall be of a type approved by the fire department.
- Gate plans shall be submitted to the fire department prior to installation. These plans shall show all locations, widths, and details of the proposed gates.

FP-10: All proposals for traffic calming measures (speed humps/bumps, traffic circles, roundabouts, etc.) shall be submitted to the fire department for review prior to implementation.

FP-11: At such time that the College consults with LACoFD to determine adequate fire-flow rates for a proposed building, the College shall provide notice to CCFD. This notification will provide the CCFD with an opportunity to comment on the fire-flow rates for the project.

RF-1: The use of all College facilities shall be governed by the applicable District and College policies and procedures, including but not limited to the rules for conduct on campus, Civic Center Permits, and Permits for Use. The recreational facilities at the College, including the football field, track, basketball courts, baseball field, softball field, soccer fields, etc., shall remain open and available for public use whenever the campus is open so long as such use does not directly interfere with a specific College event, class or activity, then being held on such facilities.

RF-2: Meeting rooms and other comparable facilities on the College campus shall be made available to nonprofit organizations, clubs, and associations in accordance with state law and District and College policies and procedures.

c) Finding

Implementation of Mitigation Measures **PS-1** through **PS-3** and **FP-1** through **FP-11** would ensure that public service impacts would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts on public services would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

As indicated in the 2005 FEIR and the 2010 Draft Supplemental EIR, no significant impacts would occur to recreational and park facilities. Consequently, no mitigations measures are necessary. Nonetheless, in

response to community concerns about access to College facilities Mitigation Measures **RF-1** and **RF-2** were included in the EIR.

d) Reference

For a complete discussion of impacts on public services, see pp. 3.16-7 through 3.16-12 through 3.15-7 of the Draft Supplemental EIR.

L. TRANSPORTATION, TRAFFIC AND PARKING

1. Construction Traffic (Draft Supplemental EIR p. 3.17-9)

a) Significant Environmental Effects

Construction-related truck traffic (including employee vehicles, trucks for material delivery and debris removal, and trucks for earth hauling) would result in additional vehicles on the surrounding street system. Impacts related to construction of the secondary access road are no longer an issue as the road is completed.

b) Mitigation Measures

T-1: All transportation construction activities shall be undertaken in total and complete conformity with all applicable state, county and city laws, rules, and regulations.

T-2: Construction vehicles (i.e., all vehicles participating in any construction work on the College campus and all vehicles hauling materials, debris, or other items relating to the construction projects to or from the College campus) shall comply with applicable regulations of each jurisdiction within which activities take place.

T-3: Parking for construction vehicles, (i.e., construction vehicles as defined in T-2 above) shall be restricted to the designated construction staging and parking sites. No construction vehicles shall be permitted to stand, park, or stage on the campus other than at designated construction staging and parking areas. No construction vehicles shall be permitted to park on the streets surrounding the College campus or stand, park or stage on any Culver City street. All vehicles carrying workers or other people who are involved in the Master Plan projects, must park in campus parking lots (or in designated construction staging and parking sites) and will continue to be absolutely prohibited (via red curb or other means) from parking on Freshman Drive, Sophomore Drive, or Stocker Street or on neighborhood streets.

T-4: During construction of the projects, the District shall ensure that there is sufficient on-campus parking for enrolled students (as well as for staff, construction workers, and other invitees) so as to minimize and dissuade student parking on the residential streets of the surrounding community. Prior to each quarter, the District will prepare a schedule of parking, which estimates the number of on-site parking spaces needed and, demonstrates that at all times there will be an adequate supply of parking spaces on campus to handle all projected students, employees, construction personnel, and invitees of the College. There will at all times be an adequate supply of parking on campus to handle the needs of the College's students, staff, construction personnel, and guests.

T-5: The District shall keep the community fully and timely informed regarding all upcoming construction activities. At a minimum, this shall include quarterly posting of construction scheduling information for the next quarter on the WLAC website with updates whenever major changes are made that will be implemented prior to the next quarterly report.

T-6: No construction vehicles (as defined in T-2 above) having a gross vehicle weight in excess of 6,000 pounds shall be permitted to use the Overland/Freshman entrance to the College.

T-7: All construction vehicles shall enter campus via the new access road; all large trucks with more than two axels shall enter the access road by traveling west on Jefferson Boulevard and making left turns onto the new road.

Measures related to construction of the secondary access road are no longer necessary as the roadway is completed.

See also Measure N-1.

c) Finding

Construction traffic impacts were identified as less than significant in the 2005 FEIR and impacts were not changed in the 2010 Supplemental Draft EIR; nonetheless, the District, in response to public concerns, has agreed to implement Mitigation Measures **T-1** through **T-7**. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts from construction traffic would be less than significant. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with construction traffic, see pp. 3.17-9 through 3.17-10 and p. 3.17-16 of the Draft Supplemental EIR.

2. Parking (Draft Supplemental EIR p. 3.17-13)

a) Significant Environmental Effects

Future growth on campus would increase the demand for parking. The estimated future supply of parking in the 2009 Master Plan is 3,114 spaces (including 464 on surrounding streets), which would be adequate to accommodate the projected peak academic parking needs at buildout (1,908 spaces in year 2022).

b) Mitigation Measures

T-9: The District shall prepare a parking plan and take reasonable steps to encourage students to park on the campus rather than on surrounding residential neighborhood streets. The District shall conduct periodic parking surveys during each semester and if it is determined that students are parking on neighborhood streets due to the lack of available parking on-campus, the District shall make such modifications to its parking plan as are necessary to discourage such parking.

T-10: Total on-campus student population at the College shall not exceed 10,998 students (based on a count of actual on-campus students, not “full-time equivalent” students) unless and until it is demonstrated by additional parking impact analysis that adequate parking spaces are supplied to meet student parking demand. (Using the most recent parking use ratio of 1 space per 7 students, 2,143 spaces should be sufficient to meet the demand from 15,000 on-campus students. It is anticipated that there will be 2,650 spaces on-site not including on-street spaces. Current projections indicate that no more than 10,998 on-campus students are anticipated on-campus through 2022.)

T-11: The District plans to seek permission from the County of Los Angeles to install parking meters on Freshman Drive, Sophomore Drive and Stocker Streets. Even if permission is given by the County of Los Angeles, the District shall not install parking meters beyond the proposed Phase 1 installation below if such installation will result in students of the College parking on neighborhood streets. To that end, the meters shall be installed in phases, as follows:

- Phase 1 Sophomore Drive: No more than 60 meters
- Phase 2 Sophomore Drive: No more than 60 additional meters
- Phase 3 Freshman Drive: No more than 60 meters
- Phase 4 Stocker Street: Entire street
- Phase 5 Sophomore Drive: No more than 60 additional meters
- Phase 6 Sophomore Drive: Balance of the street
- Phase 7 Freshman Drive: Balance of the street

The District shall proceed in the order shown in the above phasing schedule, so that work shall not begin on a particular phase until after the completion of the meter installations permitted by all of the lower numbered phases. As stated above, the District shall not commence work on any phase after Phase 1 until an appropriate time after the installation of the meters permitted by the immediately prior phase. After the completion of each phase, the District shall conduct a parking survey and solicit comments from residents of the adjoining residential neighborhoods. If it is determined that student parking on neighborhood streets is a significant problem, the District shall not proceed with any further parking meter installation phases until such parking has been stopped.

a) Finding

Parking impacts were identified as less than significant in the 2005 FEIR and this conclusion did not change in the 2010 Supplemental Draft EIR; nonetheless, the District, in response to public concerns, has agreed to implement Mitigation Measures T-9 through T-11. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that parking impacts would be less than significant. As the agency that is responsible for discretionary action on the proposed project, LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

b) Reference

For a complete discussion of parking impacts associated with the project, see pp. 3.17-13 to 3.17-14 and 3.17-15 to 3.17-16 of the Draft Supplemental EIR.

M. UTILITIES

1. Mineral Resources (Draft Supplemental EIR p. 3.18-6)

a) Significant Environmental Effects

Water Supply: In the 2005 FEIR water demand on the campus due to implementation of the Master Plan (based on the number of anticipated on-campus students) was estimated to increase by up to 39,897 gallons per day. This increase would not create a significant impact on Southern California Metropolitan Water District's water supply. Since the number of students on campus is now anticipated to be fewer (as a result of on-line learning), impacts would be less than indicated in the 2005 FEIR.

Wastewater: The 2005 FEIR indicated that wastewater flows could increase by 19,955 gallons per day by fall 2022 due to implementation of the 2005 Master Plan (based on the number of anticipated on-campus students). Local sewer lines and wastewater treatment facilities were indicated to have adequate capacity to accommodate this increase in wastewater flows according to the Los Angeles City Bureau of Sanitation. Since the number of students on campus is now anticipated to be fewer, impacts would be less than indicated in the 2005 FEIR.

Solid Waste: The 2005 FEIR indicated that the proposed Master Plan could result in an additional 239 tons of solid waste per year (based on the number of anticipated on-campus students). Area landfills are expected to have adequate capacity to accommodate this increase. Since the number of students on campus is now anticipated to be fewer, impacts would be less than indicated in the 2005 FEIR.

Energy: The 2005 FEIR indicated that electricity usage and natural gas consumption could increase by 2.03 million kWh by 2022 as a result of the Master Plan (based on the number of anticipated on-campus students). Existing infrastructure should be adequate to meet this projected increase in demand. Since the number of students on campus is now anticipated to be fewer, impacts would be less than indicated in the 2005 FEIR.

Storm Drains: The 2005 FEIR indicated that implementation of the Master Plan would require a total on-site storm water detention of 5,837 cubic feet (cf).

b) Mitigation Measures

WS-1: New landscaping shall utilize automatic sprinkler systems for landscape irrigation, which shall be adjusted seasonally.

WS-2: Landscaping design shall incorporate native and drought tolerant plants to further reduce irrigation water needs.

WS-3: The College shall install low-flow faucets, toilets, and showerheads in new facilities.

c) Finding

Implementation of Mitigation Measures **WS-1** through **WS-3** would ensure that impacts to utilities would be less than significant. These mitigation measures will be enforced by LACCD as described in the MMRP. Based on the foregoing, the LACCD finds that impacts on utilities would be mitigated to a less-than-significant level. As the agency that is responsible for discretionary action on the proposed project,

LACCD is the appropriate agency that could make informed and detailed review of the impacts associated with the project.

d) Reference

For a complete discussion of impacts associated with utilities, see pp. 3.18-6 to 3.18-10 of the Draft Supplemental EIR.

VII. ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

A. AIR QUALITY

1. Construction Air Quality – Regional and Local (Draft Supplemental EIR p. 3.4-9)

a) Significant Environmental Effects

Remaining Master Plan construction activities (for purposes of analysis it was assumed that peak construction activities could coincide) would generate an estimated 67.54 pounds of carbon monoxide (CO), 36.48 pounds of reactive organic gases (ROG), and 114.28 pounds of nitrogen oxides (NO_x) on the peak day, which for NO_x (as in the 2005 FEIR) would exceed the South Coast Air Quality Management District (SCAQMD) recommended significance threshold for NO_x of 75 pounds/day, respectively. Thus, with mitigation, NO_x emissions would be significant on peak construction days (grading activities) where construction activities at the different building sites overlap. In addition grading activities would result in localized significant impacts with respect to PM₁₀ and PM_{2.5}.

Impacts related to construction of the secondary access road are no longer an issue as the roadway has been completed.

b) Mitigation Measures

AQ-1: Apply soil stabilizers to inactive areas.

AQ-2: Water exposed surfaces three times daily.

AQ-3: Cover all stock piles with tarps.

AQ-4: Water all haul roads three times daily.

AQ-5: Reduce speeds on any unpaved roads to less than 15 miles per hour.

AQ-6: Moisten soil not more than 15 minutes prior to moving soil and four times a day under windy conditions in order to maintain soil moisture of 12 percent.

AQ-7: On the last day of active operations prior to a weekend or holiday, apply water or a chemical stabilizer to maintain a stabilized surface.

AQ-8: Cease grading during periods when winds exceed 25 miles per hour.

AQ-9: Moisten excavated soil prior to loading on trucks.

AQ-10: Apply cover to all loads of dirt leaving the site or leave sufficient freeboard capacity in truck to prevent fugitive dust emissions en route to disposal site.

AQ-11: Sweep streets to remove dirt carried out by truck wheels.

AQ-12: Schedule grading and excavation activities that occur within approximately 200 feet of the CDC during periods when children are not in attendance. If it is not possible to schedule grading and excavation activities when children are not present at the CDC, then children shall be kept indoors with the windows closed. Air conditioners in the CDC building shall have proper filters to ensure dust generated by construction activities is not transmitted indoors via the building's ventilation system.

AQ-13: Construct a temporary fence around the perimeter of the CDC site to shield it from fugitive dust emissions. The fence shall have a minimum height of 8 feet and a solid or impermeable surface.

AQ-14: Wash off all trucks leaving the construction site.

AQ-15: Use aqueous diesel fuel wherever feasible.

AQ-16: Use cooled exhaust gas recirculation wherever feasible.

AQ-17: Turn off equipment when not in use for longer than 5 minutes as feasible and prudent.

AQ-18: Use bio-diesel fuel in all onsite diesel-powered equipment, if available.

AQ-19: Use alternatively fueled (compressed natural gas [CNG], liquefied natural gas [LNG], dual-fuel, or electric) construction equipment, if available.

AQ-20: To the extent feasible, minimize truck idling on site and locate staging areas away from locations where students are congregated.

AQ-21: Require all construction vehicles to use Culver City haul routes and schedules.

AQ-22: Phase and schedule construction activities to avoid emission peaks and discontinue use during second stage smog alerts. A second stage smog alert occurs when the Pollution Standard Index reaches 300, at which point the general public is advised to avoid outdoor activity.

AQ-23: Implement the following to reduce construction-related traffic congestion (and therefore emissions): 1) Provide rideshare and transit incentives to construction personnel; 2) Configure construction parking to minimize traffic interferences; 3) Provide a flagperson with radio communication to guide traffic properly when and if necessary; 4) Begin construction activity at 8:00 a.m. (subject to noise restrictions in Measure N-1 which includes interior work allowed between 7 a.m. and 8 a.m. and limited construction activity between 6:00 a.m. and 8:00 a.m.) and end construction activity at 6:00 p.m. (with construction prohibited on Sundays and national holidays).

AQ-24: All appropriate reasonable steps shall be taken to minimize the amount of any air pollution generated by construction activities and all feasible mitigation measures shall be implemented to protect the community against any potentially harmful effects of such pollution.

c) Finding

Implementation of Mitigation Measures **AQ-1** through **AQ-24** would reduce the significant impacts related to construction air quality; NOx emissions as well as localized PM10 and PM2.5 would remain significant and unavoidable. Impacts would be similar in magnitude to those addressed in the 2005 FEIR but would be of overall longer duration (with completion scheduled for 2013 vs 2010 discussed in the 2005 FEIR); the impacts would remain significant and unavoidable.

Based on the foregoing, LACCD finds that construction activities would result in an unavoidable significant air quality impact. This impact is considered significant and unavoidable because emissions would exceed SCAQMD thresholds. In addition, specific economic, legal, social, technological, or other considerations, including considerations identified in Section X of these Findings (Statement of Overriding Considerations), make infeasible additional mitigation measures.

d) Reference

For a complete discussion of construction air quality impacts associated with the project, see pp. 3.4-9 to 3.4-10 and 3.4-12 to 3.4-13 of the Draft Supplemental EIR.

B. BIOLOGICAL RESOURCES

1. Operational Impacts to Bird Species adjacent to College Boulevard (Draft Supplemental EIR p. 3.4-9)

a) Significant Environmental Effects

The secondary access road is complete and associated impacts have already occurred and are therefore not further addressed in this Supplemental EIR. Remaining construction activities would occur internal to the (urban) campus and would have potential to disturb nesting birds on campus trees in areas immediately adjacent to construction sites. The 2005 EIR identified traffic on the secondary access road as having a potentially significant impact on adjacent species. This access road has been completed and any impacts to biological resources would not change as a result of the 2009 Master Plan.

b) Mitigation Measures

None available.

c) Finding

No mitigation measures are available to reduce the potential impact on bird species as a result of traffic along the secondary access road. Impacts would be similar or less than those addressed in the 2005 FEIR (since on-campus student population is anticipated to be less resulting in less traffic on the roadway); the impact would remain potentially significant and unavoidable.

Based on the foregoing, LACCD finds that operational traffic on the secondary access road could result in an unavoidable significant impact on bird species. In addition, specific economic, legal, social, technological, or other considerations, including considerations identified in Section X of these Findings (Statement of Overriding Considerations), make infeasible additional mitigation measures.

d) Reference

For a complete discussion of construction air quality impacts associated with the project, see pp. 3.5-7 3.5-8 of the Draft Supplemental EIR.

C. NOISE

1. Construction Noise (Draft Supplemental EIR p. 3.15-2)

a) Significant Environmental Effects

Construction activity would result in intermittent and short-term noise impacts on residences west and south. On-campus facilities, i.e., classrooms in the immediate vicinity of construction sites and the Child Development Center, could experience short-term increase in noise levels.

b) Mitigation Measures

N-1: All construction activity shall be undertaken in such a manner as to not cause undue or unnecessary disruption to, or interference with, the residents of the surrounding community in accordance with noise nuisance regulations of the County of Los Angeles and City of Culver City (as of June 2010) with respect to noise levels (not hours), whichever is most restrictive. (As used in this mitigation measure, the term “construction activity” shall be interpreted as the operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition.) To that end, all appropriate reasonable steps shall be taken to minimize the amount of any noise pollution generated by construction activity and all feasible mitigation measures shall be implemented to protect the community against any potentially harmful effects of such pollution in accordance with the County Code, Title 12, Environmental Protection, 12.12 Building Construction Noise. Without limiting the generality of the foregoing:

- The College shall employ noise-reducing construction practices to comply with existing applicable local and California noise standards.

- Construction activity at or in the vicinity of the College and controlled by the College, shall be limited to the hours of 8:00 a.m. to 6:00 p.m. weekdays and 9:00 am to 4:00 pm Saturdays with construction prohibited Except limited construction activity shall be permitted between 7:00 a.m. and 8:00 a.m. only if all such construction noise-generating activity occurs within the interiors of fully completed building shells (i.e., all exterior walls must already have been completed and roof, windows and doors already have been installed), and provided further that the noise audible outside of the building within which such internal construction is being performed does not exceed Culver City noise standards, and the noise levels do not exceed 55 dBA in multi-family residential areas and 53 dBA in single-family residential areas. On weekdays between 7:00 a.m. and 8:00 a.m., should noise monitors show an increase in noise levels above noise levels described in this measure, and the increase is caused by the College, then construction activities shall be changed to reduce the noise to a level consistent with the requirements of this measure or construction shall be postponed until 8 a.m.
- The College may engage in (1) construction activity at all other times to the extent the construction activity is necessary to address unexpected emergencies that threaten life or property, or (2) limited construction activity (anticipated to be confined to concrete pours and associated work) between 6:00 a.m. and 8:00 a.m. provided that a variance is obtained from the LA County Health Officer for any work between 7:00 p.m. and 7:00 a.m., and further provided that at least two weeks advance notice of such limited construction activity is given by the College Project Manager to the City. The College will also post notice of such limited activity on the College web site. The City will distribute this notice, or provide a link to the information on the College website, to the College web group to be established by the City. Noise impacts from such activity shall be mitigated to the extent feasible through the use of sound blankets, and either disabling back-up beepers to the extent permitted by law and if considered not to decrease safety to the workers and public, or minimizing their use of back up beepers.
- All equipment shall have sound-control devices no less effective than those provided on the original equipment. No equipment shall have an unmuffled exhaust.
- Appropriate mitigation measures shall be implemented relating to changing the location of stationary construction equipment, shutting off idling equipment, rescheduling construction activity, or installing acoustic barriers around stationary construction noise sources or construction sites.
- No construction equipment or vehicles operating or traveling on or in the vicinity of the decommissioned temporary haul road or permanent secondary access road (College Boulevard) shall utilize a system that sounds warning beeps when the vehicle backs up; rather the College shall require the use of additional personnel or other means to assure backup safety, in the area of the temporary or permanent secondary access road, with the exception that the College shall comply with California law. [California Code of Regulations Vol. 9, Title 8, Subchapter 4, Construction Safety Orders, Article 10, S Haulage and Earth Moving, Section 1592(a) states: "Every vehicle with a haulage capacity of 2 1/2 cubic yards or more used to haul dirt, rock, concrete, or other construction material shall be equipped with a warning device that operates automatically while the vehicle is backing. The warning sound shall be of such magnitude that it will normally be audible from a distance of 200 feet and will sound immediately on backing."]

- Construction noise monitors were installed in residential areas at eight locations around the campus. Said monitors shall be operated continuously throughout the construction phase. The data from these monitors shall be made available on the campus web site. Should such data indicate that campus noise creates a noise environment at the stations in excess of applicable noise standards, noise mitigation measures shall be increased until such standards are met.
 - All construction activity shall be undertaken in total and complete conformity with all laws, rules, and regulations imposed by the jurisdiction in which the construction activity occurs.
 - No construction vehicles shall be permitted, at any time, to stand, park, or stage at any location other than the designated construction staging and parking areas as shown in Figure 3-15 of the Final SEIR.
 - Lot 8A (located immediately west of the South parking structure) shall not be used as a construction staging area in connection with any construction activity.
 - Use of radios on construction sites shall be prohibited to the extent that they can be heard in adjacent residential areas. Graffiti shall be removed promptly from campus areas during construction.
 - Each construction site shall be organized to minimize backing up that results in excessive beeping.
 - Construction truck traffic on College Boulevard shall not cause noise levels to increase by more than 3 dBA at the nearby residences. If construction truck traffic causes noise levels to increase by more than 3 dBA, additional mitigation will be applied until this level is met.
- N-2:** The College has erected 4,600 linear feet of approximately 20-foot tall noise walls at numerous locations around the campus to reduce construction noise in all residential areas potentially affected by construction noise. These noise walls shall remain in place until all exterior Master Plan construction on the campus is completed.
- N-4:** The District shall provide a Mitigation Hotline (telephone and e-mail) during the period of construction of the projects to ensure that the mitigation measures adopted by the District are implemented and to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to such matters. The Hotline will be staffed by a fulltime employee (liaison) during construction hours. The District shall respond to identified concerns as soon as feasible and a response reporting actions taken shall be provided to callers in a timely manner, usually within 24-hours or on the first business day following a weekend or holiday. In accordance with better practices, after six months of operation, the Parties shall assess the effectiveness of the Mitigation Hotline and shall make adjustments as required.
- N-5:** During the implementation of the Master Plan, the District will schedule guided campus tours of the College campus for members of the community that request such tours for the purposes of responding to questions and concerns regarding the construction of the projects under the Master Plan. The dates, times, and scope of such tours shall be within the discretion of the College president.

c) Finding

Implementation of Mitigation Measures N-1 through N-5 would reduce construction noise impacts but potentially not below a level of significance. Impacts would be similar in magnitude to those addressed in the 2005 FEIR but would be of longer duration (with completion scheduled for 2013 vs 2010 discussed in the 2005 FEIR). In addition, to allow for flexibility and therefore greater efficiency, the mitigation requirement has been changed (consistent with applicable noise regulations) to allow for earlier start times. As a result of these changes, construction impacts are now found to be potentially significant and unavoidable (they were found less than significant after mitigation in the 2005 FEIR). Mitigation Measures N-1 through N-5 will be enforced by LACCD as described in the MMRP.

Based on the foregoing, LACCD finds that construction noise impacts could result in an unavoidable significant impact on bird species. In addition, specific economic, legal, social, technological, or other considerations, including considerations identified in Section X of these Findings (Statement of Overriding Considerations), make infeasible additional mitigation measures.

d) Reference

For a complete discussion of impacts associated with construction noise, see p. 3.15-2 to 3.15-6 of the Draft Supplemental EIR.

D. TRANSPORTATION, TRAFFIC AND PARKING

1. Operational Traffic (Draft Supplemental EIR p. 3.17-6)

c) Significant Environmental Effects

The 2005 FEIR indicates that due to increases in enrollment and employment anticipated under the Master Plan and the resulting increases in traffic, significant impacts could occur at up to 17 of the 44 study intersections in the year 2022. Increased on-line attendance will result in substantially fewer students on campus in the future compared to what was analyzed in the 2005 FEIR.

d) Mitigation Measures

T-7A: Mitigation Measures from the 2005 FEIR required for City of Los Angeles intersections (T-12, T-13, T-14, T-20, T-23) shall be complied with to the satisfaction of the City of Los Angeles.

T-7B: The following contingency has been agreed to with the City of Culver City, even though current projections do not anticipate the student population reaching 18,000: LACCD will study and mitigate any residual traffic impacts that exceed the projected impacts and associated mitigation identified in the 2005 FEIR (based on an *on-campus* student population of 18,904 students); LACCD shall initiate new studies once total student enrollment (based on a count of actual students, not full time equivalent, but *including on-line and other off-campus students*) exceeds 18,000 students. Studies shall be planned and undertaken to ensure that impacts are identified and mitigated well in advance of the actual on-campus student population reaching 18,000.

T-7C: College Boulevard shall be closed from 11:00 p.m. to 6:00 am. The District shall attempt to maintain College Boulevard in such a manner that it is impracticable at all times (except in the case of an emergency), to use College Boulevard as a cut through from Jefferson Boulevard to Overland Avenue. If the District and the City of Culver City determines College Boulevard is being used as a

cut through from Jefferson Boulevard to Overland Avenue, then the District and the City of Culver City will work with the Los Angeles County to install appropriate traffic control mechanisms to further discourage cut through traffic. Appropriate traffic control measures may include a traffic light with left turn only allowed in the southbound direction and no left turn allowed in the northbound direction and/or signage restricting turn movements at the intersection of College Boulevard and Sophomore or speed humps. All of which requires approval by Los Angeles County prior to implementation.

T-8: If a road is built from La Cienega to an area in close proximity with the College, the District will use due diligence to implement a connection to this road for purposes of campus access. The District shall insure that no such additional access road can be used as a thruway from La Cienega Boulevard to Jefferson Boulevard or Overland Avenue.

e) Finding

Impacts for the 2009 Master Plan would be similar to, or more likely less than those addressed in the 2005 FEIR because of the anticipated decrease in on-campus students as a result of increased on-line learning; the 2005 FEIR indicated that residual impacts would remain at; La Cienega SB Ramp/ Slauson during AM peak; La Cienega NB ramp/Slauson during AM and PM peak.

In addition, an unavoidable significant impact was identified at the intersection of the new secondary access road/Leahy Street with Jefferson Boulevard (in the City of Culver City) which would function at LOS E in 2022, and the v/c would increase by more than 0.02.

Since the College does not control the operation of any of the streets or bus systems that serve the campus, the mitigation measures (or in-lieu fees) were (or in the case of the City of Los Angeles will be) provided to the appropriate jurisdictions for their consideration and approval. Where monies rather than improvements are provided, the agencies may choose not to use the monies to implement the 2005 FEIR mitigation measures (either because mitigation is determined infeasible or for other reasons) and therefore significant impacts could continue to occur as identified in the 2005 FEIR. The 2009 Master Plan would have no additional impact beyond what was already identified in the 2005 FEIR (rather impacts would be less as a result of decreased on-campus students). The impact would remain potentially significant and unavoidable.

Based on the foregoing, LACCD finds that operational traffic could result in unavoidable significant impacts on local intersections. In addition, specific economic, legal, social, technological, or other considerations, including considerations identified in Section X of these Findings (Statement of Overriding Considerations), make infeasible additional mitigation measures.

f) Reference

For a complete discussion of operational traffic impacts associated with the project, see pp. 3.17-6 to 3.17-15 of the Draft Supplemental EIR.

VIII. ALTERNATIVES TO THE PROJECT

The Draft Supplemental EIR evaluated no additional alternatives beyond those analyzed in the 2005 FEIR. The 2005 FEIR considered and rejected a number of alternatives including an Alternative Site, a substantial increase in Distance Learning, College plus Housing, and Alternative Site Plans. The 2005 FEIR evaluated the following alternatives: No Project/No Build and reasonably Foreseeable

Development (1989 Master Plan, net new addition of 207,000 sq. ft. that could accommodate up to 15,000 enrolled on-campus students); Alternative Enrollment of 25,520 students; alternative Alignments to the Secondary Access Road. All alternatives were rejected as resulting in greater impacts or not meeting project objectives to the extent they would be met by the project.

IX. FINDINGS REGARDING OTHER CEQA CONSIDERATIONS

1. LACCD finds that the Supplemental EIR was prepared in compliance with CEQA and the CEQA Guidelines. LACCD finds that it has independently reviewed and analyzed the Supplemental EIR for the proposed project, that the Draft Supplemental EIR which was circulated for public review reflected its independent judgment and that the Final Supplemental EIR reflects the independent judgment of LACCD.
3. LACCD finds that the Supplemental EIR provides objective information to assist the Board of Trustees and the public at large in their consideration of the environmental consequences of the project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft Supplemental EIR. The Final Supplemental EIR was prepared after the review period and responds to comments made during the public review period.
4. LACCD evaluated comments on environmental issues received from persons who reviewed the Draft Supplemental EIR. In accordance with CEQA, LACCD prepared written responses describing the disposition of significant environmental issues raised. The Final Supplemental EIR provides adequate, good faith and reasoned responses to the comments. LACCD reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft Supplemental EIR. The LACCD has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the Supplemental EIR.
5. The Supplemental EIR evaluated the following environmental potential project and cumulative impacts: Aesthetics; Agricultural Resources; Air Quality; Biological Resources; Historic Resources; Archaeological Resources; Paleontological Resources; Geological Resources; Hazards; Hydrology; Land Use; Mineral Resources; Population; Noise; Public Services; Transportation and Parking; Utilities. The potentially significant environmental impacts of the project were identified in the text and summary of the Supplemental EIR.
6. While experts may disagree pursuant to CEQA Guidelines Section 15151, substantial evidence in the record supports the LACCD's conclusions in the Supplemental EIR.
7. The recommended mitigation measures which have been identified for the proposed project were identified in the text and summary of the Supplemental EIR. The final mitigation measures are described in the Mitigation Monitoring and Reporting Program (MMRP) (see attached). Each of the mitigation measures identified in the MMRP, and contained in the Final Supplemental EIR, have been incorporated into the proposed project, as appropriate. The LACCD finds that the indirect impacts of the proposed project have been mitigated to the extent feasible by the mitigation measures identified in the MMRP, and contained in the Final Supplemental EIR.
8. Corrections and clarifications to the text of the Draft EIR including mitigation measures were identified and are presented in the Final Supplemental EIR. LACCD has made every effort to notify

the LACCD Board of Trustees and the interested public/agencies of changes in the various documents associated with the project review. The corrections and clarifications result from comments made on the Draft EIR by various organizations and individuals and do not substantially effect the conclusions presented in the Draft Supplemental EIR, to the extent that conclusion would be changed impacts would be less than identified in the Draft Supplemental EIR.

9. The responses to the comments on the Draft Supplemental EIR, which are contained in the Final Supplemental EIR, clarify and amplify the analysis in the Draft Supplemental EIR.
10. Having reviewed the information contained in the Final Supplemental EIR and in the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of EIRs, the LACCD finds that there is no significant new information in the Final Supplemental EIR such that recirculation of the Draft Supplemental EIR, pursuant to the requirements outlined in Section 15088.5 of CEQA Guidelines, would be required.
11. CEQA requires the lead agency approving a project to adopt an MMRP for the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with project implementation. The mitigation measures included in the Supplemental EIR as certified by the LACCD Board of Trustees and included in MMRP as adopted by LACCD serves that function. The MMRP includes all of the recommended mitigation measures identified in the Supplemental EIR.

X. STATEMENT OF OVERRIDING CONSIDERATIONS

The Supplemental EIR identified one additional unavoidable significant impact (construction noise) compared to what was identified in the 2005 FEIR that will result from implementation of the proposed project. Section 15093(b) of the CEQA Guidelines provides that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record.

The following impacts were identified as potentially not mitigated to a less-than-significant level:

- Regional and Localized Air Quality Construction Emissions
- Biological Resources (Bird Species)
- Construction Noise
- Traffic (local intersections)

The Supplemental EIR did not further address Alternatives beyond those already discussed in the 2005 FEIR. Furthermore, while the project alternatives were feasible, they would not satisfy the project objectives. Accordingly, the LACCD adopts the following Statement of Overriding Considerations. The LACCD recognizes that significant and unavoidable impacts will result from implementation of the proposed project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible alternatives to the proposed project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the proposed project against the proposed project's significant and unavoidable impacts, LACCD hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

The reasons stated below summarize the benefits, goals, and objectives of the proposed project and provide the rationale for the benefits of the proposed project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the proposed project justify adoption of the

proposed project and certification of the completed Final Supplemental EIR. Many of these overriding considerations individually would be sufficient to outweigh the adverse environmental impacts of the proposed project.

1. Implementation of the proposed project would equip the college with state of the art facilities that will greatly enhance the educational opportunities of the students, faculty and staff.
2. Implementation of the proposed project would improve campus sustainability by creating buildings that have a low impact on the environment, provide good indoor environmental air quality for the students, staff, and faculty, and create long term energy savings.
3. Implementation of the proposed project would replace the outdated campus infrastructure which would provide a safe and secure learning environment.
4. Implementation of the proposed project would contribute to improving the overall campus image to attract and satisfy the needs of existing and future student populations.

XI. MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program (MMRP) was prepared for the proposed project, and is being approved by the LACCD by the same resolution that adopts these findings and Statement of Overriding Considerations. (See PRC Section 21081.6, subd. (a)(1); CEQA Guidelines Section 15097.) The MMRP attached.