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February 21, 2019

Honorable Mike Bonin
Councilmember, 11th Council District
Los Angeles City Council
Los Angeles City Hall, Rm. 475
200 North Spring Street
Los Angeles, CA 90012

Kevin Keller
Executive Officer
Los Angeles City Planning Department
Los Angeles City Hall, 5th Floor
200 North Spring Street
Los Angeles, CA 90012-2601

RE: Draft EIR — ENV-2016-2319-EIR
12001 Chalon Rd., Los Angeles, CA 90049 (Mount St. Mary's University)
Request for Recirculation

Dear Councilmember Bonin and Mr. Keller:

On behalf of Sunset Coalition¹ and Brentwood Residents Coalition (“BRC”)² we write to follow up on our request that Mount St. Mary’s (“MSM”) Final Environmental Impact Report (“EIR”) for the proposed Wellness Pavilion be delayed and the Draft EIR be revised and recirculated to address fundamental errors that will prevent community members from properly understanding the project’s baseline conditions, which will

¹ Sunset Coalition is an unincorporated organization founded by concerned residents and organizations from Pacific Palisades to Brentwood impacted by the unprecedented number of large development projects threatening to impact traffic, safety, and the environment along the Sunset Corridor between the I-405 freeway and the Pacific Ocean.

² Brentwood Residents Coalition is a grass-roots, non-profit advocacy group whose purposes are to preserve and enhance the environment and quality of life in Brentwood, to protect the integrity of residential neighborhoods, to assist with planning, to uphold zoning and municipal codes, to encourage traffic safety, and to educate the public on quality of life and environmental issues.

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hinder the community's ability to provide meaningful public comment during the administrative process.

It is crucial that the project description be accurate because it sets the stage for all subsequent analysis of impacts and mitigation. Even more importantly, the project description informs the public of what is proposed and shapes their comments. An inaccurate project description cripples the entire public participation and review process. Therefore, it is incumbent on the City to ensure an accurate project description is included in the EIR.

We have had two Council District 11 meetings (September 4, 2018 with Councilmember Bonin, and October 12, 2018 with Planning Deputies Krista Kline and Len Nguyen) and a meeting with Planning (a December 21, 2018 meeting with Department of City Planning Executive Officer Keven Keller) to discuss our concerns regarding the Draft EIR circulated in April 2018. Following these meetings we understood that Council District 11 and Planning would work together to address our concerns, beginning with CD11 staff posing relevant questions to Planning staff who would research the issues raised. We have not heard back. Separately, we previously submitted a letter dated May 29, 2018 (May Letter) petitioning for revocation of Mount Saint Mary's existing conditional use permit. The purpose of this letter, however, is to address the EIR issues, not revocation.

We are very concerned that the Final EIR may be released by Planning within the next few months without correcting the Draft EIR's significant errors. The Council office and Planning should follow through with their assurances that our concerns will be adequately reviewed. We renew our request that the Draft EIR be revised and recirculated to avoid the premature publication of an indefensible environmental review document.

A. The EIR's Project Description Misstates Permitted Enrollment at MSM's Chalon Campus.

To be specific, the Project Description is fatally flawed in that it misstates permitted enrollment at MSM's Chalon Campus. The Draft EIR relies on Planning Case No. 4072 CU, Condition 3 (July 27, 1984) to support its contention that "the maximum permitted student enrollment on Campus shall remain 2,244 students." (Draft EIR Project Description II-12.) Enrollment cannot "remain" at a number that was never authorized. The January 26, 1984 approval authorizes an enrollment of 750 students. No subsequent authorization increased the enrollment from 750. Indeed, no request to increase enrollment has been made since 1984 until the currently proposed project was filed.

The January 1984 approval states, "The staff has recommended that any future expansions of enrollment be predicated upon the construction of the future parking structure at the southern end of campus." It continues, "... there would be no inherent control in this approval to insure that enrollment would not grow in an ad hoc fashion, apart from the condition relating future increases to the proposed parking structure." The clear intent of approving an additional parking structure was to contain growth, not to authorize increased enrollment, and that the City wanted to prevent enrollment increasing "in an ad hoc fashion." Conditions of approval also made perfectly clear that enrollment was capped at 750 students. See City Planning Case 4072-CU, granted January 26, 1984.³ (May Letter, Exhibit 19, attached and highlighted for your convenience.)

In July 1984, the City approved a parking structure at MSM's Chalon Campus. There was no concurrent request for an enrollment increase. Traffic engineer Allyn Rifkin, P.E., was Chief of LADOT's Planning Bureau at the time of the July 1984 approval. Regarding that approval, Rifkin writes, "[f]rom the project description it is clear that the [1984] request was to build a parking structure and not for an enrollment increase."⁴ (May Letter, Exhibit 1, attached and highlighted.)

Had MSM sought to increase its enrollment, Rifkin notes "LADOT would have required further assessment of the added vehicle trips to determine the need for a traffic study and ultimate assessment of traffic impacts." But there is no record that LADOT assessed the additional vehicle trips associated with an enrollment increase, or that any other impacts of an enrollment increase were identified and analyzed. This is compelling and irrefutable evidence that the 1984 approval was not, and could not have been, intended to increase enrollment. In fact, just the opposite is true: the March 1984 Initial Study's traffic analysis (May Letter, Exhibit 22, attached and highlighted) states there will be no significant traffic impact "provided that no enrollment increase is allowed."

The July 1984 parking garage approval was necessarily limited by the certified Mitigated Negative Declaration ("MND"). The MND's project description says nothing whatsoever about an increase to student enrollment: "Conditional Use for a 4-story, 80,000 sq. ft. parking structure for 244 cars located on the Mount St. Mary's College campus on 45.5 net acres, zoned RE40-1-H."

³ "There shall be no increase in student enrollment beyond 750 students, until a parking structure is constructed at the southern end of the campus. In lieu of this, when an increase in enrollment beyond 750 students is contemplated, the college may apply to the City Planning Commission for a review of the adequacy of existing and any proposed on-campus surface parking."

⁴ Initial Study Project Description, "Cond Use for a 4 story, 80,000 sq. ft. parking structure for 244 cars located on the Mt. St. Mary's College property on 45.5 net acres, zoned RE40-1-H."

(May Letter, Exhibit 21, attached and highlighted.)

Yet over the next 32 years, MSM illegally increased enrollment “in an ad hoc fashion,” gradually but dramatically and severely impacting the community. According to the current Draft EIR, 2015 student enrollment is reported as 1,561, and 2016 enrollment is reported as 1,498. (Draft EIR Project Description II-11.) This is approximately twice what was allowed by the 1984 authorization, in violation of MSM’s conditions of approval.

The filing related to the proposed Wellness Pavilion project now seeks to *triple* the January 1984 authorization to allow as many as 2,244 students, based on an unsupported assumption about previous entitlement approvals and environmental documents that were not included with the current entitlement application materials.⁵ The Draft EIR’s land use analysis thus fails to identify or analyze potentially significant impacts related to the substantial enrollment increase.

B. MSM Proposes to Expand Commercial Activities, Contrary to the Terms of Its 1952 Conditions of Approval.

In addition to the very incorrect statements regarding permitted enrollment, the MSM Campus is limited to school use. However, the Draft EIR states the Pavilion will be used for MSM’s student body, staff and faculty, provide a practice facility for MSM’s club sports teams *and to increase MSM’s commercial activities*. The permitted uses for the Campus were limited in a 1952 City approval adding 17 acres of land to the existing College site for the construction of athletic facilities (the same location of the proposed Wellness Pavilion). Condition No. 3 of the May 23, 1952 grant stated “***This grant shall only apply to school use involving educational subjects which are in conformance with the State Educational Code, religious services, or religious educational activities.***” (See City Plan Case 4072-CU, May 23, 1952.)⁶ The Draft EIR Project Description

⁵ The 1984 initial study traffic analysis and certified MND for the 1984 MSM parking structure approval were recovered by BRC and Sunset Coalition members from documents archived at the C. Erwin Piper Technical Center in downtown Los Angeles. They were not included in the hundreds of pages of documents attached to the project application.

⁶ In 1946, the City adopted the Los Angeles Zoning Code, which placed “Educational Institutions” under the authority of the Planning Commission as a Conditional Use. Under the newly adopted zoning code, Educational Institutions were required to apply for a permit, which would be approved following a public hearing, for all new or expanded uses. (LAMC section 12.24.U.6.)

assumes without evidence that MSM may lease its property for outside uses and filming. MSM has cited no authorization allowing outside uses or filming, which in fact are in violation of the 1952 conditions of approval.

In 1995, community members provided evidence that MSM had been renting and leasing its Chalon Campus for outside events in violation of the City's municipal code and CUP limitations on its activities. (May Letter, Exhibit 24.) MSM has advertised and profited from leasing its Campus for commercial non-academic program events and film shoots for decades bringing thousands of car trips into the surrounding area. (May Letter, pp. 25-29.) There has been no approval for the current commercialization of the campus and yet the Draft EIR describes those events as if they are permitted uses, and MSM now proposes expanding those uses, including summer sports camps (up to 12-week programs for hundreds of attendees), a health and wellness speaker series and other wellness/sports external rental events/activities, as well as continuing its current leasing program for conferences, workshops, seminars, retreats, and filming. (May Letter, Exhibits 27, 37, 38, 39, 41, 42, and 43.) Despite never receiving an authorization for these uses, MSM now intends to expand them.

C. Conclusion.

An accurate project description is fundamental to CEQA. (*Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal.App.3d 577, 591 [“An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.”].) “The defined project and not some different project must be the EIR’s bona fide subject.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199 (emphasis added).) An EIR must contain a detailed statement of “[a]ll significant effects on the environment of *the proposed project*.” (Pub. Res. Code § 21100(b)(1) (emphasis added).) “A curtailed, enigmatic or unstable project description draws a red herring across the path of public input.” *County of Inyo, supra*, Cal.App.3d 185, 198.) Similarly, an inaccurate project description renders meaningful public comment impossible. “Only through an accurate view of the project may affected outside and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures . . . and weigh other alternatives in the balance.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192–193.)

Based on the available evidence in the public record, including 1984 approval documents, there can be no serious debate that the current Draft EIR’s project description is inaccurate.

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Mr. Kevin Keller
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The City must revise the Draft EIR to provide an accurate project description and the Draft EIR must be recirculated.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas P. Carstens", with a stylized flourish at the end.

Douglas P. Carstens

Enclosures

Enclosure
(May Letter, Exhibit 19)

**LOS Angeles City Planning Department
Room 561**

CITY PLAN CASE NO. 4072

**BRENTWOOD-PACIFIC PALISADES
DISTRICT
COUNCIL DISTRICT NO. 11
Bk. 2, Page 490
Grid AZ/37**

**DECISION DATE: January 26, 1984
TIME: After 9:30 A.M.
LOCATION: Van Nuys Woman's Club
14836 Sylvan Street
Van Nuys, CA**

**To: City Planning Commission
From: Zoning Plans Section
Requested by: Mt. St. Mary's College, Chalon Campus
Subject: APPROVAL OF PLANS - FACULTY RESIDENCE BUILDING
Property Involved: Located at 12001 Chalon Road, east of Bundy Drive.**

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EXHIBITS:		
ZP-1 (Radius Map)		Attached
ZP-2 (set of site plans, floor plans and elevations)		Attached

EXHIBITS: COPIES FOR COMMISSIONERS ONLY

RECOMMENDATION

ACTION RECOMMENDED BY THE STAFF: That the Commission

Consider the Staff Report.

Approve the construction of a faculty residence hall, a one-story parking garage and a relocation of 39 parking spaces, subject to the following conditions:

- ✓ 1. There shall be no increase in student enrollment beyond 750 students, until a parking structure is constructed at the southern end of the campus. In lieu of this, when an increase in enrollment beyond 750 students is contemplated, the college may apply to the City Planning Commission for a review of the adequacy of existing and any proposed on-campus surface parking.
- AS 2. The faculty residence hall shall contain not more than three dwelling units nor 32 bedrooms, including three bedrooms to be used as guest rooms. *33 Avn per CPC construction*
- AS 3. The faculty residence hall shall not exceed three stories in height, and the garage building shall not exceed one story in height. *5/6*
- ✓ 4. The subject property shall be developed substantially in accordance with the plans, Exhibit ZP-2, attached to City Plan Case No. 4072, on file in the Los Angeles City Planning Department, except as the subject property may be required to meet the provisions set down by the Municipal Code and the conditions herein.
- 5. Prior to the issuance of building permits, detailed development plans, including a complete landscape plan, shall be submitted to the Department of City Planning for approval.
- 6. Eleven parking spaces shall be provided adjacent to the faculty residence hall.
- 7. This approval shall be utilized within two years after the effective date of approval. If at least one usable dwelling is not completed by that date, this approval shall become void.

FEE PAID

Receipt No. 129041 Date 5-17-84

Recommended by:

BY W. Lillenberg Approved by:

John J. Parker Jr.
John J. Parker Jr.
City Planner

William E. Lillenberg
William E. Lillenberg
Senior City Planner

APPROVED PLAN NO. CPC 4072
CITY PLANNING COMMISSION
DATE 5-17-84
BY *[Signature]*

paid prior
refund given
to applicant rep
Jim Broeske

STAFF REPORTRequest:

The Commission has received a request from Mt. St. Mary's College (Chalon Campus) for approval for a three-dwelling unit apartment building, containing 32 bedrooms, including several guest rooms, to be used for housing faculty and staff presently located elsewhere on the campus. The housing used elsewhere will be made available for students living on-campus.

Comments:

The proposed structure would be three stories in height. To the north would be a one-story garage structure, let into the earth bank on the north side. The requested faculty residence hall would also entail a minor reconfiguration of campus parking, as explained below.

The college, for the past five years, has maintained a constant enrollment of between 700 and 750 students. The college is planning to keep enrollment steady at its current level in the foreseeable future. The new residence hall is therefore being built to increase the number of students living on-campus, not to increase enrollment. The construction of the new faculty residence hall will open up rooms in Rossiter Hall, located approximately at the center of the campus, which can then be occupied by students.

By Code. the proposed residence hall will require seven additional parking spaces. This includes two parking spaces for each of the three dwelling units, and one additional space for three guest bedrooms (the latter requirement is so low because more than 60 guest rooms are located elsewhere within the campus). The proposed new residence hall is being built on the northern-most parking lot within the campus which currently contains 39 spaces. Eleven new spaces would be contained within the proposed garage building, for a net loss of 28 spaces on the site. The lost spaces would be replaced on a lower lot (see Drawing AS-5 in the exhibits) through the removal of several temporary trailers and a portion of a dilapidated building. This will create 38 new parking spaces at that location resulting in an overall campus gain of 10 parking spaces (or three more than the seven required for the new residence hall).

In addition to increasing the net existing number of parking spaces on the campus by 10, the relocation of parking from the northern-most lot where the residence hall will be constructed to the more southerly location will place that parking in a more convenient location and it should be more fully utilized. It should also be noted that, at the southern end of the campus, there is a proposed future parking structure. While no new parking is needed at the present time, future changes in enrollment could create a demand for more parking. The future parking

structure will be constructed if and when the need for it becomes apparent.

The requested faculty residence hall will have no discernible impact on any surrounding development. The Mt. St. Mary's campus is located atop a leveled ridge. The campus is straddled on both sides by precipitous canyons which are uninhabited. The nearest development is to the west of Chalon Road and Bundy Drive.

At the specific location of the proposed residence hall at the northern end of the campus, the view to both the east and west is composed of plunging canyons which then rise precipitously to ridge lines along which no development is visible. To the north, the topography rises steeply, again with no visible development (the garage building would be let in to this north rising slope). The sole direction in which development is visible is to the south, the campus itself.

Conclusion:

It is the staff recommendation that, with the recommended conditions, the requested addition of a faculty residence hall and reconfiguration of parking be approved. In consideration of the severe topography on three sides of the subject site, in combination with the total lack of any visible development to and beyond the ridge lines in these three directions, the proposed development will have no impact of any type on surrounding off-campus developments. The relocation of the existing parking lot from its present position to a more centralized location, will be beneficial since it will promote a greater utilization of the parking spaces.

The staff has recommended that any future expansions of enrollment be predicated upon the construction of the future parking structure at the southern end of the campus. While it is true, as the applicant has noted, that the proposed faculty residence hall contemplates a net addition of 10 parking spaces on-campus with no increase in student enrollment, there would be no inherent control in this approval to insure that enrollment would not grow in an ad hoc fashion, apart from the condition relating future increases to the proposed parking structure.

Enclosure
(May Letter, Exhibit 1)

Allyn D. Rifkin, PE
Rifkin Transportation Planning Group

4455 Los Feliz Boulevard, Suite 1403
Los Angeles, CA 90027
(323) 664-2805 [t]
(323) 697-1594 [c]

May 23, 2018

David Wright, Sunset Coalition
Wendy-Sue Rosen, Brentwood Residents Coalition
11845 Chaparal Street
Los Angeles, CA 90049

Via email: zofia.wright@gmail.com

Traffic and Circulation Issues – Regarding the proposed Mount Saint Mary’s University Expansion

Dear Mr. Wright and Ms. Rosen:

This is a summary of my review of traffic issues and impacts related to the current operations of Mount Saint Mary’s University (MSMU) and the proposed expansion of the Chalon campus at 12001 Chalon Road in Brentwood. I have 30 years of experience in the field of transportation engineering and planning and until recently I held the position of Chief of the Los Angeles Department of Transportation (LADOT) Bureau of Planning and Land Use Development. In that role, I was responsible for managing a staff of 38 professionals and serving as the key department liaison between the development community and City Council on traffic mitigation and transportation planning issues, including supervision of the completion of numerous project EIRs for the City of Los Angeles. I also have extensive experience working closely with residential neighborhood associations and developers to negotiate consensus on traffic mitigation measures in association with proposed development projects. Attached is **EXHIBIT 1** with a complete summary of my credentials.

As you know, having reviewed school traffic issues regarding the Archer School and the Brentwood School in concert with your neighbor homeowner associations, I have specialized knowledge of school expansion programs in Brentwood and related traffic congestion issues affecting the Sunset Boulevard Corridor west of the I- 405 Freeway. Further, I held the position of Transportation Planning Bureau Chief for the LADOT in 1984, when MSMU submitted their application for conditional use for a parking structure. The application was reviewed and commented on by my department. **It is important to note that the review at that time was in no way intended to be a finding of entitlement for increased attendance of the campus.**

Review of Prior Documents

As mentioned above, I was Transportation Planning Bureau Chief at LADOT in 1984, when the Initial Study Traffic Analysis document (**EXHIBIT 2**) was signed by LADOT Traffic Engineer Charles King, and, at that time, I was his immediate supervisor. With direct knowledge of procedures in place at LADOT, I am especially qualified to interpret the findings of the Initial Traffic Study Analysis and the associated approval for the parking structure.

In an effort to evaluate the background for MSMU's current operational conditions, I have reviewed a number of historical documents that have been submitted to or issued by the City in reference to past entitlements and the current application for expansion (ENV-2016-2319-EIR). The Initial Study Traffic Analysis report by LADOT from March 28, 1984, was issued in response to an application to build a 244-space parking structure on top of an existing parking lot (EIR Case No: 113-84-CUZ). The important note on that document is that LADOT, pursuant to CEQA, did not require a traffic analysis of the requested permit and recommended a finding of **NOT SIGNIFICANT** impact for traffic "Provided that no enrollment increase is allowed." During that time, MSMU's enrollment was approximately 750 students (see the January 1984 CUP for the Faculty Residence Building). From the project description it is clear that the request was to build a parking structure and not for an enrollment increase. That is how the City should have processed the entitlement. If the City instead permitted an increase of enrollment to 1,072 students (a 43% increase without additional traffic analysis and new environmental review), that would be a critical error.

Additionally, the July 1984 CUP approval was for a parking structure only --- with a condition that tied the ratio of students to the number of parking spaces in that structure. It did not address the remaining parking spaces on campus that were required by code. The current MSMU Draft EIR includes a misleading assumption which asserts that the ratio of 1 to 4 parking spaces to students applies to all of the parking on campus.

Contrary to what MSMU asserts, LADOT issued the "NOT SIGNIFICANT" traffic impact determination for the July 1984 CUP with the condition that enrollment would not increase. If the permit was to provide for increased student enrollment, LADOT would have required further assessment of the added vehicle trips to determine the need for a traffic study and ultimate assessment of traffic impacts.

Parking Requirements for Universities

As stated above, there are documents in the current application for expansion that stipulate the parking garage entitles the University to expand the number of students. In the field of transportation planning and engineering, as it applies to the City of Los Angeles, there is no documentation or guidelines that the provision of parking spaces generates additional traffic. Thus, the number of parking spaces is not considered a determination of the amount of traffic impact. Generally, the provision of adequate parking is a mitigation of neighborhood traffic impacts with regards to parking over-flow.

EXHIBIT 3 is a summary of a national data base (Institute of Transportation Engineers)

regarding existing parking demands for universities. On average, the peak demand for parking at urban universities exceeded 0.22 parking spaces per student. A conservative practice would be to compare parking needs to the 85th percentile data (statistics which are exceeded only 15% of the time) implying a parking demand of 0.29 parking spaces per student. These data included all visitors to the surveyed universities – including students, staff and visitors.

In comparison, the City parking requirements for learning institutions are not calculated upon the number of students, but rather, based upon an analysis of allocated square feet. Generally, the City requires only one space per 500 square feet with Auditoriums and administration office space treated separately (see **EXHIBIT 4**). **There is no basis in City of Los Angeles entitlements to calculate student enrollment based upon the number of parking spaces provided.**

Existing Roadways Are Inadequate for Current Traffic

EXHIBIT 5 shows the route to the campus from the Sunset Boulevard Corridor, namely Bundy Drive, Norman Place and Chalon Road. According to the Circulation maps from the latest adopted Brentwood-Pacific Palisades Community Plan and the Circulation Element of the Citywide Plan, all roads to the MSMU campus are designated as “local” roads (see **EXHIBIT 6**). This appears to be in conflict with more recently adopted designations from the Baseline Hillside Ordinances (Ordinance No. 181,624 and Ordinance # 168,159), wherein these roads are designated as “Hillside Limited Streets.” In both of these criteria, **the intention of these roads is that they “are intended to accommodate lower volumes of vehicle traffic.”**

The City standard for determining roadway width is based upon the street designation, documented in the recently adopted Complete Streets Design Guidelines. **EXHIBIT 7** is a summary of what the City expects for “local” roadways pursuant to the recently adopted Complete Streets Design Guidelines in which the requirement is for 36-foot wide streets. **EXHIBIT 8** shows that the requirement for Hillside Limited Streets is that the paved part of the street be at least 20-feet wide.

During my field investigation, I measured these roads and found the roadway width to narrow from 30 feet wide (nearest to Sunset Boulevard) down to less than 19 feet wide on Norman Place in its approach to Chalon Road which is the entrance to the campus. As evidenced by pictures of the route which are attached in **EXHIBIT 9**, **these roads are very narrow, windy, lacking sidewalks and with limited sight-line. Those sections of roadway below 20-feet are substandard by any of the City applicable standards and unsafe for two-way traffic.**

MSMU proposes to add shuttles and busses to accommodate increased student population and events. **The addition of busses to the mix of existing traffic would necessitate wider roadway widths as well as engineering design accommodations such as pavement thickness and minimum sight-line requirements.** As evidenced by pictures in **EXHIBIT 10**, large busses bringing visitors to the MSMU campus got stuck on Saltair Ave, a very narrow, substandard road.

Additionally, these substandard roads in a high fire area, are inadequate for the amount of current and future traffic generated by Mount St. Mary's University.

Consideration of Other Major Projects in the Sunset Corridor

There have been two major development project approvals with significant impacts on the Sunset Boulevard Corridor: Archer School and Brentwood School – both expansions of existing school sites. **EXHIBIT 11** is a summary table of expected traffic impacts for these sites as reported in the Archer School Traffic Study. Traffic conditions projected to be Level of Service (LOS) E or F (unacceptable according to City Policies) at the following 6 intersections in the Sunset Corridor:

- Bundy Drive
- Saltair Avenue
- Barrington Avenue
- Barrington Place
- Church Lane/I-405 Freeway
- Veteran Avenue

All of these intersections are also expected to be traversed by MSMU students, faculty and visitors. The Draft EIR must take these cumulative impacts into consideration using the proper baseline of enrollment permitted.

SUMMARY

In conclusion, from the documents I have reviewed, the July 1984 CUP approval did not include any condition allowing an increase in enrollment and MSMU appears to be operating with an enrollment number in excess of any City approvals.

The increased enrollment on MSMU's campus without the City's review and imposition of mitigation measures has added to the unacceptable traffic conditions in the Sunset Corridor. In my opinion, based on the current traffic and extent of substandard roadways serving access to the MSMU campus from Sunset Blvd, **the proposed expansion of the University will be significantly impactful to the community.**

Please contact me if you have questions.

Very truly yours,



Allyn D. Rifkin, PE

EXHIBIT 1**Allyn Rifkin, P.E.
Experience and Qualifications**

Mr. Rifkin has over 30 years experience in the field of transportation engineering and planning. Included in that experience are assignments in both the private and public sectors, ranging from consultant for developers to research for the Automobile Club of Southern California. Until recently, he was the Chief of the Los Angeles Department of Transportation's Bureau of Planning and Land Use Development, responsible for managing a staff of 38 professionals and serving as the key department liaison between the development community and City Council on traffic mitigation and transportation planning issues. He supervised the completion of numerous project EIRs for the City of Los Angeles. His latest projects focused on transit oriented development along various rail alignments in the Los Angeles area. As a private consultant, Mr. Rifkin has worked closely with residential neighborhood associations and developers to negotiate consensus on traffic mitigation measures in association with proposed development projects. Other consultant efforts of interest include assistance to the Eagle Rock neighborhood in the formation of the Colorado Boulevard Pilot Community Parking program and to County Supervisor Yaroslavsky in the initial proposal to convert Olympic and Pico Boulevards into a one-way pair. On the Westside of Los Angeles, Rifkin has worked with the Brentwood Homeowners and other neighborhood groups seeking traffic mitigation of expanding private schools along the Sunset Boulevard corridor.

Professionally, Allyn is active in the Urban Land Institute (ULI) and the Institute of Transportation Engineers (ITE), and has served as the president of the ITE'S largest Chapter of ITE, the Southern California Chapter, with over 1,100 members. In addition to serving on the ITE National Transit and Transportation Planning committees, he has been instrumental on national steering committees for the ITE Trip Generation Committee and the Urban Goods Movement Committee. He has lectured extensively on the topics of traffic impact mitigation and on neighborhood traffic controls.

His college education began with a B.S. in Systems Engineering at UCLA and led to an M.S. in Transportation Engineering at Northwestern University. Rifkin is nationally recognized for his expertise in travel demand forecasting. His more recent work has involved traffic plans to relieve congestion in various hot spots of development in Southern California including the South Coast Plaza area of Orange County, Downtown Los Angeles, Westwood, the LAX Transportation Corridor (the initial area in Los Angeles to adopt a traffic impact mitigation fee), and Warner Center.

He was involved in the creation of five transportation trust funds with current balances exceeding \$23 million for transportation improvements. In his role as mediator of development traffic impact Mr. Rifkin launched a neighborhood traffic safety program currently exceeding \$1.5 million in neighborhood traffic controls and negotiated pedestrian safety mitigations from the Los Angeles Unified School District.

Enclosure
(May Letter, Exhibit 22)

Enclosure
(May Letter, Exhibit 21)

CITY OF LOS ANGELES
CALIFORNIA



TOM BRADLEY
MAYOR

CITY PLANNING
COMMISSION

DANIEL P. GARCIA
PRESIDENT

J. S. KRUEGER
VICE-PRESIDENT

STEVE HARRINGTON
CARL MASTON
SUZETTE NEIMAN

RAYMOND I. NORMAN
SECRETARY

DEPARTMENT OF
CITY PLANNING
561 CITY HALL
LOS ANGELES, CA 90012

CALVIN S. HAMILTON
DIRECTOR

April 18, 1984

The Blurock Partnership
Alan E. Smith
2300 Newport Boulevard
Newport Beach, CA 92663

RE: MND-113-84-CUC
PARKING STRUCTURE FOR MOUNT ST. MARY'S COLLEGE

The Environmental Review Committee on April 18, 1984, granted the subject project a Mitigated Negative Declaration with four impacts that will be mitigated through the approval process. In addition to those four concerns, the Committee is concerned about the view/aesthetics impacts and recommends that a site line analysis be done for the project and its impact on surrounding single-family uses. This should be done by the time the Hearing Examiner holds a public hearing on the Conditional Use application.

Kei Uyeda
Acting Director


BOB ROGERS
Senior City Planner
Chairman of Environmental Review Committee

BR:AMS:gk

CITY OF LOS ANGELES

CITY CLERK'S USE

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL

LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

MITIGATED **NEGATIVE DECLARATION**

(Article V — City CEQA Guidelines)

LEAD CITY AGENCY Los Angeles City Planning Department	COUNCIL DISTRICT 11
PROJECT TITLE MND-113-84-CUC	CASE NO.

PROJECT LOCATION
12001 Chalon Road between Chalon Road and Bundy Drive; Brentwood-Pacific Palisades.

PROJECT DESCRIPTION:
Conditional Use for a 4-story, 80,000 sq.ft. parking structure for 244 cars located on the Mount St. Mary's College campus on 45.5 net acres, zoned RE40-1-H.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Mount St. Mary's College
12001 Chalon Road
Los Angeles, CA 90049

FINDING:

▶ The City Planning Department Environmental Review Committee of the City of Los Angeles has determined that this project will not have a significant effect on the environment for the following reasons:

The ERC initial study prepared for the proposal indicates that possible environmental impacts could occur due to major landforms on the site. However, the potential grading and subsidence impacts will be dealt with and mitigated by administrative procedures required by the Municipal Code.

The ERC initial study also indicates that the property is potentially subject to flood hazards. Any flood hazard that exists will be mitigated to a level of insignificance if the requirements of the Flood Hazard Management Specific Plan Ordinance are complied with. (This MND does not apply should a waiver be given under provisions of the Flood Hazard Management Specific Plan).

(continued on page 2)

▶ SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

"Any written objections received during the public review period are attached together with the responses of the Lead City Agency."

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM Alta Shigeta	TITLE City Planner	TELEPHONE NUMBER (213) 485-5776
ADDRESS 200 N. Spring Street, Room 655 Los Angeles, CA 90012	SIGNATURE (Official) Bob Rogers, Chairman ERC <i>Bob Rogers</i>	DATE 04-18-84

The ERC initial study prepared for the proposal also indicates that possible environmental impacts could occur due to the potential loss of significant trees on the site. However, these impacts can be mitigated to a level of insignificance by requiring the preservation of as many trees as possible on the site; and by replacement of other desirable trees in the parkway area on a 1:1 basis to the satisfaction of the Street Tree Division of the Bureau of Street Maintenance.

The ERC initial study prepared for the proposal also indicates possible environmental impacts due to its location in an area likely to yield unrecorded archaeological sites. However, previous surveys conducted in the area, plus field inspection, revealed that the area immediately surrounding the subject property does not appear to contain significant cultural resources. Yet it is possible that some archaeological materials may have been buried by modern activity.

As a safety factor, UCLA Archaeological Research Center should be notified when the project is started. If any archaeological materials are encountered during the course of the project development, the project should be halted and the Research Center contacted at once for a proper assessment of resource and evaluation of the impact. (See letter dated April 11, 1984 from the UCLA Archaeological Research Center on file).

The conditions imposed in the mitigated negative declaration shall be fulfilled as a condition of the decision-making body.

Therefore, it is concluded that no significant impacts are apparent which might result from this project's implementation.

This action is based on the project description on the preceding page.