

# DRAFT

## MARYMOUNT COLLEGE FACILITIES EXPANSION PROJECT COMMENTS ON FINAL ENVIRONMENTAL IMPACT REPORT

| Comment Maker         | Topic              | Comment  | Response By | Response |
|-----------------------|--------------------|--|-------------|----------|
| Commissioner Knight   | Geology            | How does the EIR analyze the highly expansive bentonite soil? Will excavation and export be required?  | RBF/City    |          |
| Commissioner Knight   | Hydrology          | What is considered adequate secondary overflow?  | RBF         |          |
| Commissioner Knight   | Hydrology          | Demonstrate that the proposed detention basin can accommodate maximum run-off (100 year)?  | RBF         |          |
| Commissioner Knight   | Hydrology          | Will the proposed detention basin be lined?  | RBF         |          |
| Commissioner Knight   | Traffic            | What is the after hours (night-time and weeknights) condition of local roadways including PVDS / 25 <sup>th</sup> street / Western Avenue  | RBF         |          |
| Commissioner Knight   | Traffic            | Mitigation Measure TR-9 requires roadway improvements at the intersection of PVDS / PVDE and the College is responsible for its proportionate share of the improvement costs. When will this impact be mitigated? If not fully implemented, will this impact be mitigated? | RBF         |          |
| Commissioner Knight   | Student Enrollment | All programs considered, based on the Traffic and Parking studies, what is the maximum student cap for summer sessions?  | RBF         |          |
| Commissioner Gerstner | Hydrology          | Is the proposed detention basin designed to accommodate 100-year flows?  | RBF         |          |
| Commissioner Gerstner | Parking            | How is parking being addressed based on maximum enrollment vs. average enrollment (as it presently exists)   | RBF         |          |
| Commissioner Tomblin  | Grading            | Will the City require a completion bond for the proposed grading   | City        |          |
| Commissioner Tomblin  | Lighting           | What would the night light impacts be to neighboring properties when the residence halls are lit?  | RBF         |          |

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| Commissioner Lewis     | Alternative              | Split-campus alternative  | RBF         |          |
| Commissioner Tetreault | Traffic                  | What are the impacts of youth driveways on local roadways?  | RBF         |          |
| Commissioner Tetreault | Traffic                  | What is the accident percentage for the various age groups, specifically youth drivers?   | RBF         |          |
| Commissioner Tetreault | Traffic                  | What are the drive-through (short-cut) impacts to Via Colinita between Miraleste and PVDE?  | RBF         |          |
| Commissioner Tetreault | Parking                  | If Marymount is not currently providing the minimum number of on-site parking spaces required by the Code, what kind of mitigation has been imposed (vanpools, shuttles, off-site parking, etc.)  | City        |          |
| Commissioner Tetreault | Parking                  | How does the City handle parking requirements for typical needs such as daily student loads, verses special events, including athletic, cultural, and community events (and graduations) that will bring many more people and cars to the facility? | City        |          |
| Commissioner Tetreault | Parking                  | How many such events can the school have before they are considered baseline or normal daily activities that may require greater on-campus parking?   | RBF         |          |
| Commissioner Tetreault | Parking                  | What is staff's evaluation of the number of parking spaces for the proposed residence halls planned for this facility? Does staff agree or disagree with the manner by which RBF calculated that number?  | RBF         |          |
| Commissioner Tetreault | Public Utilities - Water | Will the proposed project adversely impact water pressure and water supplies?   | RBF         |          |
| Commissioner Tetreault | Geology and Hydrology    | What is the status of the hydrology and geology studies? If not complete, when will they be completed and incorporated into the EIR?  | City        |          |

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| Commissioner Tetreault | Modular Buildings           | In light of how the PC dealt with the recent request by Green Hills to convert a temporary modular building to a permanent building, how does the City treat the use of modular buildings to be used for longer than a year? Many schools use modular buildings as permanent classrooms. Is this proposal something that is not treated in the EIR and if not, does it need to be addressed?   | City        |          |
| Marymount College      | Land Use - Code Consistency | The DEIR had suggested that the College's request for a variance to locate limited portions of the Athletic Facility and Residence Halls in areas with artificially created extreme slopes in and of itself created a "significant and unavoidable impact." (5-1-23 and 24.) The FEIR has properly revised this analysis to conclude that "the [Code] inconsistency could be resolved, if a Variance is approved." (12-13; 12-868/121.11.) It is not clear if the finding of a potential Code inconsistency in Section 5.1.6 has been revised on page 5.1-24 of the FEIR to be consistent with the response on page 12-13. | RBF         |          |
| Marymount College      | Traffic and Circulation     | The FEIR fails to adequately disclose that many of the forecast trips are non-project trips generated by local residents using the new and enhanced facilities.  | RBF         |          |
| Marymount College      | Traffic                     | The Final EIR fails to analyze how the College's voluntary offer to restrict the number of vehicles permitted for students living on campus to 125 maximum could minimize adverse traffic impacts.   | RBF         |          |
| Marymount College      | Traffic                     | The Final EIR fails to analyze how the college's voluntary offer to restrict the number of vehicles  | RBF         |          |

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|                    |                       | permitted for students living on campus to 125 maximum could minimize adverse parking impacts.   |             |          |
| Marymount College  | Enrollment Cap        | There is a lack of a nexus to impose a new enrollment cap on the weekend program.  | RBF / CITY  |          |
| Marymount College  | Noise                 | The proposed new mitigation NOI-8 (maintaining residence hall windows in closed position) is not supported by substantial evidence and is contrary to multiple city policies.  | RBF         |          |
| Marymount College  | Alternative           | The Final EIR's reduction of overall housing opportunities under the affordable housing alternative is contrary to Marymount's request, the City's draft Housing Element and policies, and State law.  | RBF         |          |
| CCC/ME – Lois Karp | Land Use              | What is the explanation in 12.4.1 Land Use and Relevant Planning Master Response referring to ordinance 463?   | City        |          |
| CCC/ME – Lois Karp | Hydrology and Geology | The Hydrology and Geology studies found in the EIR are incomplete and still a work in progress.  | City        |          |
| CCC/ME – Lois Karp | Hydrology             | The Revised Development Plan (Preliminary Grading and Drainage sheet 1 of 3) does not show the location of the secondary overflow for the detaining basin, it does not show a drainage plan for the grasscrete parking lot on the eastern boundary and the drainage show flows onto adjacent properties. | City/RBF    |          |

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| CCC/ME –<br>Lois Karp | Traffic | Forty-plus mitigations are no assurance that compliance will occur.<br>Marymount has a history of noncompliance.   | City        |          |
| CCC/ME –<br>Lois Karp | Traffic | The 1990-CUP required ridesharing, which was never complied with and RPV never enforced it. Ridesharing was in the CUP because there was a shortage of parking! Parking and traffic in the EIR has many unresolved issues and RBF did not have a traffic consultant at the previous meeting to hear comment or answer questions.   | City        |          |
| CCC/ME –<br>Lois Karp | Traffic | The Traffic Safety Commission must send a report to the Planning Commission.   | City        |          |
| CCC/ME –<br>Lois Karp | Parking | The EIR states that “baseline condition” is a reason for not counting the number of possible seats in the athletic facility. Marymount does not have an athletic facility now and this new building should be subject to “Assembly” parking requirements (per the California Building Code 2008) and RPV parking codes. This building alone can accommodate over 1100 people. The basketball court requires an additional 183 parking spaces based on the proposed bleacher seats. | RBF         |          |
| CCC/ME –<br>Lois Karp | Parking | The increased intensity of use of the entire site was never studied by RBF. This plan is changing the land use as well by changing an 8-5 school into a 24/7 facility. The ramifications of 8-5 hours or 24/7 hours was not studied.   | RBF         |          |

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| CCC/ME –<br>Lois Karp | Parking | The number of parking spaces being presented is inadequate and does not comply with City Code. With the addition of meeting, study and computer rooms in the library, aerobics, weight rooms and an enlarged swimming pool in the athletic facility, students will have reasons to stay on campus for extended periods of time. All of these additional activities and overlapping uses were outlined in the Project Description in 3.3. The new more intensive use of the campus was very apparent but the FEIR made no adjustments for the additional rooms and seats that were added. Students spending more time on campus to use all these proposed amenities creates a greater demand for parking. How does the parking study address the increased use of the College? | RBF         |          |
| CCC/ME –<br>Lois Karp | Parking | The DEIR and the FEIR do not agree on the amount of parking spaces needed for the on-campus housing. Why were the parking space requirements decreased from 255 to 127 in the FEIR when there were no changes to this part of the project?  | RBF         |          |
| CCC/ME –<br>Lois Karp | Parking | The new parking lot configuration completely ignores the current CUP. Since 1975 and carried forward in the 1990 CUP covenants restricting parking against the walls on San Ramon and the use of that driveway for faculty and staff only have been an important safeguard. These restrictions are long standing protections for the residents of San Ramon Drive.  |             |          |
| CCC/ME –<br>Lois Karp | Parking | Marymount is also asking for a variance on the parking lot setback along PVDE. Why should they be allowed to put all those cars right up to the city sidewalk when residents in this area are required  | City        |          |

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|                       |                               | to have the proper setbacks and Marymount should not be the exception.  |             |          |
| CCC/ME –<br>Lois Karp | Parking                       | The EIR has completely ignored the youthful driver risks and hazards associated with this project. The Master Answer on page 12-26 stating that Marymount students causing accidents is sheer speculation is not correct and not factually supported. Why have the residents submitted letters, spoken at hearings, sent copies of CHP statistics if none of this was taken into consideration by RBF? Photos of accidents and testimonial letters were included in the comments. They are not speculation! We have a real life-safety problem! | City / RBF  |          |
| CCC/ME –<br>Lois Karp | Aesthetics                    | When do we get to discuss the bulk and mass of this project in regards to the surrounding homes?  | City        |          |
| CCC/ME –<br>Lois Karp | Noise                         | How will students signing a “Code of Conduct” suppress the noise of 255 students living in a dormitory. The college says they will enforce the Code. What recourse will residents have? How could the original noise studies be conducted with closed windows in the DEIR when the Fire Code requires the windows to be operable?   | RBF         |          |
| CCC/ME –<br>Lois Karp | Public Utilities and Services | 12.4.8 Public Services and Utilities Master Response also misses the mark. It states that additional calls for service will not cause the need to construct a new police station. A new station was never in question. The issue is about an increase in services provided by the Los Angeles County Sheriff’s Department, which will be required. This is a burden on the RPV budget and Marymount College does not pay any taxes.   | RBF         |          |

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|                    |                               | The cost of additional deputies would have to be borne by the residents of RPV.  |             |          |
| CCC/ME – Lois Karp | Public Utilities and Services | The statistics used for crime and criminal related offenses omitted current off-campus information. We submitted annual statistics from the same Office of Post Secondary Education reporting burglary 15; drugs 89; and alcohol 347 incidents at Marymount's PV North campus.   | RBF         |          |
| CCC/ME – Lois Karp | Appendix A                    | According to the Revised Site Plan, the introduction of modular buildings on-site and within view of everyone using Palos Verdes Drive East, for as long as 6 years is a significant change. These are not temporary buildings. Why are there no visual simulations? The construction road on that same slope is another significant change not only visually but also environmentally. These impacts must be studied and reported in FEIR in order for it to be complete. | City        |          |
| CCC/ME – Lois Karp | Alternatives                  | The reasonable conclusion is that the Living Campus/Academic Campus is the environmentally superior alternative. We agree with the FEIR that it reduces impacts, and meets the basic objects of the project. Additionally, it would locate the entire student housing in one location, providing Marymount with the unified housing they have requested.   | City        |          |
| CCC/ME – Lois Karp | Alternatives                  | Before Marymount took title to the PV North property an environmental study was completed and no further environmental mitigation was necessary at that site. Marymount stated at the last hearing that they were in compliance with the   |             |          |

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|                       |             | <p>Department of Educations requirements on their PV North property.<br/>But we were talking about promises made and promises not kept. They told the Federal Government in their application that they needed the property because they could not house students on the Crest Road Campus and would make \$3 million of improvements in three years. They have not done it.</p>  |             |          |
| CCC/ME - James Gordon | Air Quality | <p>As part of the 1990 approvals, the College was required to provide 45 parking spaces out of the total 343 spaces for ride-sharing. According to Condition No. 13 of Resolution No. 90-20, "within 6 months, a plan to the City equivalent to trip reduction and management provisions of Rule 15 of Southern California Air Quality Management District provisions" was to be submitted to the City. One of the reasons for this condition was to address the parking deficiency. The lack of compliance by the College establishes precedence on how future mitigation measures and conditions will be treated.</p> | City        |          |
| CCC/ME – James Gordon | Parking     | <p>According to the EIR, the project proposes to have a total of 709 student seats representing a net increase of 131 seats from the current 578 seats. The parking analysis for the EIR does not account for the following additional seats:</p> <ul style="list-style-type: none"> <li>• Faculty Office Building Classroom 49</li> <li>• Library Computer room 100 spaces</li> <li>• Library seminar room 26 spaces</li> <li>• Library group study room total 60 spaces</li> <li>• Athletic Facility Classroom 40 spaces</li> </ul> <p>The total of unaccounted parking spaces equals 276 spaces.</p>                 | RBF         |          |

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|                       |                          | The project proposed vast improvements to its facilities which in turn will result in students staying on campus longer and less of a turn-over impacting parking which is not addressed in the EIR.  |             |          |
| CCC/ME – James Gordon | On-Campus Housing        | Marymount College is not a community college but rather a private two-year liberal arts college. The EIR cites 9 commuter colleges that provide on-campus housing. The colleges cited that offer on-campus housing are public institutions unlike Marymount College and are not comparable.                                       | RBF         |          |
| CCC/ME – James Gordon | Land Use / Parking       | The project EIR omits any reference to the parking restriction along the San Ramon property line adopted by the City Council in 1975 and 1990 and is still in effect.   | City        |          |
| CCC/ME – James Gordon | Hydrology                | The proposed construction phasing as it pertains to the installation of the required drainage facilities does not establish an enforceable milestone for completion. Mitigation Measures HYD-1, HYD-2, HYD-3, HYD-4 and GEO-2 should require that the drainage facilities be installed prior to allowing occupancy of the campus. | City        |          |
| CCC/ME – James Gordon | Split-Campus Alternative | For the public record, this Alternative does not in fact “create a split campus” as the College instituted the split campus concept in 1975 with housing located off-site.  | City        |          |
| CCC/ME – James Gordon | Split-Campus Alternative | The proposed Academic / Living Campus Alternative included in the EIR would not result in significant environmental impacts as the City of Los Angeles have already reviewed and found potential impacts to be negligible with the implementation of the proposed action (transfer of   | City        |          |

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|                       |                         | ownership from the Navy to Marymount College)  |             |          |
| CCC/ME – James Gordon | Traffic – Youth Drivers | Information was provided regarding serious impacts that housing of youthful drivers on campus would create. The Master Response 12.4.3 seems to fully discount any dangers imposed by increasing the College’s proposed introduction of these youthful new drivers on-site by stating that there is no supportive evidence, other than “speculation” that Marymount College students have caused or will otherwise in the future cause or contribute to any increase in reported accidents along PVDE. To contend that this data does not support a rational expectation of increased traffic accidents is statistical nonsense when the project proposes to increase youthful population. | RBF         |          |
| Ken Goldman           | Geology                 | What drill core data is available regarding the easternmost boundary of the Marymount property   | City        |          |
| Ken Goldman           | Geology                 | What is the depth of bedrock at this location  | City        |          |
| Ken Goldman           | Geology                 | Why are caissons not required bearing down to bedrock as is necessary for residential structures on unstable soil  | City        |          |
| Ken Goldman           | Geology                 | Is there potential for the South Shore Landslide to affect the Marymount property?   | City        |          |
| Ken Goldman           | Geology                 | What possibility is there for the Marymount project triggering the South Shore Landslide?  | City        |          |
| Ken Goldman           | Geology                 | The College’s geologist, ASE, is recommending that the Library and the Residence Hall be setback a 150 feet to 220 feet from the top of slope (eastern). It is noted that the eastern parking lot may be impacted with storm water   | City        |          |

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|               |                            | runoff and landscape irrigation. There is potential for the eastern portion of the parking lot to experience unsightly cracking associated with long-term slope creep.   |             |          |
| Ken Goldman   | Geology                    | The area within the geologic building setback indicates an inadequate factor of safety. Will extensive earth grading and construction impact the South Shore Landslide?  | City        |          |
| Ken Goldman   | Traffic – Youthful Drivers | The EIR contends that data pertaining to youthful drivers is speculative. There is no speculation regarding the accident rate for teenage drivers. The students residing in the proposed dormitories would be freshmen typically 17 to 19 years of age. There is no speculation that the driving performance of the Marymount students would differ in any respect from that of the typical teenager driving on PVDE or anywhere else in the U.S. Allowing 250 Marymount teenage drivers on PVDE 24/7 is tantamount to inviting traffic accidents and is a significant impact on safety of residents in RPV. | RBF         |          |
|               |                            |  |             |          |