VI. ALTERNATIVES TO THE MASTER PLAN
B. NO PROJECT ALTERNATIVE

INTRODUCTION

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project (State CEQA Guidelines Section 15126.6(e)(1)). Pursuant to State CEQA Guidelines Section 15126.6(e)(2):

> *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.*

While an EIR normally evaluates just one No Project Alternative, this Draft EIR includes a discussion of three potential No Project Alternatives that could conceivably occur if the Master Plan did not proceed. These No Project Alternatives are discussed below.

DESCRIPTION OF NO PROJECT ALTERNATIVES

No Project Alternative (1)

Under the No Project Alternative (1), the Master Plan would not be adopted and implemented. The existing four-story West Building would remain on the Bundy Campus and continue to provide SMC classes within the existing 16 classrooms currently in use. Under this Alternative, the existing East Building would remain vacant and would not be occupied by SMC activities. No access, parking, or landscaping improvements identified under the Master Plan would occur under this Alternative. Under the No Project Alternative (1), those programs slated to move to the New Building under the Master Plan would remain at the Main Campus. The No Project Alternative (1) would therefore result in less activity (i.e., students, vehicles, and construction impacts) on the Bundy Campus as compared to the Master Plan.

No Project Alternative (2)

Under the No Project Alternative (2), the Master Plan would not be adopted and implemented and SMC would sell the entire site (including the existing remodeled four-story West Building and the existing vacant East Building) to a commercial developer. Based on the Appraisal Report[1] prepared for the Bundy Campus in 2001, the "highest and best use" of the site would involve the development of 494,100 square

[1] *Buss-Shelger Associates, BAE Systems Property, 3171 South Bundy Drive, Los Angeles, California, November 30, 2001.*

feet (sf) of commercial office development and 2,000 parking spaces.[2] Therefore, the No Project Alternative (2) assumes the existing West Building and most of the existing landscaping and parking improvements on the Bundy Campus would be demolished, re-graded, and replaced with the development of three six-floor office buildings providing a total of 468,000 sf of office space and the existing East Building which would be renovated to provide 26,100 sf of office space, for a total of approximately 494,100 sf of office development, 1,728 employees[3] and 2,000 parking spaces. Parking would presumably be provided within a multi-level subterranean or above-grade parking garage as the building footprint under the No Project Alternative (2) would be substantially larger than the Master Plan, resulting in proportionally less landscaped area and surface parking area. Under the No Project Alternative (2), all programs currently provided within the renovated West Building would be moved back to the Main Campus and those programs slated to move to the New Building under the Master Plan would remain at the Main Campus.

No Project Alternative (3)

Under the No Project Alternative (3), the Master Plan would not be adopted and implemented and SMC would sell the entire site (including the existing remodeled four-story West Building, and the existing vacant East Building) to a multi-family residential developer. Based on the prospective buyers of the site as identified in the Appraisal Report prepared for the Bundy Campus in November 2001, 625 multi-family residences could possibly be built on the site. Based on the size of the site, these multi-family residences could be provided within several six-story buildings. Therefore, the No Project Alternative (3) assumes the existing West Building, the existing East Building, and most of the existing landscaping and parking improvements on the Bundy Campus would be demolished, re-graded, and replaced with the development of 625 multi-family residential units, which would house approximately 1,413 residents[4] and provide parking for a minimum of 1,250 vehicles.[5] Parking would presumably be provided within a multi-level subterranean or above-grade parking garage as the building footprint under the No Project Alternative (3) would be substantially larger than the Master Plan. This Alternative would result in less permeable surface area as compared to the Master Plan. Under the No Project Alternative (3), all programs currently provided within the renovated West Building would be moved back to the Main Campus and those programs slated to move to the New Building under the Master Plan would remain at the Main Campus.

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[2] *Appraisal Institute, The Appraisal of Real Estate, 10th Edition, p. 274.*

[3] *Based on employee generation rate as follows: 3.4965 employees / 1,000 sf of office space. Los Angeles Unified School District, School Fee Justification Studies, September 2002, p. ES-2.*

[4] *Based on the 2000 Census ratio of 2.26 persons per dwelling unit for the Community Plan area. City of Los Angeles, Census 2000: Palms-Mar Vista – del Rey Community Plan Area, Families and Households, website: http://cityplanning.lacity.org/, September 8, 2006.*

[5] *Based on the parking standard of two parking spaces per dwelling unit of more than three habitable rooms (LAMC Sec. 12.21 A 4 (a)).*

ANALYSIS OF NO PROJECT ALTERNATIVE IMPACTS

Following is an analysis of the expected environmental impacts associated with each of the three No Project Alternatives described above. Only those environmental issue areas analyzed in Section IV of this Draft EIR for the proposed Master Plan have been included in the analyses below.

No Project Alternative (1)

Aesthetics

Post-Project Views

Under the No Project Alternative (1), the Master Plan would not be constructed and both the existing vacant two-story East Building and occupied four-story West Building would remain on the Bundy Campus. Since the existing East Building is located adjacent to Bundy Drive, the No Project Alternative (1) would continue to block views from some locations along Bundy Drive looking west. East-facing views of the Bundy Campus would be very similar under the No Project Alternative (1) as under the proposed Master Plan because the existing West Building currently blocks most views of the existing East Building from locations west of the Bundy Campus. South-facing views of the East Building from locations to the north would not change substantially according to where the East Building is located. Under the No Project Alternative (1), impacts to post-project views would be less than significant, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Visual Character

Under the No Project Alternative (1), the existing East Building would remain on the Bundy Campus and no landscaping improvements would be provided along Bundy Drive. In comparison, the Master Plan would replace the existing East Building with a New Building adjacent to the West Building and would provide landscaping improvements throughout the campus. Under the No Project Alternative (1), impacts to visual character would be less than significant, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Lighting

Under the No Project Alternative (1), existing levels of lighting would continue to be generated on the Bundy Campus. The existing East Building is currently vacant; therefore, the No Project Alternative would only generate lighting from the existing surface parking areas and existing day and evening classroom uses in the West Building. In comparison, the Master Plan would replace the existing East Building with a New Building which would also be occupied with day and evening classroom uses, resulting in an increase in nighttime lighting at the Bundy Campus. Under the No Project Alternative (1), no impact would occur with respect to lighting, which would be reduced as compared to the Master Plan's less-than-significant impact after mitigation.

Glare

Under the No Project Alternative (1), existing minimal levels of glare would occur on the Bundy Campus. In comparison, the Master Plan would introduce minimal glare associated with the New Building, which would generally be constructed of non-glare materials. Under the No Project Alternative, no impact would occur with respect to glare, which would be reduced as compared to the Master Plan's less-than-significant impact after mitigation.

Air Quality

Construction

Under the No Project Alternative (1), no new construction would take place on the Bundy Campus that would have the potential to generate air quality emissions. In comparison, the Master Plan would generate air emissions in association with the site preparation, grading, demolition, and construction phases involved in the buildout of the Master Plan. Under the No Project Alternative (1), no impact would occur with respect to air quality during construction, which would be reduced as compared to the Master Plan's less-than-significant impact after mitigation.

Operation

Under the operation of the No Project Alternative (1), no added vehicles, equipment, or other facilities would be introduced to the Bundy Campus that would have the potential to generate air quality emissions. In comparison, the Master Plan would generate air emissions in association with the increase in vehicles traveling to and from the Bundy Campus, as well as new equipment that would operate within the Bundy Campus. Under the No Project Alternative (1), no impact would occur with respect to air quality during operation, which would be reduced as compared to the Master Plan's less-than-significant impact.

Hazards and Hazardous Materials

Routine Transport, Use, or Disposal of Hazardous Materials

Under the No Project Alternative (1), the Bundy Campus would not increase the type or quantity of hazardous materials used, which would continue to consist of typical cleaning, maintenance, and landscaping solvents. Likewise, under the Master Plan, any increase in hazardous materials used would be minimal. Under the No Project Alternative (1), no impact would occur with respect to routine transport, use, or disposal of hazardous materials, which would be reduced as compared to the Master Plan's less-than-significant impact.

Accidental Release of Hazardous Materials

<u>Demolition/Construction</u>

Because the No Project Alternative (1) would not involve the remodeling or demolition of the existing East Building, this Alternative would not expose sensitive receptors to asbestos-containing materials

(ACMs) or lead-based paint (LBP), which are usually only released when building materials are exposed. Sensitive receptors include schools, residences, playgrounds, and other uses that typically house sensitive populations. In comparison, the Master Plan would involve demolition of the East Building and would implement mitigation measures to reduce impacts associated with potential ACM and LBP exposure. Under the No Project Alternative (1), no impact would occur with respect to accidental release of hazardous materials during construction, which would be reduced as compared to the Master Plan's less-than-significant impact after mitigation.

Operation

Because the No Project Alternative (1) would not introduce any new sensitive receptors to the Bundy Campus, operation of the No Project Alternative (1) would not expose new sensitive receptors to hazardous materials or subsurface contamination. In comparison, the Master Plan would introduce additional students, which are normally considered sensitive receptors, to the Bundy Campus. Under the No Project Alternative (1), no impact would occur with respect to accidental release of hazardous materials during operation, which would be reduced as compared to the Master Plan's less-than-significant impact after mitigation.

Airport Hazards

The No Project Alternative (1) would not introduce any new aircraft hazards such as tall buildings but would maintain the two-story East Building at its existing location. Likewise, the Master Plan, which would replace the existing two-story East Building with a building of similar height but at a lower elevation, would not introduce any new aircraft hazards. Under the No Project Alternative (1), a less-than-significant impact would occur with respect to airport hazards, which would be similar to the to the Master Plan's less-than-significant impact.

Emergency Response Plan

Construction

The No Project Alternative (1) would not involve the closure of any streets such that an emergency response plan would be affected. In comparison, the Master Plan may involve temporary street closures to accommodate the potential installation of the traffic signal for the new Northeast Bundy Driveway. Under the No Project Alternative (1), no impact would occur with respect to emergency response plans during construction, which would be reduced as compared to the proposed Master Plan's less-than-significant impact.

Operation

The No Project Alternative (1) would not involve the permanent closure of or addition of any traffic to existing streets such that an emergency response plan would be affected. In comparison, the Master Plan would add traffic to the surrounding street system which could potentially affect emergency response. Under the No Project Alternative (1), no impact would occur with respect to emergency response plans

during operation, which would be reduced as compared to the proposed Master Plan's less-than-significant impact.

Hydrology and Water Quality

Depletion of Groundwater Supplies

The No Project Alternative (1) would not involve any new wells or other activities that could deplete groundwater supplies. In comparison, the Master Plan would slightly increase the number of persons on the Bundy Campus, increasing demand on regional water supplies, though no new wells or other local groundwater depleting activities would be introduced. Under the No Project Alternative (1), no impact would occur with respect to groundwater supplies, which would be reduced as compared to the Master Plan's less-than-significant impact.

Alteration of Drainage Pattern Resulting in Erosion or Flooding

The No Project Alternative (1) would result in no change to the amount of permeable surface area on the Bundy Campus; however, the existing detention basin on the Bundy Campus at times exceeds its design capacity, and, subsequently, may at times exceed the capacity of the storm drains which receive its outflow. In comparison, the Master Plan would increase the permeable surface area of the Bundy Campus, which would be expected to reduce erosion and flooding. Therefore, although the No Project Alternative (1) would not involve any new development, this Alternative would still, at some point, require the expansion of the existing detention basin design capacity as mitigation. Under the No Project Alternative (1), a less-than-significant impact after mitigation would occur with respect to on- or off-site erosion and flooding, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Exceed Storm Drain Capacity

The No Project Alternative (1) would result in no change to the amount of permeable surface area on the Bundy Campus; however, the existing detention basin on the Bundy Campus at times exceeds its design capacity, and, accordingly, may at times exceed the capacity of the storm drains which receive its outflow. In comparison, the Master Plan would increase the permeable surface area of the Bundy Campus, which would be anticipated to reduce the amount of water flowing to the on-site detention basin. Therefore, although the No Project Alternative (1) would not involve any new development, this Alternative would still, at some point, require the expansion of the existing detention basin design capacity as mitigation. Under the No Project Alternative (1), a less-than-significant impact after mitigation would occur with respect to existing storm drain capacity which would be slightly increased as compared to the Master Plan's less-than-significant-impact after mitigation.

Produce Polluted Runoff

Construction

The No Project Alternative (1) would not involve any construction activities. In comparison, the Master Plan would involve moderate demolition, grading, and construction and would implement construction Best Management Practices (BMPs) as mitigation. Under the No Project Alternative (1), no impact would occur with respect to polluted runoff during construction, which would be reduced as compared to the Master Plan's less-than-significant impact after mitigation.

Operation

The No Project Alternative (1) would not introduce any new activities or chemicals to the Bundy Campus with the potential to generate polluted runoff. In comparison, the Master Plan would generate some non-point source pollutants during operation. Under the No Project Alternative (1), no impact would occur with respect to polluted runoff during operation, which would be reduced as compared to the Master Plan's less-than-significant impact with-mitigation.

Land Use and Planning

Project Consistency with Land Use Plans/Zoning

The No Project Alternative (1) would result in no new or changed land uses from those currently existing onsite, which include classroom uses within the existing West Building. The Master Plan would introduce additional classroom space and would remain consistent with regional and local land use plans and zoning. Under the No Project Alternative (1), a less-than-significant impact would occur with respect to land use plans and zoning, which would be similar to the Master Plan's less-than-significant impact.

Project Compatibility with Surrounding Land Uses

The No Project Alternative (1) would result in no new or changed land uses from those currently existing onsite, which include a vacant two-story building, and a four-story building, currently utilized for approximately 64,000 sf of educational space. The No Project Alternative (1) would continue to be generally consistent with surrounding airport-related uses to the north and single-family residential neighborhoods to the south, east, and west of the Bundy Campus. The Master Plan would not change the current use of the Bundy Campus as an educational institution and would only slightly increase the total classroom area of the site to approximately 100,000 sf; therefore, the Master Plan would not create a new impact related to incompatibility with surrounding neighborhoods. Under the No Project Alternative (1), a less-than-significant impact would occur with respect to surrounding land use consistency, which would be similar to the Master Plan's less-than-significant impact.

Noise

Construction

The No Project Alternative (1) would not involve any construction activities that could result in an increase in construction noise or vibration. In comparison, the Master Plan would have the potential to impact surrounding noise and vibration sensitive receptors (including neighboring residences to the south and students onsite within the existing West Building). Under the No Project Alternative (1), no impact would occur with respect to construction noise or vibration, which would be reduced as compared to the Master Plan's (temporary) significant and unavoidable impact with respect to construction noise.

Operation

The No Project Alternative (1) would not introduce any new activities to the Bundy Campus with the potential to create operational noise impacts, or sensitive receptors with the potential to be impacted by noise impacts. In comparison, the Master Plan would introduce additional students to the Bundy Campus, which would be considered noise-sensitive receptors, new noise generating equipment, and noise associated with new vehicle trips. Nonetheless, the proposed New Building would be required to be constructed with materials that keep noise levels at acceptable levels for classroom uses. Under the No Project Alternative (1), no impact would occur with respect to operational noise, which would be reduced as compared to the Master Plan's less-than-significant impact after mitigation.

Public Utilities (Water, Sewer, Energy)

The No Project Alternative (1) would not introduce any new persons to the Bundy Campus that would have the potential to increase wastewater generation or water consumption, and would not introduce any new equipment to the Bundy Campus that would have the potential to increase energy use. In comparison, the Master Plan would introduce approximately double the number of new persons at the Bundy Campus, increasing wastewater generation by approximately 2,253 gpd or approximately 0.002 million gallons per day (mgd), and increasing water consumption by approximately 2,703 gpd (less than 0.003 mgd). Furthermore, the Master Plan would introduce a new 38,205-sf building, increasing electricity consumption by approximately 1,209 kilowatt-hours (kWh) per day and increasing natural gas consumption by approximately 3,574 cubic feet (cf) per day. Under the No Project Alternative (1), no impact would occur with respect to public utilities, which would be reduced as compared to the Master Plan's less-than-significant impacts.

Public Services (Police and Fire Protection)

Police

The No Project Alternative (1) would not introduce any new persons to the Bundy Campus that would have the potential to increase the need for police services. It should be noted, however, that the existing East Building, which is currently vacant, presents some security issues typically associated with vacant structures. In comparison, the Master Plan would slightly increase the demand for police protection

services at the Bundy Campus as a result of the increase in student activity and parking onsite. Under the No Project Alternative (1), a less-than-significant impact would occur with respect to police protection, which would be reduced as compared to the Master Plan's less-than-significant impact.

Fire

The No Project Alternative (1) would not introduce any new facilities to the Bundy Campus that would have the potential to increase the need for fire protection. It should be noted, however, that the existing East Building, which is currently vacant, presents some fire safety issues typically associated with vacant structures. In comparison, the Master Plan would only slightly increase the demand for fire protection services at the Bundy Campus with the introduction of the New Building, which would replace the East Building. Under the No Project Alternative (1), a less-than-significant impact would occur with respect to fire protection, which would be reduced as compared to the Master Plan's less-than-significant impact.

Transportation and Traffic

Intersection Traffic

The No Project Alternative (1) would not introduce any new persons to the Bundy Campus, and, thus, would not have the potential to increase traffic at study intersections in the surrounding area. In comparison, the Master Plan would introduce new students to the Bundy Campus and would result in significant traffic impacts at four of the 27 study intersections during one or both of the analyzed peak hours in 2010, under all Access Alternatives. Under the No Project Alternative (1), no impact would occur with respect to intersection traffic, which would be reduced as compared to the Master Plan's significant and unavoidable impacts.

Street Segments

The No Project Alternative (1) would not introduce any new persons to the Bundy Campus, and, thus, would not have the potential to increase traffic along studied street segments. In comparison, the Master Plan would introduce new students to the Bundy Campus and would create a significant impact on two of the 22 studied street segments under all Access Alternatives. Under the No Project Alternative (1), no impact would occur with respect to street segments, which would be reduced as compared to the Master Plan's significant and unavoidable impacts.

Regional Transportation System

The No Project Alternative (1) would not introduce any new persons to the Bundy Campus, and, thus, would not have the potential to increase traffic at Congestion Management Program (CMP) arterial monitoring locations, at CMP freeway monitoring locations, and on the CMP bus system. In comparison, the Master Plan would introduce new students to the Bundy Campus which would increase area traffic. Under the No Project Alternative (1), no impact would occur with respect to the regional transportation system, which would be reduced as compared to the Master Plan's less-than-significant impact.

Parking

The No Project Alternative (1) would not introduce any new persons to the Bundy Campus that would demand parking and would continue to provide approximately 609 on-site parking spaces, which meet the peak parking demand of existing students, staff, and visitors at the Bundy Campus. In comparison, the Master Plan would introduce a peak need of approximately 765 spaces and would provide a total of approximately 780 on-site parking spaces within surface and subterranean parking. Therefore, both the No Project Alternative (1) as well as the Master Plan would provide a parking supply that would meet their peak parking demand. Under the No Project Alternative (1), no impact would occur with respect to parking, which would be reduced as compared to the Master Plan's less-than-significant impact.

Neighborhood Effects

As discussed throughout this Section, the No Project Alternative (1) would have impacts ranging from no impact to less-than-significant after mitigation for each of the environmental issue areas analyzed. No significant and unavoidable impacts would occur under No Project Alternative (1). In comparison, the Master Plan would have environmental impacts ranging from less than significant to significant and unavoidable, with significant and unavoidable impacts occurring for Noise (Construction) and Transportation and Traffic (Intersections and Street Segments). Overall, the No Project Alternative (1) would have reduced impacts with respect to neighborhoods effects, as compared to the Master Plan's impacts.

No Project Alternative (2)

Aesthetics

Post-Project Views

Under the No Project Alternative (2), most of the existing improvements on the Bundy Campus, including the four-story West Building, would be demolished and replaced with three six-story commercial office structures, and a new multi-level parking structure. Under this Alternative, the existing East Building would continue to block public views from some locations along Bundy Drive looking west. The three six-story buildings are assumed to block or impair westerly public views from locations along Bundy Drive, westerly public and private views from Grand View Boulevard and other streets east of Bundy Drive, northerly private views from the residences along Stanwood Place and Stewart Street, and southerly public views from locations along Airport Avenue. In comparison, the Master Plan would open up views from Bundy Drive by demolishing the East Building and constructing the New Building closer to the center of the campus. Under the No Project Alternative (2), it is assumed that there would be no feasible and effective mitigation for impacts to views. Under the No Project Alternative (2), a significant and unavoidable impact would occur with respect to post-project views, which would be increased as compared to the Master Plan's less-than-significant impact.

Visual Character

Under the No Project Alternative (2), the Bundy Campus would be substantially altered as the Bundy Campus would be replaced with a commercial office complex resulting in a substantial increase in building masses and heights, reduction in landscaping and permeable surface area, and increase in parking areas. In comparison, the Master Plan would replace the existing East Building with a New Building adjacent to the West Building and would provide landscaping improvements throughout the campus. Nonetheless, with adherence to careful design standards ensured through mitigation, the No Project Alternative (2) could reduce impacts to visual character. Under the No Project Alternative (2), impacts related to visual character would be less-than-significant after mitigation, which would be increased as compared to the Master Plan's less-than-significant impact.

Lighting

Under the No Project Alternative (2), the levels of lighting needed to illuminate the Bundy Campus would increase in association with the increase from approximately 64,000 sf of existing classroom space to approximately 494,100 sf of commercial office space. Office uses generate most lighting during the daytime; however, most office complexes maintain some illumination throughout the night for security and for employees working late. Lighting would also be generated from the 2,000-space parking structure and from vehicles entering and leaving the site. In comparison, the Master Plan would introduce lighting for security within the New Building and proposed subterranean parking garage until the end of classes each day (approximately 10 p.m.). Both the No Project Alternative (2) and the Master Plan would include light-reducing features to minimize lighting spillover onto surrounding properties. Under the No Project Alternative (2), a less-than-significant impact after mitigation would occur with respect to lighting, which would be increased as compared to the Master Plan's less-than-significant impact after mitigation.

Glare

Under the No Project Alternative (2), the amount of glare on the Bundy Campus would increase in association with the facade materials and windows of the three six-story commercial office structures, and vehicles entering and exiting the 2,000-space parking garage. In comparison, the Master Plan would introduce minimal glare to the Bundy Campus in association with the 38,205 sf New Building and increase of approximately 171 parking spaces. Both the No Project Alternative (2) and the Master Plan would include glare-reducing features, such as the use of non-glare materials for building façades, to minimize off-site glare impacts. Under the No Project Alternative (2), a less-than-significant impact after mitigation would occur with respect to glare, which would be slightly increased as compared to the Master Plan's less-than-significant impact after mitigation.

Air Quality

Construction

Under the No Project Alternative (2), the existing approximately 64,000 sf West Building and most of the other existing improvements to the Bundy Campus would be demolished and regraded, the existing approximately 33,000 sf East Building would be renovated, and three six-story buildings (totaling approximately 452,925 sf) and a multi-level parking structure would be constructed on the site. As such, the No Project Alternative (2) would have the potential to generate substantial air quality emissions associated with demolition, renovation, and construction activities. In comparison, the Master Plan would generate air emissions in association with the demolition of the approximately 33,055 sf East Building and the grading, site preparation, and construction associated with the approximately 38,205 sf New Building and new one-level subterranean parking garage. The No Project Alternative (2) would involve buildout of almost the entire 10.4-acre site, as compared to the Master Plan, which would involve construction activities on less than half of the site, with a maximum of approximately two acres under construction at any given time. Therefore, while it is not possible to determine with precision the construction air quality impacts of the No Project Alternative (2), it is likely that this Alternative would exceed construction air quality thresholds even after mitigation. Under the No Project Alternative (2), a significant and unavoidable air quality impact would occur during construction, which would be increased as compared to the Master Plan's less-than-significant impact after mitigation.

Operation

Under the operation of the No Project Alternative (2), approximately 1,728 employees and 2,000 parking spaces (including visitor spaces) would be introduced to the site, which would have the potential to generate air quality emissions in association with the introduction of approximately 5,440 daily vehicle trips. In comparison, the Master Plan would generate air emissions in association with the increase from approximately 16 to 30 classrooms in use on the Bundy Campus, for a total of approximately 5,317 vehicle trips per day under Master Plan buildout. Under the No Project Alternative (2), a less-than-significant air quality impact would occur during operation, which would be increased as compared to the Master Plan's less-than-significant impact.

Hazards and Hazardous Materials

Routine Transport, Use, or Disposal of Hazardous Materials

Under the No Project Alternative (2), the use of hazardous materials onsite would increase with the increase from the existing approximately 64,000 sf of classroom space to 494,100 sf of commercial office space. Likewise, under the Master Plan, an increase in hazardous materials used in association with the increase of approximately 38,205 sf of classroom space would be minimal. Under both the No Project Alternative (2) and the Master Plan, the type of hazardous materials used would continue to consist of typical cleaning, maintenance, and landscaping solvents; however, the amount of hazardous materials used under the No Project Alternative (2) would be increased as compared to the Master Plan due to the increased size of the No Project Alternative (2). Under the No Project Alternative (2), a less-than-

significant impact would occur with respect to routine transport, use, or disposal of hazardous materials, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Accidental Release of Hazardous Materials

Demolition/Construction

Under both the No Project Alternative (2) and the Master Plan, the demolition of the East Building would result in potential exposure of ACM and LBP, requiring mitigation measures to ensure adequate ACM and LBP removal. Under the No Project Alternative (2), a less-than-significant impact after mitigation would occur with respect to accidental release of hazardous materials during construction, which would be similar to the Master Plan's less-than-significant impact after mitigation.

Operation

Under the No Project Alternative (2), approximately 1,728 new employees would be introduced to the site, some of whom may be considered sensitive receptors. In comparison, the Master Plan would introduce additional students, faculty, and staff to the Bundy Campus, many of whom would be considered sensitive receptors. It is unknown whether the No Project Alternative (2) would include a subterranean parking garage; however, in the case of any subterranean excavation, the No Project Alternative (2) would adhere to the same mitigation measures recommended for the Master Plan with respect to subsurface contamination. Under the No Project Alternative (2), a less-than-significant impact after mitigation would occur with respect to accidental release of hazardous materials during operation, which would be similar to the Master Plan's less-than-significant impact after mitigation.

Airport Hazards

The No Project Alternative (2) would introduce three new six-story buildings to the Bundy Campus. In comparison, the Master Plan would replace the existing two-story East Building with a building of similar height but at a lower elevation. Under the No Project Alternative (2), a less-than-significant impact would occur with respect to airport hazards, which would be similar to the Master Plan's less-than-significant impact.

Emergency Response Plan

Construction

Due to the size of the No Project Alternative (2) (i.e., approximately 494,100 sf of commercial floor area), it is likely that this Alternative would require the partial closure of surrounding off-site streets to accommodate utility and/or access improvements necessary for the site to accommodate the new development. In comparison, the Master Plan may be associated with temporary partial street closures to accommodate the potential installation of the traffic signal for the new Northeast Bundy Driveway but would not require off-site street closures for infrastructure upgrades. Under the No Project Alternative (2), a less-than-significant impact would occur with respect to emergency response plans during

construction, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Operation

Both the No Project Alternative (2) and the Master Plan would involve the addition of traffic to existing streets that could potentially affect an emergency response plan. However, the No Project Alternative (2) would introduce a total of approximately 5,440 vehicles to the surrounding street system, as compared to the Master Plan's 5,317 total daily vehicles under Master Plan buildout. Under the No Project Alternative (2) a less than significant impact would occur with respect to emergency response plans, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Hydrology and Water Quality

Depletion of Groundwater Supplies

Neither the No Project Alternative (2) nor the Master Plan would involve any new wells or other activities that could deplete local groundwater supplies. However, the No Project Alternative (2) would increase demand on regional water supplies more than the Master Plan through its introduction of approximately 1,728 new employees to the site as compared to the Master Plan's total of approximately 876 students and 53 faculty and staff on the campus at any given time during buildout. Under the No Project Alternative (2), a less-than-significant impact would occur with respect to groundwater supplies, which would be increased as compared to the Master Plan's less-than-significant impact.

Alteration of Drainage Pattern Resulting in Erosion or Flooding

The No Project Alternative (2) would result in a decrease in the amount of permeable surface area at the Bundy Campus which would be developed with the proposed office buildings and parking structure. In comparison, the Master Plan would increase the permeable surface area of the Bundy Campus in association with landscaping and permeable pavement, which would be expected to reduce erosion and flooding. The No Project Alternative (2) would likely require a new bio swale and watershed detention basin or other stormwater control as a mitigation to prevent runoff from the Bundy Campus from causing off-site flooding and/or erosion. Under the No Project Alternative (2), a less-than-significant impact after mitigation would occur with respect to on- or off-site erosion and flooding, which would be increased as compared to the Master Plan's less-than-significant impact.

Exceed Storm Drain Capacity

As discussed above, the No Project Alternative (2) would result in a decrease in the amount of permeable surface area at the Bundy Campus, while the Master Plan would increase the permeable surface area of the Bundy Campus. As mitigation, the No Project Alternative (2) would likely require a new bio swale and watershed detention basin or other stormwater control to prevent runoff from the Bundy Campus from exceeding the capacity of surrounding storm drains, while Master Plan would require expansion of the existing detention basin on the Bundy Campus. Under the No Project Alternative (2), a less-than-

significant impact after mitigation with respect to existing storm drain capacity would occur, which would be slightly increased as compared to the Master Plan's less-than-significant impact after mitigation.

Produce Polluted Runoff

Construction

The No Project Alternative (2) would involve substantial demolition, grading, renovation, and construction activities, all of which would have the potential to create polluted runoff. In comparison, the Master Plan would involve moderate demolition, grading, and construction. Both Alternatives would implement construction BMPs as mitigation. Under the No Project Alternative (2), a less-than-significant impact after mitigation would occur with respect to polluted runoff during construction, which would be increased as compared to the Master Plan's less-than-significant impact after mitigation.

Operation

Under the No Project Alternative (2), the use of chemicals onsite would slightly increase with the increase from the existing approximately 64,000 sf of classroom space to 494,100 sf of commercial office space. Under the Master Plan, the increase in hazardous materials used in association with the increase of approximately 38,205 sf of classroom space would be minimal. Most chemicals introduced to the site under the No Project Alternative (2) would be associated with the 2,000 on-site parking spaces, and under the Master Plan would be associated with the 780 on-site parking spaces. Both Alternatives would implement operational BMPs as mitigation. Under the No Project Alternative (2), a less-than-significant impact after mitigation would occur with respect to polluted runoff during operation, which would be slightly increased as compared to the Master Plan's less-than-significant-impact after mitigation.

Land Use and Planning

Project Consistency with Land Use Plans/Zoning

The No Project Alternative (2) would introduce 494,100 sf of commercial office uses within the renovated East Building and three six-story structures and would provide 2,000 parking spaces.

With respect to permitted uses and heights under the City of Los Angeles Municipal Code (LAMC), the majority of the site is zoned M1-1 Limited Industrial, while a portion of the east of the site is zoned [Q]CR-1 Limited Commercial and the east, west, and south perimeters of the site are zoned P-1VL Parking. The M1-1 and CR zones would allow the commercial office uses and the heights proposed under the No Project Alternative (2). The P-1VL zone does not allow commercial uses and, furthermore, the "VL" (Very Limited) condition limits development to a maximum of three stories and 45 feet in height. Therefore, six-story commercial structures proposed would need to be constructed within the portions of the site zoned M1-1. Likewise, the Master Plan would be consistent with permitted uses under current zoning.

With respect to density and parking requirements under the LAMC, like the Master Plan, the No Project Alternative (2) would not exceed the 679,536 sf of maximum floor area allowed to be developed on the 10.4-acre Bundy Campus based on a floor area ratio (FAR) of 1.5:1, and would exceed the minimum 988 parking spaces based on the LAMC requirement of two spaces per 1,000 sf of commercial/office floor area (LAMC Sec. 12.21 A 4 (c)).

With respect to the Palms-Mar Vista-Del Rey Community Plan, the No Project Alternative (2) would provide a commercial use and the Master Plan would provide an educational institution, although the Bundy Campus is currently identified for limited industrial uses in the Community Plan. However, the Community Plan permits uses which are allowed in more restrictive zones, such as commercial or educational uses. Like the Master Plan, the No Project Alternative (2) would generally implement other regional and local land use plans.

Overall, the No Project Alternative (2) may require various approvals from local agencies as mitigation prior to implementation. The Master Plan would not require any such approvals. Under the No Project Alternative, a less-than-significant impact after mitigation would occur with respect to land use plans and zoning, which would be increased as compared to the Master Plan's less-than-significant impact.

Project Compatibility with Surrounding Land Uses

The No Project Alternative (2) would introduce 494,100 sf of commercial office uses and 2,000 parking spaces to the site within the renovated East Building, three new six-story structures, and a multi-level parking garage. This development would provide a substantial change from existing uses at the site, which is currently developed with a two-story and a four-story building, providing approximately 64,000 sf of educational space. The introduction of 494,100 sf of commercial office uses could create potential conflicts related to noise, traffic, and other nuisances at surrounding single-family residential neighborhoods to the south, east, and west of the site. In comparison, the Master Plan would not change the current use of the Bundy Campus as an educational institution and would only slightly increase the total classroom area of the site to approximately 100,000 sf, providing uses and intensity of uses more consistent with surrounding single-family residential neighborhoods. It is not likely that the No Project Alternative (2) would be able to mitigate impacts related to land use consistency. Under the No Project Alternative (2), a significant and unavoidable impact would occur with respect to surrounding land use consistency, which would be increased as compared to the Master Plan's less-than-significant impact.

Noise

Construction

The No Project Alternative (2) would involve substantial demolition, grading, renovation, and construction activities that would increase temporary noise and vibration. The No Project Alternative (2) would involve almost entire buildout of the site. Therefore some of the construction activities under this Alternative would likely take place near the property line with neighboring sensitive receptors to the south along Stanwood Place. No sensitive receptors would be affected in the West Building, which would be demolished, and all students would move back to the Main Campus under this Alternative. In

comparison, the Master Plan would involve moderate demolition, grading, and construction. Under the Master Plan, no major construction activities would take immediately adjacent to the property line with neighboring residences to the south along Stanwood Place. The nearest sensitive receptors that would be impacted by noise and vibration from construction of the Master Plan would be neighboring residences approximately 50 feet to the south, and students within the West Building approximately 38 feet to the west, of the construction site for the New Building. Both the No Project Alternative (2) and the Master Plan would implement construction noise and vibration reducing mitigation measures. While it is not possible to determine with precision the construction noise and vibration impacts of the No Project Alternative (2), it is likely that this Alternative would exceed construction noise and, potentially, construction vibration thresholds even after mitigation. Under the No Project Alternative (2), a significant and unavoidable impact with respect to construction noise and, potentially, construction vibration would occur, which would be increased as compared to the Master Plan's (temporary) significant and unavoidable impact with respect to construction noise.

Operation

The No Project Alternative (2) would introduce new office buildings and a multi-level parking structure to the Bundy Campus which would have the potential to create operational noise impacts, and which would require certain noise levels in association with the office uses. However, most noise under the No Project Alternative (2) would be generated in association with the introduction of approximately 5,440 daily vehicle trips. In comparison, the Master Plan would introduce additional students to the Bundy Campus, which would be considered noise-sensitive receptors, new noise generating equipment, and new vehicle noise in association with the total of approximately 5,317 vehicle trips per day under Master Plan buildout. Nonetheless, both the No Project Alternative (2) and the Master Plan would be required to be constructed with materials that keep noise levels as acceptable levels for office and classroom uses, respectively. Under the No Project Alternative (2), a less-than-significant impact after mitigation would occur with respect to operational noise, which would be increased as compared to the Master Plan's less-than-significant impact after mitigation.

Public Utilities (Water, Sewer, Energy)

The No Project Alternative (2) would introduce 494,100 sf of new office floor area to the Bundy Campus, which would increase wastewater generation to approximately 88,938 gpd,[6] water consumption to approximately 84,240 gpd,[7] electricity use to approximately 17,530 kWh of electricity per day,[8] and

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[6] *[494,100 sf x (150 gpd/1,000 sf)]. Based on wastewater generation rates for office buildings provided by the City of Los Angeles Department of Public Works, Bureau of Engineering, Sewer Generation Rates, March 2002.*

[7] *[494,100 sf x (180 gpd/1,000 sf)]. Based on 120 percent of wastewater generation rates for office buildings provided by the City of Los Angeles Department of Public Works, Bureau of Engineering, Sewer Generation Rates, March 2002.*

natural gas use to approximately 32,940 cf of natural gas per day.[9] It is unknown at this time whether the existing utility infrastructure serving the Bundy Campus would be able to accommodate the No Project Alternative (2)'s increase in utility needs; therefore, new or expanded infrastructure may potentially be required as mitigation before implementation of this Alternative. In comparison, the Master Plan would approximately double the number of persons at the Bundy Campus, increasing wastewater generation by approximately 2,253 gpd, increasing water consumption by approximately 2,703 gpd, increasing electricity consumption by approximately 1,209 kWh per day and increasing natural gas consumption by approximately 3,574 cf per day. The existing utility infrastructure serving the Bundy Campus could accommodate this increase in utility needs under the Master Plan. Under the No Project Alternative (2), less-than-significant impacts after mitigation would occur with respect to public utilities, which would be increased as compared to the Master Plan's less-than-significant impacts.

Public Services (Police and Fire Protection)

Police

The No Project Alternative (2) would introduce approximately 1,728 new employees to the Bundy Campus that would have the potential to increase the need for police services in and around the commercial office complex as well as within the multi-level parking structure. In comparison, the Master Plan would slightly increase the demand for police protection services at the Bundy Campus as a result of the increase in student activity and parking onsite. Both the No Project Alternative (2) and the Master Plan would involve the preparation of a security plan, which would include crime prevention specific to commercial and educational uses, respectively. Implementation of the security plan would ensure that the demand for police services would be reduced. Under the No Project Alternative (2), a less-than-significant impact would occur with respect to police protection, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Fire

The No Project Alternative (2) would involve approximately 494,100 sf of office space and a 2,000-space multi-level parking structure on the Bundy Campus that would have the potential to increase the need for fire protection. In comparison, the Master Plan would slightly increase the demand for fire protection services at the Bundy Campus with the 38,205 sf New Building but would reduce the need for fire protection with the demolition of the 33,055 sf East Building. Both the No Project Alternative (2) and the Master Plan would implement fire prevention features recommended by the City of Los Angeles Fire

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[8] *[494,100 sf x (12.95 kWh/sf/year) / 365 days]. Based on electricity generation rates for office uses provided by the South Coast Air Quality Management District, CEQA Air Quality Handbook, 2003, Table A9-11-A.*

[9] *[494,100 sf x (2 cubic feet/sf/ month) / 30 days)]. Based on natural gas generation rates for office uses provided by the South Coast Air Quality Management District, CEQA Air Quality Handbook, 2003, Table A9-12-A.*

Department (LAFD) such that the demand for fire services would be reduced. Under the No Project Alternative (2), a less-than-significant impact would occur with respect to fire protection, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Transportation and Traffic

Intersection Traffic

The No Project Alternative (2) would involve approximately 494,100 sf of office space at the Bundy Campus, which would generate approximately 5,440 daily vehicle trips. In comparison, the Master Plan would increase the number of classrooms at the Bundy Campus from 16 to 30 classrooms in use, resulting in a total of approximately 5,317 daily vehicle trips under Master Plan buildout. Without conducting a comprehensive traffic analysis, it is not certain which intersections, if any, this Alternative may impact. However, because the Master Plan (under all Access Alternatives) would result in significant traffic impacts at four of the 27 study intersections during one or both of the analyzed peak hours in 2010, and the No Project Alternative (2) would slightly increase the number of daily trips generated as compared to the Master Plan at buildout, this Alternative would be expected to result in significant traffic impacts at a minimum of four of the 27 study intersections during one or both of the analyzed peak hours under future conditions.

While the No Project Alternative (2) would generate a slightly increased number of daily trips as compared to the Master Plan, trip generation during the a.m. peak hour would be over 200 percent as high and during the p.m. peak hour would be over 150 percent as high as the Master Plan. This would be expected to result in two or more additional intersection impacts, as compared to the Master Plan. It should also be noted that the Bundy Campus generates substantially reduced traffic on Fridays and during winter, spring, and summer vacations when the campus is closed. However, the offices uses under the No Project Alternative (2) would generate fairly consistent traffic levels Monday through Friday, with little reduction in traffic during typical winter, spring, and summer vacation periods, since employees do not all vacation at the same time.

Furthermore, under the No Project Alternative (2), all programs currently provided within the renovated West Building would be moved back to the Main Campus and those programs slated to move to the New Building under the Master Plan would remain at the Main Campus. Therefore, this Alternative may also result in secondary impacts to intersections in the vicinity of the Main Campus, the precise details for which are unknown at this time. Like the Master Plan, some of these intersection impacts would not be able to be feasibly and effectively mitigated.

Because this Alternative would result in at least as many unmitigated intersections impacts as the Master Plan and may result in additional unmitigated secondary intersection impacts near the Main Campus, this Alternative is anticipated to have increased significant and unavoidable intersections impacts as compared to the Master Plan. Under the No Project Alternative (2), significant and unavoidable impacts would occur with respect to intersection traffic, which would be increased as compared to the Master Plan's significant and unavoidable impacts.

Street Segments

As discussed above, the No Project Alternative (2) would generate approximately 5,440 daily vehicle trips, as compared to the Master Plan's total of approximately 5,317 daily vehicle trips at buildout. Without conducting a comprehensive traffic analysis, it is not certain which street segments, if any, this Alternative may impact. However, because the Master Plan would result in a significant impact at two of the 22 studied street segments under all Access Alternatives, and the No Project Alternative (2) would slightly increase the number of daily trips generated as compared to the Master Plan at buildout, this Alternative would be expected to result in significant traffic impacts at a minimum of two of the 22 study street segments.

Furthermore, under the No Project Alternative (2), all programs currently provided within the renovated West Building would be moved back to the Main Campus and those programs slated to move to the New Building under the Master Plan would remain at the Main Campus. Therefore, this Alternative may also result in secondary impacts to street segments in the vicinity of the Main Campus, the precise details for which are unknown at this time. Like the Master Plan, some of these street segment impacts would not be able to be feasibly and effectively mitigated.

Because this Alternative would result in at least as many unmitigated street segment impacts as the Master Plan and may result in additional unmitigated secondary street segment impacts near the Main Campus, this Alternative is anticipated to have increased significant and unavoidable street segment impacts as compared to the Master Plan. Under the No Project Alternative (2), significant and unavoidable impacts would occur with respect to street segments, which would be increased as compared to the Master Plan's significant and unavoidable impacts.

Regional Transportation System

As discussed above, the No Project Alternative (2) would generate approximately 5,440 daily vehicle trips, as compared to the Master Plan's total of approximately 5,317 daily vehicle trips at buildout. Without conducting a comprehensive traffic analysis, it is not certain whether this Alternative would result in an impact to regional transportation. The Master Plan would not increase traffic such that a significant impact would be triggered at CMP arterial monitoring locations, CMP freeway monitoring locations, or on the CMP bus system. Therefore, because the No Project Alternative (2) would only slightly increase the number of daily trips generated as compared to the Master Plan at buildout, this Alternative (2) would not be expected to have a significant impact with respect to the regional transportation system. Under the No Project Alternative (2), a less-than-significant impact would occur with respect to the regional transportation system, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Parking

The No Project Alternative (2) would provide approximately 494,100 sf of commercial office space and 2,000 parking spaces within an above-grade or subterranean parking garage. These 2,000 spaces would exceed the minimum 988 parking spaces based on the LAMC requirement of two spaces per 1,000 sf of

commercial/office floor area (LAMC Sec. 12.21 A 4 (c)), and would be expected to meet the parking demand of the 1,728 future office employees. Without conducting a comprehensive parking analysis, it is not certain whether this Alternative would meet the parking demand of the 1,728 future employees in addition to visitors to the proposed office uses; therefore, a parking analysis would need to be prepared for this Alternative. In comparison, the Master Plan would introduce a peak need of approximately 765 spaces and would provide a total of approximately 780 on-site parking spaces within surface and subterranean parking. Under the No Project Alternative (2), a less-than-significant impact would occur with respect to parking, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Neighborhood Effects

As discussed throughout this Section, the No Project Alternative (2) would have impacts ranging from less than significant to significant unavoidable for each of the environmental issue areas analyzed, with significant and unavoidable impacts occurring for Air Quality (Construction and Operation), Aesthetics (Views), Noise (Construction), and Transportation and Traffic (Intersections and Street Segments). In comparison, the Master Plan would have environmental impacts ranging from less than significant to significant and unavoidable, with significant and unavoidable impacts occurring for Noise (Construction) and Transportation and Traffic (Intersections and Street Segments). Overall, the No Project Alternative (2) would have increased impacts with respect to neighborhood effects as compared to the Master Plan's impacts.

No Project Alternative (3)

Aesthetics

Post-Project Views

Under the No Project Alternative (3), most of the existing improvements on the Bundy Campus, including the four-story West Building and two-story East Building, would be demolished and replaced with several six-story buildings providing 625 multi-family residential units and a new multi-level parking structure. Under this Alternative, the six-story buildings are expected to block or impair westerly public views from locations along Bundy Drive, westerly public and private views from Grand View Boulevard and other streets east of Bundy Drive, northerly private views from the residences along Stanwood Place and Stewart Street, and southerly public views from locations along Airport Avenue. In comparison, the Master Plan would open up views from Bundy Drive by demolishing the East Building and constructing the New Building closer to the center of the campus. Under the No Project Alternative (3), it is assumed that there would be no feasible and effective mitigation for impacts to views. Under the No Project Alternative (3) a significant and unavoidable impact to post-project views would occur, which would be increased as compared to the Master Plan's less-than-significant impact.

Visual Character

Under the No Project Alternative (3), the Bundy Campus would be substantially altered as the Bundy Campus would be replaced with a multi-family residential complex resulting in a substantial increase in building masses and heights, reduction in permeable surface area, and increase in parking areas. In comparison, the Master Plan would replace the existing East Building with a New Building adjacent to the West Building and would provide landscaping improvements throughout the campus. Nonetheless, with adherence to careful design standards ensured through mitigation, the No Project Alternative (3) could reduce impacts to visual character. Under the No Project Alternative (3), impacts related to visual character would be less-than-significant after mitigation, which would be increased as compared to the Master Plan's less-than-significant impact.

Lighting

Under the No Project Alternative (3), the levels of lighting needed to illuminate the Bundy Campus would increase in association with the increase from approximately 64,000 sf of existing classroom space to approximately 625 multi-family residential units. Multi-family residential buildings typically generate substantial lighting throughout the night in association with outside security and direction lighting and indoor building illumination. Lighting would also be generated from the 1,250-space parking structure and from vehicles entering and leaving the site. In comparison, the Master Plan would introduce lighting for security within the New Building and proposed subterranean parking garage until the end of classes each day (approximately 10 p.m.). Both the No Project Alternative (3) and the Master Plan would include light-reducing features to minimize light travel onto surrounding properties. However, due to the substantial amount of lighting generated by multi-family residential structures, lighting impacts are assumed to remain significant under No Project Alternative (3). Under the No Project Alternative (3), a significant and unavoidable impact would occur with respect to lighting, which would be increased as compared to the Master Plan's less-than-significant impact after mitigation.

Glare

Under the No Project Alternative (3), the amount of glare on the Bundy Campus would increase, primarily in association with vehicles entering and exiting the 1,250-space parking garage. In comparison, the Master Plan would introduce minimal glare to the Bundy Campus in association with the 38,205 sf New Building and increase in approximately 171 parking spaces. Both the No Project Alternative (3) and the Master Plan would include glare-reducing features, such as the use of non-glare materials for building façades, to minimize off-site glare impacts. Under the No Project Alternative (3), a less-than-significant impact would occur after mitigation with respect to glare, which would be increased as compared to the Master Plan's less-than-significant impact after mitigation.

Air Quality

Construction

Under the No Project Alternative (3), the all of the existing structures and improvements to the Bundy Campus (including both the East and West Buildings) would be demolished, the site regraded, and 625 new multi-family residential units and a 1,250-space multi-level parking structure would be constructed. As such, the No Project Alternative (3) would have the potential to generate substantial air quality emissions associated with demolition, grading, and construction activities. In comparison, the Master Plan would generate air emissions in association with the demolition of the approximately 33,055 sf East Building and the grading, site preparation, and construction associated with the approximately 38,205 sf New Building and new one-level subterranean parking garage. The No Project Alternative (3) would involve the buildout of almost the entire 10.4-acre site, as compared to the Master Plan, which would involve construction activities on less than half of the site, with a maximum of approximately two acres under construction at any given time. Therefore, while it is not possible to determine with precision the construction air quality impacts of the No Project Alternative (3), it is assumed that this Alternative would exceed construction air quality thresholds even after mitigation. Under the No Project Alternative (3), a significant and unavoidable air quality impact would occur during construction, which would be increased as compared to the Master Plan's less-than-significant impact after mitigation.

Operation

Under the operation of the No Project Alternative (3), approximately 1,413 residents and 1,250 parking spaces (including visitor spaces) would be introduced to the site, which would have the potential to generate air quality emissions in association with the introduction of approximately 4,200 daily vehicle trips. In comparison, the Master Plan would generate air emissions in association with the increase from approximately 16 to 30 classrooms in use on the Bundy Campus, for a total of approximately 5,317 vehicle trips per day at buildout. Therefore, while it is not possible to determine with precision the operational air quality impacts of the No Project Alternative (3), it is assumed that this Alternative would result in reduced operational air quality impacts. Under the No Project Alternative (3), a less-than-significant air quality impact would occur during operation, which would be reduced as compared to the Master Plan's less-than-significant impact.

Hazards and Hazardous Materials

Routine Transport, Use, or Disposal of Hazardous Materials

Under the No Project Alternative (3), the use of hazardous materials onsite would increase with the increase from the existing approximately 64,000 sf of classroom space to 625 multi-family residential units. Under the Master Plan, an increase in hazardous materials used in association with the increase of approximately 38,205 sf of classroom space would be minimal. Under both the No Project Alternative (3) and the Master Plan, the type of hazardous materials used would continue to consist of typical cleaning, maintenance, and landscaping solvents; however, the amount of hazardous materials used under the No Project Alternative (3) would be increased as compared to the Master Plan due the increased size

of the No Project Alternative (3). Under the No Project Alternative (3), a less-than-significant impact would occur with respect to routine transport, use, or disposal of hazardous materials, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Accidental Release of Hazardous Materials

Demolition/Construction

Under both the No Project Alternative (3) and the Master Plan, the demolition of the East Building would have the potential for exposure to ACM and LBP, requiring mitigation to ensure adequate ACM and LBP removal. Under the No Project Alternative (3), a less-than-significant impact after mitigation would occur with respect to accidental release of hazardous materials during construction, which would be similar to the Master Plan's less-than-significant impact after mitigation.

Operation

Under the No Project Alternative (3), approximately 1,413 new residents would be introduced to the site, many of whom may be considered sensitive receptors. Likewise, the Master Plan would introduce additional students, faculty, and staff to the Bundy Campus, many of whom would be considered sensitive receptors. It is unknown whether the No Project Alternative (3) would include a subterranean parking garage; however, in the case of any subterranean excavation, the No Project Alternative (3) would adhere to the same mitigation measures recommended for the Master Plan with respect to subsurface contamination. Under the No Project Alternative (3), a less-than-significant impact after mitigation would occur with respect to accidental release of hazardous materials during operation, which would be similar to the Master Plan's less-than-significant impact after mitigation.

Airport Hazards

The No Project Alternative (3) would introduce several six-story buildings to the Bundy Campus. In comparison, the Master Plan would replace the existing two-story East Building with a building of similar height but at a lower elevation. Under the No Project Alternative (3), a less-than-significant impact would occur with respect to airport hazards, which would be similar to the Master Plan's less-than-significant impact.

Emergency Response Plan

Construction

Due to the size of the No Project Alternative (3) (i.e., approximately 625 multi-family residential units), it is likely that this Alternative may require the partial closure of surrounding streets to accommodate utility and/or access improvements necessary for the site to accommodate the new development. In comparison, the Master Plan may be associated with temporary partial street closures to accommodate the potential installation of the traffic signal for the new Northeast Bundy Driveway but would not require off-site infrastructure upgrades. Under the No Project Alternative (3), a less-than-significant impact would occur

with respect to emergency response plans during construction, which would be slightly increased as compared to the proposed Master Plan's less-than-significant impact.

Operation

Both the No Project Alternative (3) and the Master Plan would involve the addition of traffic to existing streets that could potentially affect an emergency response plan. However, the No Project Alternative (3) would introduce a total of approximately 4,200 daily vehicles to the surrounding street system, as compared to the Master Plan's total of approximately 5,317 vehicles at buildout. Under the No Project Alternative (3) a less than significant impact would occur with respect to emergency response plans, which would be reduced as compared to the Master Plan's less-than-significant impact.

Hydrology and Water Quality

Depletion of Groundwater Supplies

Neither the No Project Alternative (3) nor the Master Plan would involve any new wells or other activities that could deplete local groundwater supplies. However, the No Project Alternative (3) would increase demand on regional water supplies more than the Master Plan through its introduction of approximately 1,413 new residents to the site as compared to the Master Plan's total of approximately 876 students and 53 faculty and staff on the campus at any given time during buildout. Under the No Project Alternative (3), a less-than-significant impact would occur with respect to groundwater supplies, which would be increased as compared to the Master Plan's less-than-significant impact.

Alteration of Drainage Pattern Resulting in Erosion or Flooding

The No Project Alternative (3) would result in a decrease in the amount of permeable surface area at the Bundy Campus, which would be developed with multi-family residential buildings and a parking structure. In comparison, the Master Plan would increase the permeable surface area of the Bundy Campus in association with landscaping and permeable pavement, which would be expected to reduce erosion and flooding. The No Project Alternative (3) would likely require a new bio swale and watershed detention basin or other stormwater control as mitigation to prevent runoff from the Bundy Campus from causing off-site flooding and/or erosion. Under the No Project Alternative (3), a less-than-significant impact after mitigation would occur with respect to on- or off-site erosion and flooding, which would be increased as compared to the Master Plan's less-than-significant impact.

Exceed Storm Drain Capacity

As discussed above, the No Project Alternative (3) would result in a decrease in the amount of permeable surface area at the Bundy Campus, while the Master Plan would increase the permeable surface area of the Bundy Campus. The No Project Alternative (3) would likely require a new bio swale and watershed detention basin or other stormwater control as mitigation to prevent runoff from the Bundy Campus from exceeding the capacity of surrounding storm drains, while the Master Plan would require expansion of the existing detention basin on the Bundy Campus. Under the No Project Alternative (3), a less-than-

significant impact after mitigation would occur with respect to existing storm drain capacity, which would be slightly increased as compared to the Master Plan's less-than-significant-impact after mitigation.

Produce Polluted Runoff

Construction

The No Project Alternative (3) would involve substantial demolition, grading, and construction activities, all of which would have the potential to create polluted runoff. In comparison, the Master Plan would involve moderate demolition, grading, and construction. Both the No Project Alternative (3) and the Master Plan would implement BMPs as mitigation. Under the No Project Alternative (3), a less-than-significant impact after mitigation would occur with respect to polluted runoff during construction, which would be increased as compared to the Master Plan's less-than-significant impact after mitigation.

Operation

Under the No Project Alternative (3), the use of chemicals onsite would slightly increase with the increase from the existing approximately 64,000 sf of classroom space to 625 multi-family residential units. Under the Master Plan, the increase in hazardous materials used in association with the increase of approximately 38,205 sf of classroom space would be minimal. Most chemicals introduced to the site under the No Project Alternative (3) would be associated with the 1,250 on-site parking spaces, and under the Master Plan would be associated with the 780 on-site parking spaces. Both the No Project Alternative (3) and the Master Plan would implement operational BMPs as mitigation. Under the No Project Alternative (3), a less-than-significant impact after mitigation would occur with respect to polluted runoff during operation, which would be slightly increased as compared to the Master Plan's less-than-significant impact after mitigation.

Land Use and Planning

Project Consistency with Land Use Plans/Zoning

The No Project Alternative (3) would introduce 625 multi-family residential units and would provide 1,250 parking spaces.

With respect to permitted uses and heights under the LAMC, the majority of the site is zoned M1-1 Limited Industrial, while a portion of the east of the site is zoned [Q]CR-1 Limited Commercial and the east, west, and south perimeters of the site are zoned P-1VL Parking. The M1-1 zone allows for multi-family residential uses and does not restrict height; therefore, the multi-family residential structures could be developed on the portion of the site zoned M1-1. The [Q]CR-1 does not restrict height; however, the "Q" (Qualified Classification) prohibits most residential uses. The P-1VL zone does not allow residential uses and, furthermore, the "VL" (Very Limited) condition limits development to a maximum of three stories and 45 feet in height. Therefore, multi-family residential structures proposed would need to be constructed within the portions of the site zoned M1-1. Likewise, the Master Plan would be consistent with permitted uses under current zoning.

With respect to density and parking requirements under the LAMC, like the Master Plan, the No Project Alternative (3) would not be expected to exceed the 679,536 sf of maximum floor area allowed to be developed on the 10.4-acre Bundy Campus based on the FAR of 1.5:1, would meet the minimum 1,250 parking spaces based on the LAMC requirement of two spaces per dwelling unit of more than three habitable rooms (LAMC Sec. 12.21 A 4 (a).

With respect to the Palms-Mar Vista-Del Rey Community Plan, the No Project Alternative (3) would provide multi-family residential uses and the Master Plan would provide an educational institution, although the Bundy Campus is currently identified for limited industrial uses in the Community Plan. However, the Community Plan permits uses which are allowed in more restrictive zones, such as multi-family residential and educational uses. Like the Master Plan, the No Project Alternative (3) would generally implement other regional and local land use plans.

Overall, the No Project Alternative (3) may require other approvals from local agencies as mitigation prior to implementation. The Master Plan would not require any such approvals. Under the No Project Alternative, a less-than-significant impact after mitigation would occur with respect to land use plans and zoning, which would be increased as compared to the Master Plan's less-than-significant impact.

Project Compatibility with Surrounding Land Uses

The No Project Alternative (3) would introduce 625 multi-family residential units and 1,250 parking spaces to the site within several new six-story structures and a multi-level parking garage. This development would provide a substantial change from existing uses at the site, which is currently developed with a two-story and a four-story building, providing approximately 64,000 sf of educational space. The introduction of 625 multi-family residential units could create potential conflicts related to noise and other nuisances for future residents of the No Project Alternative (3) due to the proximity of the multi-family residences to the airport-related industrial uses to the north of the site. Likewise, the introduction of 625 multi-family residential units could create potential conflicts related to lighting, noise, and other nuisances at surrounding single-family residences to the south, east, and west of the site. In comparison, the Master Plan would not change the current use of the Bundy Campus as an educational institution and would only slightly increase the total classroom area of the site to approximately 100,000 sf, providing uses and intensity of uses more consistent with surrounding airport and single-family residential neighborhoods. Under the No Project Alternative (3), a less-than-significant impact would occur with respect to surrounding land use consistency, which would be increased as compared to the Master Plan's less-than-significant impact.

Noise

Construction

The No Project Alternative (3) would involve substantial demolition, grading, and construction activities that would increase temporary noise and vibration. The No Project Alternative (3) would involve almost entire buildout of the site. Therefore some of the construction activities under this Alternative would likely take place near the property line with neighboring sensitive receptors to the south along Stanwood

Place. No sensitive receptors would be affected in the West Building, which would be demolished, and as all students would move back to the Main Campus under this Alternative. In comparison, the Master Plan would involve moderate demolition, grading, and construction. Under the Master Plan, no major construction activities would take place immediately adjacent to the property line with neighboring residences to the south along Stanwood Place. The nearest sensitive receptors that would be impacted by noise and vibration from construction of the Master Plan would be neighboring residences approximately 50 feet to the south, and students within the West Building approximately 38 feet to the west, of the construction site for the New Building. Both the No Project Alternative (3) and the Master Plan would implement construction noise and vibration reducing measures. Under the No Project Alternative (3), a significant and unavoidable impact would occur with respect to construction noise, and potentially, construction vibration, which would be increased as compared to the Master Plan's (temporary) significant and unavoidable impact with respect to construction noise.

Operation

The No Project Alternative (3) would introduce new multi-family residential units and a multi-level parking structure to the Bundy Campus which would have the potential to create operational noise impacts, and which would require certain noise levels in association with the multi-family residential uses. However, most noise under the No Project Alternative (3) would be generated in association with the introduction of approximately 4,200 daily vehicle trips. In comparison, the Master Plan would introduce additional students to the Bundy Campus, which would be considered noise-sensitive receptors, new noise generating equipment, and new vehicle noise in association with the total of approximately 5,317 vehicle trips per day at buildout. Nonetheless, both the No Project Alternative (3) and the proposed New Building would be required to be constructed with materials that keep noise levels at acceptable levels for residential and classroom uses, respectively. Under the No Project Alternative (3), a less-than-significant impact after mitigation would occur with respect to operational noise, which would be reduced as compared to the Master Plan's less-than-significant impact after mitigation.

Public Utilities (Water, Sewer, Energy)

The No Project Alternative (3) would introduce 625 multi-family residential units to the Bundy Campus, which would increase wastewater generation to approximately 100,000 gpd,[10] water consumption to approximately 120,000 gpd,[11] electricity use to approximately 9,634 kWh of electricity per day,[12] and

[10] *[625 du x (160 gpd/du)]. Based on wastewater generation rates for two-bedroom multi-family residential units provided by the City of Los Angeles Department of Public Works, Bureau of Engineering, Sewer Generation Rates, March 2002.*

[11] *[625 du x (192 gpd/du)]. Based on 120 percent of wastewater generation rates for two-bedroom multi-family residential units provided by the City of Los Angeles Department of Public Works, Bureau of Engineering, Sewer Generation Rates, March 2002.*

natural gas use to approximately 83,573 cf of natural gas per day.[13] It is unknown at this time whether the existing utility infrastructure serving the Bundy Campus would be able to accommodate the No Project Alternative (3) increase in utility needs; therefore, new or expanded infrastructure could potentially be required under this Alternative, which would become a mitigation required before implementation. In comparison, the Master Plan would approximately double the number of persons at the Bundy Campus, increasing wastewater generation by approximately 2,253 gpd, increasing water consumption by approximately 2,703 gpd, increasing electricity consumption by approximately 1,209 kWh per day, and increasing natural gas consumption by approximately 3,574 cf per day. The existing utility infrastructure serving the Bundy Campus could accommodate this increase in utility needs under the Master Plan. Under the No Project Alternative (3), less-than-significant impacts after mitigation would occur with respect to public utilities, which would be increased as compared to the Master Plan's less-than-significant impacts.

Public Services (Police and Fire Protection)

Police

The No Project Alternative (3) would introduce approximately 1,413 new residents to the Bundy Campus that would have the potential to increase the need for police services in and around the multi-family residential buildings as well as within the multi-level parking structure. In comparison, the Master Plan would slightly increase the demand for police protection services at the Bundy Campus as a result of the increase in student activity and parking onsite. Both the No Project Alternative (3) and the Master Plan would involve the preparation of a security plan, which would include crime prevention features specific to residential and educational uses, respectively. Implementation of the security plan would ensure that the demand for police services would be reduced. Under the No Project Alternative (3), a less-than-significant impact would occur with respect to police protection, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Fire

The No Project Alternative (3) would involve approximately 625 multi-family residential units and a 1,250-space multi-level parking structure on the Bundy Campus that would have the potential to increase the need for fire protection. In comparison, the Master Plan would slightly increase the demand for fire protection services at the Bundy Campus with the 38,205 sf New Building but would reduce the need for fire protection with the demolition of the 33,055 sf East Building. Both the No Project Alternative (3)

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[12] *[625 du x (5,626.5 kWh/du/year) / 365 days]. Based on electricity generation rates for residential uses provided by the South Coast Air Quality Management District, CEQA Air Quality Handbook, 2003, Table A9-11-A.*

[13] *[625 du x (4,011.5 cubic feet/du/month) / 30 days)]. Based on natural gas generation rates for office uses provided by the South Coast Air Quality Management District, CEQA Air Quality Handbook, 2003, Table A9-12-A.*

and the Master Plan would implement fire prevention features recommended by the LAFD such that the demand for fire services would be reduced. Under the No Project Alternative (3), a less-than-significant impact would occur with respect to fire protection, which would be slightly increased as compared to the Master Plan's less-than-significant impact.

Transportation and Traffic

Intersection Traffic

The No Project Alternative (3) would involve approximately 625 multi-family residential units at the Bundy Campus, which would generate approximately 4,200 daily vehicle trips. In comparison, the Master Plan would increase the number of classrooms at the Bundy Campus from 16 to 30 classrooms in use, resulting in a total of approximately 5,317 daily vehicle trips at buildout. Without conducting a comprehensive traffic analysis, is not certain which intersections, if any, this Alternative may impact. However, because the Master Plan (under all Access Alternatives) would result in significant traffic impacts at four of the 27 study intersections during one or both of the analyzed peak hours in 2010, and the No Project Alternative (3) would reduce trip generation by approximately 21 percent as compared to the Master Plan's daily trips generated, this Alternative would be expected to result in significant traffic impacts at up to four of the 27 study intersections during one or both of the analyzed peak hours under future conditions.

While the No Project Alternative (3) would generate approximately 21 percent fewer daily trips as compared to the Master Plan, the No Project Alternative (3) would only generate approximately 10 percent fewer trips in the a.m. and p.m. peak hours, as compared to the Master Plan. Therefore, the same intersections impacted under the Master Plan would be expected to be impacted under this Alternative. It should also be noted that the Bundy Campus generates substantially reduced traffic on Fridays and during winter, spring, and summer vacations when the campus is closed. However, the multi-family residential uses under the No Project Alternative (3) would generate fairly consistent traffic levels Monday through Friday, with little reduction in traffic during typical winter, spring, and summer vacation periods, since residents do not all vacation at the same time.

Furthermore, under the No Project Alternative (3), all programs currently provided within the renovated West Building would be moved back to the Main Campus and those programs slated to move to the New Building under the Master Plan would remain at the Main Campus. Therefore, this Alternative may result in secondary impacts to intersections in the vicinity of the Main Campus, the precise details for which are unknown at this time. Like the Master Plan, it is expected that some of these secondary intersection impacts would not be able to be feasibly and effectively mitigated.

Because this Alternative would result in approximately as many unmitigated intersections impacts as the Master Plan and may result in additional unmitigated secondary intersection impacts near the Main Campus, this Alternative is anticipated to have increased significant and unavoidable intersections impacts as compared to the Master Plan. Under the No Project Alternative (3), significant and

unavoidable impacts would occur with respect to intersection traffic, which may be increased as compared to the Master Plan's significant and unavoidable impacts.

Street Segments

As discussed above, the No Project Alternative (3) would generate approximately 4,200 daily vehicle trips, as compared to the Master Plan's total of approximately 5,317 daily vehicle trips at buildout. Without conducting a comprehensive traffic analysis, it is not certain which street segments, if any, this Alternative may impact. The Master Plan would result in a significant impact at two of the 22 studied street segments under all Access Alternatives. The No Project Alternative (3) would reduce trip generation by approximately 21 percent as compared to the Master Plan's daily trips generated. However, because the significance threshold for these two street segments is one additional vehicle trip per day, this Alternative would be expected to result in significant traffic impacts at two of the 22 study street segments.

However, under the No Project Alternative (3), all programs currently provided within the renovated West Building would be moved back to the Main Campus and those programs slated to move to the New Building under the Master Plan would remain at the Main Campus. Therefore, this Alternative may also result in secondary impacts to street segments in the vicinity of the Main Campus, the precise details for which are unknown at this time. Like the Master Plan, it is expected that some of these secondary street segment impacts would not be able to be feasibly and effectively mitigated.

Because this Alternative would result in at least as many unmitigated street segment impacts as the Master Plan and may result in additional unmitigated secondary street segment impacts near the Main Campus, this Alternative is anticipated to have increased significant and unavoidable street segment impacts as compared to the Master Plan. Under the No Project Alternative (3), significant and unavoidable impacts would occur with respect to street segments, which may be increased as compared to the Master Plan's significant and unavoidable impacts.

Regional Transportation System

As discussed above, the No Project Alternative (3) would generate approximately 4,200 daily vehicle trips, as compared to the Master Plan's total of approximately 5,317 daily vehicle trips at buildout. Without conducting a comprehensive traffic analysis, it is not certain whether this Alternative would result in an impact to regional transportation. However, the Master Plan would not increase traffic such that a significant impact would be triggered at CMP arterial monitoring locations, at CMP freeway monitoring locations, or on the CMP bus system. Therefore, because the No Project Alternative (3) would reduce trip generation by approximately 21 percent as compared to the Master Plan's daily trips generated, this Alternative would not be expected to have a significant impact with respect to the regional transportation system. Under the No Project Alternative (3), a less-than-significant impact would occur with respect to the regional transportation system, which would be reduced as compared to the Master Plan's less-than-significant impact.

Parking

The No Project Alternative (3) would provide approximately 625 multi-family residential units and 1,250 parking spaces within an above-grade or subterranean parking garage. These 1,250 spaces would meet the minimum 1,250 parking spaces based on the LAMC requirement of two spaces per dwelling unit of more than three habitable rooms (LAMC Sec. 12.21 A 4 (a). Without conducting a comprehensive parking analysis, it is not certain whether this Alternative would meet the parking demand of the 1,413 future residents; therefore, a parking analysis would need to be prepared for this Alternative. In comparison, the Master Plan would introduce a peak need of approximately 765 spaces and would provide a total of approximately 780 on-site parking spaces within surface and subterranean parking. Under the No Project Alternative (3), a less-than-significant impact would occur with respect to parking, which would be increased as compared to the Master Plan's less-than-significant impact.

Neighborhood Effects

As discussed throughout this Section, the No Project Alternative (3) would have impacts ranging from less than significant to significant and unavoidable for each of the environmental issue areas analyzed, with significant and unavoidable impacts occurring for Air Quality (Construction and Operation), Aesthetics (Views and Light), Noise (Construction), and Transportation and Traffic (Intersections, and Street Segments). In comparison, the Master Plan would have environmental impacts ranging from less than significant to significant and unavoidable, with significant and unavoidable impacts occurring for Noise (Construction) and Transportation and Traffic (Intersections and Street Segments). Overall, the No Project Alternative (3) would have increased impacts with respect to neighborhood effects as compared to the Master Plan's impacts.