

VERSION 1

PEPPERDINE UNIVERSITY

**The Campus Life Project: The Next Step in Fulfilling our
Long Range Development Plan**

LRDP Amendment 1-11, Part B

THESE MATERIALS HAVE BEEN PROVIDED TO COASTAL COMMISSION STAFF

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- Pepperdine strongly disagrees with the Staff's recommendations that the existing field and lights were not permitted
 - The existing field and lights were installed pursuant to three CDPs approved by the Commission in the early 1980s; the Commission subsequently certified the existing facility and its lighting in 1990, 1998, and 2012
 - The LRDP encompassed all on-the-ground development at the time of its certification in 1990
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds do not withstand scientific scrutiny
 - Pepperdine used a highly conservative threshold to measure potential impacts; the Commission has previously relied on the 0.1 fc threshold previously and it is consistent with IESNA recommendations
 - The EIR and Pepperdine's supplemental, site-specific biological analysis concluded that the lights would not adversely impact any sensitive resources
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- By mutual agreement with Staff, Pepperdine divided its LRDP Amendment 1-11 into two parts (Part A and Part B); the Commission unanimously approved Part A in December 2012
- Part B is a focused review of three elements of the approved Enhanced Recreation Area:
 - Replacement of the existing unshielded "flood lights" with state-of-the-art, shielded fixtures
 - Confirmation of east-west field configuration as requested by Coastal Staff
 - Specific location of the approved small restroom/storage facility

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Aerial View of
Approved
Enhanced
Recreation Area,
Proposed
Light/Restroom
Locations, and
Field Orientation

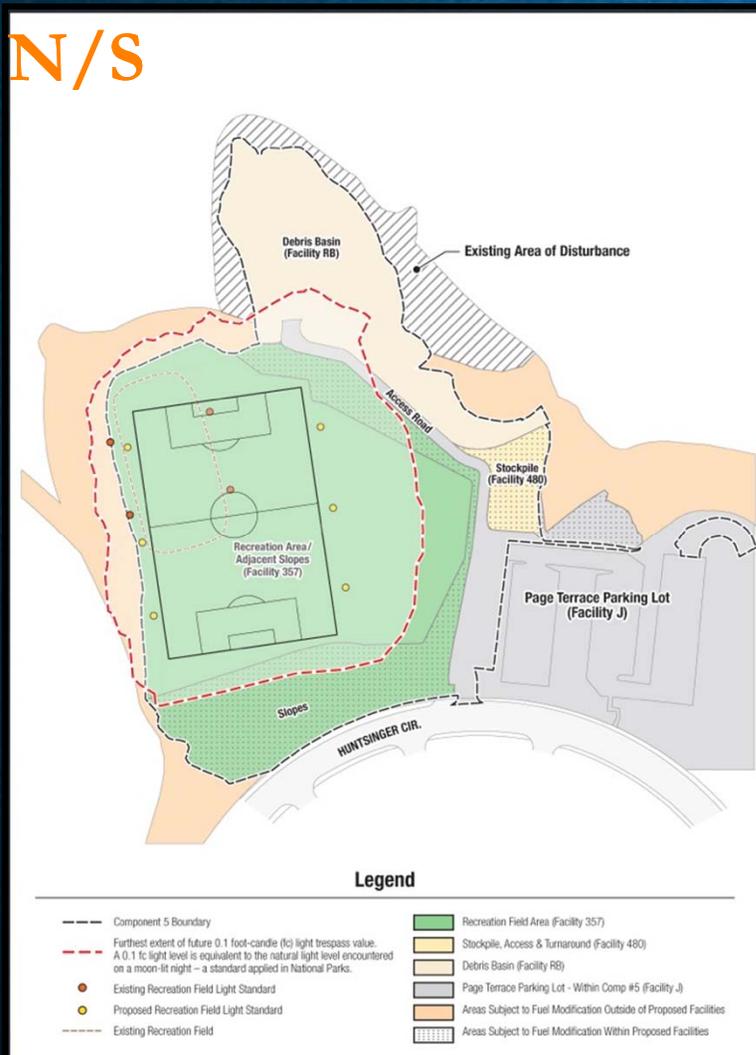


Aerial View of the Proposed Lights Within the Developed Campus Core



Recreation Field Orientation

- Pepperdine would agree to orient the proposed Recreation Field in Staff's preferred "east-west" configuration
- The E/W orientation focuses light further south towards Huntsinger Circle; in this orientation the field would be surrounded by developed and disturbed areas



Importance to Campus Community

- The Campus Life Project provides much needed enhancements to on-campus amenities
- The approved Enhanced Recreation Area will provide all students with safe recreational space for physical health and building community
- Night lighting is critical for all students to enjoy the facility
 - Student days are filled with ever expanding class loads, volunteering, internships, clubs, jobs, etc.
 - **The University has a critical need for additional recreational field space**, and without night lighting, a significant percentage of the Campus's young men and woman will lose the already limited opportunity to recreate and participate in intramural or club sports

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Project Need

- The existing field at the site of the approved Enhanced Recreation Area is Pepperdine's only lighted recreational field space
 - This is already significantly deficient when compared with peer institutions
- Key objectives of the Campus Life Project include:
 - Provide an enhanced recreation facility including a lighted field to alleviate the overcrowded conditions
 - Provide needed outdoor recreation field within the existing developed campus
- Without approval of Part B, Pepperdine would be forced to continue using the existing undersized, flood-lit field

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Lighted Fields at Peer Institutions

Institution	Lighted Recreational Field Area (acres)*
Pepperdine University	0.46
Loyola Marymount University	3.05
University of California Los Angeles	7.33
University of California Santa Barbara	5.32
University of the Pacific	1.93
Saint Mary's College	1.73
University of San Diego	3.57
University of San Francisco	1.70
Santa Clara University	3.13
University of California San Diego	10.78
University of California Berkeley	5.19
California State University Long Beach	8.63
Stanford University	5.13

* Information compiled by Envicom Corporation August 2013.

Enhanced Recreation Area Lighting Design

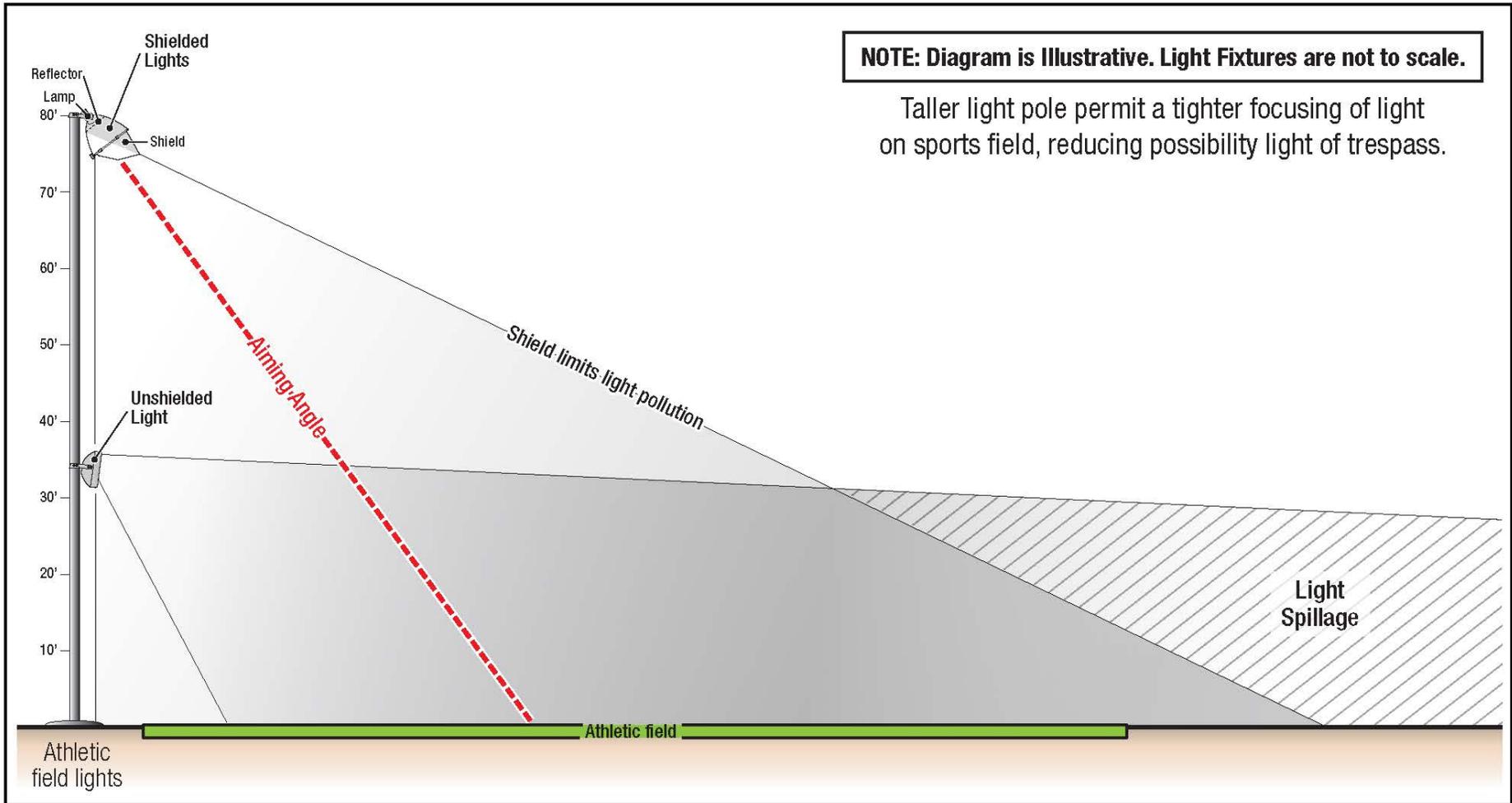
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- Proposed lighting features state-of-the-art technology designed to prevent or minimize all forms of light pollution including glare, light trespass, and sky glow
 - The proposed cutoff, angled, and shielded fixtures will direct light onto the field rather than into natural areas and the night sky
 - Would utilize the same advanced fixtures approved by the Commission for the soccer field in Part A
 - Lighting levels would be lower than soccer field due to proposed recreational use
- Would improve existing conditions by replacing the existing, non-cutoff, non-shielded flood lights



Existing Recreation Lighting Proposed for Replacement





Revised: Sep. 23, 2013

Consistency with the LRDP Lighting Policy

- When approving Part A, the Commission proposed a comprehensive LRDP "Lighting Policy," which the University adopted
- The proposed lights fully comply with the terms and intent of the Policy. The lights are:
 - "Qualite" or a superior, state-of-the-art technology designed to dark-sky-compatible standards
 - Minimized, directed downward, and shielded using the best available visor technology and pole height design to minimize light spill, sky glow, and glare
 - Designed to minimize light trespass into adjacent non-target areas, and to limit the illumination of adjacent open space and sensitive habitat areas

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Reducing Lighting Impacts

- The EIR lighting study determined there would be no significant light trespass or glare impacts
 - The EIR used a highly conservative 0.1 fc line to measure impacts in the vicinity of the proposed field; Pepperdine's Campus is actually registered as a CEC "Lighting Zone 3," associated with a 0.8 fc threshold level
- For LRDP Amendment 1-11, Pepperdine conducted a supplemental analysis finding:
 - No light trespass greater than 0.1 fc will occur in undisturbed, naturally vegetated or habitat areas
- The 0.1 footcandle (fc) level is the most conservative threshold used in past Commission precedent
 - Staff Biologist Dr. Engel stated in 2011: "[T]he significance threshold for spill light upon sensitive resources is 0.1 [fc] at any receptor location"
 - Dr. Engel agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit

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Legend

- Pepperdine University Property Boundary
- Limit of 0.1 foot candles
- Limit of 0.01 foot candles



Reducing Sky Glow Impacts

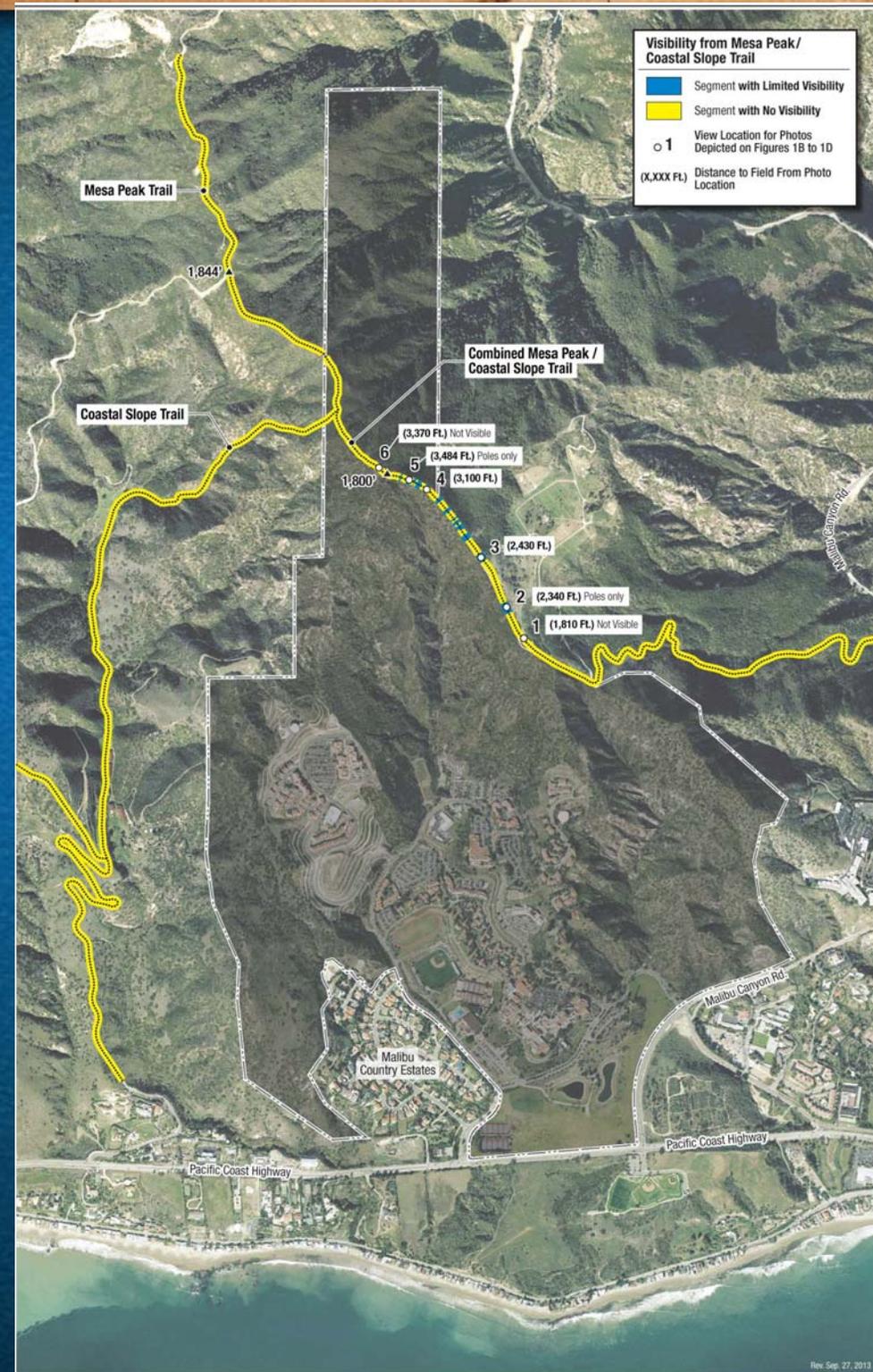
- The lighting incorporates principles and recommendations provided by the International Dark Sky Association and Illuminating Engineering Society of North America to prevent or minimize sky glow and protect Coastal resources
- Light emitted between 80 and 100 degrees has the greatest effect on sky glow
 - The new fixtures will emit light between 16 and 62 degrees, which is far less likely to result in sky glow than conventional lights
 - The existing flood lights emit light at ~ 80 degrees
- If approved, replacement of the existing recreational field lighting along with the Campus globe lights would ***reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%***

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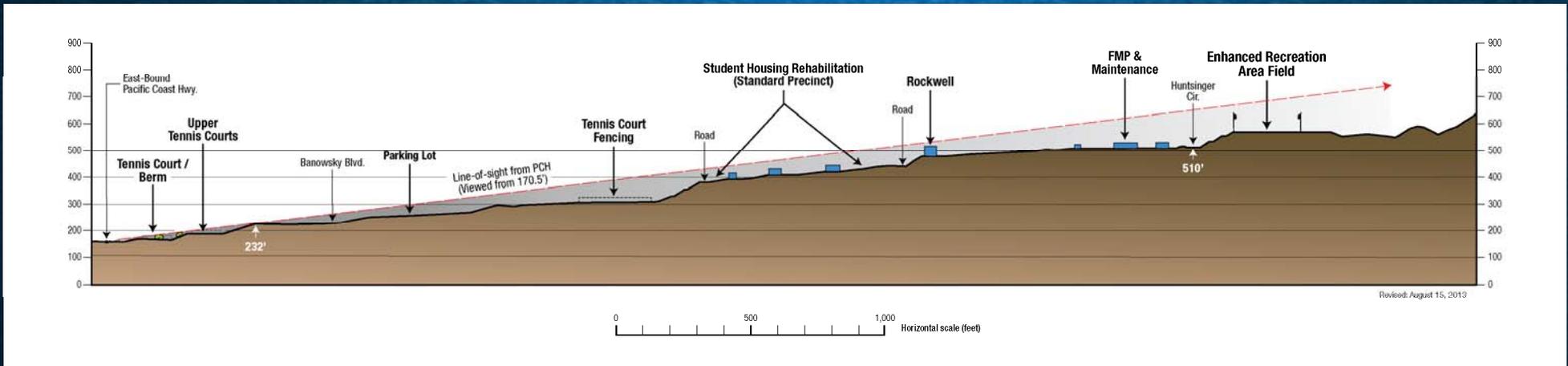


Protecting Visual Resources

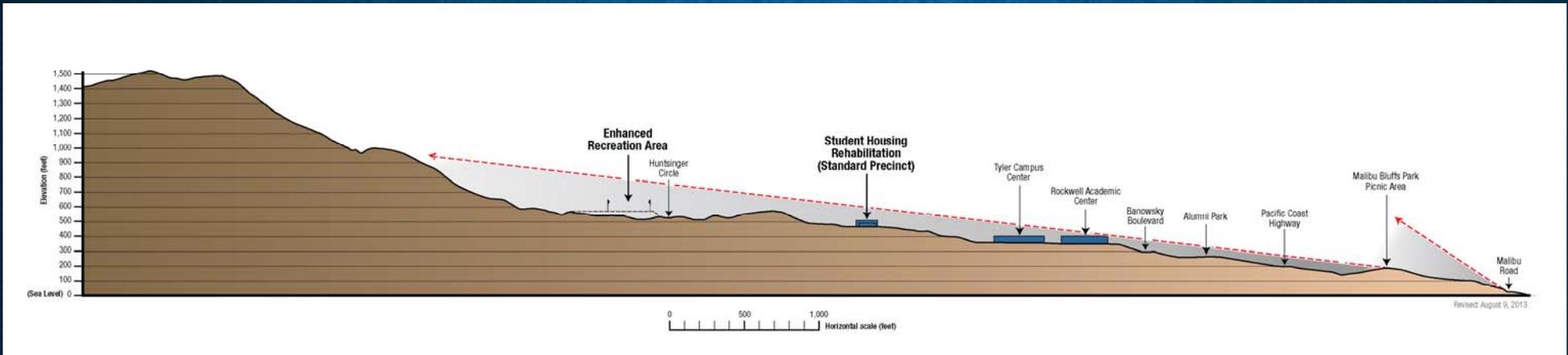
- The light fixtures will not be visible from:
 - Malibu Canyon Road
 - Pacific Coast Highway
 - Santa Monica Mountains Conservancy-Owned Malibu Bluffs
- Fixtures are invisible from the vast majority of area trails - hikers could see the fixtures along less than 4% of the 4.1 miles that comprises the combined Coastal Slope and Mesa Peak trails
- Limited views of fixtures would be consistent with the current views of the developed campus and the City of Malibu



Proposed Light Fixtures are not Visible from PCH



Proposed Light Fixtures are not Visible from Bluffs Park



Protecting Avian Resources

Nesting Birds

- The proposed east-west orientation focuses light further south towards Huntsinger Circle and away from the undeveloped campus
 - Minimizes potential light trespass and glare impacts on nesting birds

Migratory Birds

- Proposed Qualite International fixtures produce "cool" white light (not the type of red light found potentially impactful to avian behaviors in the majority of reviewed studies)
 - Only 11.84% of the light produced falls within the red spectrum

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Conclusions

- The Enhanced Recreation Area lighting is the final piece of the Campus Life Project
- The proposed lights:
 - Are consistent with Pepperdine's Commission-recommended LRDP lighting policy
 - Will limit light trespass consistent with the conservative 0.1 fc threshold used in the past by the Commission for areas near sensitive resources and consistent with IESNA recommendations for areas where light might adversely affect flora and fauna
 - Provide important additional recreational opportunities on Campus
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

The Campus Life Project – Response to Staff Report: Overview

- Pepperdine strongly disagrees with the Staff's recommendations
- Pepperdine disagrees with the assertion that the existing field and its lights were not permitted
- Staff's rejection of the 0.1 fc threshold for significant impacts breaks from Commission precedent, direction provided to Pepperdine during the LRDP process, and IESNA recommendations for areas where light might adversely affect flora and fauna
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds are arbitrary and do not withstand scientific scrutiny
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

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Response to Staff Report – Existing Field and Lighting Approvals

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- The existing recreational field (formerly the equestrian center) and its lighting have been in place in the same location for approximately 30 years
- Pepperdine developed the field and its lights pursuant to three CDPs (P-80-7325, CDP 5-81-395A, and CDP P-81-7818) in the early 1980s
 - While the permits do not specifically refer to lights, the level of permit detail was vastly differently in the 1980s
- When the Commission certified the LRDP in 1990, after the field and lighting had been installed, it also certified that “Development at Pepperdine has been consistent with the goals, policies, rules and regulations of ... the California Coastal Commission”
- The LRDP encompassed all on-the-ground development at the time of the LRDP certification in 1990



Response to Staff Report – Existing Field and Lighting Approvals

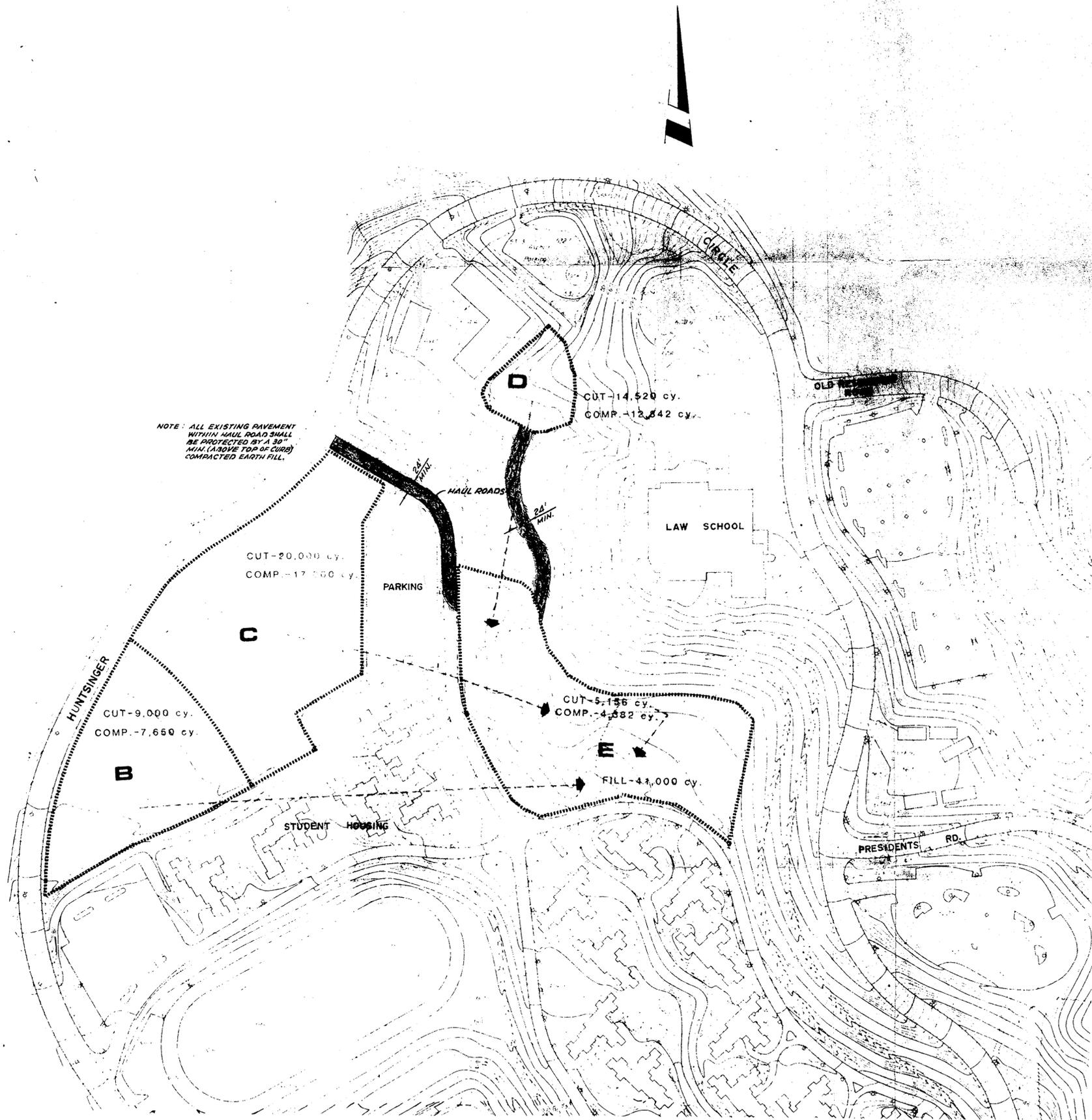
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- P-80-7325 (Development Description)
 - *Dismantling of an equestrian center and construction of 116 units of law school and undergraduate student housing, parking spaces for 484 cars, staircases to the University Annex, an electrical distribution building and temporary classroom facility. Application includes a request for approval of allocation of the needed portion of the unused sewage treatment capacity to the proposed facilities. Project is included in the University Land Plan.*
- CDP 5-81-395A (Amendment to Permit P-80-7325)
 - *Relocate existing equestrian center to be dismantled for 116 unit housing as approved on P-80-7325.*
- CDP P-81-7818 (Development Description)
 - *Construction of university campus facilities including a heritage hall, music wing, and a visiting professors' duplex, relocation of an equestrian center and expansion of the student housing reception center. These proposals are consistent with the University's Master Plan, previously reviewed and approved by the Commission.*



Response to Staff Report – Existing Field and Lighting Approvals

- Staff bases its position on a “haul route plan” in its CDP 5-81-395A file
 - The plan identifies four pads (B, C, D and E) that would either generate cut or receive fill; **but** the field was balanced onsite (no cut or fill for transport)
 - **And** each of these four pads correlated to a specific proposed facilities at the time of the issuance of CDP 5-81-395A
- Approved County of Los Angeles Grading Plan (1987)
 - Shows field as built in its existing location
- Coastal Commission LRDP Staff Report (August 1989)
 - .. the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, **equestrian riding ring located just northwest of the existing graded campus**, music hall, and various parking, sports, security, storage, and temporary trailer uses.
- Coastal Commission-Certified LRDP (1990)
 - Shows field (as an existing graded facility) on the LRDP Conceptual Grading Map



DATE	9/20/87	SHEET	1	OF	1
SCALE	1"=100'	DESIGNER		APPROVED	
PROJECT		DATE		JOB NUMBER	8874

HAUL ROUTE PLAN
 OF
 EQUESTRIAN USE AREAS
 PEPPERDINE UNIVERSITY
 MALIBU, CA.

BUILDING AND SAFETY DIVISION
 Department of County Engineer

APPROVAL IN CONCEPT

SIG. *Seaworth*
 DATE 9/20/87
 PLAN CHECK NO.

Per sec. 27400 et seq. of the
 Public Resources Code and
 Sec 13210(a) Title 14 of the
 Administrative Code, State
 of California.
 THIS IS NOT A PERMIT
 and
 is subject to any conditions
 listed below.

South Coast Regional
 Commission
 APPROVAL
 Permit No. *5-045-A*
 By *Ed Howell*

FILE COPY

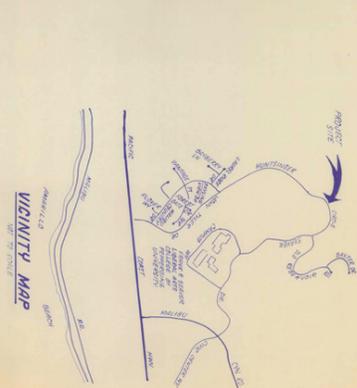
OLIN D. MURPHY - CIVIL ENGINEER
 COUNTY OF SAN DIEGO
 LICENSE NO. 10000



- SECTION BERM DETAIL**
1. No fill shall be placed until satisfactory completion of the foundation, walls, and other drainage devices approved at the time of the site plan.
 2. The fill engineer shall set drainage stakes for all drainage devices.
 3. No fill shall be placed until satisfactory completion of the foundation, walls, and other drainage devices approved at the time of the site plan.
 4. The fill engineer shall set drainage stakes for all drainage devices.
- INSPECTION NOTES**
1. The site plan for this project shall satisfy the requirements of the Department of Public Works and the Department of Public Health.
 2. The site plan shall be approved by the Department of Public Works and the Department of Public Health.

CONSTRUCTION NOTES

1. The site plan shall be approved by the Department of Public Works and the Department of Public Health.
2. The site plan shall be approved by the Department of Public Works and the Department of Public Health.



APPROVED FOR DRAINAGE

By *James T. Emerson* Date **4-27-87**

LAND DEVELOPMENT DIV.

APPROVED FOR GRADING

By *James T. Emerson* Date **4-27-87**

LAND DEVELOPMENT DIV.

"AS BUILT"

NON-STRUCTURAL FILL PAD

GRADING PLAN FOR PEPPERDINE UNIVERSITY

PROPOSED CONTOURS

550
560
570
580
590
600
610
620

B & E ENGINEERS

21917 E. 21st Ave. Suite 200
Denver, CO 80231
Tel: 303-751-1100

APR 17 1987

Response to Staff Report – Existing Field and Lighting

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- The Commission certified the existing location of the recreation area (the former equestrian center) in 1998
 - Pepperdine amended its LRDP map to leave the recreation area in its current location (as opposed to moving the field to an undeveloped area of campus)
 - In certifying LRDP 2-97, the Commission recognized that this environmentally sensitive decision would “reflect what currently exists”
- Pepperdine transitioned the equestrian center to the less intensive recreational/intramural use in 2000
- The Commission approved the enhancement of the existing recreational field in LRDP 1-11, Part A



Response to Staff Report – Lighting Impacts

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- Pepperdine used the very conservative 0.1 fc line to measure potential light trespass impacts
 - Pepperdine is actually registered a CEC “Lighting Zone 3,” associated with a 0.8 fc threshold level
- Commission biologist Dr. Engel has stated that “[T]he significance threshold for spill light upon sensitive resources is 0.1 foot-candles at any receptor location”
- The Commission has used the 0.1 fc threshold for other projects in the vicinity of sensitive resources
 - Staff agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit
- Staff now, **for the first time**, rejects the usage of the 0.1 fc line and establishes significance threshold that is not supported Commission precedent and not appropriate for a developed campus setting



Response to Staff Report – Lighting Impacts

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- Staff proposes applying a “No Ambient Lighting” threshold of 0.01 fc to the natural areas in the vicinity of the field
 - To our knowledge, no regulatory agency has ever applied this threshold to a project in California
 - Only appropriate for undisturbed wilderness and other areas where little to no light is expected
- Pepperdine is a developed campus, in a developed area where artificial light is expected and continuous
 - Ambient conditions in the natural areas near the proposed field already exceed the 0.01 fc standard by as much as a factor of three (even without taking into account the existing field lighting)
- The EIR and Supplemental Analysis’ conservative 0.1 fc threshold:
 - Is consistent with Commission precedent, staff direction provided to Pepperdine, and IESNA recommendations for areas where light might adversely affect flora and fauna



Response to Staff Report – Lighting Impacts

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- The Proposed Lighting Will Not Result in Adverse Impacts to Biological Resources
- The Field is located in the developed campus surrounded by disturbed areas; a supplemental site-specific biological analysis concluded:
 - Light trespass up to 0.01 fc is almost entirely contained in developed or disturbed areas
 - The limited light spill of between 0.09 and 0.01 fc in the 0.2 acres of undisturbed area is consistent with ambient conditions and will not result in adverse impacts to the specific animals, birds and plants in the area
 - The area has very low to no stop-over value for migrating birds
 - Many of the migrating birds that pass the area are only active during the day; night migrating birds in the area will be unaffected due to flight patterns and careful lighting design



Legend

-  Pepperdine University Property Boundary
-  Limit of 0.1 foot candles
-  Limit of 0.01 foot candles



Hymelinger Cir.

Seaver Dr.

John Tyler Dr.

Banowsky Blvd.

Malibu Canyon Rd.

Pacific Coast Hwy.

Aerial View of the Proposed Lights Within the Developed Campus Core



Pacific Flyway



EXHIBIT A

8

ORNIA COASTAL COMMISSION

COAST AREA

100 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



DATE: August 28, 1989

TO: Coastal Commissioners and Interested Parties

FROM: Peter Douglas, Executive Director,
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: Pepperdine University Long Range Development Plan, Public hearing
and action (for September 12, 1989 meeting)

SYNOPSIS

Summary of Plan

Pepperdine University has submitted a Long Range Development Plan (LRDP) which proposes development of University facilities to serve up to 5,000 FTE (full-time equivalent) students over the 830 acre campus. The LRDP would permit 212 additional student and faculty/staff housing units, academic and support facilities totalling approximately 854,000 square feet within the 225 acre existing developed campus area. An additional 202 on-campus housing units and academic and support facilities totalling 385,000 sq. ft. and 182,000 sq. ft. of new roads is also proposed on a 72 acre expansion area on undeveloped land northwest of the developed campus area. Development of the expansion area will involve 3 million cubic yards of grading (842,000 cubic yards for stabilization of landslides and 2.2 million cubic yards for roads and building pads). Approval of the expansion of the Malibu Mesa Wastewater Reclamation Plant to 500,000 gallons per day capacity from the current 200,000 gpd is also being sought, to be constructed should the County of Los Angeles abandon its plans for a regional sewer system.

Summary of the Staff Recommendation

Staff is recommending that the Commission (1) deny the LRDP as submitted due to its non conformance with the coastal access, landform alteration and visual resource protection, hazards, and environmentally sensitive habitat protection policies of the Coastal Act; and (2) approve with suggested modifications dealing with public access, visual and environmental resources protection, hazards, and marine resources protection, that portion of the LRDP for the build-out of the existing developed campus area. The existing developed campus area is defined to include that area east of John Tyler Drive, south of Huntsinger Circle and west of Seaver Drive; the northern extent of Baxter Drive; the area northeast of the intersection of Seaver Drive and Baxter Drive; the area east of Seaver Drive between Baxter Drive and President Drive; and the area at the southeast intersection of Seaver Drive and President Drive, as shown on Exhibit 4.

EXHIBIT A

Pepperdine LRDP
Page 11

irrigation and monitoring plan, (2) additional geotechnical analysis to better determine the extent of the landslides on the proposed 72 acre expansion area and the amount of grading necessary for both landslide stabilization and roads and pads, (3) determination of whether the Malibu Coast Fault or any splays thereof exists within the campus, (4) updated traffic analysis and (5) visual impact analysis of the development proposed within the 72 acre expansion area.

B. Current Level of Development

The 830 acre Pepperdine University campus is located in western Los Angeles County, west of the Civic Center area of Malibu, adjacent to the intersection of Pacific Coast Highway and Malibu Canyon Road. The University is bounded on the east by Malibu Canyon Road and the site of the approved Adamson 300-room Adamson Hotel, on the west by the Malibu Mesa Wastewater Reclamation Plant and the Malibu County Estates condominium development, on the north by undisturbed watershed and the LUP designated Malibu Canyon Significant Watershed, and on the south by Pacific Coast Highway, the Malibu Bluffs State parkland, the new Malibu Colony Plaza (Reco) shopping center and the Malibu Road residential community and Amarillo Beach south of the highway.

The existing developed campus covers approximately 225 acres or a little over 25% of the 830 acres. The campus contains roughly 850,000 square feet of development. Additionally there are two 40,000 sq. ft. effluent lakes with a total capacity of 12.4 million gallons of treated water, 3.1 million gallon capacity of water storage tanks, playing fields and running tracks, tennis, racquetball and other sports facilities, water tanks and a retention basin. According to an April, 1989 University report, there are 2150 parking spaces within lots or structures and 990 on-street spaces within the University campus for a total of 3140 parking spaces (See Exhibit 4).

According to the Pepperdine University Specific Plan figures, the 850,000 square feet of facilities is devoted to 16% (135 units) student housing for 1537 students, 29% (52 units) faculty/staff/administration housing and recreational amenities, and the remaining 55% devoted to academic and support uses.

Pepperdine University was formerly located in south central Los Angeles. A program to move the campus to Malibu and to expand the University's facilities began nearly twenty years ago. The Long Range Development Plan (LRDP) which is reviewed here provides for a continuation of that expansion through 1997.

The University acquired its Malibu campus in 1968. In May of 1979 Los Angeles County approved a zone change to allow the campus site to be used for university purposes. On July 11, 1972, the County Planning Commission issued a Conditional Use Permit for the expansion of the university's facilities. Specific Plans were not adopted under this Conditional Use Permit until December 30, 1976.

Under the Coastal Act of 1976, the campus came under the jurisdiction of the Coastal Commission. The University applied for a claim of vested rights for all facilities shown on the 1976 Specific Plan. Prior to the effective date of the Coastal Act, the University had obtained numerous grading and building permits from the county and complete construction of 35 permanent buildings and were under way on 4 additional structures. Under the University's 1976

EXHIBIT A

Pepperdine LRDP
Page 12

Specific Plan the following facilities were yet to be constructed:

1. Undergraduate administration building
2. Fine arts complex
3. Hillside theatre and 2 contemporary arts facilities
4. Sea lodge
5. Temporary offices and administrative facilities (5)
6. Law School housing and parking structures
7. Student dormitory (1)
8. Student/staff housing structures (4)
9. Utility connections, grading, driveways, walkways and retaining walls to accommodate above listed development.

The claim of vested rights to complete the remainder of the facilities under the 1976 Specific Plan was denied by the South Coast Regional Commission on June 6, 1977 (E-2-E-5). A subsequent appeal to the State Coastal Commission resulted in a finding of no substantial issue on July 20, 1977, thus leaving the denial in place (Appeal No. 191-77, Pepperdine University).

Since this time the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, equestrian riding ring located just northwest of the existing graded campus, music hall, and various parking, sports, security, storage, and temporary trailer uses.

The University and Century Malibu, Inc. (Malibu Country Estates) were also given a permit to construct the 200,000 gallon per day (gpd) Malibu Mesa Wastewater Reclamation Plant located at the intersection of John Tyler Drive and Pacific Coast Highway. A spray irrigation management plan (SIMP) to dispose of treated wastewater over the landscaped and natural areas of the campus was also approved.

The Specific Plan states that as of fall, 1983 the enrollment totalled 1,920 full time equivalent (FTE) students. This number of FTE students was made up of 2,540 full and part-time students, of which 1,537 lived in campus housing and 1,003 commuted from other locations. There were 2148 FTE students enrolled in the University as of March, 1989. Under the proposed full build out of 5,000 FTE students, there would be an actual enrollment of 6,500 students, 500 faculty, 777 staff and 17 administrators.

C. Local Government Action on 1988 LRDP Proposal

There has been considered debate among some local citizen groups as to whether or not CEQA procedures have been properly followed with regards to the adequacy of the environmental analysis of the LRDP beyond the CUP for Phase I. The University has responded that the CEQA process has been properly carried out by the County of Los Angeles for the full LRDP as was proposed at the 1988 Commission hearing (see Exhibit 12). The University further contends that while the August, 1989 revisions to the LRDP are significant changes to the LRDP, they are significant reductions to the proposed development and therefore no additional or supplemental EIR is required under CEQA.

The October, 1983 Draft EIR on the University Specific Plan or LRDP was prepared as part of the process for review and consideration of Conditional Use Permit application CUP 2432 (4) requesting approval to development the Pepperdine campus as specified in the Specific Plan. The county zoning board

Response to Staff Report – Other Considerations

- The existing field is the only lighted outdoor recreational field on Campus
 - Staff's recommendation would force Pepperdine to continue using the existing field and its inferior lighting
- The proposed denial would actually result in greater environmental impacts to surrounding areas
- As voluntary mitigation for the Campus Life Project athletic field lighting, Pepperdine agreed to replace all existing campus globe lights
 - *This action would reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%*
- Staff would have the Commission accept this mitigation while denying the very project the mitigation was designed to address

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FEDERAL INTERESTS IN FEDERAL LANDS

Section 104. (a) The United States, through the Department of the Interior, Bureau of Land Management, has certain interests in the lands described in this section.

SECTION 104. FEDERAL INTERESTS IN FEDERAL LANDS

Table with 2 columns: FEDERAL INTERESTS IN FEDERAL LANDS and FEDERAL INTERESTS IN FEDERAL LANDS. It lists various land parcels and their corresponding interests.

SECTION 104. FEDERAL INTERESTS IN FEDERAL LANDS. (b) The United States, through the Department of the Interior, Bureau of Land Management, has certain interests in the lands described in this section.

EXHIBIT I

PEPPERDINE UNIVERSITY - MALIBU LEGEND FOR LAND USE SITE PLAN

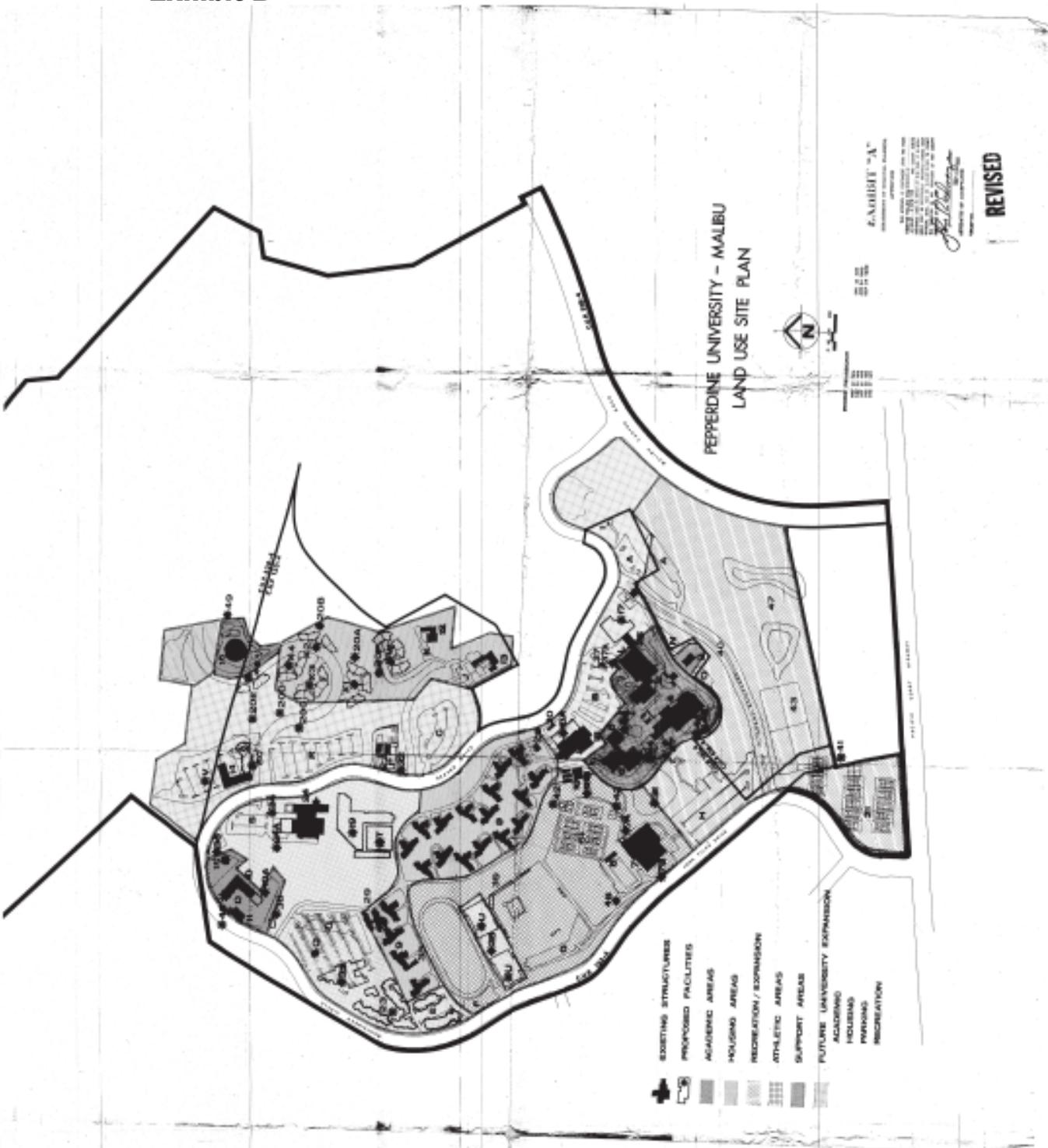
DATE: 10/1/68



- 1. The land shown on the map is owned by the State of California, Department of Public Safety, and is located in the County of Los Angeles, State of California.
- 2. The land shown on the map is owned by the State of California, Department of Public Safety, and is located in the County of Los Angeles, State of California.

- 1. The land shown on the map is owned by the State of California, Department of Public Safety, and is located in the County of Los Angeles, State of California.
- 2. The land shown on the map is owned by the State of California, Department of Public Safety, and is located in the County of Los Angeles, State of California.

Exhibit B



DATE	DESCRIPTION	BY

Exhibit B

HAUL ROUTE PLAN
 DEPARTMENT OF AGRICULTURE
 UNIVERSITY OF CALIFORNIA
 MARSH, CA

DAVID J. MERRILL - CIVIL ENGINEER
 1000 S. GARDEN AVENUE, SUITE 100
 ANAHEIM, CALIFORNIA 92805
 (714) 771-1111


HAUL ROUTE PLAN
 DEPARTMENT OF AGRICULTURE
 UNIVERSITY OF CALIFORNIA
 MARSH, CA

FILE COPY

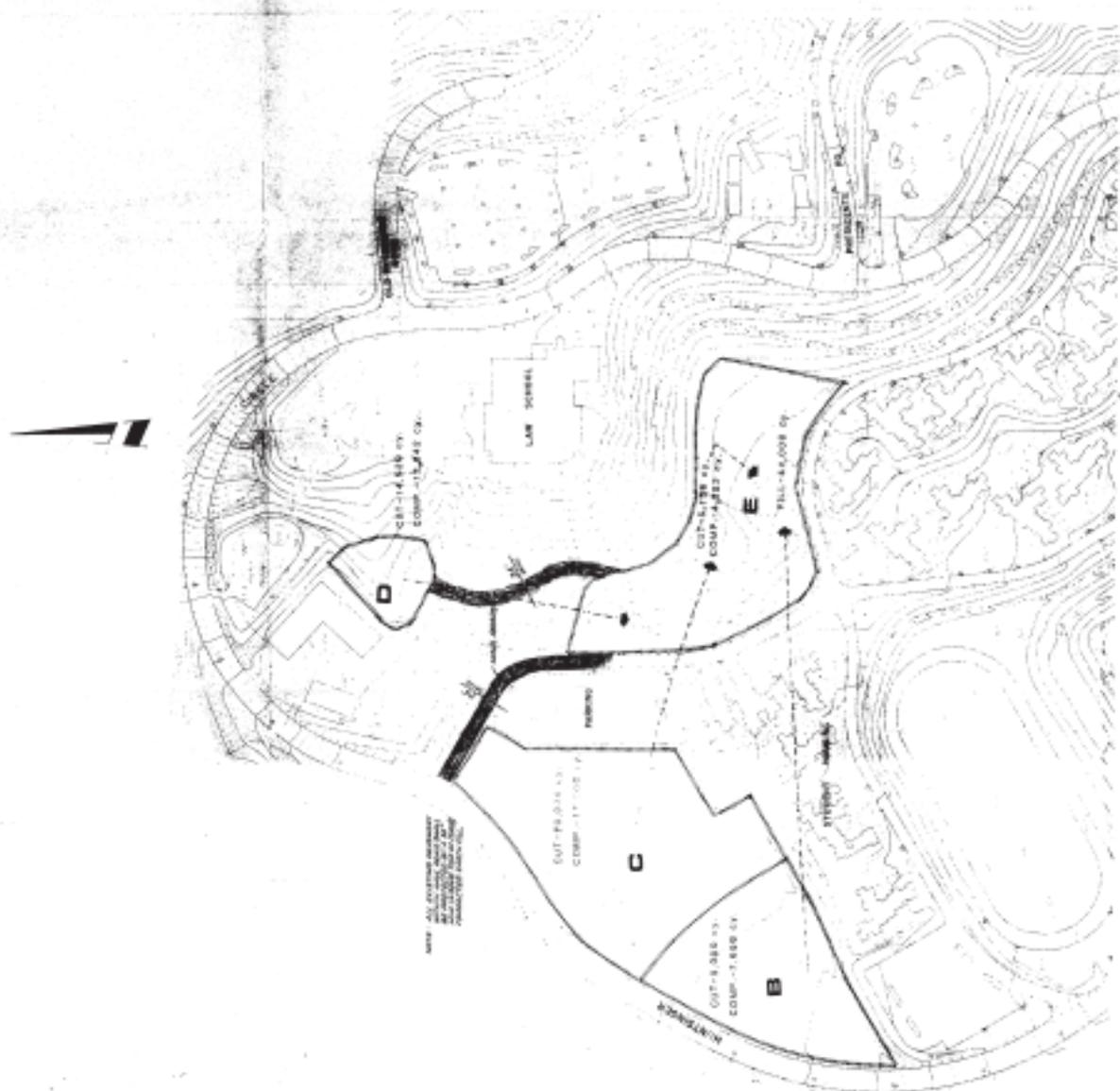


Exhibit B

PEPPERDINE UNIVERSITY

TOTAL 530 ACRES

A-1-1-DP
ZONE BOUNDARY

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

KESA PEAK TRAIL
(DEED RESTRICTED)

OPEN SPACE

COMBINED MESA PEAK
AND CENTRAL SLOPE TRAILS
(DEED RESTRICTED)

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

OPEN SPACE

OPEN SPACE

WALKWAY TRAILS

1/11/86
Notes: This is not and
never shall be an EIR.
See ID #14, dated 3/1/85
in Doc. Ann. 12-7.



Project Location Map

EAI ENVIRONMENTAL AUDIT, INC.
1000-A ORFILA WAY • PASADENA, CA 91107-7125
714/795-8522 • FAX 714/795-8154

Prepared: Environmental Analysis and
Mitigation

DATE: 7/28/82
BY: LAUREL HOOK
PROJECT: 1345RASH DMS 1

Exhibit B

• MAP A •

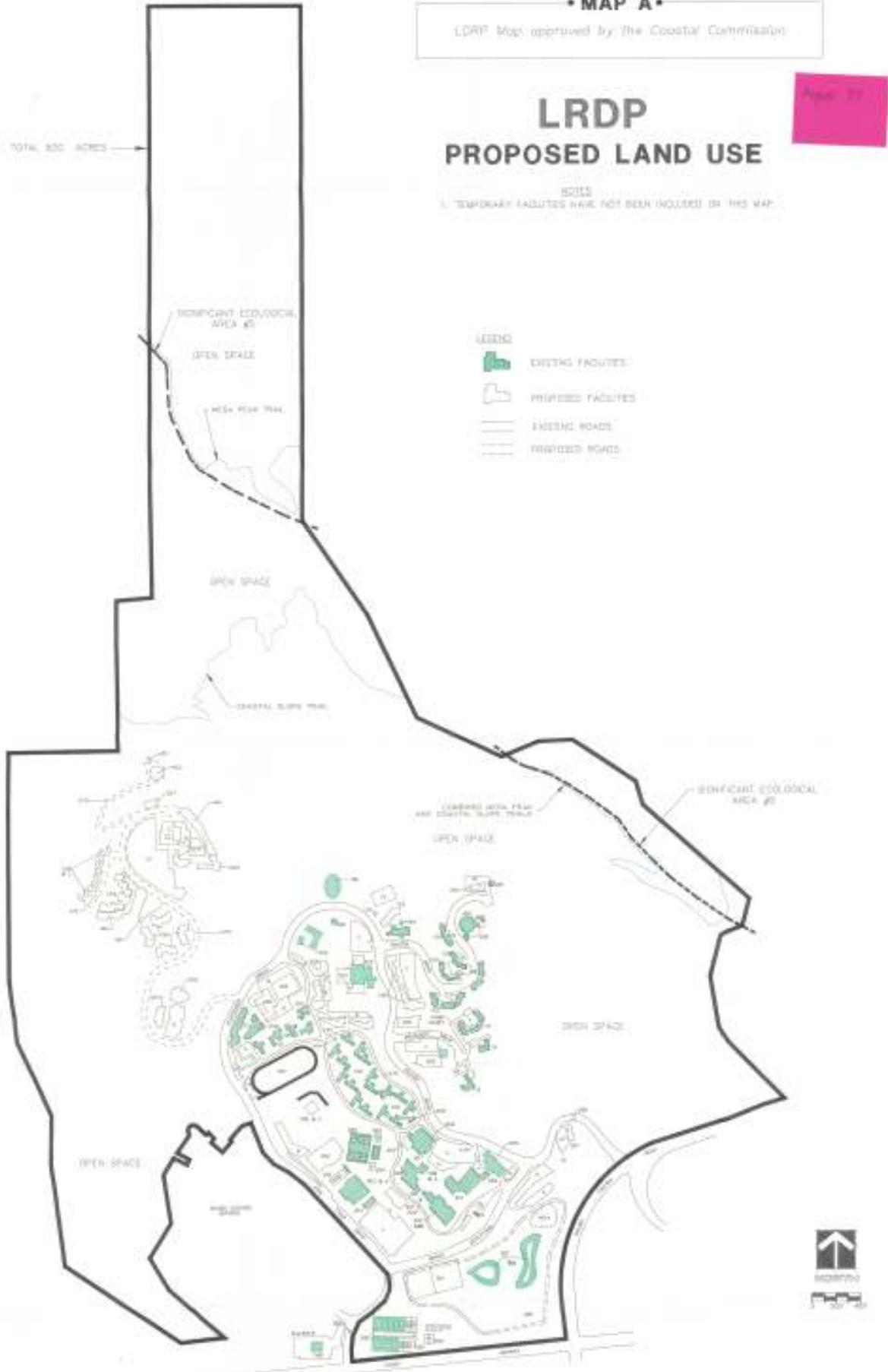
LRDP Map approved by the Coastal Commission

LRDP PROPOSED LAND USE



NOTES
1. TEMPORARY FACILITIES HAVE NOT BEEN INCLUDED ON THIS MAP.

TOTAL 800 ACRES



NOVEMBER 1999

BUILDING NUMBERS, GENERAL DESCRIPTIONS
& USES OF BUILDINGS/FACILITIES
ARE LISTED IN THE SPECIFIC PLAN

EAJ ENVIRONMENTAL AUDIT, INC.
 1000-A DUNN RD • FARMINGDALE, NY 11735-1129
 TEL: 516-833-4700 FAX: 516-833-4704
 e-mail: info@environmentalaudit.com
 Planning, Environmental Analysis, and
 Remedial Solutions Management and Construction

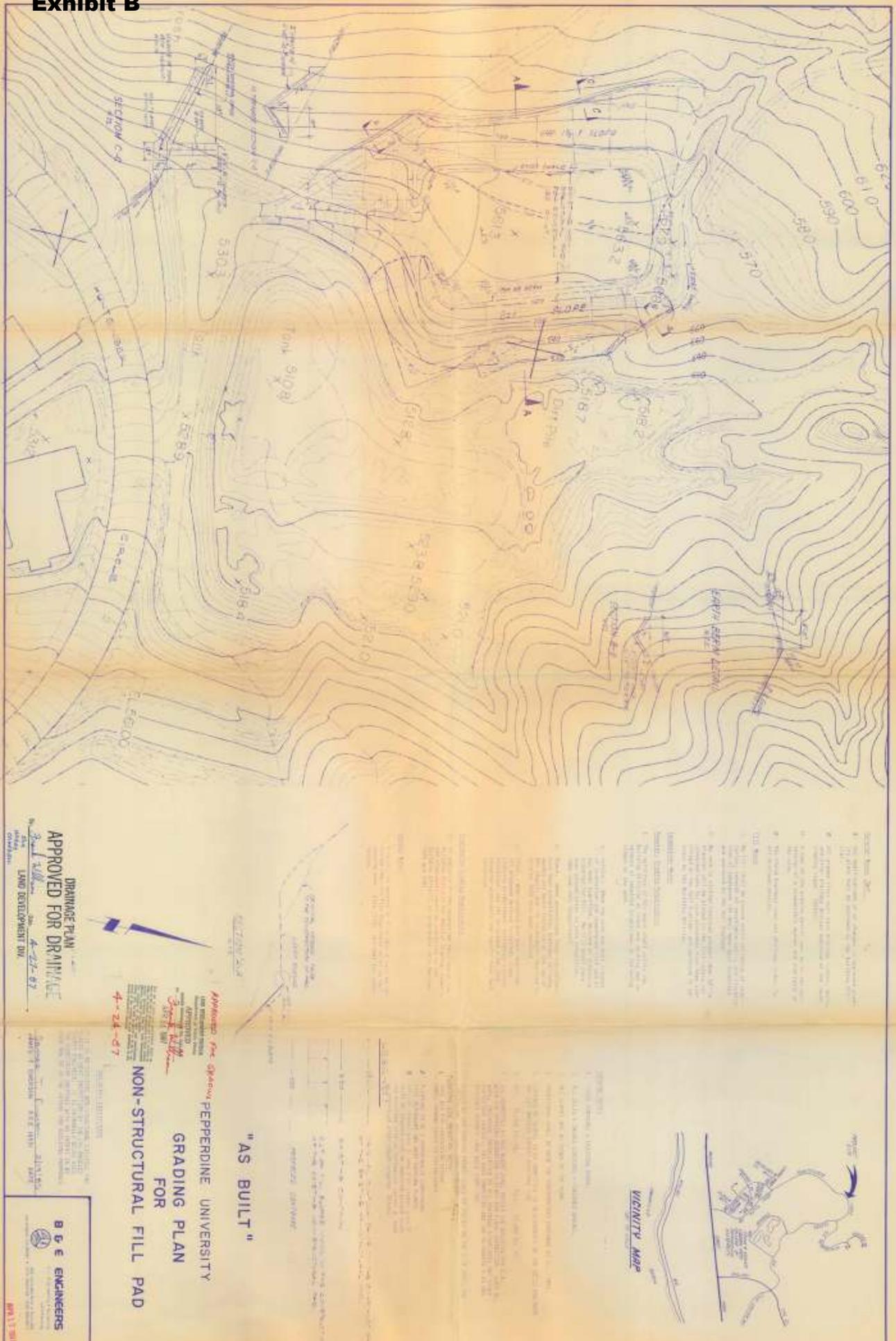
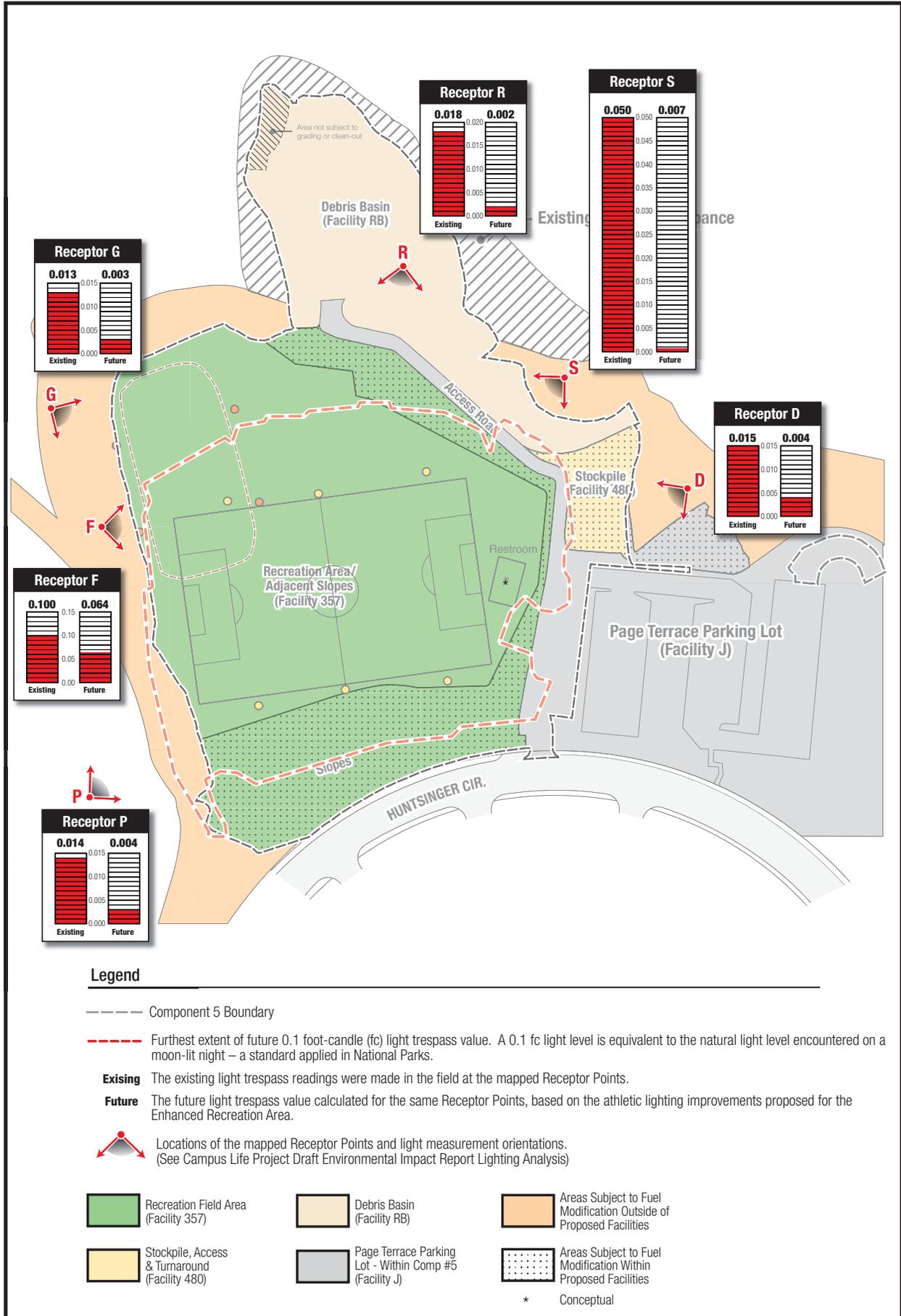


EXHIBIT C



June 10, 2013

CALIFORNIA COASTAL COMMISSION

SOUTH COAST AREA
245 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



December 21, 1989

TO: Commissioners and Interested Persons

FROM: Peter Douglas, Executive Director
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: REVISED FINDINGS ON THE PEPPERDINE UNIVERSITY LONG RANGE DEVELOPMENT PLAN (LRDP) for Public Hearing and Commission Action at the Meeting of January 11, 1990.

SYNOPSIS

Summary of Commission Action

On September 12, 1989, the California Coastal Commission reviewed the Pepperdine University Long Range Development Plan (LRDP). In its action, the Commission denied the LRDP as submitted and certified it with Suggested Modifications regarding public access, hazards, and visual, marine and environmentally sensitive resource protection.

If these Suggested Modifications are adopted by the Board of Regents of the University within six months of the Commission's action (March 11, 1990) and the Commission is so notified, the LRDP will become effectively certified.

Commission Vote

The Commission's action included two resolutions on the LRDP submittal. The Commissioners voting on the prevailing side on the first resolution to deny the LRDP as submitted were:

Glickfeld, Rynerson, MacElvaine, Malcolm, McInnis, Knapp, Neely, Warren, Wright, Hisserich, Franco, and Chairman Wornum

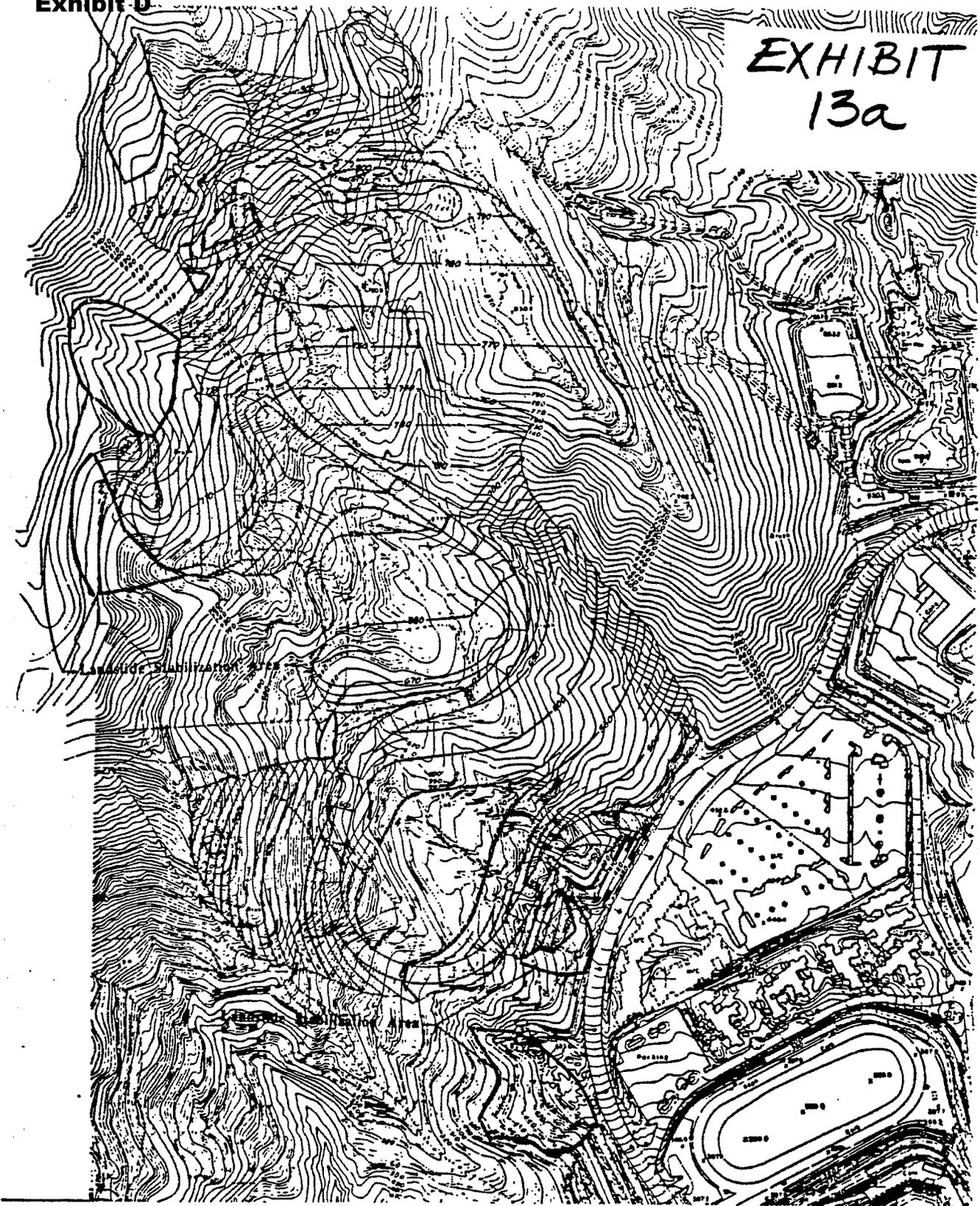
The Commissioners voting on the prevailing side on the second resolution to certify the LRDP with Suggested Modifications were:

Knapp, Neely, Wright, Glickfeld, MacElvaine, Malcolm, McInnis, and Chairman Wornum

Additional Information

Further information on the Pepperdine University Long Range Development Plan may be obtained from Teresa Henry at the South Coast Area Office of the Coastal Commission, 245 West Broadway, Suite 380, Long Beach, CA 90802, (213) 590-5071.

EXHIBIT
13a



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area
Conceptual Grading Plan
 Showing Landslide Stabilization Areas
 Outside of Graded Area.

RECEIVED

AUG 4 1989



ATTACHMENT C-1

CALIFORNIA
COASTAL COMMISSION

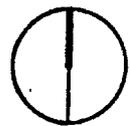
These materials have been provided to Coastal Commission Staff

Exhibit D

EXHIBIT
136



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area •
Conceptual Grading Plan
With Proposed Buildings



ATTACHMENT C-2

Albert C. Martin and Assoc.
DATE 7-20-02

Exhibit E



Source: GoogleEarth Pro, August 27, 2012.

VERSION 2

PEPPERDINE UNIVERSITY

**The Campus Life Project: The Next Step in Fulfilling our
Long Range Development Plan**

LRDP Amendment 1-11, Part B

THESE MATERIALS HAVE BEEN PROVIDED TO COASTAL COMMISSION STAFF

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- Pepperdine strongly disagrees with the Staff's recommendations that the existing field and lights were not permitted
 - The existing field and lights were installed pursuant to three CDPs approved by the Commission in the early 1980s; the Commission subsequently certified the existing facility and its lighting in 1990, 1998, and 2012
 - The LRDP encompassed all on-the-ground development at the time of its certification in 1990
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds do not withstand scientific scrutiny
 - Pepperdine used a highly conservative threshold to measure potential impacts; the Commission has previously relied on the 0.1 fc threshold previously and it is consistent with IESNA recommendations
 - The EIR and Pepperdine's supplemental, site-specific biological analysis concluded that the lights would not adversely impact any sensitive resources
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- By mutual agreement with Staff, Pepperdine divided its LRDP Amendment 1-11 into two parts (Part A and Part B); the Commission unanimously approved Part A in December 2012
- Part B is a focused review of three elements of the approved Enhanced Recreation Area:
 - Replacement of the existing unshielded "flood lights" with state-of-the-art, shielded fixtures
 - Confirmation of east-west field configuration as requested by Coastal Staff
 - Specific location of the approved small restroom/storage facility

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Aerial View of
Approved
Enhanced
Recreation Area,
Proposed
Light/Restroom
Locations, and
Field Orientation

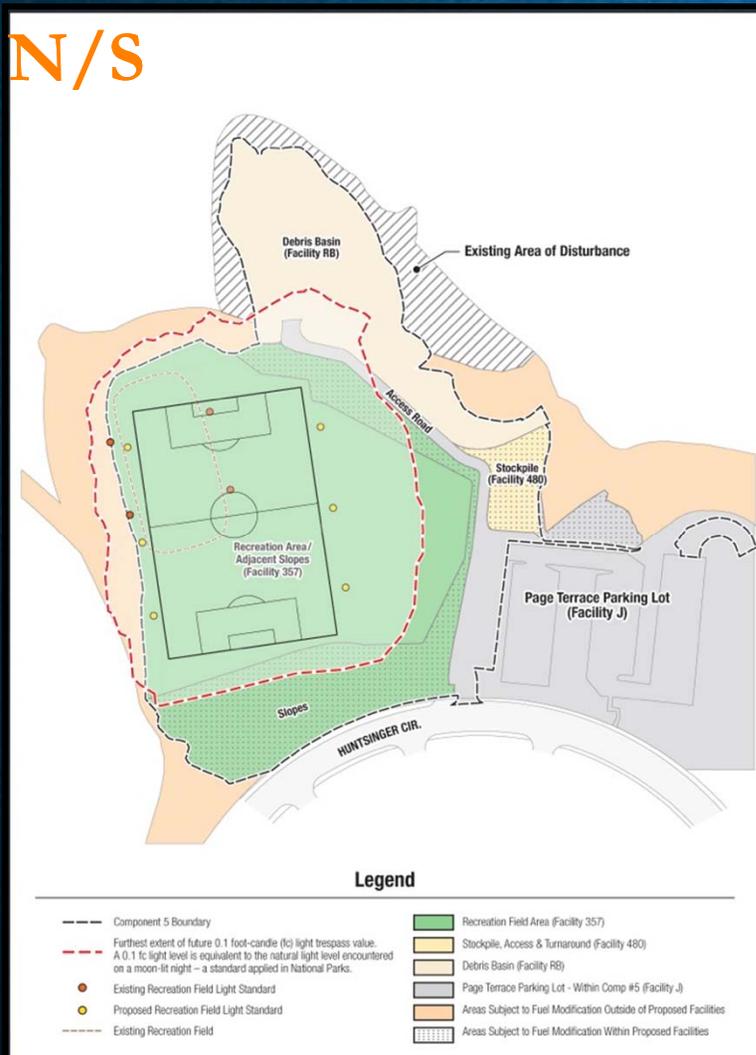


Aerial View of the Proposed Lights Within the Developed Campus Core



Recreation Field Orientation

- Pepperdine would agree to orient the proposed Recreation Field in Staff's preferred "east-west" configuration
- The E/W orientation focuses light further south towards Huntsinger Circle; in this orientation the field would be surrounded by developed and disturbed areas



Importance to Campus Community

- The Campus Life Project provides much needed enhancements to on-campus amenities
- The approved Enhanced Recreation Area will provide all students with safe recreational space for physical health and building community
- Night lighting is critical for all students to enjoy the facility
 - Student days are filled with ever expanding class loads, volunteering, internships, clubs, jobs, etc.
 - **The University has a critical need for additional recreational field space**, and without night lighting, a significant percentage of the Campus's young men and woman will lose the already limited opportunity to recreate and participate in intramural or club sports

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Project Need

- The existing field at the site of the approved Enhanced Recreation Area is Pepperdine's only lighted recreational field space
 - This is already significantly deficient when compared with peer institutions
- Key objectives of the Campus Life Project include:
 - Provide an enhanced recreation facility including a lighted field to alleviate the overcrowded conditions
 - Provide needed outdoor recreation field within the existing developed campus
- Without approval of Part B, Pepperdine would be forced to continue using the existing undersized, flood-lit field

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Lighted Fields at Peer Institutions

Institution	Lighted Recreational Field Area (acres)*
Pepperdine University	0.46
Loyola Marymount University	3.05
University of California Los Angeles	7.33
University of California Santa Barbara	5.32
University of the Pacific	1.93
Saint Mary's College	1.73
University of San Diego	3.57
University of San Francisco	1.70
Santa Clara University	3.13
University of California San Diego	10.78
University of California Berkeley	5.19
California State University Long Beach	8.63
Stanford University	5.13

* Information compiled by Envicom Corporation August 2013.

Enhanced Recreation Area Lighting Design

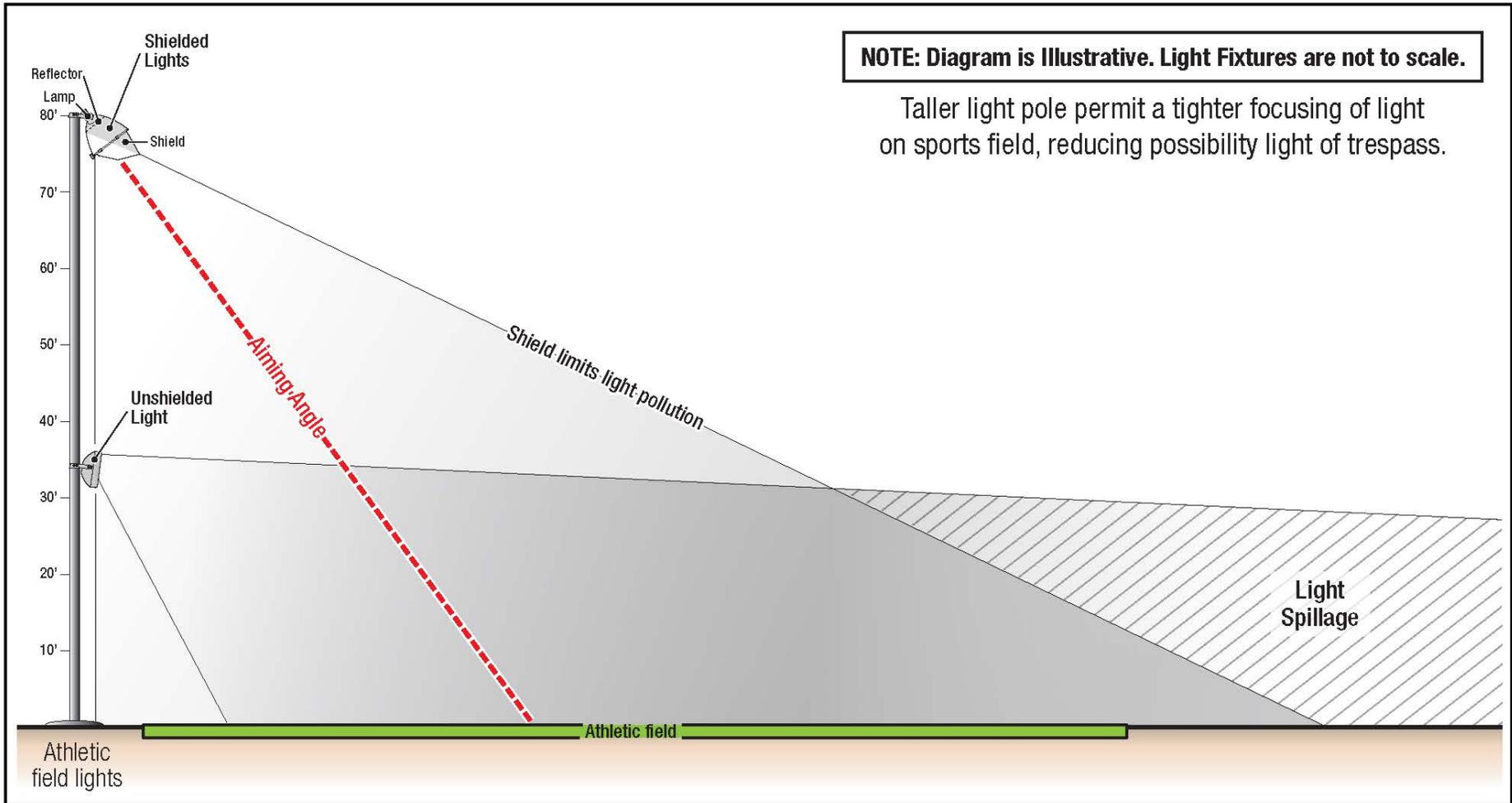
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- Proposed lighting features state-of-the-art technology designed to prevent or minimize all forms of light pollution including glare, light trespass, and sky glow
 - The proposed cutoff, angled, and shielded fixtures will direct light onto the field rather than into natural areas and the night sky
 - Would utilize the same advanced fixtures approved by the Commission for the soccer field in Part A
 - Lighting levels would be lower than soccer field due to proposed recreational use
- Would improve existing conditions by replacing the existing, non-cutoff, non-shielded flood lights



Existing Recreation Lighting Proposed for Replacement





Revised: Sep. 23, 2013

Consistency with the LRDP Lighting Policy

- When approving Part A, the Commission proposed a comprehensive LRDP "Lighting Policy," which the University adopted
- The proposed lights fully comply with the terms and intent of the Policy. The lights are:
 - "Qualite" or a superior, state-of-the-art technology designed to dark-sky-compatible standards
 - Minimized, directed downward, and shielded using the best available visor technology and pole height design to minimize light spill, sky glow, and glare
 - Designed to minimize light trespass into adjacent non-target areas, and to limit the illumination of adjacent open space and sensitive habitat areas

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Reducing Lighting Impacts

- The EIR lighting study determined there would be no significant light trespass or glare impacts
 - The EIR used a highly conservative 0.1 fc line to measure impacts in the vicinity of the proposed field; Pepperdine's Campus is actually registered as a CEC "Lighting Zone 3," associated with a 0.8 fc threshold level
- For LRDP Amendment 1-11, Pepperdine conducted a supplemental analysis finding:
 - No light trespass greater than 0.1 fc will occur in undisturbed, naturally vegetated or habitat areas
- The 0.1 footcandle (fc) level is the most conservative threshold used in past Commission precedent
 - Staff Biologist Dr. Engel stated in 2011: "[T]he significance threshold for spill light upon sensitive resources is 0.1 [fc] at any receptor location"
 - Dr. Engel agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit

PEPPERDINE
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Legend

- Pepperdine University Property Boundary
- Limit of 0.1 foot candles
- Limit of 0.01 foot candles



Reducing Sky Glow Impacts

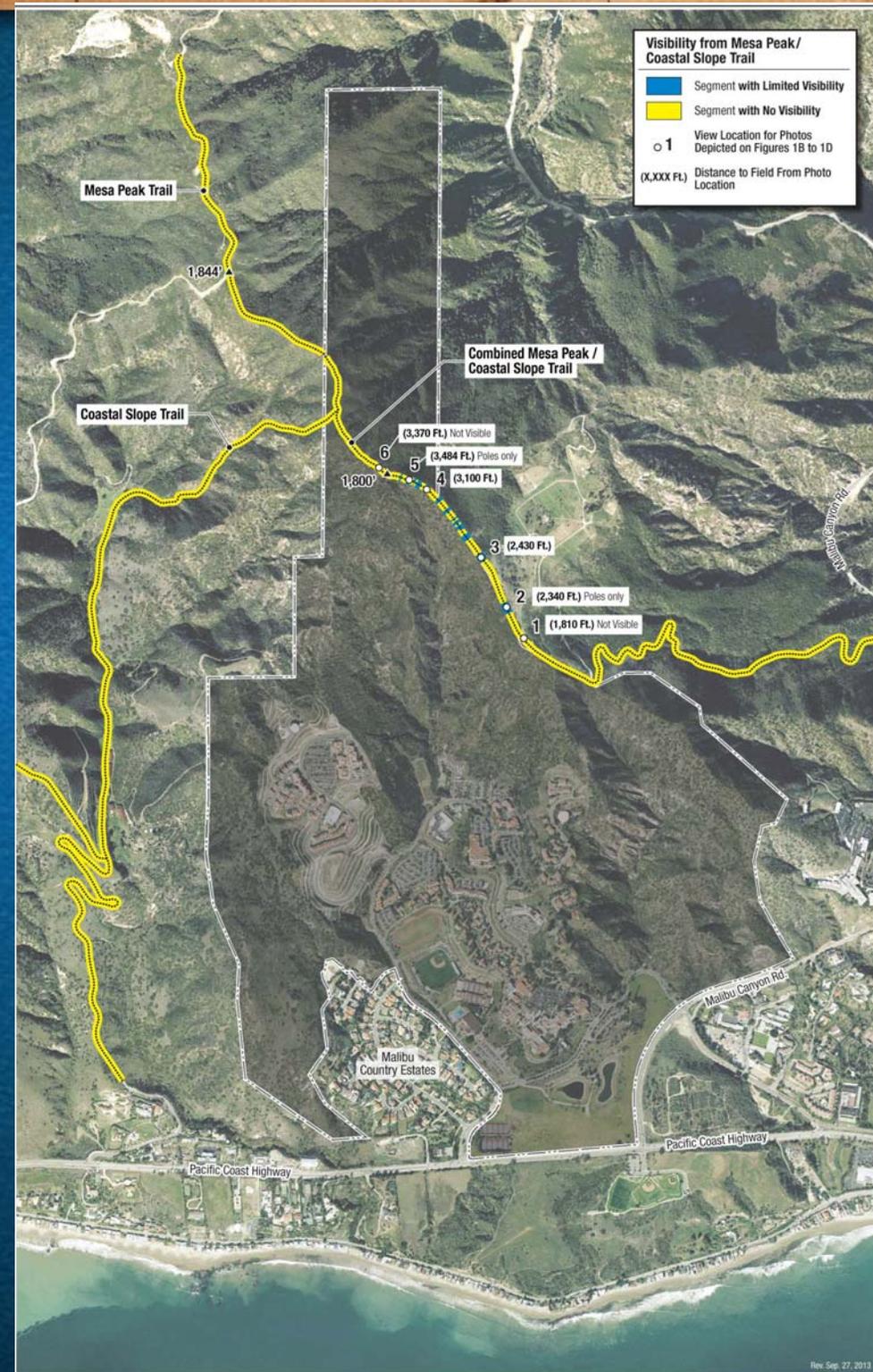
- The lighting incorporates principles and recommendations provided by the International Dark Sky Association and Illuminating Engineering Society of North America to prevent or minimize sky glow and protect Coastal resources
- Light emitted between 80 and 100 degrees has the greatest effect on sky glow
 - The new fixtures will emit light between 16 and 62 degrees, which is far less likely to result in sky glow than conventional lights
 - The existing flood lights emit light at ~ 80 degrees
- If approved, replacement of the existing recreational field lighting along with the Campus globe lights would ***reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%***

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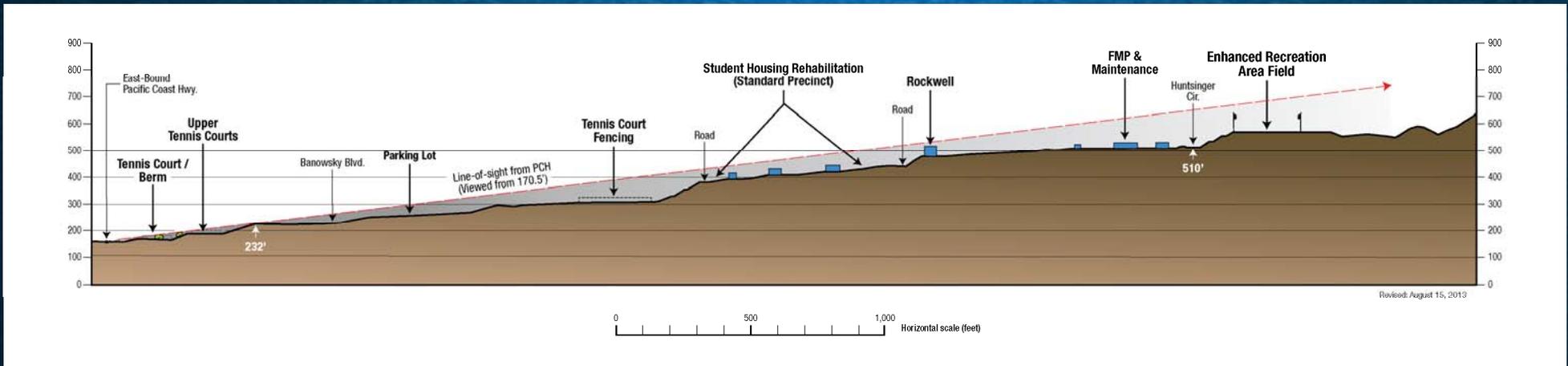


Protecting Visual Resources

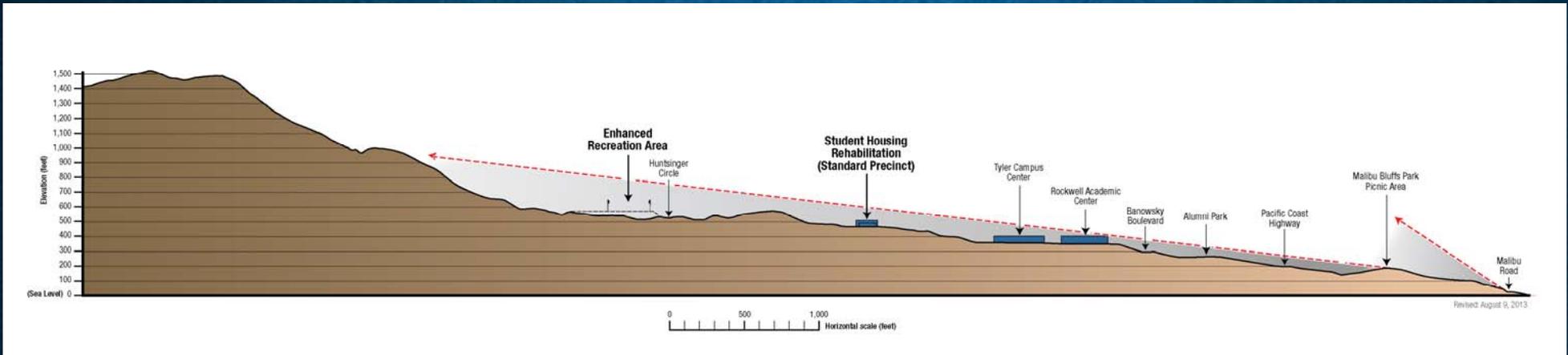
- The light fixtures will not be visible from:
 - Malibu Canyon Road
 - Pacific Coast Highway
 - Santa Monica Mountains Conservancy-Owned Malibu Bluffs
- Fixtures are invisible from the vast majority of area trails - hikers could see the fixtures along less than 4% of the 4.1 miles that comprises the combined Coastal Slope and Mesa Peak trails
- Limited views of fixtures would be consistent with the current views of the developed campus and the City of Malibu



Proposed Light Fixtures are not Visible from PCH



Proposed Light Fixtures are not Visible from Bluffs Park



Protecting Avian Resources

Nesting Birds

- The proposed east-west orientation focuses light further south towards Huntsinger Circle and away from the undeveloped campus
 - Minimizes potential light trespass and glare impacts on nesting birds

Migratory Birds

- Proposed Qualite International fixtures produce "cool" white light (not the type of red light found potentially impactful to avian behaviors in the majority of reviewed studies)
 - Only 11.84% of the light produced falls within the red spectrum

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Conclusions

- The Enhanced Recreation Area lighting is the final piece of the Campus Life Project
- The proposed lights:
 - Are consistent with Pepperdine's Commission-recommended LRDP lighting policy
 - Will limit light trespass consistent with the conservative 0.1 fc threshold used in the past by the Commission for areas near sensitive resources and consistent with IESNA recommendations for areas where light might adversely affect flora and fauna
 - Provide important additional recreational opportunities on Campus
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

The Campus Life Project – Response to Staff Report: Overview

- Pepperdine strongly disagrees with the Staff's recommendations
- Pepperdine disagrees with the assertion that the existing field and its lights were not permitted
- Staff's rejection of the 0.1 fc threshold for significant impacts breaks from Commission precedent, direction provided to Pepperdine during the LRDP process, and IESNA recommendations for areas where light might adversely affect flora and fauna
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds are arbitrary and do not withstand scientific scrutiny
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

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Response to Staff Report – Existing Field and Lighting Approvals

PEPPERDINE
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- The existing recreational field (formerly the equestrian center) and its lighting have been in place in the same location for approximately 30 years
- Pepperdine developed the field and its lights pursuant to three CDPs (P-80-7325, CDP 5-81-395A, and CDP P-81-7818) in the early 1980s
 - While the permits do not specifically refer to lights, the level of permit detail was vastly differently in the 1980s
- When the Commission certified the LRDP in 1990, after the field and lighting had been installed, it also certified that “Development at Pepperdine has been consistent with the goals, policies, rules and regulations of ... the California Coastal Commission”
- The LRDP encompassed all on-the-ground development at the time of the LRDP certification in 1990



Response to Staff Report – Existing Field and Lighting Approvals

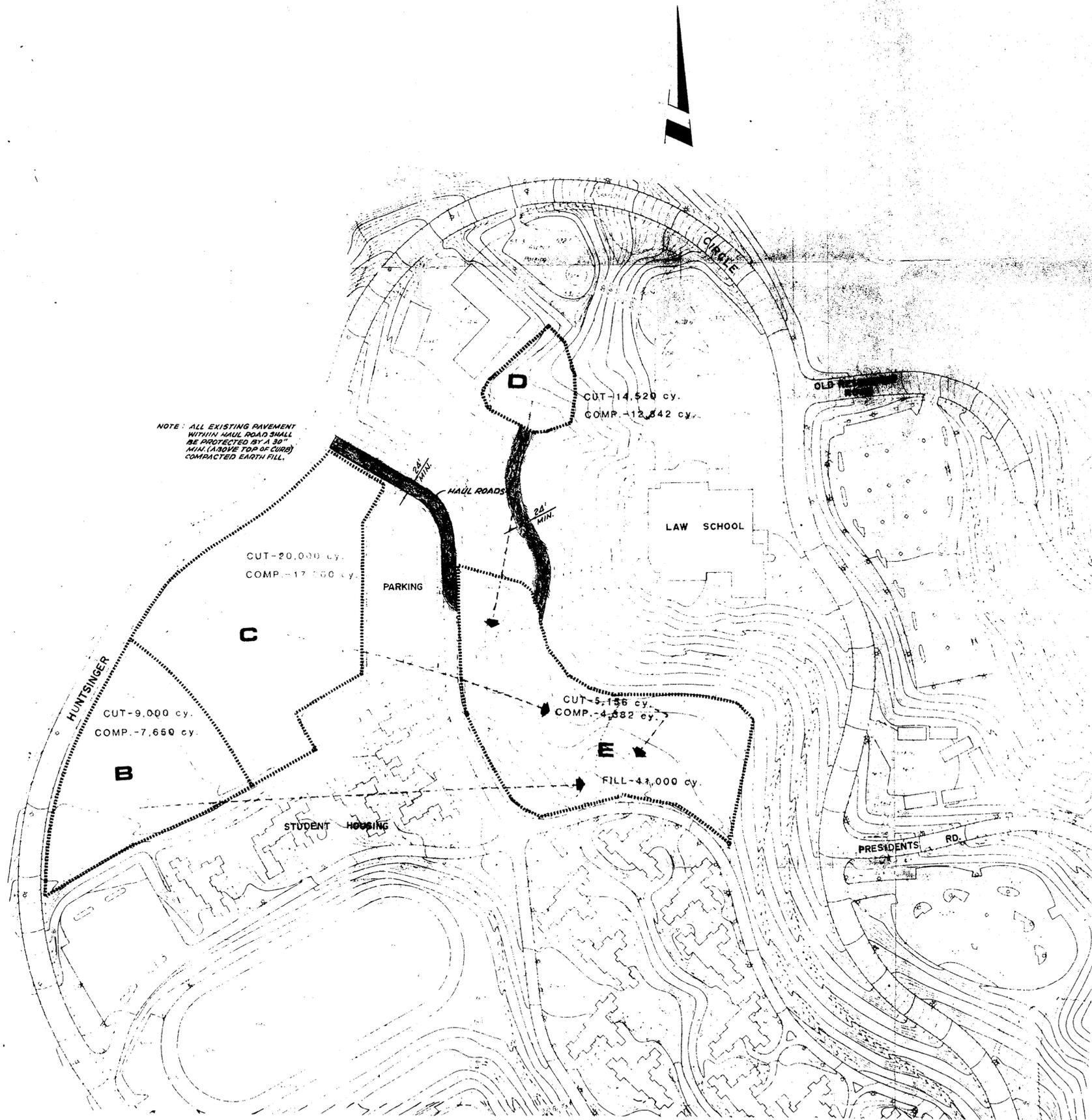
PEPPERDINE
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- P-80-7325 (Development Description)
 - *Dismantling of an equestrian center and construction of 116 units of law school and undergraduate student housing, parking spaces for 484 cars, staircases to the University Annex, an electrical distribution building and temporary classroom facility. Application includes a request for approval of allocation of the needed portion of the unused sewage treatment capacity to the proposed facilities. Project is included in the University Land Plan.*
- CDP 5-81-395A (Amendment to Permit P-80-7325)
 - *Relocate existing equestrian center to be dismantled for 116 unit housing as approved on P-80-7325.*
- CDP P-81-7818 (Development Description)
 - *Construction of university campus facilities including a heritage hall, music wing, and a visiting professors' duplex, relocation of an equestrian center and expansion of the student housing reception center. These proposals are consistent with the University's Master Plan, previously reviewed and approved by the Commission.*



Response to Staff Report – Existing Field and Lighting Approvals

- Staff bases its position on a “haul route plan” in its CDP 5-81-395A file
 - The plan identifies four pads (B, C, D and E) that would either generate cut or receive fill; **but** the field was balanced onsite (no cut or fill for transport)
 - **And** each of these four pads correlated to a specific proposed facilities at the time of the issuance of CDP 5-81-395A
- **Approved County of Los Angeles Grading Plan (1987)**
 - Shows field as built in its existing location
- **Coastal Commission LRDP Staff Report (August 1989)**
 - .. the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, **equestrian riding ring located just northwest of the existing graded campus**, music hall, and various parking, sports, security, storage, and temporary trailer uses.
- **Coastal Commission-Certified LRDP (1990)**
 - Shows field (as an existing graded facility) on the LRDP Conceptual Grading Map



DATE	9/20/87	SHEET	1	OF	1
SCALE	1"=100'	DESIGNED BY		APPROVED BY	
PROJECT		DATE		DATE	

HAUL ROUTE PLAN
 OF
 EQUESTRIAN USE AREAS
 PEPPERDINE UNIVERSITY
 MALIBU, CA.

BUILDING AND SAFETY DIVISION
 Department of County Engineer

APPROVAL IN CONCEPT
 SIG. *[Signature]*
 DATE 9/20/87
 PLAN CHECK NO.

Per sec. 27400 et seq. of the
 Public Resources Code and
 Sec 13210(a) Title 14 of the
 Administrative Code, State
 of California.
 THIS IS NOT A PERMIT
 and
 is subject to any conditions
 listed below.

South Coast Regional
 Commission
 APPROVAL
 Permit No. *5-045-A*
 By *[Signature]*

FILE COPY

OLIN D. MURPHY - CIVIL ENGINEER
 10000 WILSON AVENUE
 MALIBU, CALIFORNIA 90263
 (310) 316-1111

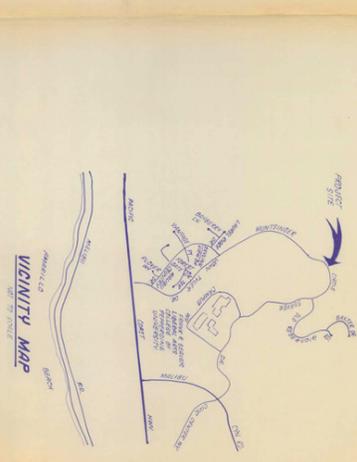




- SECTION BERM DETAIL**
1. The berm shall be placed until satisfactory of compacting, stability, and drainage is achieved and approved by the Soil Engineer.
 2. No rock or similar material greater than 1/2" in diameter shall be placed in the berm. The berm shall be compacted to a minimum of 95% relative compaction.
 3. The Soil Engineer shall inspect the berm at all stages of construction.
- SECTION C-D**
1. The berm shall be placed until satisfactory of compacting, stability, and drainage is achieved and approved by the Soil Engineer.
 2. No rock or similar material greater than 1/2" in diameter shall be placed in the berm. The berm shall be compacted to a minimum of 95% relative compaction.
 3. The Soil Engineer shall inspect the berm at all stages of construction.

CONSTRUCTION NOTES

1. The berm shall be placed until satisfactory of compacting, stability, and drainage is achieved and approved by the Soil Engineer.
2. No rock or similar material greater than 1/2" in diameter shall be placed in the berm. The berm shall be compacted to a minimum of 95% relative compaction.
3. The Soil Engineer shall inspect the berm at all stages of construction.



"AS BUILT"

NON-STRUCTURAL FILL PAD

GRADING PLAN FOR PEPPERDINE UNIVERSITY

APPROVED FOR GRADING

APPROVED BY: *James T. Emerson*

DATE: 4-24-87

DRAINAGE PLAN

APPROVED FOR DRAINAGE

APPROVED BY: *James T. Emerson*

DATE: 4-27-87

LAND DEVELOPMENT DIV.

B & E ENGINEERS

211 N. G Street, Suite 200
 Los Angeles, CA 90012
 (213) 475-1111

JAMES T. EMERSON P.E. (MS) 1111
 DATE: 2/19/85

DRAINAGE CERTIFICATE

THIS IS TO CERTIFY THAT THE DRAINAGE PLAN HAS BEEN REVIEWED AND APPROVED BY THE LOS ANGELES COUNTY ENGINEERING DEPARTMENT FOR THE PURPOSES OF THE CITY OF LOS ANGELES. THIS CERTIFICATE IS VALID FOR THE PERIOD OF 180 DAYS FROM THE DATE OF ISSUANCE.

APR 17 1987

Response to Staff Report – Existing Field and Lighting

PEPPERDINE
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- The Commission certified the existing location of the recreation area (the former equestrian center) in 1998
 - Pepperdine amended its LRDP map to leave the recreation area in its current location (as opposed to moving the field to an undeveloped area of campus)
 - In certifying LRDP 2-97, the Commission recognized that this environmentally sensitive decision would “reflect what currently exists”
- Pepperdine transitioned the equestrian center to the less intensive recreational/intramural use in 2000
- The Commission approved the enhancement of the existing recreational field in LRDP 1-11, Part A



Response to Staff Report – Lighting Impacts

PEPPERDINE
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- Pepperdine used the very conservative 0.1 fc line to measure potential light trespass impacts
 - Pepperdine is actually registered a CEC “Lighting Zone 3,” associated with a 0.8 fc threshold level
- Commission biologist Dr. Engel has stated that “[T]he significance threshold for spill light upon sensitive resources is 0.1 foot-candles at any receptor location”
- The Commission has used the 0.1 fc threshold for other projects in the vicinity of sensitive resources
 - Staff agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit
- Staff now, **for the first time**, rejects the usage of the 0.1 fc line and establishes significance threshold that is not supported Commission precedent and not appropriate for a developed campus setting



Response to Staff Report – Lighting Impacts

PEPPERDINE
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- Staff proposes applying a “No Ambient Lighting” threshold of 0.01 fc to the natural areas in the vicinity of the field
 - To our knowledge, no regulatory agency has ever applied this threshold to a project in California
 - Only appropriate for undisturbed wilderness and other areas where little to no light is expected
- Pepperdine is a developed campus, in a developed area where artificial light is expected and continuous
 - Ambient conditions in the natural areas near the proposed field already exceed the 0.01 fc standard by as much as a factor of three (even without taking into account the existing field lighting)
- The EIR and Supplemental Analysis’ conservative 0.1 fc threshold:
 - Is consistent with Commission precedent, staff direction provided to Pepperdine, and IESNA recommendations for areas where light might adversely affect flora and fauna



Response to Staff Report – Lighting Impacts

PEPPERDINE
UNIVERSITY

- The Proposed Lighting Will Not Result in Adverse Impacts to Biological Resources
- The Field is located in the developed campus surrounded by disturbed areas; a supplemental site-specific biological analysis concluded:
 - Light trespass up to 0.01 fc is almost entirely contained in developed or disturbed areas
 - The limited light spill of between 0.09 and 0.01 fc in the 0.2 acres of undisturbed area is consistent with ambient conditions and will not result in adverse impacts to the specific animals, birds and plants in the area
 - The area has very low to no stop-over value for migrating birds
 - Many of the migrating birds that pass the area are only active during the day; night migrating birds in the area will be unaffected due to flight patterns and careful lighting design



Legend

-  Pepperdine University Property Boundary
-  Limit of 0.1 foot candles
-  Limit of 0.01 foot candles



Hymelinger Cir.

Seaver Dr.

John Tyler Dr.

Banowsky Blvd.

Malibu Canyon Rd.

Pacific Coast Hwy.

Aerial View of the Proposed Lights Within the Developed Campus Core



Pacific Flyway



EXHIBIT A

8

ORNIA COASTAL COMMISSION

COAST AREA

100 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



DATE: August 28, 1989

TO: Coastal Commissioners and Interested Parties

FROM: Peter Douglas, Executive Director,
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: Pepperdine University Long Range Development Plan, Public hearing
and action (for September 12, 1989 meeting)

SYNOPSIS

Summary of Plan

Pepperdine University has submitted a Long Range Development Plan (LRDP) which proposes development of University facilities to serve up to 5,000 FTE (full-time equivalent) students over the 830 acre campus. The LRDP would permit 212 additional student and faculty/staff housing units, academic and support facilities totalling approximately 854,000 square feet within the 225 acre existing developed campus area. An additional 202 on-campus housing units and academic and support facilities totalling 385,000 sq. ft. and 182,000 sq. ft. of new roads is also proposed on a 72 acre expansion area on undeveloped land northwest of the developed campus area. Development of the expansion area will involve 3 million cubic yards of grading (842,000 cubic yards for stabilization of landslides and 2.2 million cubic yards for roads and building pads). Approval of the expansion of the Malibu Mesa Wastewater Reclamation Plant to 500,000 gallons per day capacity from the current 200,000 gpd is also being sought, to be constructed should the County of Los Angeles abandon its plans for a regional sewer system.

Summary of the Staff Recommendation

Staff is recommending that the Commission (1) deny the LRDP as submitted due to its non conformance with the coastal access, landform alteration and visual resource protection, hazards, and environmentally sensitive habitat protection policies of the Coastal Act; and (2) approve with suggested modifications dealing with public access, visual and environmental resources protection, hazards, and marine resources protection, that portion of the LRDP for the build-out of the existing developed campus area. The existing developed campus area is defined to include that area east of John Tyler Drive, south of Huntsinger Circle and west of Seaver Drive; the northern extent of Baxter Drive; the area northeast of the intersection of Seaver Drive and Baxter Drive; the area east of Seaver Drive between Baxter Drive and President Drive; and the area at the southeast intersection of Seaver Drive and President Drive, as shown on Exhibit 4.

EXHIBIT A

Pepperdine LRDP
Page 11

irrigation and monitoring plan, (2) additional geotechnical analysis to better determine the extent of the landslides on the proposed 72 acre expansion area and the amount of grading necessary for both landslide stabilization and roads and pads, (3) determination of whether the Malibu Coast Fault or any splays thereof exists within the campus, (4) updated traffic analysis and (5) visual impact analysis of the development proposed within the 72 acre expansion area.

B. Current Level of Development

The 830 acre Pepperdine University campus is located in western Los Angeles County, west of the Civic Center area of Malibu, adjacent to the intersection of Pacific Coast Highway and Malibu Canyon Road. The University is bounded on the east by Malibu Canyon Road and the site of the approved Adamson 300-room Adamson Hotel, on the west by the Malibu Mesa Wastewater Reclamation Plant and the Malibu County Estates condominium development, on the north by undisturbed watershed and the LUP designated Malibu Canyon Significant Watershed, and on the south by Pacific Coast Highway, the Malibu Bluffs State parkland, the new Malibu Colony Plaza (Reco) shopping center and the Malibu Road residential community and Amarillo Beach south of the highway.

The existing developed campus covers approximately 225 acres or a little over 25% of the 830 acres. The campus contains roughly 850,000 square feet of development. Additionally there are two 40,000 sq. ft. effluent lakes with a total capacity of 12.4 million gallons of treated water, 3.1 million gallon capacity of water storage tanks, playing fields and running tracks, tennis, racquetball and other sports facilities, water tanks and a retention basin. According to an April, 1989 University report, there are 2150 parking spaces within lots or structures and 990 on-street spaces within the University campus for a total of 3140 parking spaces (See Exhibit 4).

According to the Pepperdine University Specific Plan figures, the 850,000 square feet of facilities is devoted to 16% (135 units) student housing for 1537 students, 29% (52 units) faculty/staff/administration housing and recreational amenities, and the remaining 55% devoted to academic and support uses.

Pepperdine University was formerly located in south central Los Angeles. A program to move the campus to Malibu and to expand the University's facilities began nearly twenty years ago. The Long Range Development Plan (LRDP) which is reviewed here provides for a continuation of that expansion through 1997.

The University acquired its Malibu campus in 1968. In May of 1979 Los Angeles County approved a zone change to allow the campus site to be used for university purposes. On July 11, 1972, the County Planning Commission issued a Conditional Use Permit for the expansion of the university's facilities. Specific Plans were not adopted under this Conditional Use Permit until December 30, 1976.

Under the Coastal Act of 1976, the campus came under the jurisdiction of the Coastal Commission. The University applied for a claim of vested rights for all facilities shown on the 1976 Specific Plan. Prior to the effective date of the Coastal Act, the University had obtained numerous grading and building permits from the county and complete construction of 35 permanent buildings and were under way on 4 additional structures. Under the University's 1976

EXHIBIT A

Pepperdine LRDP
Page 12

Specific Plan the following facilities were yet to be constructed:

1. Undergraduate administration building
2. Fine arts complex
3. Hillside theatre and 2 contemporary arts facilities
4. Sea lodge
5. Temporary offices and administrative facilities (5)
6. Law School housing and parking structures
7. Student dormitory (1)
8. Student/staff housing structures (4)
9. Utility connections, grading, driveways, walkways and retaining walls to accommodate above listed development.

The claim of vested rights to complete the remainder of the facilities under the 1976 Specific Plan was denied by the South Coast Regional Commission on June 6, 1977 (E-2-E-5). A subsequent appeal to the State Coastal Commission resulted in a finding of no substantial issue on July 20, 1977, thus leaving the denial in place (Appeal No. 191-77, Pepperdine University).

Since this time the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, equestrian riding ring located just northwest of the existing graded campus, music hall, and various parking, sports, security, storage, and temporary trailer uses.

The University and Century Malibu, Inc. (Malibu Country Estates) were also given a permit to construct the 200,000 gallon per day (gpd) Malibu Mesa Wastewater Reclamation Plant located at the intersection of John Tyler Drive and Pacific Coast Highway. A spray irrigation management plan (SIMP) to dispose of treated wastewater over the landscaped and natural areas of the campus was also approved.

The Specific Plan states that as of fall, 1983 the enrollment totalled 1,920 full time equivalent (FTE) students. This number of FTE students was made up of 2,540 full and part-time students, of which 1,537 lived in campus housing and 1,003 commuted from other locations. There were 2148 FTE students enrolled in the University as of March, 1989. Under the proposed full build out of 5,000 FTE students, there would be an actual enrollment of 6,500 students, 500 faculty, 777 staff and 17 administrators.

C. Local Government Action on 1988 LRDP Proposal

There has been considered debate among some local citizen groups as to whether or not CEQA procedures have been properly followed with regards to the adequacy of the environmental analysis of the LRDP beyond the CUP for Phase I. The University has responded that the CEQA process has been properly carried out by the County of Los Angeles for the full LRDP as was proposed at the 1988 Commission hearing (see Exhibit 12). The University further contends that while the August, 1989 revisions to the LRDP are significant changes to the LRDP, they are significant reductions to the proposed development and therefore no additional or supplemental EIR is required under CEQA.

The October, 1983 Draft EIR on the University Specific Plan or LRDP was prepared as part of the process for review and consideration of Conditional Use Permit application CUP 2432 (4) requesting approval to development the Pepperdine campus as specified in the Specific Plan. The county zoning board

Response to Staff Report – Other Considerations

- The existing field is the only lighted outdoor recreational field on Campus
 - Staff's recommendation would force Pepperdine to continue using the existing field and its inferior lighting
- The proposed denial would actually result in greater environmental impacts to surrounding areas
- As voluntary mitigation for the Campus Life Project athletic field lighting, Pepperdine agreed to replace all existing campus globe lights
 - *This action would reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%*
- Staff would have the Commission accept this mitigation while denying the very project the mitigation was designed to address

PEPPERDINE
UNIVERSITY



FEDERAL INTERESTS IN FEDERAL LANDS

Section 104. (a) The United States, through the Department of the Interior, Bureau of Land Management, has an interest in the land described in this section...

SECTION 104. FEDERAL INTERESTS IN FEDERAL LANDS

Table with 2 columns: FEDERAL INTERESTS IN FEDERAL LANDS and FEDERAL INTERESTS IN FEDERAL LANDS. It lists various land parcels and their respective interests.

SECTION 104. FEDERAL INTERESTS IN FEDERAL LANDS. (b) The United States, through the Department of the Interior, Bureau of Land Management, has an interest in the land described in this section...

EXHIBIT I

PEPPERDINE UNIVERSITY - MALIBU LEGEND FOR LAND USE SITE PLAN

DATE: 10/1/77



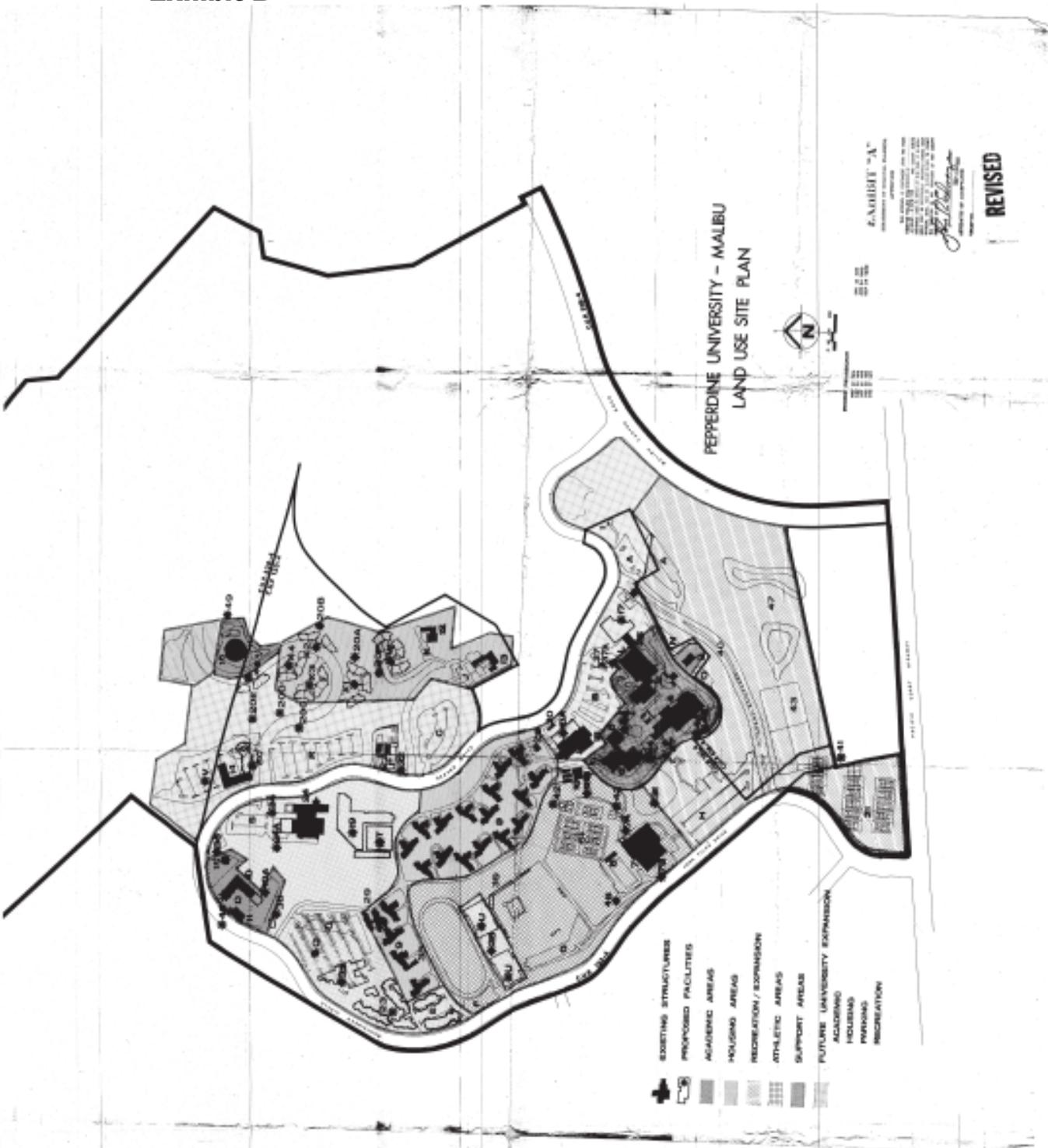
GENERAL NOTES TO INTERESTED PARTIES

- 1. The proposed project is located on the Malibu campus of Pepperdine University... 2. The project is subject to the following conditions... 3. The project is subject to the following conditions...

GENERAL NOTES TO INTERESTED PARTIES

- 1. The proposed project is located on the Malibu campus of Pepperdine University... 2. The project is subject to the following conditions... 3. The project is subject to the following conditions...

Exhibit B



DATE	DESCRIPTION	BY

Exhibit B

HAUL ROUTE PLAN
 DEPARTMENT OF AGRICULTURE
 UNIVERSITY OF CALIFORNIA
 MARSH, CA

DAVID J. MERRILL - CIVIL ENGINEER
 1000 S. GARDEN AVENUE
 SUITE 100
 ANAHEIM, CA 92805
 (714) 771-1111
 FAX (714) 771-1112
 WWW.DJMERRILL.COM



HAUL ROUTE PLAN
 DEPARTMENT OF AGRICULTURE
 UNIVERSITY OF CALIFORNIA
 MARSH, CA

FILE COPY

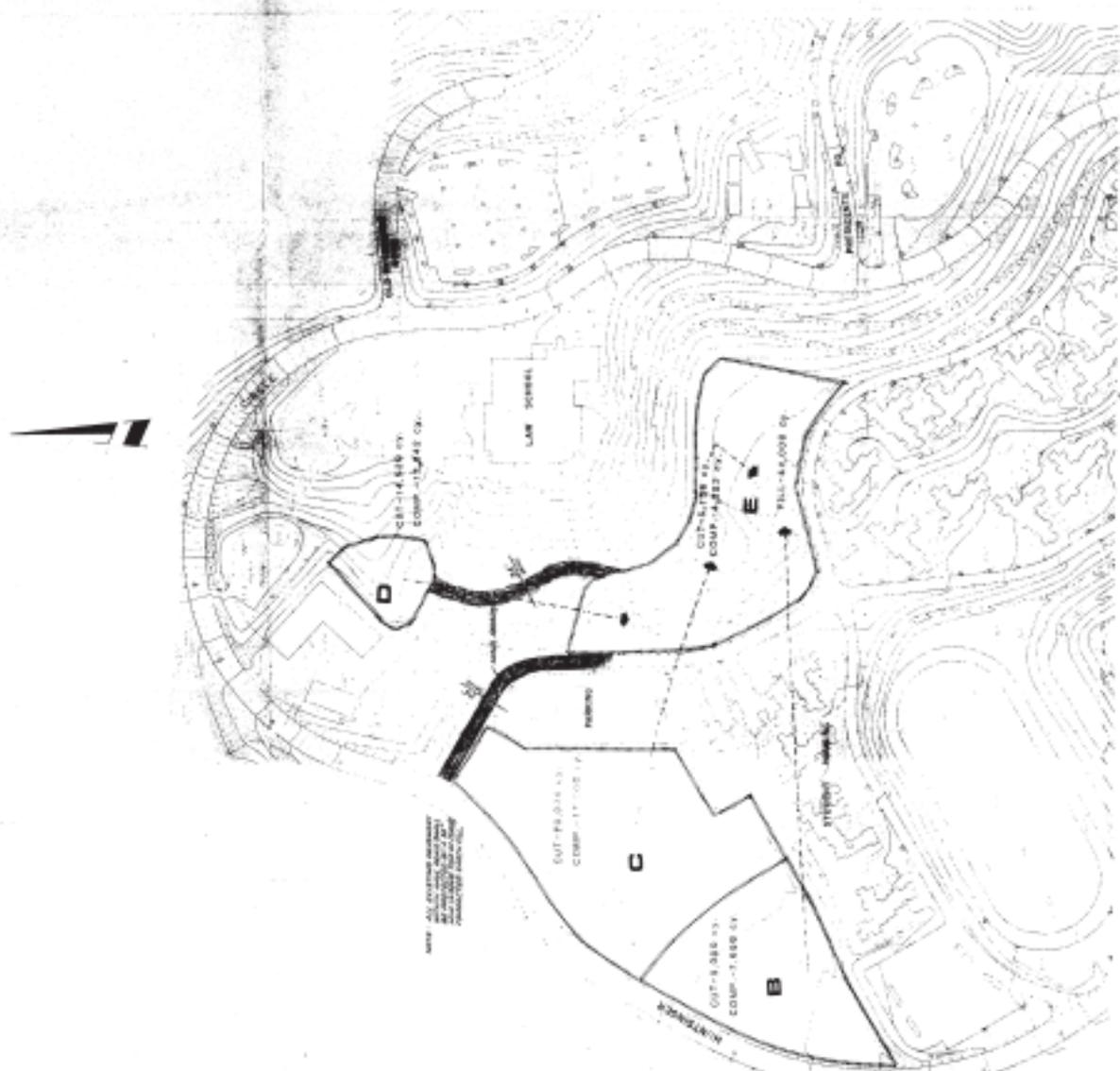


Exhibit B

PEPPERDINE UNIVERSITY

TOTAL 530 ACRES

A-1-1-DP
ZONE BOUNDARY

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

KESA PEAK TRAIL
(DEED RESTRICTED)

OPEN SPACE

COMBINED MESA PEAK
AND CENTRAL SLOPE TRAILS
(DEED RESTRICTED)

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

OPEN SPACE

OPEN SPACE

Notes:
This map is not and
should not be used
for any purpose
other than that
for which it was
prepared.
Date: 11/11/82



Project Location Map

EAI ENVIRONMENTAL AUDIT, INC.
1000 N. ORANGE WAY • PASADENA, CA 92303-7125
TEL: 714/852-8100 • FAX: 714/852-8154

Project: Environmental Analysis and
Mitigation
Location: LAUREL RIDGE

DATE	BY	REVISED	DATE	BY	REVISION
11/11/82	PSD		7/28/82		13/00001.DWG

Exhibit B

• MAP A •

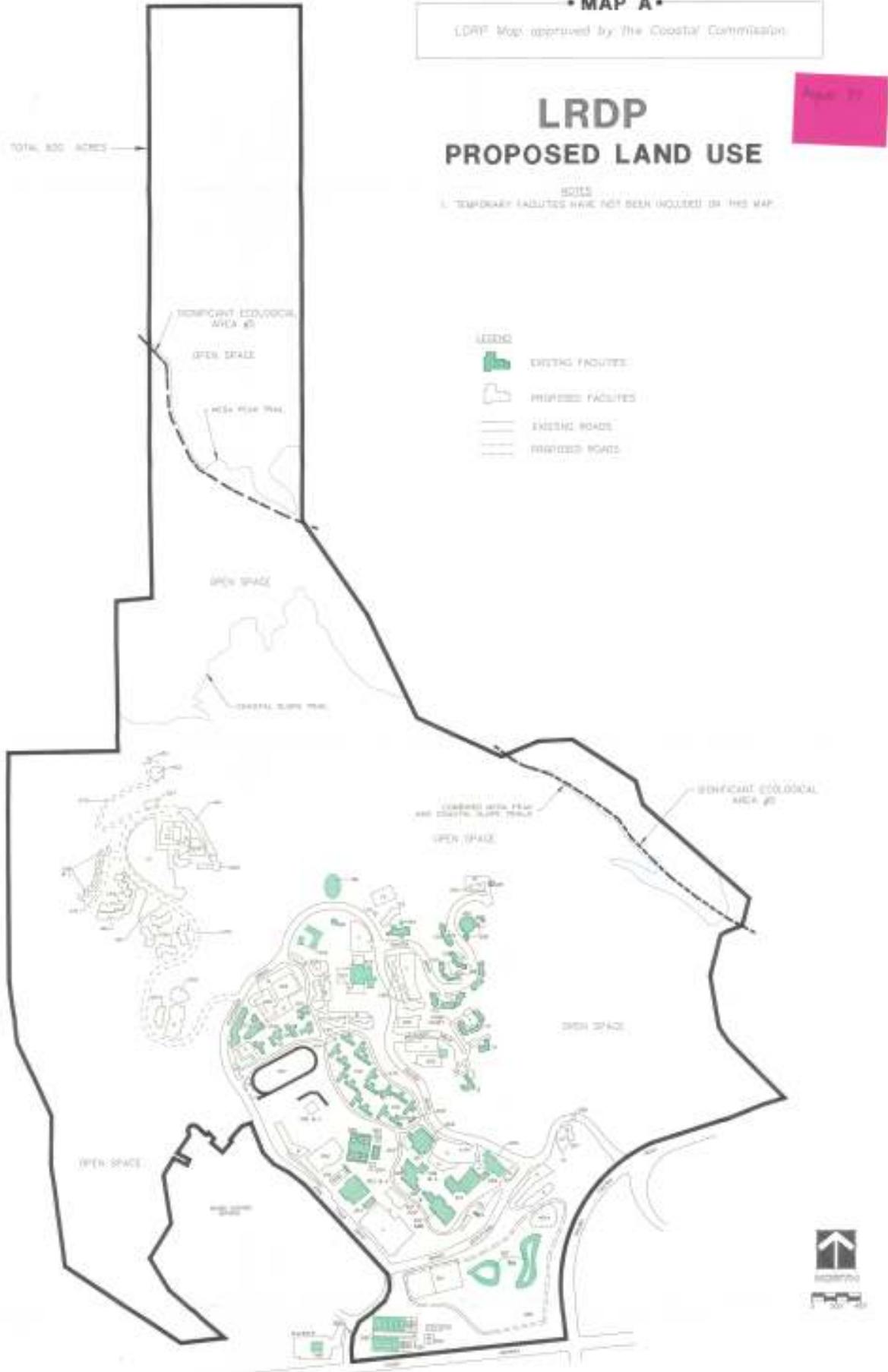
LRDP Map approved by the Coastal Commission

LRDP PROPOSED LAND USE



NOTES
1. TEMPORARY FACILITIES HAVE NOT BEEN INCLUDED ON THIS MAP.

TOTAL 800 ACRES



NOVEMBER 1999

BUILDING NUMBERS, GENERAL DESCRIPTIONS
& USES OF BUILDINGS/FACILITIES
ARE LISTED IN THE SPECIFIC PLAN

EAJ ENVIRONMENTAL AUDIT, INC.
 1000-A DUNNWAY, SUITE 100 • FARMINGTON, CT 06030-1100
 TEL: 860-638-4100 • FAX: 860-638-4200
 e-mail: Planning.Environmental.Audit@earthlink.net
 Environmental Solutions Management and Assessment

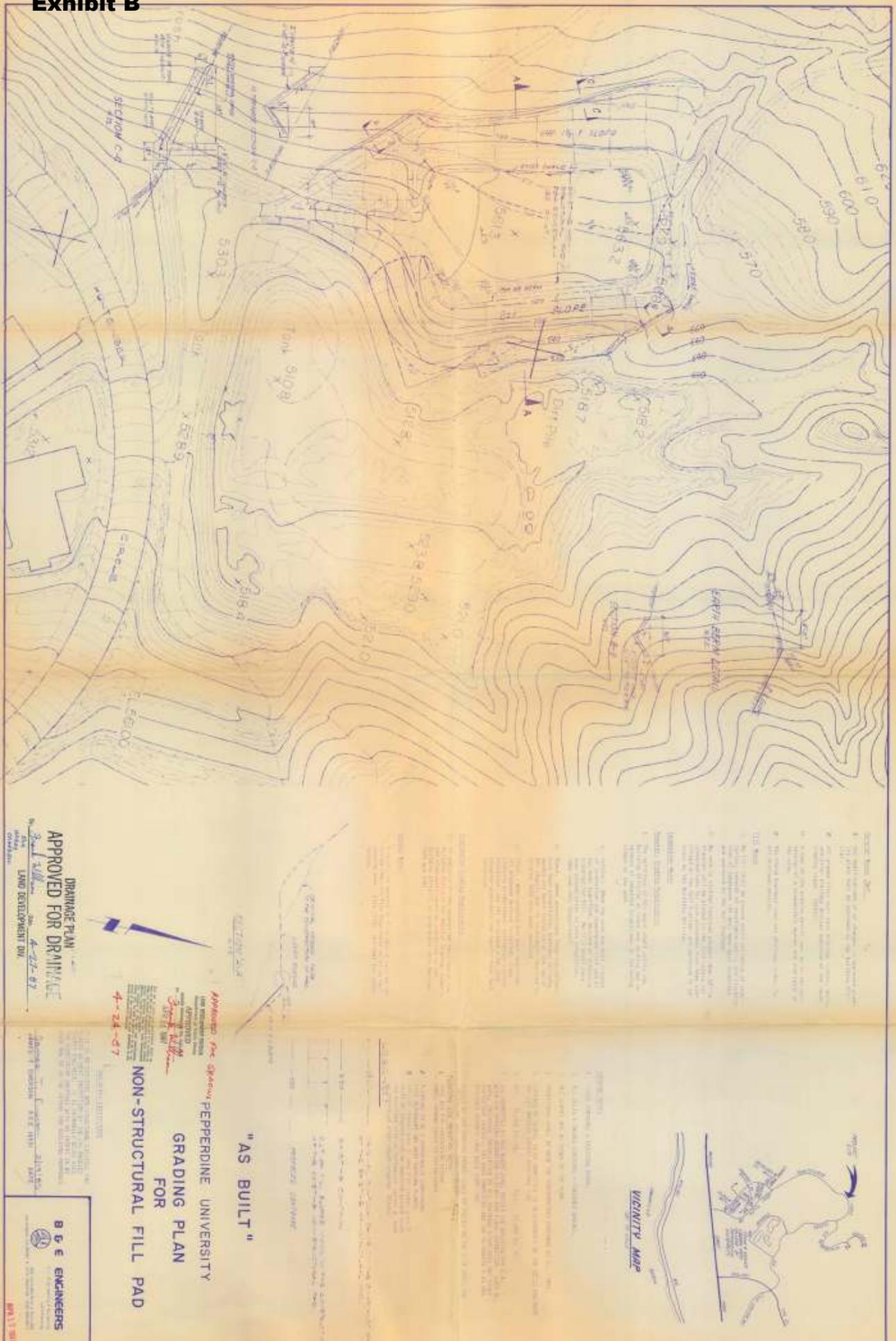
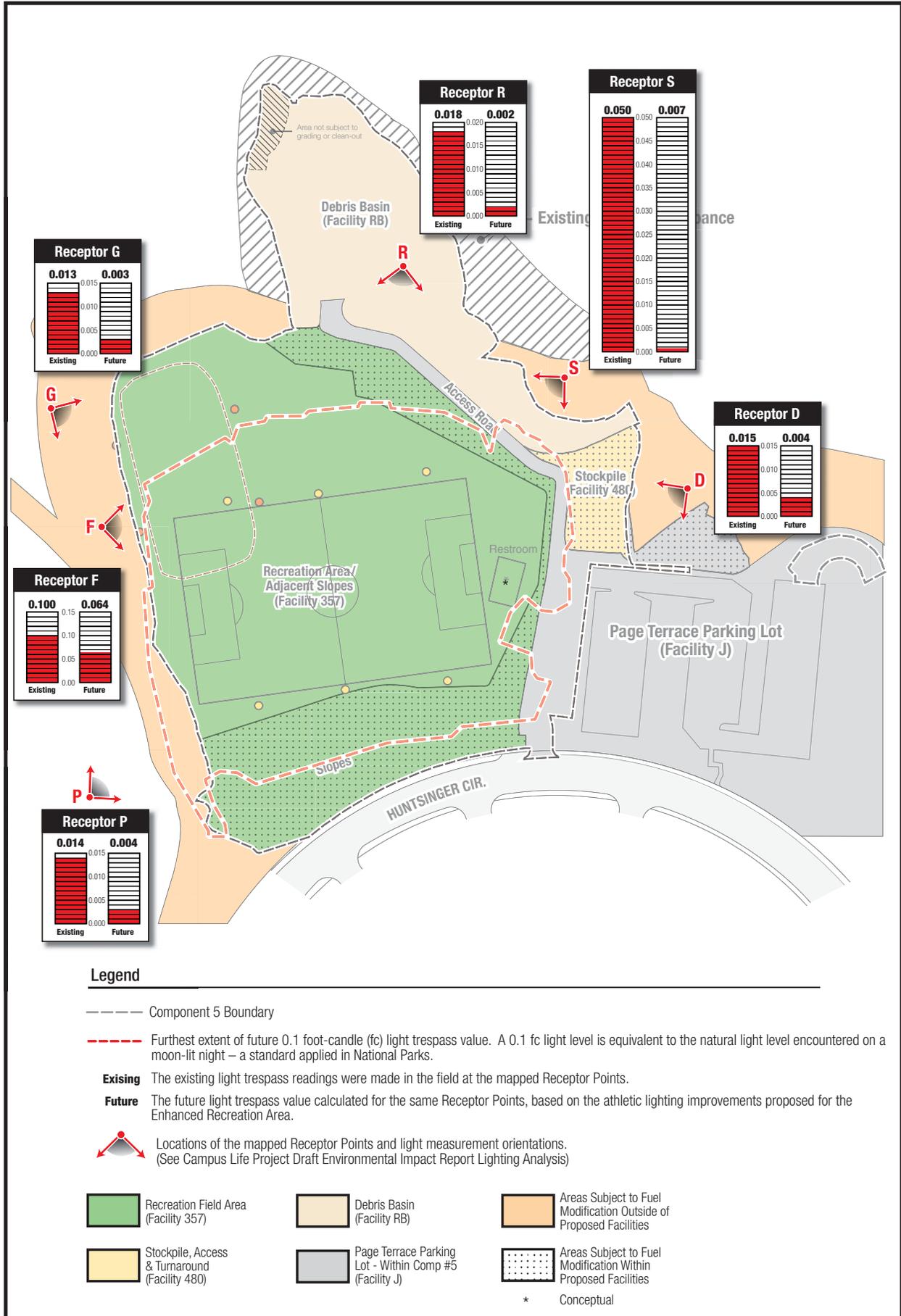


EXHIBIT C



June 10, 2013

CALIFORNIA COASTAL COMMISSION

SOUTH COAST AREA
245 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



December 21, 1989

TO: Commissioners and Interested Persons

FROM: Peter Douglas, Executive Director
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: REVISED FINDINGS ON THE PEPPERDINE UNIVERSITY LONG RANGE DEVELOPMENT PLAN (LRDP) for Public Hearing and Commission Action at the Meeting of January 11, 1990.

SYNOPSIS

Summary of Commission Action

On September 12, 1989, the California Coastal Commission reviewed the Pepperdine University Long Range Development Plan (LRDP). In its action, the Commission denied the LRDP as submitted and certified it with Suggested Modifications regarding public access, hazards, and visual, marine and environmentally sensitive resource protection.

If these Suggested Modifications are adopted by the Board of Regents of the University within six months of the Commission's action (March 11, 1990) and the Commission is so notified, the LRDP will become effectively certified.

Commission Vote

The Commission's action included two resolutions on the LRDP submittal. The Commissioners voting on the prevailing side on the first resolution to deny the LRDP as submitted were:

Glickfeld, Rynerson, MacElvaine, Malcolm, McInnis, Knapp, Neely, Warren, Wright, Hisserich, Franco, and Chairman Wornum

The Commissioners voting on the prevailing side on the second resolution to certify the LRDP with Suggested Modifications were:

Knapp, Neely, Wright, Glickfeld, MacElvaine, Malcolm, McInnis, and Chairman Wornum

Additional Information

Further information on the Pepperdine University Long Range Development Plan may be obtained from Teresa Henry at the South Coast Area Office of the Coastal Commission, 245 West Broadway, Suite 380, Long Beach, CA 90802, (213) 590-5071.

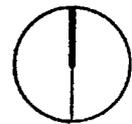
EXHIBIT
13a



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area
Conceptual Grading Plan
 Showing Landslide Stabilization Areas
 Outside of Graded Area.

RECEIVED

AUG 4 1989



ATTACHMENT C-1

CALIFORNIA
COASTAL COMMISSION

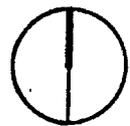
These materials have been provided to Coastal Commission Staff

Exhibit D

EXHIBIT
136



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area •
Conceptual Grading Plan
With Proposed Buildings



ATTACHMENT C-2

Albert C. Martin and Assoc.
DATE 7-20-02

VERSION 3

PEPPERDINE UNIVERSITY

**The Campus Life Project: The Next Step in Fulfilling our
Long Range Development Plan**

LRDP Amendment 1-11, Part B

THESE MATERIALS HAVE BEEN PROVIDED TO COASTAL COMMISSION STAFF

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- Pepperdine strongly disagrees with the Staff's recommendations that the existing field and lights were not permitted
 - The existing field and lights were installed pursuant to three CDPs approved by the Commission in the early 1980s; the Commission subsequently certified the existing facility and its lighting in 1990, 1998, and 2012
 - The LRDP encompassed all on-the-ground development at the time of its certification in 1990
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds do not withstand scientific scrutiny
 - Pepperdine used a highly conservative threshold to measure potential impacts; the Commission has previously relied on the 0.1 fc threshold previously and it is consistent with IESNA recommendations
 - The EIR and Pepperdine's supplemental, site-specific biological analysis concluded that the lights would not adversely impact any sensitive resources
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- By mutual agreement with Staff, Pepperdine divided its LRDP Amendment 1-11 into two parts (Part A and Part B); the Commission unanimously approved Part A in December 2012
- Part B is a focused review of three elements of the approved Enhanced Recreation Area:
 - Replacement of the existing unshielded "flood lights" with state-of-the-art, shielded fixtures
 - Confirmation of east-west field configuration as requested by Coastal Staff
 - Specific location of the approved small restroom/storage facility

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Aerial View of
Approved
Enhanced
Recreation Area,
Proposed
Light/Restroom
Locations, and
Field Orientation

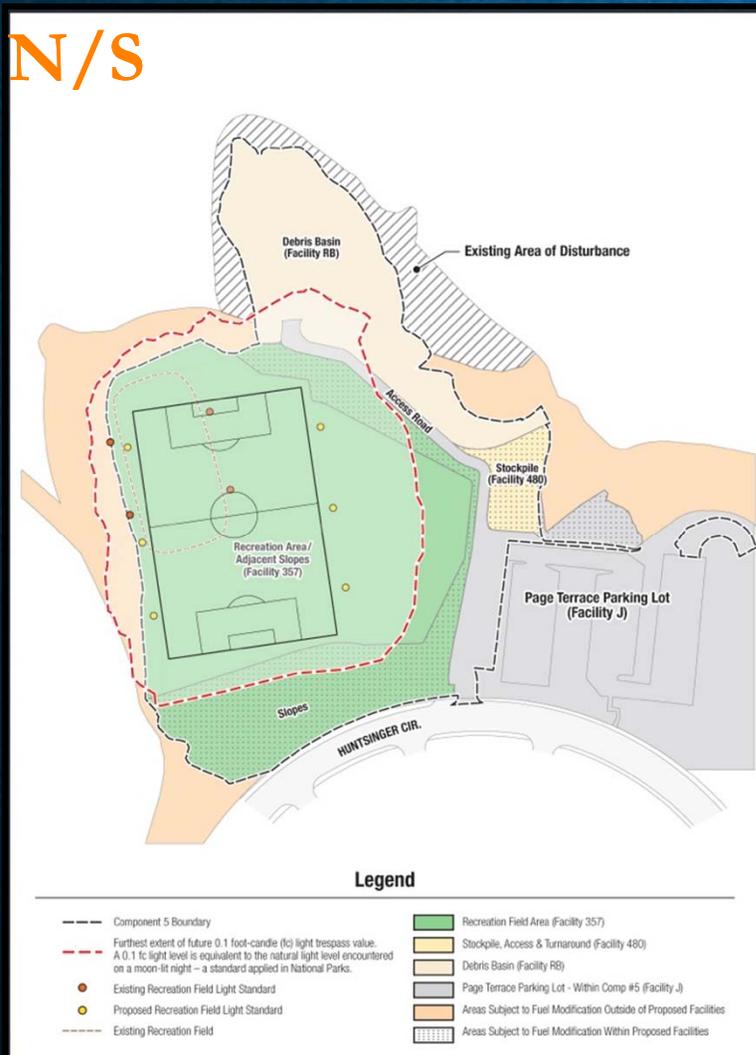


Aerial View of the Proposed Lights Within the Developed Campus Core



Recreation Field Orientation

- Pepperdine would agree to orient the proposed Recreation Field in Staff's preferred "east-west" configuration
- The E/W orientation focuses light further south towards Huntsinger Circle; in this orientation the field would be surrounded by developed and disturbed areas



Importance to Campus Community

- The Campus Life Project provides much needed enhancements to on-campus amenities
- The approved Enhanced Recreation Area will provide all students with safe recreational space for physical health and building community
- Night lighting is critical for all students to enjoy the facility
 - Student days are filled with ever expanding class loads, volunteering, internships, clubs, jobs, etc.
 - **The University has a critical need for additional recreational field space**, and without night lighting, a significant percentage of the Campus's young men and woman will lose the already limited opportunity to recreate and participate in intramural or club sports

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Project Need

- The existing field at the site of the approved Enhanced Recreation Area is Pepperdine's only lighted recreational field space
 - This is already significantly deficient when compared with peer institutions
- Key objectives of the Campus Life Project include:
 - Provide an enhanced recreation facility including a lighted field to alleviate the overcrowded conditions
 - Provide needed outdoor recreation field within the existing developed campus
- Without approval of Part B, Pepperdine would be forced to continue using the existing undersized, flood-lit field

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Lighted Fields at Peer Institutions

Institution	Lighted Recreational Field Area (acres)*
Pepperdine University	0.46
Loyola Marymount University	3.05
University of California Los Angeles	7.33
University of California Santa Barbara	5.32
University of the Pacific	1.93
Saint Mary's College	1.73
University of San Diego	3.57
University of San Francisco	1.70
Santa Clara University	3.13
University of California San Diego	10.78
University of California Berkeley	5.19
California State University Long Beach	8.63
Stanford University	5.13

* Information compiled by Envicom Corporation August 2013.

Enhanced Recreation Area Lighting Design

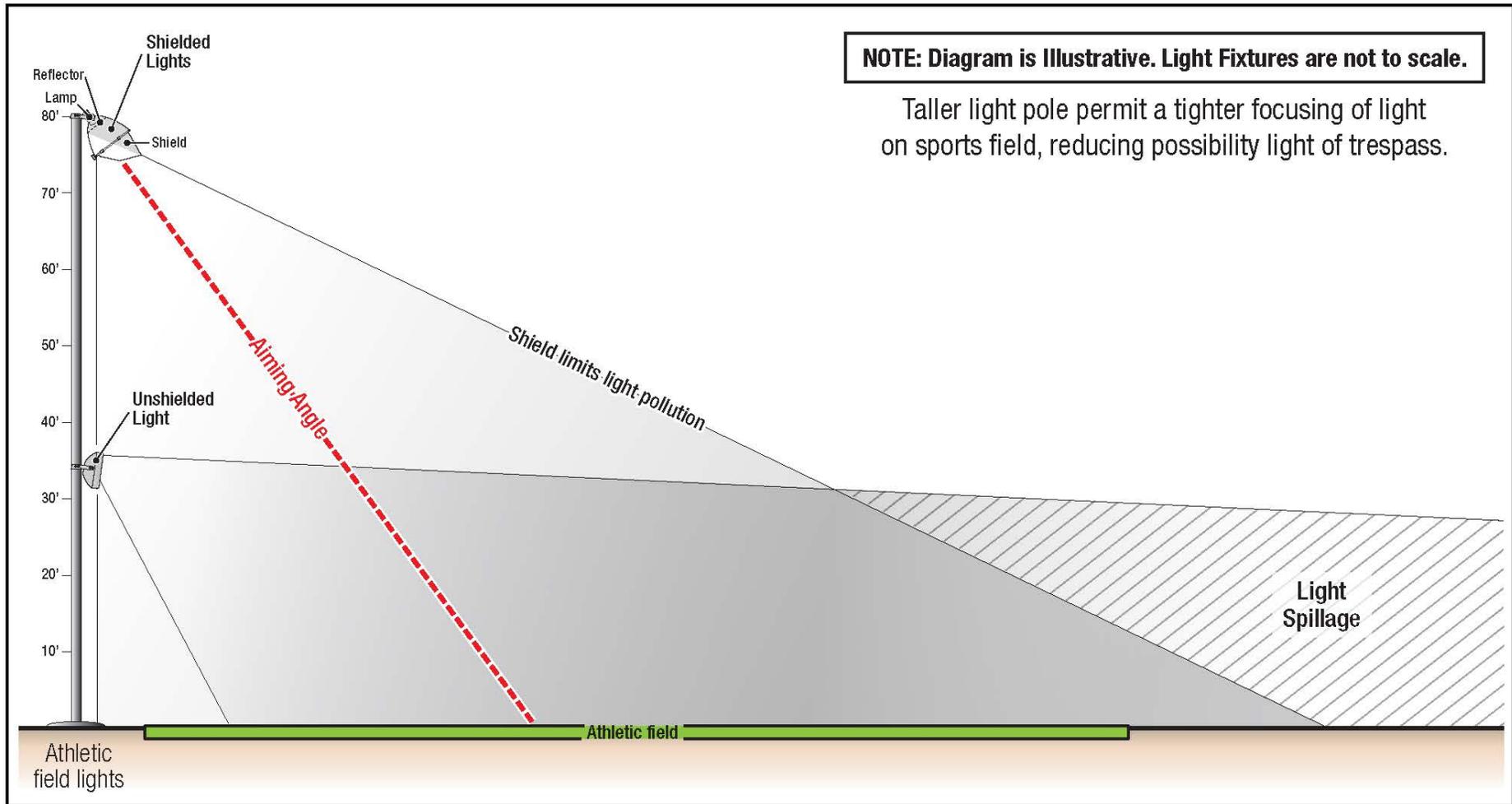
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- Proposed lighting features state-of-the-art technology designed to prevent or minimize all forms of light pollution including glare, light trespass, and sky glow
 - The proposed cutoff, angled, and shielded fixtures will direct light onto the field rather than into natural areas and the night sky
 - Would utilize the same advanced fixtures approved by the Commission for the soccer field in Part A
 - Lighting levels would be lower than soccer field due to proposed recreational use
- Would improve existing conditions by replacing the existing, non-cutoff, non-shielded flood lights



Existing Recreation Lighting Proposed for Replacement





Revised: Sep. 23, 2013

Consistency with the LRDP Lighting Policy

- When approving Part A, the Commission proposed a comprehensive LRDP "Lighting Policy," which the University adopted
- The proposed lights fully comply with the terms and intent of the Policy. The lights are:
 - "Qualite" or a superior, state-of-the-art technology designed to dark-sky-compatible standards
 - Minimized, directed downward, and shielded using the best available visor technology and pole height design to minimize light spill, sky glow, and glare
 - Designed to minimize light trespass into adjacent non-target areas, and to limit the illumination of adjacent open space and sensitive habitat areas

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Reducing Lighting Impacts

- The EIR lighting study determined there would be no significant light trespass or glare impacts
 - The EIR used a highly conservative 0.1 fc line to measure impacts in the vicinity of the proposed field; Pepperdine's Campus is actually registered as a CEC "Lighting Zone 3," associated with a 0.8 fc threshold level
- For LRDP Amendment 1-11, Pepperdine conducted a supplemental analysis finding:
 - No light trespass greater than 0.1 fc will occur in undisturbed, naturally vegetated or habitat areas
- The 0.1 footcandle (fc) level is the most conservative threshold used in past Commission precedent
 - Staff Biologist Dr. Engel stated in 2011: "[T]he significance threshold for spill light upon sensitive resources is 0.1 [fc] at any receptor location"
 - Dr. Engel agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit

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Legend

- Pepperdine University Property Boundary
- Limit of 0.1 foot candles
- Limit of 0.01 foot candles



Reducing Sky Glow Impacts

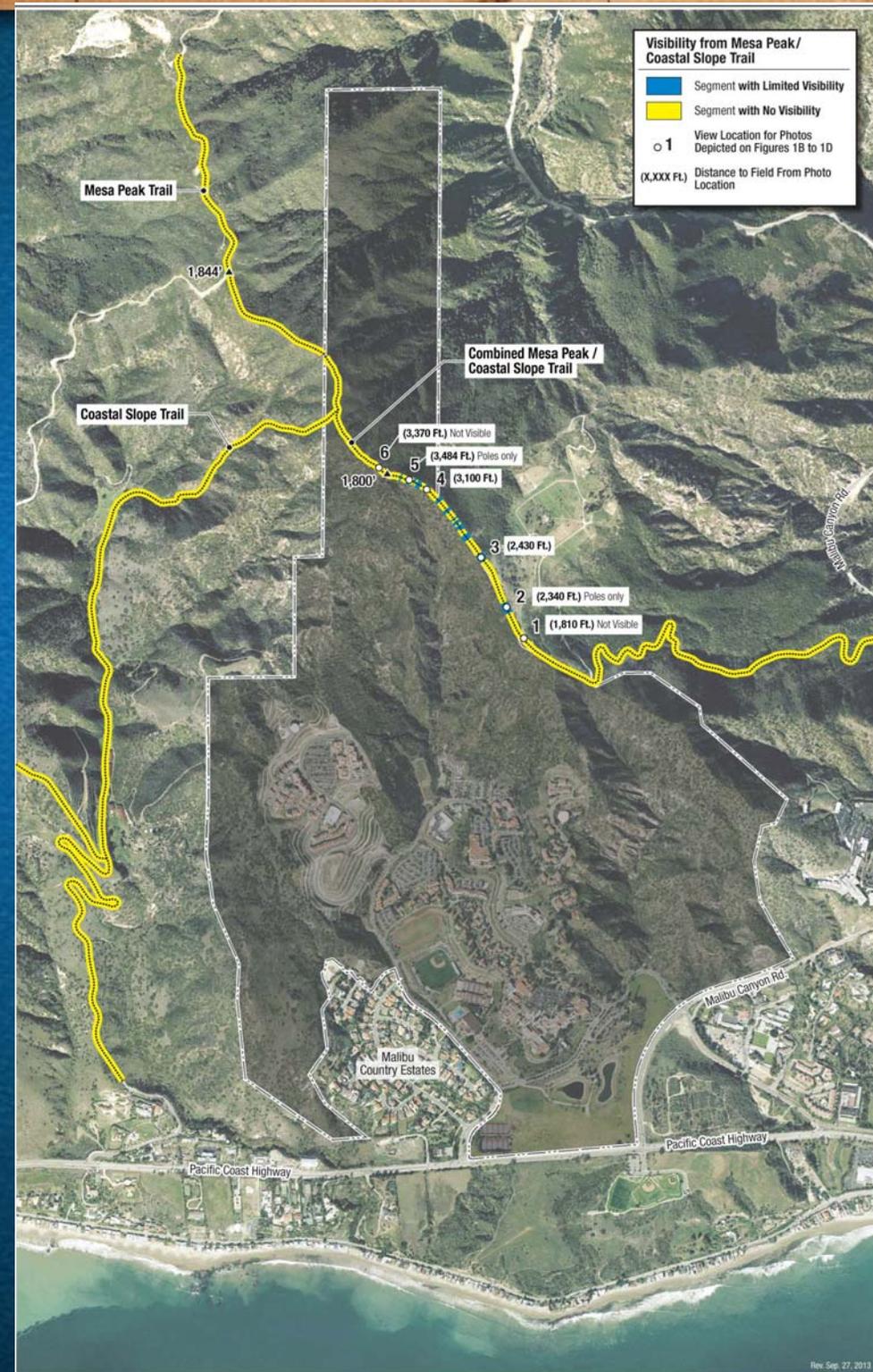
- The lighting incorporates principles and recommendations provided by the International Dark Sky Association and Illuminating Engineering Society of North America to prevent or minimize sky glow and protect Coastal resources
- Light emitted between 80 and 100 degrees has the greatest effect on sky glow
 - The new fixtures will emit light between 16 and 62 degrees, which is far less likely to result in sky glow than conventional lights
 - The existing flood lights emit light at ~ 80 degrees
- If approved, replacement of the existing recreational field lighting along with the Campus globe lights would ***reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%***

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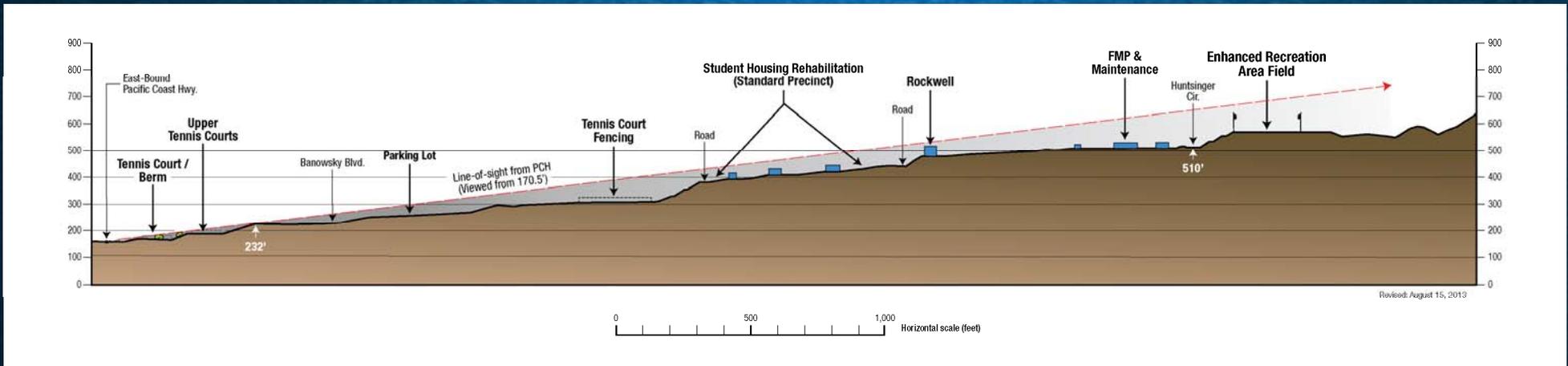


Protecting Visual Resources

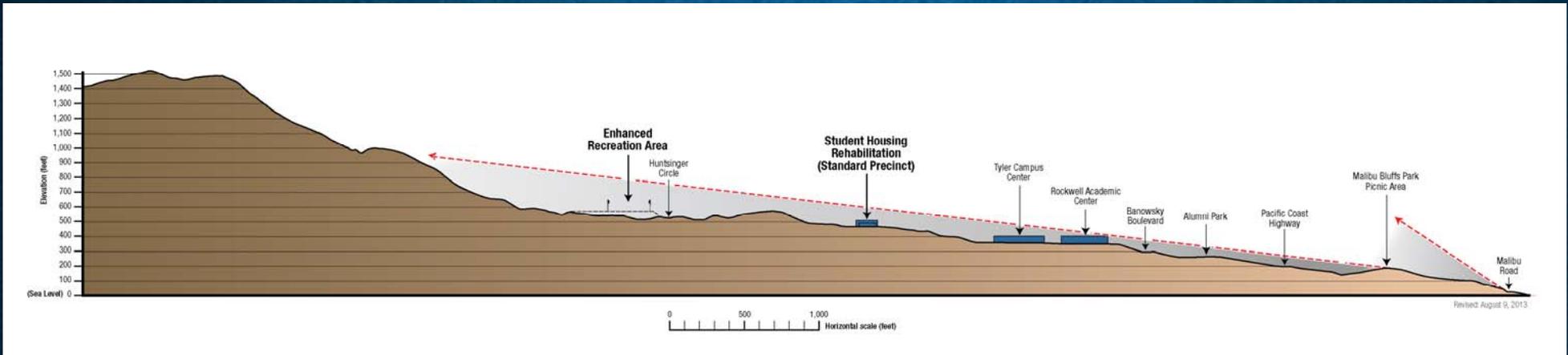
- The light fixtures will not be visible from:
 - Malibu Canyon Road
 - Pacific Coast Highway
 - Santa Monica Mountains Conservancy-Owned Malibu Bluffs
- Fixtures are invisible from the vast majority of area trails - hikers could see the fixtures along less than 4% of the 4.1 miles that comprises the combined Coastal Slope and Mesa Peak trails
- Limited views of fixtures would be consistent with the current views of the developed campus and the City of Malibu



Proposed Light Fixtures are not Visible from PCH



Proposed Light Fixtures are not Visible from Bluffs Park



Protecting Avian Resources

Nesting Birds

- The proposed east-west orientation focuses light further south towards Huntsinger Circle and away from the undeveloped campus
 - Minimizes potential light trespass and glare impacts on nesting birds

Migratory Birds

- Proposed Qualite International fixtures produce "cool" white light (not the type of red light found potentially impactful to avian behaviors in the majority of reviewed studies)
 - Only 11.84% of the light produced falls within the red spectrum

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Conclusions

- The Enhanced Recreation Area lighting is the final piece of the Campus Life Project
- The proposed lights:
 - Are consistent with Pepperdine's Commission-recommended LRDP lighting policy
 - Will limit light trespass consistent with the conservative 0.1 fc threshold used in the past by the Commission for areas near sensitive resources and consistent with IESNA recommendations for areas where light might adversely affect flora and fauna
 - Provide important additional recreational opportunities on Campus
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

The Campus Life Project – Response to Staff Report: Overview

- Pepperdine strongly disagrees with the Staff's recommendations
- Pepperdine disagrees with the assertion that the existing field and its lights were not permitted
- Staff's rejection of the 0.1 fc threshold for significant impacts breaks from Commission precedent, direction provided to Pepperdine during the LRDP process, and IESNA recommendations for areas where light might adversely affect flora and fauna
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds are arbitrary and do not withstand scientific scrutiny
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

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Response to Staff Report – Existing Field and Lighting Approvals

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- The existing recreational field (formerly the equestrian center) and its lighting have been in place in the same location for approximately 30 years
- Pepperdine developed the field and its lights pursuant to three CDPs (P-80-7325, CDP 5-81-395A, and CDP P-81-7818) in the early 1980s
 - While the permits do not specifically refer to lights, the level of permit detail was vastly differently in the 1980s
- When the Commission certified the LRDP in 1990, after the field and lighting had been installed, it also certified that “Development at Pepperdine has been consistent with the goals, policies, rules and regulations of ... the California Coastal Commission”
- The LRDP encompassed all on-the-ground development at the time of the LRDP certification in 1990



Response to Staff Report – Existing Field and Lighting Approvals

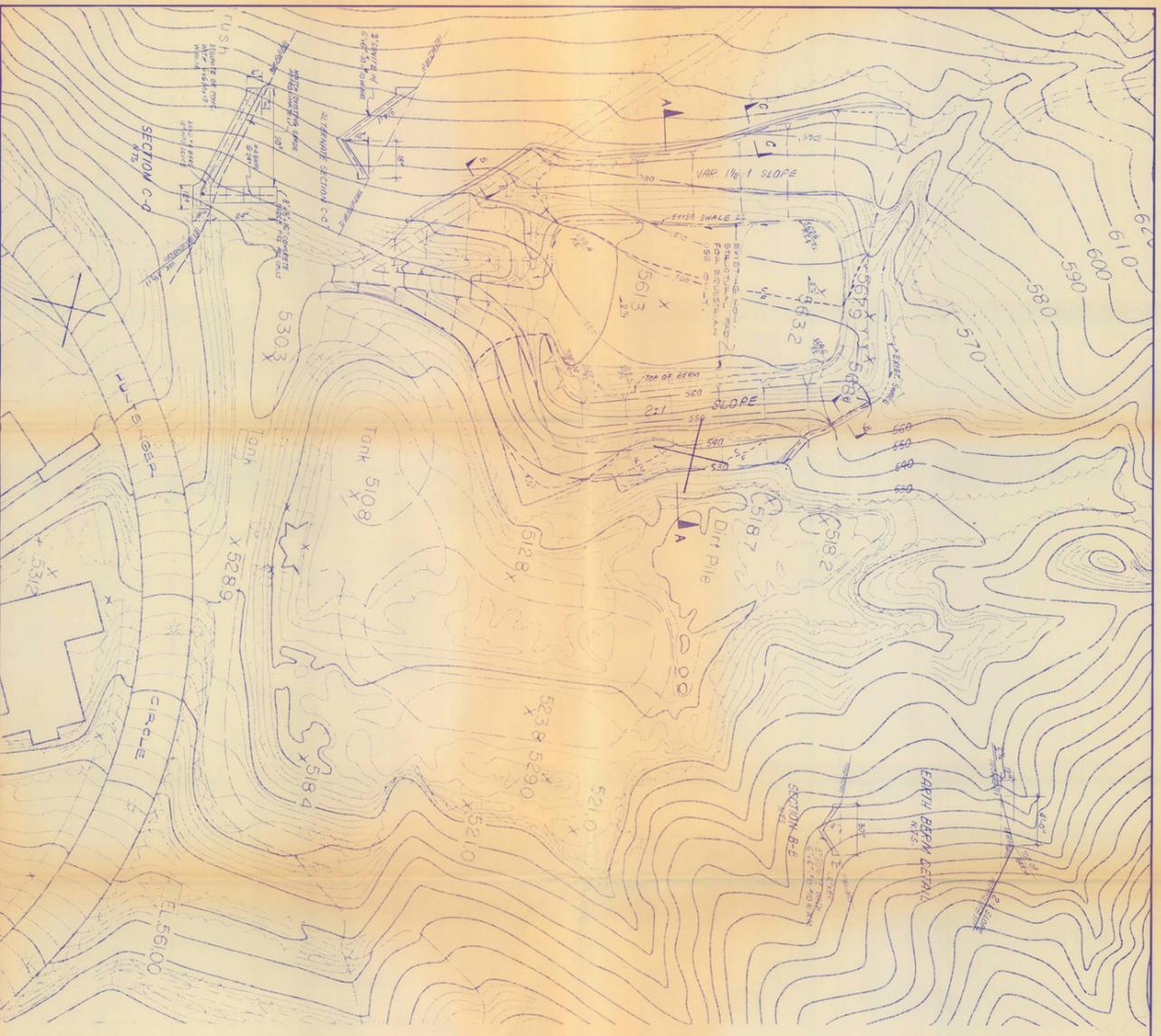
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- P-80-7325 (Development Description)
 - *Dismantling of an equestrian center and construction of 116 units of law school and undergraduate student housing, parking spaces for 484 cars, staircases to the University Annex, an electrical distribution building and temporary classroom facility. Application includes a request for approval of allocation of the needed portion of the unused sewage treatment capacity to the proposed facilities. Project is included in the University Land Plan.*
- CDP 5-81-395A (Amendment to Permit P-80-7325)
 - *Relocate existing equestrian center to be dismantled for 116 unit housing as approved on P-80-7325.*
- CDP P-81-7818 (Development Description)
 - *Construction of university campus facilities including a heritage hall, music wing, and a visiting professors' duplex, relocation of an equestrian center and expansion of the student housing reception center. These proposals are consistent with the University's Master Plan, previously reviewed and approved by the Commission.*



Response to Staff Report – Existing Field and Lighting Approvals

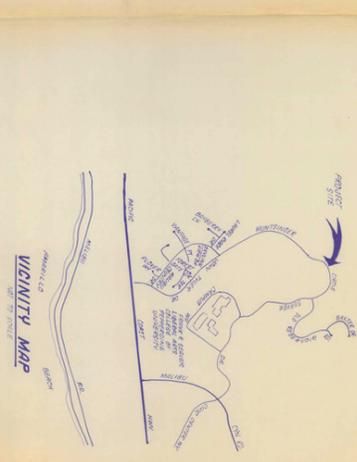
- Staff bases its position on a “haul route plan” in its CDP 5-81-395A file
 - The plan identifies four pads (B, C, D and E) that would either generate cut or receive fill; **but** the field was balanced onsite (no cut or fill for transport)
 - **And** each of these four pads correlated to a specific proposed facilities at the time of the issuance of CDP 5-81-395A
- Approved County of Los Angeles Grading Plan (1987)
 - Shows field as built in its existing location
- Coastal Commission LRDP Staff Report (August 1989)
 - .. the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, **equestrian riding ring located just northwest of the existing graded campus**, music hall, and various parking, sports, security, storage, and temporary trailer uses.
- Coastal Commission-Certified LRDP (1990)
 - Shows field (as an existing graded facility) on the LRDP Conceptual Grading Map



- SECTION BERM DETAIL**
1. No fill shall be placed until satisfactory completion of the foundation, walls, and other drainage devices approved at the time of the site plan.
 2. The fill engineer shall set drainage stakes for all drainage devices.
 3. No fill shall be placed until satisfactory completion of the foundation, walls, and other drainage devices approved at the time of the site plan.
 4. The fill engineer shall set drainage stakes for all drainage devices.
- INSPECTION NOTES**
1. The site plan for this project shall satisfy the requirements of the Department of Public Works and the Department of Public Health.
 2. The site plan shall be approved by the Department of Public Works and the Department of Public Health.
 3. The site plan shall be approved by the Department of Public Works and the Department of Public Health.

CONSTRUCTION NOTES

1. The site plan shall be approved by the Department of Public Works and the Department of Public Health.
2. The site plan shall be approved by the Department of Public Works and the Department of Public Health.
3. The site plan shall be approved by the Department of Public Works and the Department of Public Health.



APPROVED FOR DRAINAGE

By *James T. Emerson* Date 4-27-87

LAND DEVELOPMENT DIV.

APPROVED FOR GRADING

By *James T. Emerson* Date 4-27-87

LAND DEVELOPMENT DIV.

NON-STRUCTURAL FILL PAD

"AS BUILT"

PEPPERDINE UNIVERSITY

GRADING PLAN

FOR

NON-STRUCTURAL FILL PAD

DRAINAGE CERTIFICATE

DATE 2/19/85

B & E ENGINEERS

2200 Commonwealth Blvd. Suite 200
 San Diego, California 92108
 (619) 591-1111

Response to Staff Report – Existing Field and Lighting

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- The Commission certified the existing location of the recreation area (the former equestrian center) in 1998
 - Pepperdine amended its LRDP map to leave the recreation area in its current location (as opposed to moving the field to an undeveloped area of campus)
 - In certifying LRDP 2-97, the Commission recognized that this environmentally sensitive decision would “reflect what currently exists”
- Pepperdine transitioned the equestrian center to the less intensive recreational/intramural use in 2000
- The Commission approved the enhancement of the existing recreational field in LRDP 1-11, Part A



Response to Staff Report – Lighting Impacts

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- Pepperdine used the very conservative 0.1 fc line to measure potential light trespass impacts
 - Pepperdine is actually registered a CEC “Lighting Zone 3,” associated with a 0.8 fc threshold level
- Commission biologist Dr. Engel has stated that “[T]he significance threshold for spill light upon sensitive resources is 0.1 foot-candles at any receptor location”
- The Commission has used the 0.1 fc threshold for other projects in the vicinity of sensitive resources
 - Staff agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit
- Staff now, **for the first time**, rejects the usage of the 0.1 fc line and establishes significance threshold that is not supported Commission precedent and not appropriate for a developed campus setting



Response to Staff Report – Lighting Impacts

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- Staff proposes applying a “No Ambient Lighting” threshold of 0.01 fc to the natural areas in the vicinity of the field
 - To our knowledge, no regulatory agency has ever applied this threshold to a project in California
 - Only appropriate for undisturbed wilderness and other areas where little to no light is expected
- Pepperdine is a developed campus, in a developed area where artificial light is expected and continuous
 - Ambient conditions in the natural areas near the proposed field already exceed the 0.01 fc standard by as much as a factor of three (even without taking into account the existing field lighting)
- The EIR and Supplemental Analysis’ conservative 0.1 fc threshold:
 - Is consistent with Commission precedent, staff direction provided to Pepperdine, and IESNA recommendations for areas where light might adversely affect flora and fauna



Response to Staff Report – Lighting Impacts

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- The Proposed Lighting Will Not Result in Adverse Impacts to Biological Resources
- The Field is located in the developed campus surrounded by disturbed areas; a supplemental site-specific biological analysis concluded:
 - Light trespass up to 0.01 fc is almost entirely contained in developed or disturbed areas
 - The limited light spill of between 0.09 and 0.01 fc in the 0.2 acres of undisturbed area is consistent with ambient conditions and will not result in adverse impacts to the specific animals, birds and plants in the area
 - The area has very low to no stop-over value for migrating birds
 - Many of the migrating birds that pass the area are only active during the day; night migrating birds in the area will be unaffected due to flight patterns and careful lighting design



Legend

-  Pepperdine University Property Boundary
-  Limit of 0.1 foot candles
-  Limit of 0.01 foot candles



Hymelinger Cir

Seaver Dr

John Tyler Dr

Banowsky Blvd

Malibu Canyon Rd

Pacific Coast Hwy

Aerial View of the Proposed Lights Within the Developed Campus Core



Pacific Flyway



Response to Staff Report – Other Considerations

- The existing field is the only lighted outdoor recreational field on Campus
 - Staff's recommendation would force Pepperdine to continue using the existing field and its inferior lighting
- The proposed denial would actually result in greater environmental impacts to surrounding areas
- As voluntary mitigation for the Campus Life Project athletic field lighting, Pepperdine agreed to replace all existing campus globe lights
 - *This action would reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%*
- Staff would have the Commission accept this mitigation while denying the very project the mitigation was designed to address

PEPPERDINE
UNIVERSITY



EXHIBIT A

8

ORNIA COASTAL COMMISSION

COAST AREA

100 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



DATE: August 28, 1989

TO: Coastal Commissioners and Interested Parties

FROM: Peter Douglas, Executive Director,
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: Pepperdine University Long Range Development Plan, Public hearing
and action (for September 12, 1989 meeting)

SYNOPSIS

Summary of Plan

Pepperdine University has submitted a Long Range Development Plan (LRDP) which proposes development of University facilities to serve up to 5,000 FTE (full-time equivalent) students over the 830 acre campus. The LRDP would permit 212 additional student and faculty/staff housing units, academic and support facilities totalling approximately 854,000 square feet within the 225 acre existing developed campus area. An additional 202 on-campus housing units and academic and support facilities totalling 385,000 sq. ft. and 182,000 sq. ft. of new roads is also proposed on a 72 acre expansion area on undeveloped land northwest of the developed campus area. Development of the expansion area will involve 3 million cubic yards of grading (842,000 cubic yards for stabilization of landslides and 2.2 million cubic yards for roads and building pads). Approval of the expansion of the Malibu Mesa Wastewater Reclamation Plant to 500,000 gallons per day capacity from the current 200,000 gpd is also being sought, to be constructed should the County of Los Angeles abandon its plans for a regional sewer system.

Summary of the Staff Recommendation

Staff is recommending that the Commission (1) deny the LRDP as submitted due to its non conformance with the coastal access, landform alteration and visual resource protection, hazards, and environmentally sensitive habitat protection policies of the Coastal Act; and (2) approve with suggested modifications dealing with public access, visual and environmental resources protection, hazards, and marine resources protection, that portion of the LRDP for the build-out of the existing developed campus area. The existing developed campus area is defined to include that area east of John Tyler Drive, south of Huntsinger Circle and west of Seaver Drive; the northern extent of Baxter Drive; the area northeast of the intersection of Seaver Drive and Baxter Drive; the area east of Seaver Drive between Baxter Drive and President Drive; and the area at the southeast intersection of Seaver Drive and President Drive, as shown on Exhibit 4.

EXHIBIT A

Pepperdine LRDP
Page 11

irrigation and monitoring plan, (2) additional geotechnical analysis to better determine the extent of the landslides on the proposed 72 acre expansion area and the amount of grading necessary for both landslide stabilization and roads and pads, (3) determination of whether the Malibu Coast Fault or any splays thereof exists within the campus, (4) updated traffic analysis and (5) visual impact analysis of the development proposed within the 72 acre expansion area.

B. Current Level of Development

The 830 acre Pepperdine University campus is located in western Los Angeles County, west of the Civic Center area of Malibu, adjacent to the intersection of Pacific Coast Highway and Malibu Canyon Road. The University is bounded on the east by Malibu Canyon Road and the site of the approved Adamson 300-room Adamson Hotel, on the west by the Malibu Mesa Wastewater Reclamation Plant and the Malibu County Estates condominium development, on the north by undisturbed watershed and the LUP designated Malibu Canyon Significant Watershed, and on the south by Pacific Coast Highway, the Malibu Bluffs State parkland, the new Malibu Colony Plaza (Reco) shopping center and the Malibu Road residential community and Amarillo Beach south of the highway.

The existing developed campus covers approximately 225 acres or a little over 25% of the 830 acres. The campus contains roughly 850,000 square feet of development. Additionally there are two 40,000 sq. ft. effluent lakes with a total capacity of 12.4 million gallons of treated water, 3.1 million gallon capacity of water storage tanks, playing fields and running tracks, tennis, racquetball and other sports facilities, water tanks and a retention basin. According to an April, 1989 University report, there are 2150 parking spaces within lots or structures and 990 on-street spaces within the University campus for a total of 3140 parking spaces (See Exhibit 4).

According to the Pepperdine University Specific Plan figures, the 850,000 square feet of facilities is devoted to 16% (135 units) student housing for 1537 students, 29% (52 units) faculty/staff/administration housing and recreational amenities, and the remaining 55% devoted to academic and support uses.

Pepperdine University was formerly located in south central Los Angeles. A program to move the campus to Malibu and to expand the University's facilities began nearly twenty years ago. The Long Range Development Plan (LRDP) which is reviewed here provides for a continuation of that expansion through 1997.

The University acquired its Malibu campus in 1968. In May of 1979 Los Angeles County approved a zone change to allow the campus site to be used for university purposes. On July 11, 1972, the County Planning Commission issued a Conditional Use Permit for the expansion of the university's facilities. Specific Plans were not adopted under this Conditional Use Permit until December 30, 1976.

Under the Coastal Act of 1976, the campus came under the jurisdiction of the Coastal Commission. The University applied for a claim of vested rights for all facilities shown on the 1976 Specific Plan. Prior to the effective date of the Coastal Act, the University had obtained numerous grading and building permits from the county and complete construction of 35 permanent buildings and were under way on 4 additional structures. Under the University's 1976

EXHIBIT A

Pepperdine LRDP
Page 12

Specific Plan the following facilities were yet to be constructed:

1. Undergraduate administration building
2. Fine arts complex
3. Hillside theatre and 2 contemporary arts facilities
4. Sea lodge
5. Temporary offices and administrative facilities (5)
6. Law School housing and parking structures
7. Student dormitory (1)
8. Student/staff housing structures (4)
9. Utility connections, grading, driveways, walkways and retaining walls to accommodate above listed development.

The claim of vested rights to complete the remainder of the facilities under the 1976 Specific Plan was denied by the South Coast Regional Commission on June 6, 1977 (E-2-E-5). A subsequent appeal to the State Coastal Commission resulted in a finding of no substantial issue on July 20, 1977, thus leaving the denial in place (Appeal No. 191-77, Pepperdine University).

Since this time the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, equestrian riding ring located just northwest of the existing graded campus, music hall, and various parking, sports, security, storage, and temporary trailer uses.

The University and Century Malibu, Inc. (Malibu Country Estates) were also given a permit to construct the 200,000 gallon per day (gpd) Malibu Mesa Wastewater Reclamation Plant located at the intersection of John Tyler Drive and Pacific Coast Highway. A spray irrigation management plan (SIMP) to dispose of treated wastewater over the landscaped and natural areas of the campus was also approved.

The Specific Plan states that as of fall, 1983 the enrollment totalled 1,920 full time equivalent (FTE) students. This number of FTE students was made up of 2,540 full and part-time students, of which 1,537 lived in campus housing and 1,003 commuted from other locations. There were 2148 FTE students enrolled in the University as of March, 1989. Under the proposed full build out of 5,000 FTE students, there would be an actual enrollment of 6,500 students, 500 faculty, 777 staff and 17 administrators.

C. Local Government Action on 1988 LRDP Proposal

There has been considered debate among some local citizen groups as to whether or not CEQA procedures have been properly followed with regards to the adequacy of the environmental analysis of the LRDP beyond the CUP for Phase I. The University has responded that the CEQA process has been properly carried out by the County of Los Angeles for the full LRDP as was proposed at the 1988 Commission hearing (see Exhibit 12). The University further contends that while the August, 1989 revisions to the LRDP are significant changes to the LRDP, they are significant reductions to the proposed development and therefore no additional or supplemental EIR is required under CEQA.

The October, 1983 Draft EIR on the University Specific Plan or LRDP was prepared as part of the process for review and consideration of Conditional Use Permit application CUP 2432 (4) requesting approval to development the Pepperdine campus as specified in the Specific Plan. The county zoning board

FEDERAL INTERESTS IN FEDERAL LANDS

Section 104. (a) The United States, through the Department of the Interior, Bureau of Land Management, has certain interests in the lands described in this section.

PEPPERDINE UNIVERSITY - MALIBU

LEGEND FOR LAND USE SITE PLAN

Table with 2 columns: SYMBOL, DESCRIPTION. Includes symbols for 1-100 acres, 1-500 acres, 1-1000 acres, etc.

SCALE 1:50,000
NAD 83
UTM ZONE 18N
Easting 650,000
Northing 4,000,000

EXHIBIT I

PEPPERDINE UNIVERSITY - MALIBU
LEGEND FOR
LAND USE SITE PLAN

DATE: 10/1/88



FEDERAL INTERESTS IN FEDERAL LANDS

Section 104. (a) The United States, through the Department of the Interior, Bureau of Land Management, has certain interests in the lands described in this section.

PEPPERDINE UNIVERSITY - MALIBU

Table with 2 columns: SYMBOL, DESCRIPTION. Includes symbols for 1-100 acres, 1-500 acres, 1-1000 acres, etc.

SCALE 1:50,000
NAD 83
UTM ZONE 18N
Easting 650,000
Northing 4,000,000

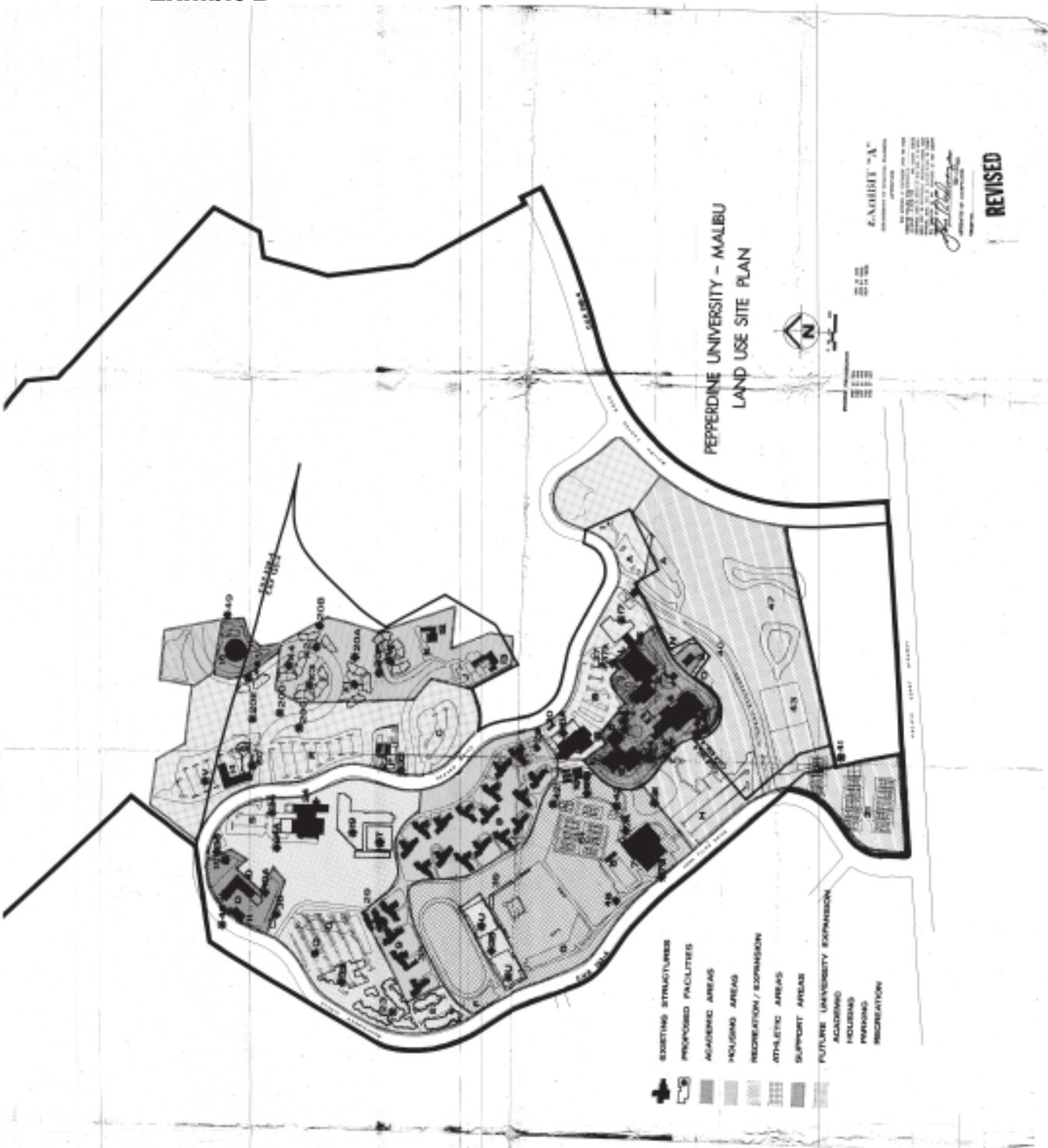
EXHIBIT I

PEPPERDINE UNIVERSITY - MALIBU
LEGEND FOR
LAND USE SITE PLAN

DATE: 10/1/88



Exhibit B



DATE	
BY	
FOR	
REVISION	
NO.	
DATE	
BY	
FOR	
REVISION	
NO.	
DATE	
BY	
FOR	
REVISION	
NO.	

Exhibit B

HAUL ROUTE PLAN
 DEPARTMENT OF AGRICULTURE
 UNIVERSITY OF CALIFORNIA
 MARSH, CA

DAVID D. MERRILL - CIVIL ENGINEER


HAUL ROUTE PLAN
 PROJECT NO. 10-10-10
 DATE: 10/10/10
 SCALE: AS SHOWN
 DRAWN BY: [Name]
 CHECKED BY: [Name]
 APPROVED BY: [Signature]
 PROJECT NO. 10-10-10

FILE COPY

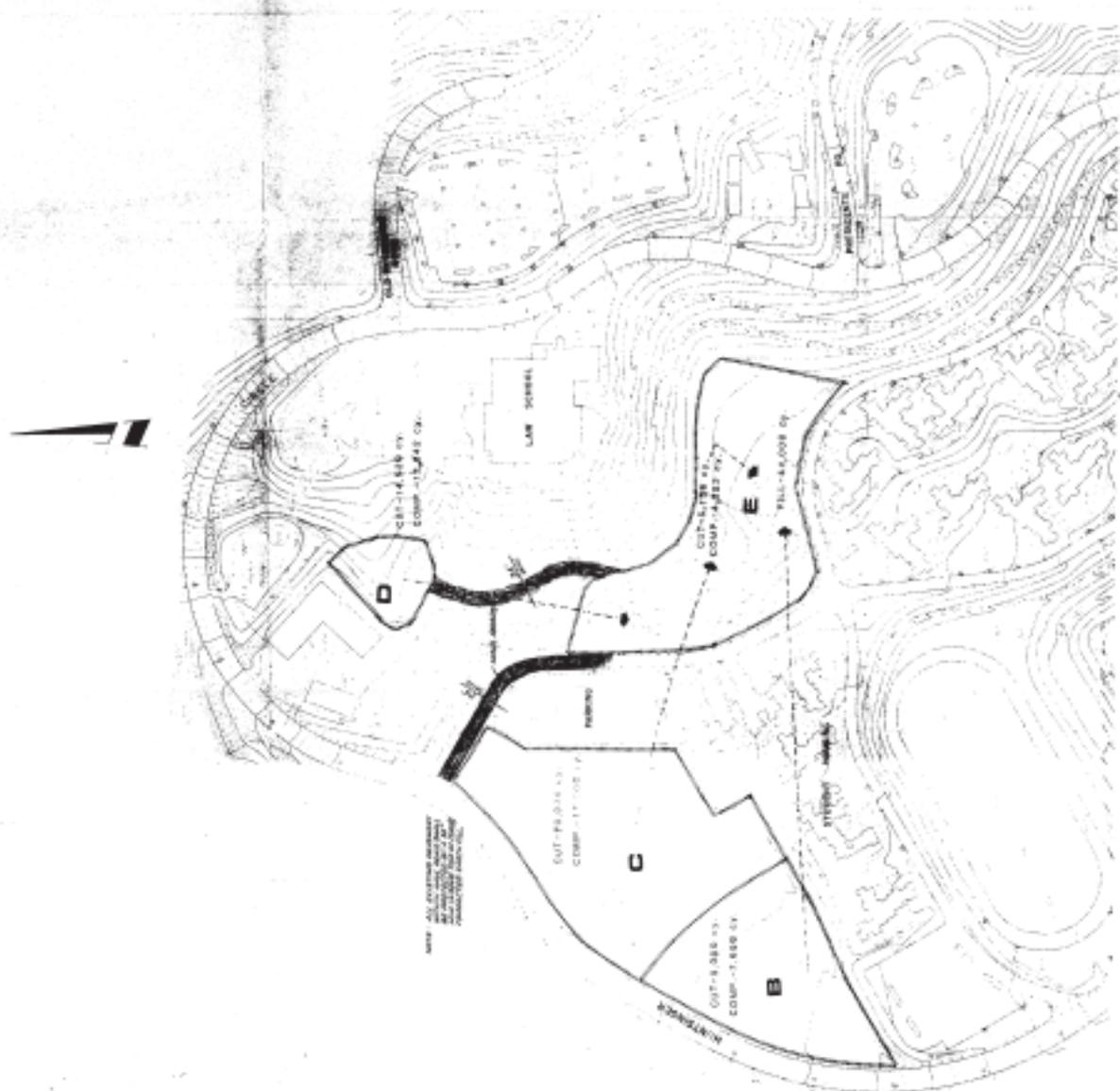


Exhibit B

PEPPERDINE UNIVERSITY

TOTAL 530 ACRES

A-1-1-DP
ZONE BOUNDARY

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

WESA PEAK TRAIL
(DEED RESTRICTED)

OPEN SPACE

COMBINED WESA PEAK
AND CENTRAL WESA TRAILS
(DEED RESTRICTED)

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

OPEN SPACE

OPEN SPACE

Notes:
This map is not and
should not be used
for any purpose
other than that
for which it was
prepared.
Date: 11/11/82

[Signature]



Project Location Map

EAI ENVIRONMENTAL AUDIT, INC.
 1000-A ORFILA WAY • PASADENA, CA 92307-7125
 TEL: 626-792-8100 • FAX: 626-792-8154

Project: Environmental Analysis and
 Mitigation for the Pepperdine University
 Campus Expansion

DATE: 7/28/82

PROJECT: LAUREL RIDGE

SCALE: 1"=500'

PROJECT NO: 1388431-DWG

DATE: 7/28/82

PROJECT: LAUREL RIDGE

SCALE: 1"=500'

PROJECT NO: 1388431-DWG

DATE: 7/28/82

Exhibit B

• MAP A •

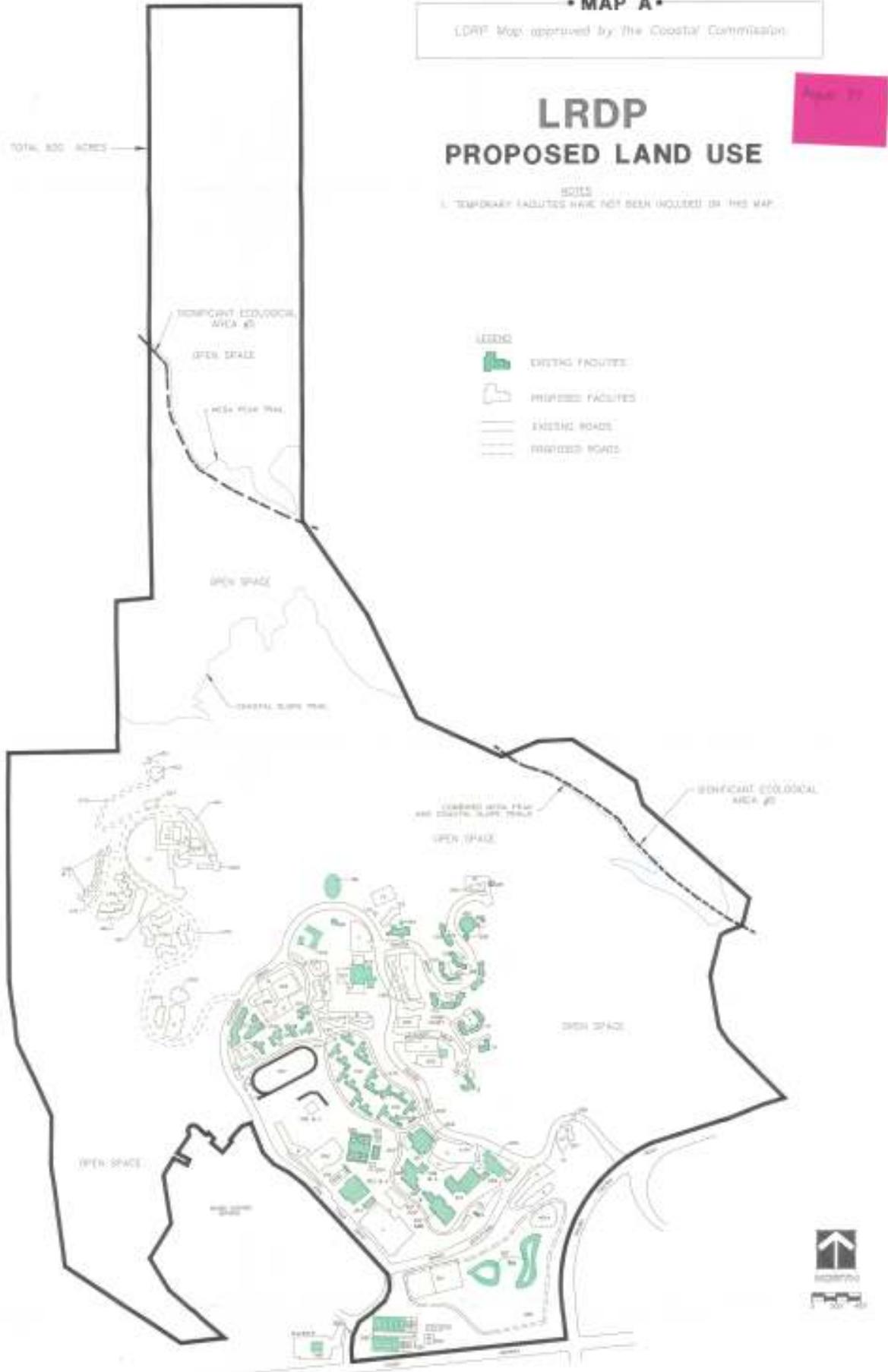
LRDP Map approved by the Coastal Commission

LRDP PROPOSED LAND USE



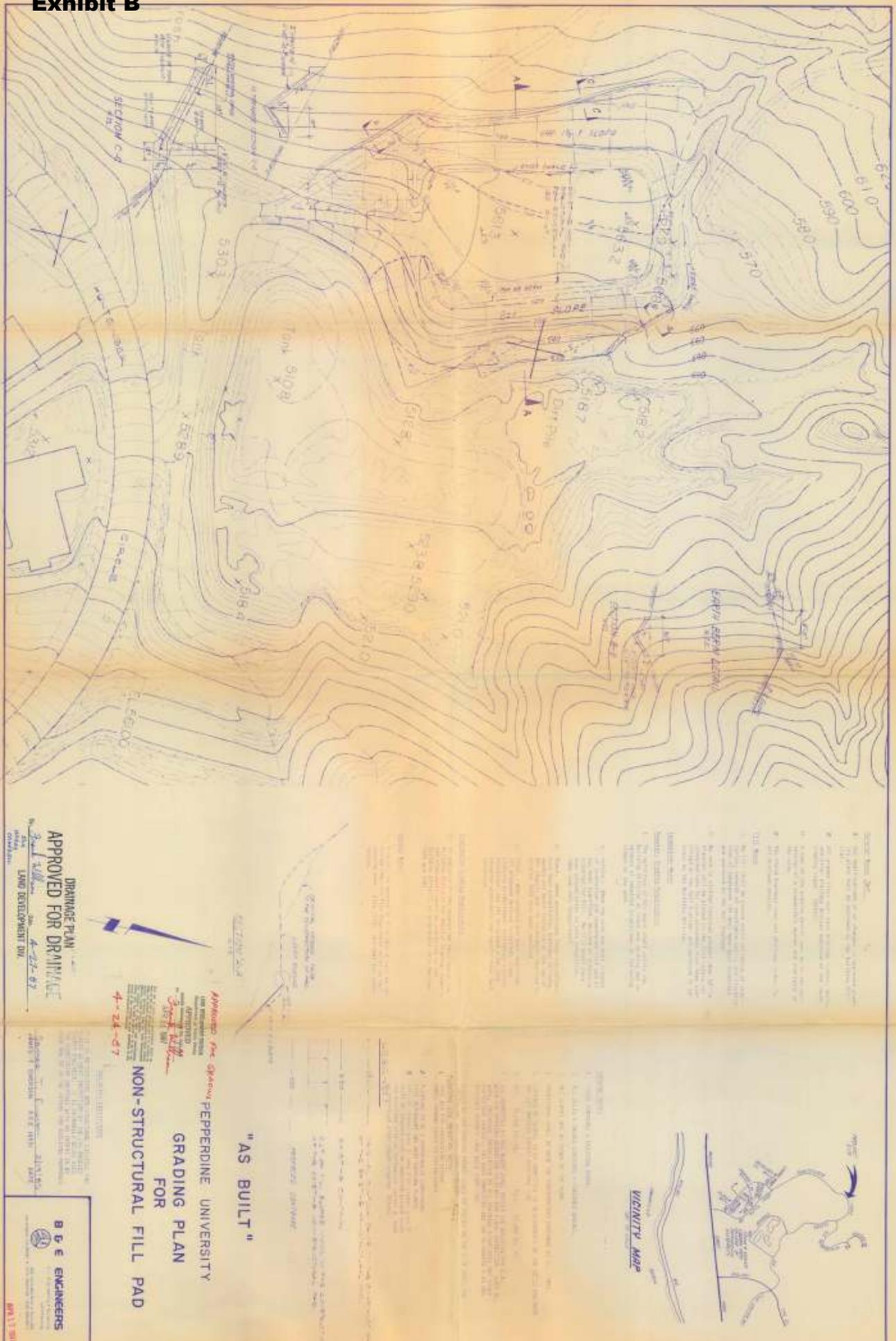
NOTES
1. TEMPORARY FACILITIES HAVE NOT BEEN INCLUDED ON THIS MAP.

TOTAL 800 ACRES



BUILDING NUMBERS, GENERAL DESCRIPTIONS & USES OF BUILDINGS/FACILITIES ARE LISTED IN THE SPECIFIC PLAN

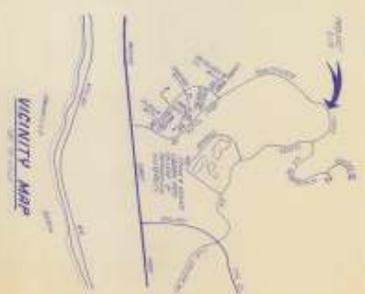
EAI ENVIRONMENTAL AUDIT, INC.
 100-A DUNN RD • FARMINGDALE, NY 11735-1126
 TEL: 516-833-4700 FAX: 516-833-4704
 www.environmentalaudit.com
 Planning, Environmental Analysis and Remediation Solutions Management and Construction



DRAINAGE PLAN
APPROVED FOR DRAINAGE
 DATE: 4-27-87
 BY: [Signature]
 LAND DEVELOPMENT DIV.

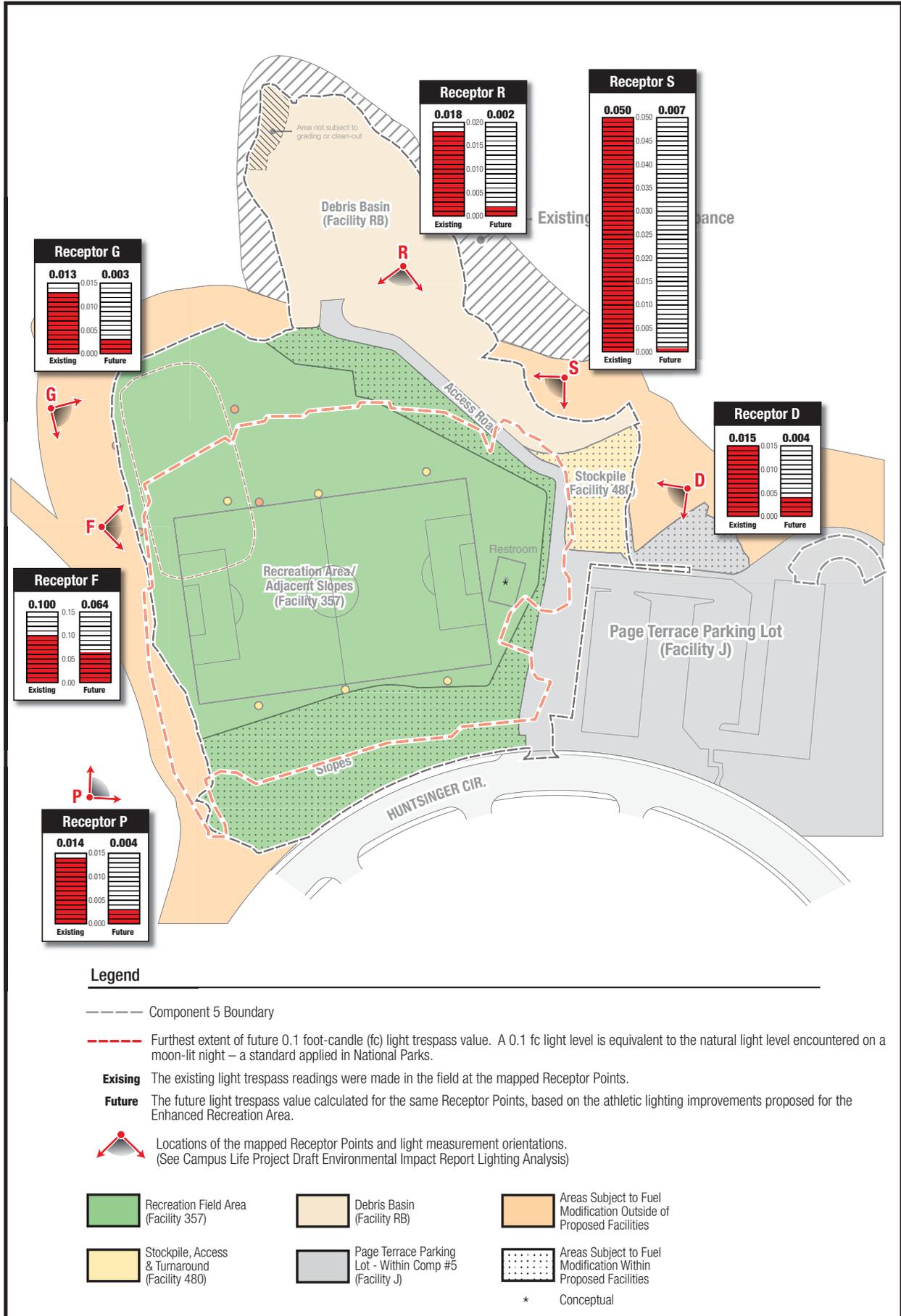


AS BUILT
NON-STRUCTURAL FILL PAD
GRADING PLAN
FOR
PEPPERDINE UNIVERSITY
 APPROVED FOR SPANISH PEPPERDINE UNIVERSITY
 DATE: 4-28-87
 BY: [Signature]



B & E ENGINEERS
 1001 S. [Address]
 [Phone Number]
 [Fax Number]

EXHIBIT C



June 10, 2013

CALIFORNIA COASTAL COMMISSION

SOUTH COAST AREA
245 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



December 21, 1989

TO: Commissioners and Interested Persons

FROM: Peter Douglas, Executive Director
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: REVISED FINDINGS ON THE PEPPERDINE UNIVERSITY LONG RANGE DEVELOPMENT PLAN (LRDP) for Public Hearing and Commission Action at the Meeting of January 11, 1990.

SYNOPSIS

Summary of Commission Action

On September 12, 1989, the California Coastal Commission reviewed the Pepperdine University Long Range Development Plan (LRDP). In its action, the Commission denied the LRDP as submitted and certified it with Suggested Modifications regarding public access, hazards, and visual, marine and environmentally sensitive resource protection.

If these Suggested Modifications are adopted by the Board of Regents of the University within six months of the Commission's action (March 11, 1990) and the Commission is so notified, the LRDP will become effectively certified.

Commission Vote

The Commission's action included two resolutions on the LRDP submittal. The Commissioners voting on the prevailing side on the first resolution to deny the LRDP as submitted were:

Glickfeld, Rynerson, MacElvaine, Malcolm, McInnis, Knapp, Neely, Warren, Wright, Hisserich, Franco, and Chairman Wornum

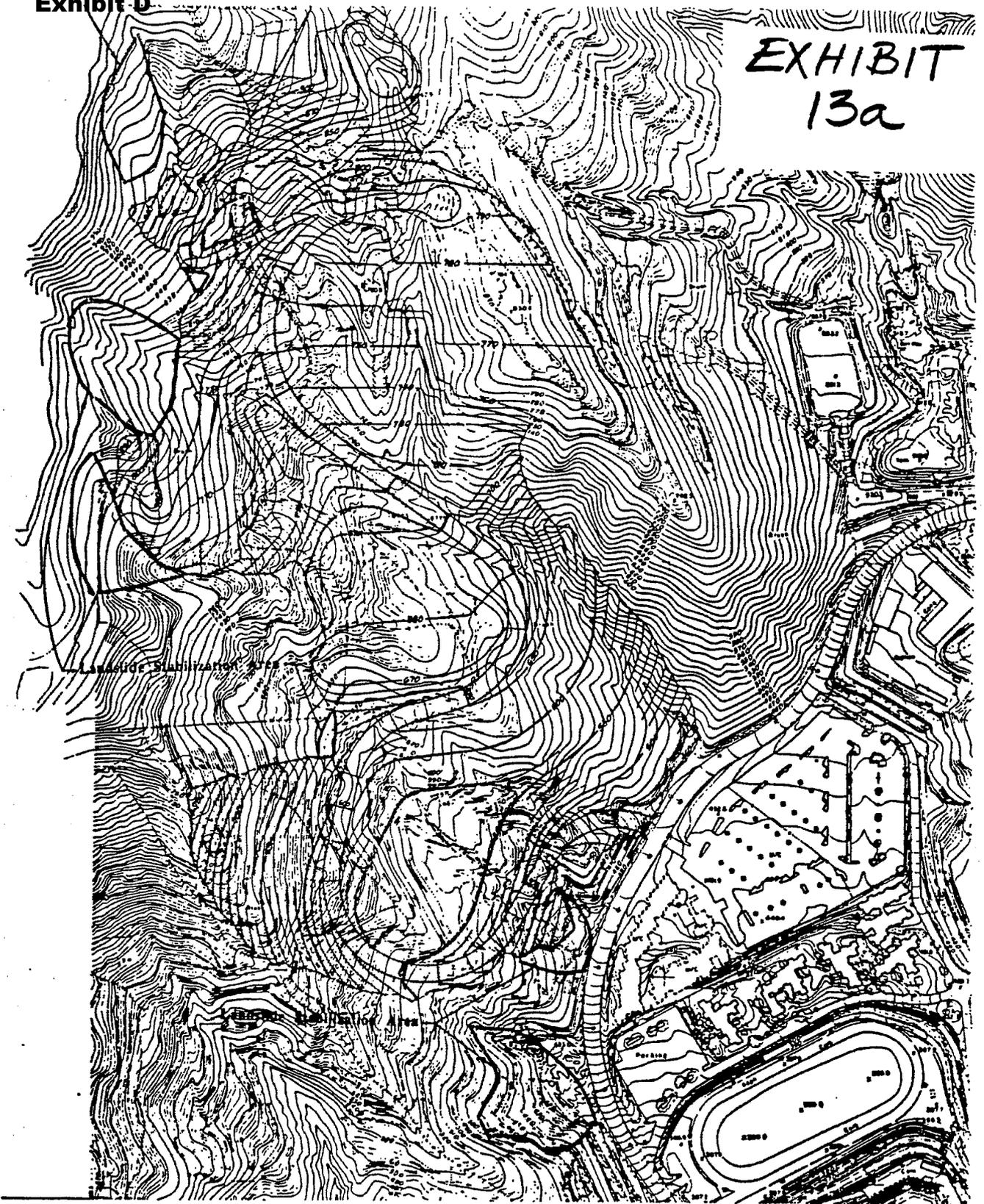
The Commissioners voting on the prevailing side on the second resolution to certify the LRDP with Suggested Modifications were:

Knapp, Neely, Wright, Glickfeld, MacElvaine, Malcolm, McInnis, and Chairman Wornum

Additional Information

Further information on the Pepperdine University Long Range Development Plan may be obtained from Teresa Henry at the South Coast Area Office of the Coastal Commission, 245 West Broadway, Suite 380, Long Beach, CA 90802, (213) 590-5071.

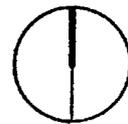
EXHIBIT
13a



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area
Conceptual Grading Plan
 Showing Landslide Stabilization Areas
 Outside of Graded Area.

RECEIVED

AUG 4 1989



ATTACHMENT C-1

CALIFORNIA
COASTAL COMMISSION

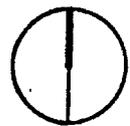
These materials have been provided to Coastal Commission Staff

Exhibit D

EXHIBIT
136



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area •
Conceptual Grading Plan
With Proposed Buildings



ATTACHMENT C-2

Albert C. Martin and Assoc.
DATE 7-20-67

Exhibit E



Source: GoogleEarth Pro, August 27, 2012.

Exhibit E



Source: GoogleEarth Pro, August 27, 2012.

VERSION 4

PEPPERDINE UNIVERSITY

**The Campus Life Project: The Next Step in Fulfilling our
Long Range Development Plan**

LRDP Amendment 1-11, Part B

THESE MATERIALS HAVE BEEN PROVIDED TO COASTAL COMMISSION STAFF

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- Pepperdine strongly disagrees with the Staff's recommendations that the existing field and lights were not permitted
 - The existing field and lights were installed pursuant to three CDPs approved by the Commission in the early 1980s; the Commission subsequently certified the existing facility and its lighting in 1990, 1998, and 2012
 - The LRDP encompassed all on-the-ground development at the time of its certification in 1990
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds do not withstand scientific scrutiny
 - Pepperdine used a highly conservative threshold to measure potential impacts; the Commission has previously relied on the 0.1 fc threshold previously and it is consistent with IESNA recommendations
 - The EIR and Pepperdine's supplemental, site-specific biological analysis concluded that the lights would not adversely impact any sensitive resources
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- By mutual agreement with Staff, Pepperdine divided its LRDP Amendment 1-11 into two parts (Part A and Part B); the Commission unanimously approved Part A in December 2012
- Part B is a focused review of three elements of the approved Enhanced Recreation Area:
 - Replacement of the existing unshielded "flood lights" with state-of-the-art, shielded fixtures
 - Confirmation of east-west field configuration as requested by Coastal Staff
 - Specific location of the approved small restroom/storage facility

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Aerial View of
Approved
Enhanced
Recreation Area,
Proposed
Light/Restroom
Locations, and
Field Orientation

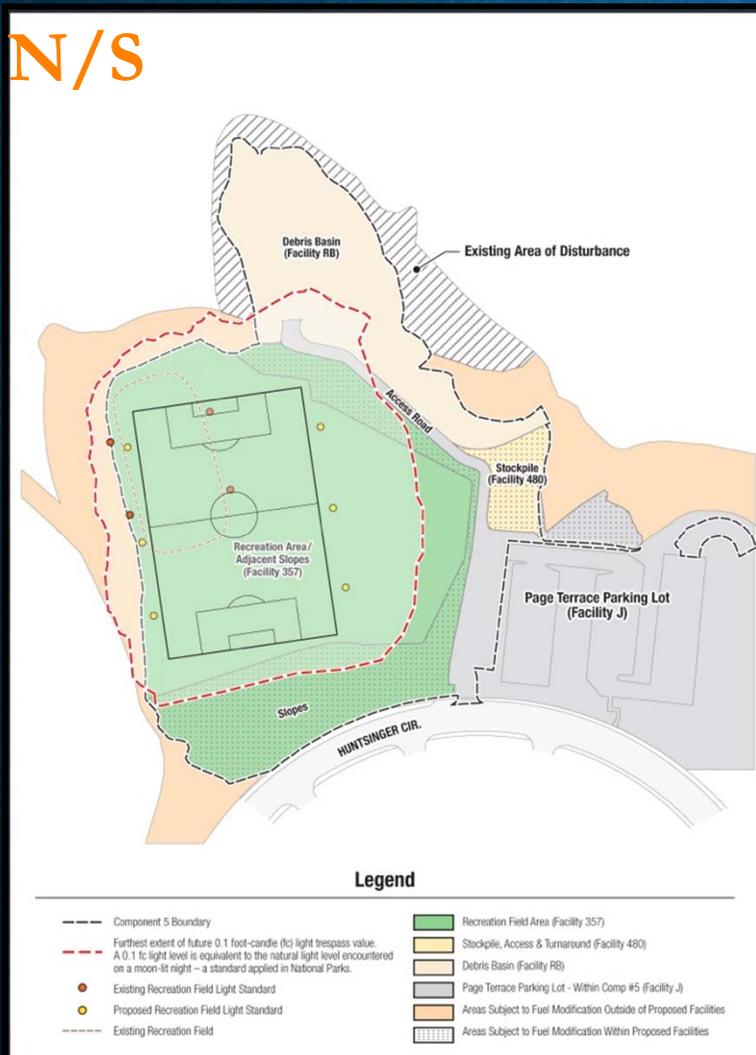


Aerial View of the Proposed Lights Within the Developed Campus Core



Recreation Field Orientation

- Pepperdine would agree to orient the proposed Recreation Field in Staff's preferred "east-west" configuration
- The E/W orientation focuses light further south towards Huntsinger Circle; in this orientation the field would be surrounded by developed and disturbed areas



Importance to Campus Community

- The Campus Life Project provides much needed enhancements to on-campus amenities
- The approved Enhanced Recreation Area will provide all students with safe recreational space for physical health and building community
- Night lighting is critical for all students to enjoy the facility
 - Student days are filled with ever expanding class loads, volunteering, internships, clubs, jobs, etc.
 - The University has a critical need for additional recreational field space, and without night lighting, a significant percentage of the Campus's young men and woman will lose the already limited opportunity to recreate and participate in intramural or club sports

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Project Need

- The existing field at the site of the approved Enhanced Recreation Area is Pepperdine's only lighted recreational field space
 - This is already significantly deficient when compared with peer institutions
- Key objectives of the Campus Life Project include:
 - Provide an enhanced recreation facility including a lighted field to alleviate the overcrowded conditions
 - Provide needed outdoor recreation field within the existing developed campus
- Without approval of Part B, Pepperdine would be forced to continue using the existing undersized, flood-lit field

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Lighted Fields at Peer Institutions

Institution	Lighted Recreational Field Area (acres)*
Pepperdine University	0.46
Loyola Marymount University	3.05
University of California Los Angeles	7.33
University of California Santa Barbara	5.32
University of the Pacific	1.93
Saint Mary's College	1.73
University of San Diego	3.57
University of San Francisco	1.70
Santa Clara University	3.13
University of California San Diego	10.78
University of California Berkeley	5.19
California State University Long Beach	8.63
Stanford University	5.13

* Information compiled by Envicom Corporation August 2013.

Enhanced Recreation Area Lighting Design

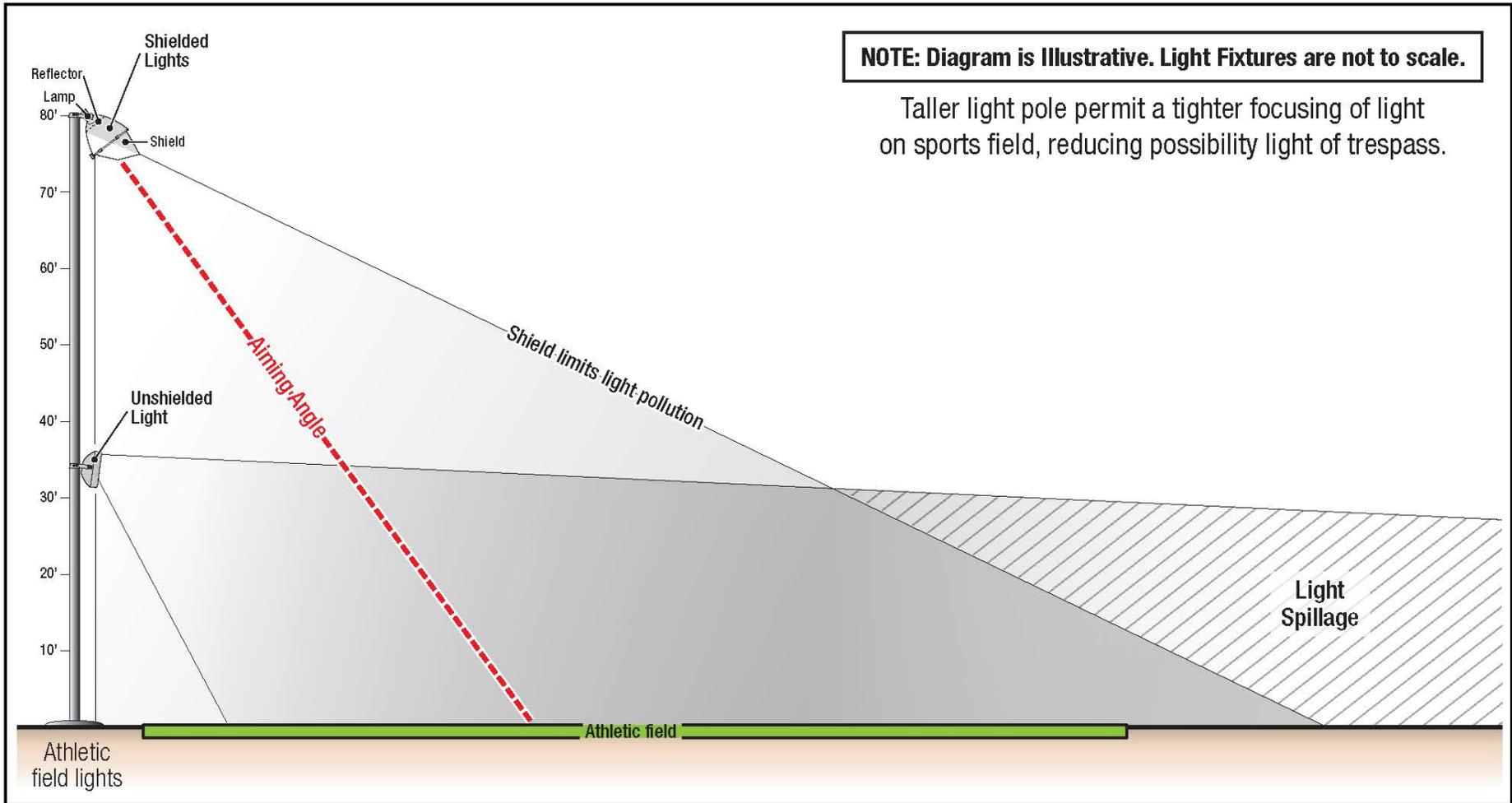
PEPPERDINE
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- Proposed lighting features state-of-the-art technology designed to prevent or minimize all forms of light pollution including glare, light trespass, and sky glow
 - The proposed cutoff, angled, and shielded fixtures will direct light onto the field rather than into natural areas and the night sky
 - Would utilize the same advanced fixtures approved by the Commission for the soccer field in Part A
 - Lighting levels would be lower than soccer field due to proposed recreational use
- Would improve existing conditions by replacing the existing, non-cutoff, non-shielded flood lights



Existing Recreation Lighting Proposed for Replacement





Revised: Sep. 23, 2013

Consistency with the LRDP Lighting Policy

- When approving Part A, the Commission proposed a comprehensive LRDP "Lighting Policy," which the University adopted
- The proposed lights fully comply with the terms and intent of the Policy. The lights are:
 - "Qualite" or a superior, state-of-the-art technology designed to dark-sky-compatible standards
 - Minimized, directed downward, and shielded using the best available visor technology and pole height design to minimize light spill, sky glow, and glare
 - Designed to minimize light trespass into adjacent non-target areas, and to limit the illumination of adjacent open space and sensitive habitat areas

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Reducing Lighting Impacts

- The EIR lighting study determined there would be no significant light trespass or glare impacts
 - The EIR used a highly conservative 0.1 fc line to measure impacts in the vicinity of the proposed field; Pepperdine's Campus is actually registered as a CEC "Lighting Zone 3," associated with a 0.8 fc threshold level
- For LRDP Amendment 1-11, Pepperdine conducted a supplemental analysis finding:
 - No light trespass greater than 0.1 fc will occur in undisturbed, naturally vegetated or habitat areas
- The 0.1 footcandle (fc) level is the most conservative threshold used in past Commission precedent
 - Staff Biologist Dr. Engel stated in 2011: "[T]he significance threshold for spill light upon sensitive resources is 0.1 [fc] at any receptor location"
 - Dr. Engel agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit

PEPPERDINE
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Legend

- Pepperdine University Property Boundary
- Limit of 0.1 foot candles
- Limit of 0.01 foot candles



Reducing Sky Glow Impacts

- The lighting incorporates principles and recommendations provided by the International Dark Sky Association and Illuminating Engineering Society of North America to prevent or minimize sky glow and protect Coastal resources
- Light emitted between 80 and 100 degrees has the greatest effect on sky glow
 - The new fixtures will emit light between 16 and 62 degrees, which is far less likely to result in sky glow than conventional lights
 - The existing flood lights emit light at ~ 80 degrees
- If approved, replacement of the existing recreational field lighting along with the Campus globe lights would ***reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%***

PEPPERDINE
UNIVERSITY

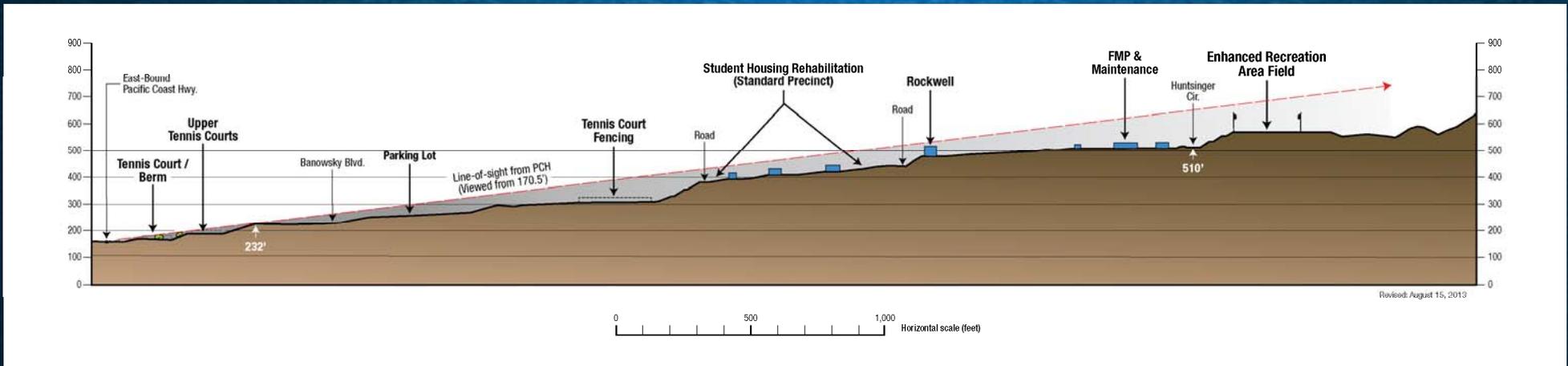


Protecting Visual Resources

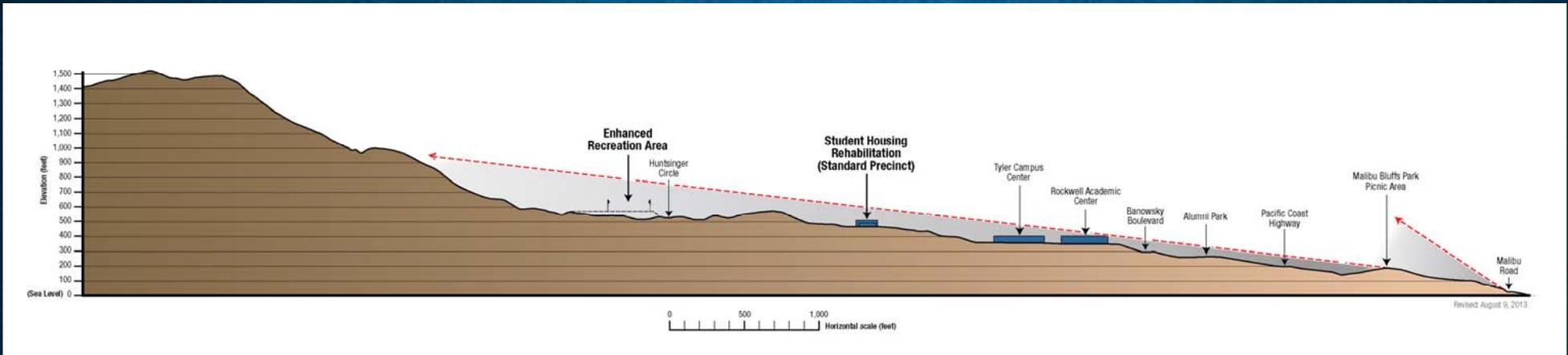
- The light fixtures will not be visible from:
 - Malibu Canyon Road
 - Pacific Coast Highway
 - Santa Monica Mountains Conservancy-Owned Malibu Bluffs
- Fixtures are invisible from the vast majority of area trails - hikers could see the fixtures along less than 4% of the 4.1 miles that comprises the combined Coastal Slope and Mesa Peak trails
- Limited views of fixtures would be consistent with the current views of the developed campus and the City of Malibu



Proposed Light Fixtures are not Visible from PCH



Proposed Light Fixtures are not Visible from Bluffs Park



Protecting Avian Resources

Nesting Birds

- The proposed east-west orientation focuses light further south towards Huntsinger Circle and away from the undeveloped campus
 - Minimizes potential light trespass and glare impacts on nesting birds

Migratory Birds

- Proposed Qualite International fixtures produce "cool" white light (not the type of red light found potentially impactful to avian behaviors in the majority of reviewed studies)
 - Only 11.84% of the light produced falls within the red spectrum

PEPPERDINE
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Conclusions

- The Enhanced Recreation Area lighting is the final piece of the Campus Life Project
- The proposed lights:
 - Are consistent with Pepperdine's Commission-recommended LRDP lighting policy
 - Will limit light trespass consistent with the conservative 0.1 fc threshold used in the past by the Commission for areas near sensitive resources and consistent with IESNA recommendations for areas where light might adversely affect flora and fauna
 - Provide important additional recreational opportunities on Campus
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

The Campus Life Project – Response to Staff Report: Overview

- Pepperdine strongly disagrees with the Staff's recommendations
- Pepperdine disagrees with the assertion that the existing field and its lights were not permitted
- Staff's rejection of the 0.1 fc threshold for significant impacts breaks from Commission precedent, direction provided to Pepperdine during the LRDP process, and IESNA recommendations for areas where light might adversely affect flora and fauna
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds are arbitrary and do not withstand scientific scrutiny
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

PEPPERDINE
UNIVERSITY



Response to Staff Report – Existing Field and Lighting Approvals

PEPPERDINE
UNIVERSITY

- The existing recreational field (formerly the equestrian center) and its lighting have been in place in the same location for approximately 30 years
- Pepperdine developed the field and its lights pursuant to three CDPs (P-80-7325, CDP 5-81-395A, and CDP P-81-7818) in the early 1980s
 - While the permits do not specifically refer to lights, the level of permit detail was vastly differently in the 1980s
- When the Commission certified the LRDP in 1990, after the field and lighting had been installed, it also certified that “Development at Pepperdine has been consistent with the goals, policies, rules and regulations of ... the California Coastal Commission”
- The LRDP encompassed all on-the-ground development at the time of the LRDP certification in 1990



Response to Staff Report – Existing Field and Lighting Approvals

PEPPERDINE
UNIVERSITY

- P-80-7325 (Development Description)
 - *Dismantling of an equestrian center and construction of 116 units of law school and undergraduate student housing, parking spaces for 484 cars, staircases to the University Annex, an electrical distribution building and temporary classroom facility. Application includes a request for approval of allocation of the needed portion of the unused sewage treatment capacity to the proposed facilities. Project is included in the University Land Plan.*
- CDP 5-81-395A (Amendment to Permit P-80-7325)
 - *Relocate existing equestrian center to be dismantled for 116 unit housing as approved on P-80-7325.*
- CDP P-81-7818 (Development Description)
 - *Construction of university campus facilities including a heritage hall, music wing, and a visiting professors' duplex, relocation of an equestrian center and expansion of the student housing reception center. These proposals are consistent with the University's Master Plan, previously reviewed and approved by the Commission.*



Response to Staff Report – Existing Field and Lighting Approvals

- Staff bases its position on a “haul route plan” in its CDP 5-81-395A file
 - The plan identifies four pads (B, C, D and E) that would either generate cut or receive fill; **but** the field was balanced onsite (no cut or fill for transport)
 - **And** each of these four pads correlated to a specific proposed facilities at the time of the issuance of CDP 5-81-395A
- Approved County of Los Angeles Grading Plan (1987)
 - Shows field as built in its existing location
- Coastal Commission LRDP Staff Report (August 1989)
 - .. the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, **equestrian riding ring located just northwest of the existing graded campus**, music hall, and various parking, sports, security, storage, and temporary trailer uses.
- Coastal Commission-Certified LRDP (1990)
 - Shows field (as an existing graded facility) on the LRDP Conceptual Grading Map



DATE	9/20/87	SHEET	1	OF	1
SCALE	1"=100'	DESIGNED BY		APPROVED BY	
PROJECT		DATE		DATE	

HAUL ROUTE PLAN
 OF
 EQUESTRIAN USE AREAS
 PEPPERDINE UNIVERSITY
 MALIBU, CA.

BUILDING AND SAFETY DIVISION
 Department of County Engineer

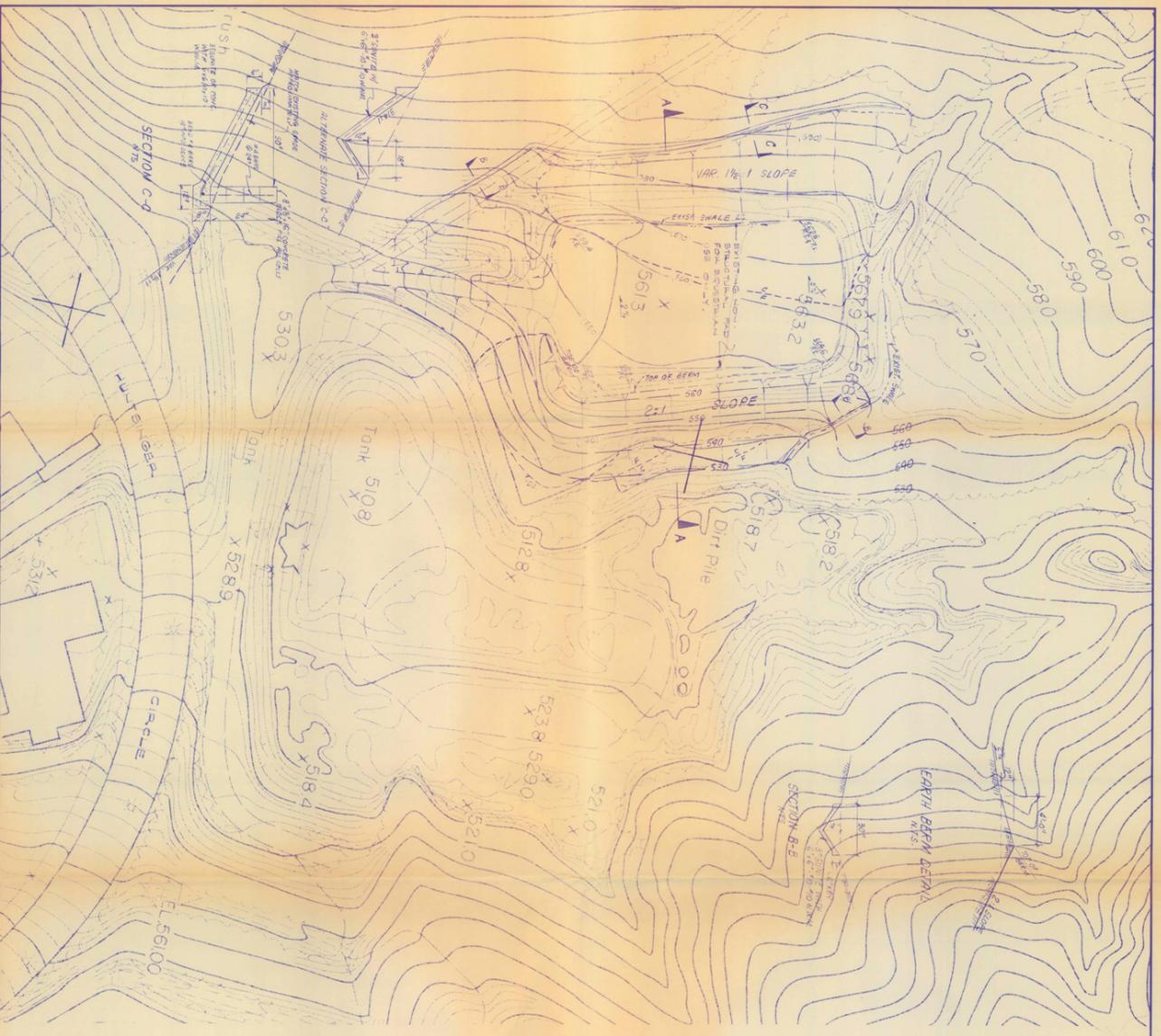
APPROVAL IN CONCEPT
 SIG. *[Signature]*
 DATE 9/20/87
 PLAN CHECK NO.

Per sec. 27400 et seq. of the
 Public Resources Code and
 Sec 13210(a) Title 14 of the
 Administrative Code, State
 of California.
 THIS IS NOT A PERMIT
 and
 is subject to any conditions
 listed below.

South Coast Regional
 Commission
 APPROVAL
 Permit No. *5-045-A*
 By *[Signature]*

FILE COPY

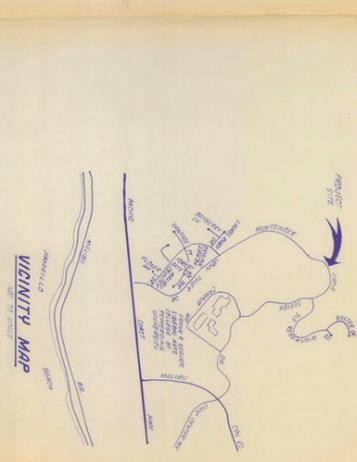
OLIN D. MURPHY - CIVIL ENGINEER
 10000 WILSON AVENUE
 MALIBU, CALIFORNIA 90263
 (310) 316-1111



- SECTION BERM DETAIL**
1. No fill shall be placed until satisfactory completion of the foundation, walls, and other drainage devices approved at the time of the site plan.
 2. The fill engineer shall set drainage stakes for all drainage devices.
 3. No fill shall be placed until satisfactory completion of the foundation, walls, and other drainage devices approved at the time of the site plan.
 4. The fill engineer shall set drainage stakes for all drainage devices.
- INSPECTION NOTES**
1. The site plan for this project shall satisfy the requirements of the local building department at the time of the site plan.
 2. The site plan shall be approved by the local building department at the time of the site plan.
 3. The site plan shall be approved by the local building department at the time of the site plan.

CONSTRUCTION NOTES

1. The site plan shall be approved by the local building department at the time of the site plan.
2. The site plan shall be approved by the local building department at the time of the site plan.
3. The site plan shall be approved by the local building department at the time of the site plan.



APPROVED FOR DRAINAGE

By *James T. Emerson* Date **4-27-87**

LAND DEVELOPMENT DIV.

APPROVED FOR GRADING

By *James T. Emerson* Date **4-27-87**

LAND DEVELOPMENT DIV.

"AS BUILT"

NON-STRUCTURAL FILL PAD

GRADING PLAN

FOR

PEPPERDINE UNIVERSITY

B & E ENGINEERS

219125 DATE

JAMES T. EMERSON P.C.E. 19531

APR 17 1987

Response to Staff Report – Existing Field and Lighting

PEPPERDINE
UNIVERSITY

- The Commission certified the existing location of the recreation area (the former equestrian center) in 1998
 - Pepperdine amended its LRDP map to leave the recreation area in its current location (as opposed to moving the field to an undeveloped area of campus)
 - In certifying LRDP 2-97, the Commission recognized that this environmentally sensitive decision would “reflect what currently exists”
- Pepperdine transitioned the equestrian center to the less intensive recreational/intramural use in 2000
- The Commission approved the enhancement of the existing recreational field in LRDP 1-11, Part A



Response to Staff Report – Lighting Impacts

PEPPERDINE
UNIVERSITY

- Pepperdine used the very conservative 0.1 fc line to measure potential light trespass impacts
 - Pepperdine is actually registered a CEC “Lighting Zone 3,” associated with a 0.8 fc threshold level
- Commission biologist Dr. Engel has stated that “[T]he significance threshold for spill light upon sensitive resources is 0.1 foot-candles at any receptor location”
- The Commission has used the 0.1 fc threshold for other projects in the vicinity of sensitive resources
 - Staff agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit
- Staff now, **for the first time**, rejects the usage of the 0.1 fc line and establishes significance threshold that is not supported Commission precedent and not appropriate for a developed campus setting



Response to Staff Report – Lighting Impacts

PEPPERDINE
UNIVERSITY

- Staff proposes applying a “No Ambient Lighting” threshold of 0.01 fc to the natural areas in the vicinity of the field
 - To our knowledge, no regulatory agency has ever applied this threshold to a project in California
 - Only appropriate for undisturbed wilderness and other areas where little to no light is expected
- Pepperdine is a developed campus, in a developed area where artificial light is expected and continuous
 - Ambient conditions in the natural areas near the proposed field already exceed the 0.01 fc standard by as much as a factor of three (even without taking into account the existing field lighting)
- The EIR and Supplemental Analysis’ conservative 0.1 fc threshold:
 - Is consistent with Commission precedent, staff direction provided to Pepperdine, and IESNA recommendations for areas where light might adversely affect flora and fauna



Response to Staff Report – Lighting Impacts

PEPPERDINE
UNIVERSITY

- The Proposed Lighting Will Not Result in Adverse Impacts to Biological Resources
- The Field is located in the developed campus surrounded by disturbed areas; a supplemental site-specific biological analysis concluded:
 - Light trespass up to 0.01 fc is almost entirely contained in developed or disturbed areas
 - The limited light spill of between 0.09 and 0.01 fc in the 0.2 acres of undisturbed area is consistent with ambient conditions and will not result in adverse impacts to the specific animals, birds and plants in the area
 - The area has very low to no stop-over value for migrating birds
 - Many of the migrating birds that pass the area are only active during the day; night migrating birds in the area will be unaffected due to flight patterns and careful lighting design



Legend

- Pepperdine University Property Boundary
- Limit of 0.1 foot candles
- Limit of 0.01 foot candles



Aerial View of the Proposed Lights Within the Developed Campus Core



Pacific Flyway



Response to Staff Report – Other Considerations

- The existing field is the only lighted outdoor recreational field on Campus
 - Staff's recommendation would force Pepperdine to continue using the existing field and its inferior lighting
- The proposed denial would actually result in greater environmental impacts to surrounding areas
- As voluntary mitigation for the Campus Life Project athletic field lighting, Pepperdine agreed to replace all existing campus globe lights
 - *This action would reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%*
- Staff would have the Commission accept this mitigation while denying the very project the mitigation was designed to address

PEPPERDINE
UNIVERSITY



EXHIBIT A

8

ORNIA COASTAL COMMISSION

COAST AREA

100 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



DATE: August 28, 1989

TO: Coastal Commissioners and Interested Parties

FROM: Peter Douglas, Executive Director,
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: Pepperdine University Long Range Development Plan, Public hearing
and action (for September 12, 1989 meeting)

SYNOPSIS

Summary of Plan

Pepperdine University has submitted a Long Range Development Plan (LRDP) which proposes development of University facilities to serve up to 5,000 FTE (full-time equivalent) students over the 830 acre campus. The LRDP would permit 212 additional student and faculty/staff housing units, academic and support facilities totalling approximately 854,000 square feet within the 225 acre existing developed campus area. An additional 202 on-campus housing units and academic and support facilities totalling 385,000 sq. ft. and 182,000 sq. ft. of new roads is also proposed on a 72 acre expansion area on undeveloped land northwest of the developed campus area. Development of the expansion area will involve 3 million cubic yards of grading (842,000 cubic yards for stabilization of landslides and 2.2 million cubic yards for roads and building pads). Approval of the expansion of the Malibu Mesa Wastewater Reclamation Plant to 500,000 gallons per day capacity from the current 200,000 gpd is also being sought, to be constructed should the County of Los Angeles abandon its plans for a regional sewer system.

Summary of the Staff Recommendation

Staff is recommending that the Commission (1) deny the LRDP as submitted due to its non conformance with the coastal access, landform alteration and visual resource protection, hazards, and environmentally sensitive habitat protection policies of the Coastal Act; and (2) approve with suggested modifications dealing with public access, visual and environmental resources protection, hazards, and marine resources protection, that portion of the LRDP for the build-out of the existing developed campus area. The existing developed campus area is defined to include that area east of John Tyler Drive, south of Huntsinger Circle and west of Seaver Drive; the northern extent of Baxter Drive; the area northeast of the intersection of Seaver Drive and Baxter Drive; the area east of Seaver Drive between Baxter Drive and President Drive; and the area at the southeast intersection of Seaver Drive and President Drive, as shown on Exhibit 4.

EXHIBIT A

Pepperdine LRDP
Page 11

irrigation and monitoring plan, (2) additional geotechnical analysis to better determine the extent of the landslides on the proposed 72 acre expansion area and the amount of grading necessary for both landslide stabilization and roads and pads, (3) determination of whether the Malibu Coast Fault or any splays thereof exists within the campus, (4) updated traffic analysis and (5) visual impact analysis of the development proposed within the 72 acre expansion area.

B. Current Level of Development

The 830 acre Pepperdine University campus is located in western Los Angeles County, west of the Civic Center area of Malibu, adjacent to the intersection of Pacific Coast Highway and Malibu Canyon Road. The University is bounded on the east by Malibu Canyon Road and the site of the approved Adamson 300-room Adamson Hotel, on the west by the Malibu Mesa Wastewater Reclamation Plant and the Malibu County Estates condominium development, on the north by undisturbed watershed and the LUP designated Malibu Canyon Significant Watershed, and on the south by Pacific Coast Highway, the Malibu Bluffs State parkland, the new Malibu Colony Plaza (Reco) shopping center and the Malibu Road residential community and Amarillo Beach south of the highway.

The existing developed campus covers approximately 225 acres or a little over 25% of the 830 acres. The campus contains roughly 850,000 square feet of development. Additionally there are two 40,000 sq. ft. effluent lakes with a total capacity of 12.4 million gallons of treated water, 3.1 million gallon capacity of water storage tanks, playing fields and running tracks, tennis, racquetball and other sports facilities, water tanks and a retention basin. According to an April, 1989 University report, there are 2150 parking spaces within lots or structures and 990 on-street spaces within the University campus for a total of 3140 parking spaces (See Exhibit 4).

According to the Pepperdine University Specific Plan figures, the 850,000 square feet of facilities is devoted to 16% (135 units) student housing for 1537 students, 29% (52 units) faculty/staff/administration housing and recreational amenities, and the remaining 55% devoted to academic and support uses.

Pepperdine University was formerly located in south central Los Angeles. A program to move the campus to Malibu and to expand the University's facilities began nearly twenty years ago. The Long Range Development Plan (LRDP) which is reviewed here provides for a continuation of that expansion through 1997.

The University acquired its Malibu campus in 1968. In May of 1979 Los Angeles County approved a zone change to allow the campus site to be used for university purposes. On July 11, 1972, the County Planning Commission issued a Conditional Use Permit for the expansion of the university's facilities. Specific Plans were not adopted under this Conditional Use Permit until December 30, 1976.

Under the Coastal Act of 1976, the campus came under the jurisdiction of the Coastal Commission. The University applied for a claim of vested rights for all facilities shown on the 1976 Specific Plan. Prior to the effective date of the Coastal Act, the University had obtained numerous grading and building permits from the county and complete construction of 35 permanent buildings and were under way on 4 additional structures. Under the University's 1976

EXHIBIT A

Pepperdine LRDP
Page 12

Specific Plan the following facilities were yet to be constructed:

1. Undergraduate administration building
2. Fine arts complex
3. Hillside theatre and 2 contemporary arts facilities
4. Sea lodge
5. Temporary offices and administrative facilities (5)
6. Law School housing and parking structures
7. Student dormitory (1)
8. Student/staff housing structures (4)
9. Utility connections, grading, driveways, walkways and retaining walls to accommodate above listed development.

The claim of vested rights to complete the remainder of the facilities under the 1976 Specific Plan was denied by the South Coast Regional Commission on June 6, 1977 (E-2-E-5). A subsequent appeal to the State Coastal Commission resulted in a finding of no substantial issue on July 20, 1977, thus leaving the denial in place (Appeal No. 191-77, Pepperdine University).

Since this time the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, equestrian riding ring located just northwest of the existing graded campus, music hall, and various parking, sports, security, storage, and temporary trailer uses.

The University and Century Malibu, Inc. (Malibu Country Estates) were also given a permit to construct the 200,000 gallon per day (gpd) Malibu Mesa Wastewater Reclamation Plant located at the intersection of John Tyler Drive and Pacific Coast Highway. A spray irrigation management plan (SIMP) to dispose of treated wastewater over the landscaped and natural areas of the campus was also approved.

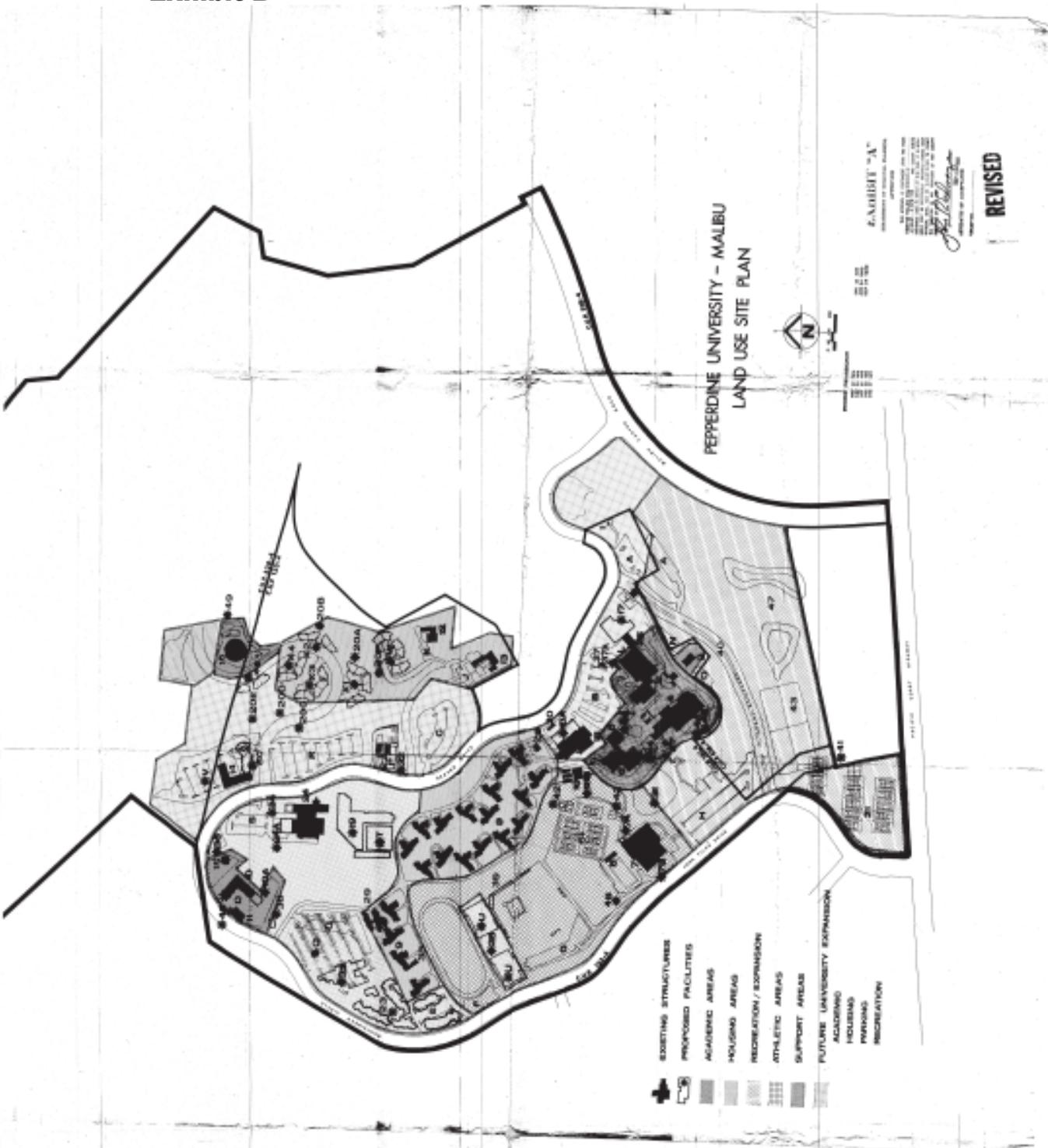
The Specific Plan states that as of fall, 1983 the enrollment totalled 1,920 full time equivalent (FTE) students. This number of FTE students was made up of 2,540 full and part-time students, of which 1,537 lived in campus housing and 1,003 commuted from other locations. There were 2148 FTE students enrolled in the University as of March, 1989. Under the proposed full build out of 5,000 FTE students, there would be an actual enrollment of 6,500 students, 500 faculty, 777 staff and 17 administrators.

C. Local Government Action on 1988 LRDP Proposal

There has been considered debate among some local citizen groups as to whether or not CEQA procedures have been properly followed with regards to the adequacy of the environmental analysis of the LRDP beyond the CUP for Phase I. The University has responded that the CEQA process has been properly carried out by the County of Los Angeles for the full LRDP as was proposed at the 1988 Commission hearing (see Exhibit 12). The University further contends that while the August, 1989 revisions to the LRDP are significant changes to the LRDP, they are significant reductions to the proposed development and therefore no additional or supplemental EIR is required under CEQA.

The October, 1983 Draft EIR on the University Specific Plan or LRDP was prepared as part of the process for review and consideration of Conditional Use Permit application CUP 2432 (4) requesting approval to development the Pepperdine campus as specified in the Specific Plan. The county zoning board

Exhibit B



DATE	DESCRIPTION	BY

Exhibit B

HAUL ROUTE PLAN
 DEPARTMENT OF AGRICULTURE
 UNIVERSITY OF CALIFORNIA
 MARSH, CA

DAVID J. MERRILL - CIVIL ENGINEER
 1000 S. GARDEN AVENUE
 SUITE 100
 ANAHEIM, CA 92810
 (714) 771-1111
 FAX (714) 771-1112
 WWW.DJMERRILL.COM



HAUL ROUTE PLAN
 PROJECT NO. 1000000000
 SHEET NO. 1000000000
 DATE: 10/10/14
 DRAWN BY: DJM
 CHECKED BY: DJM
 APPROVED BY: DJM
 SCALE: AS SHOWN

FILE COPY

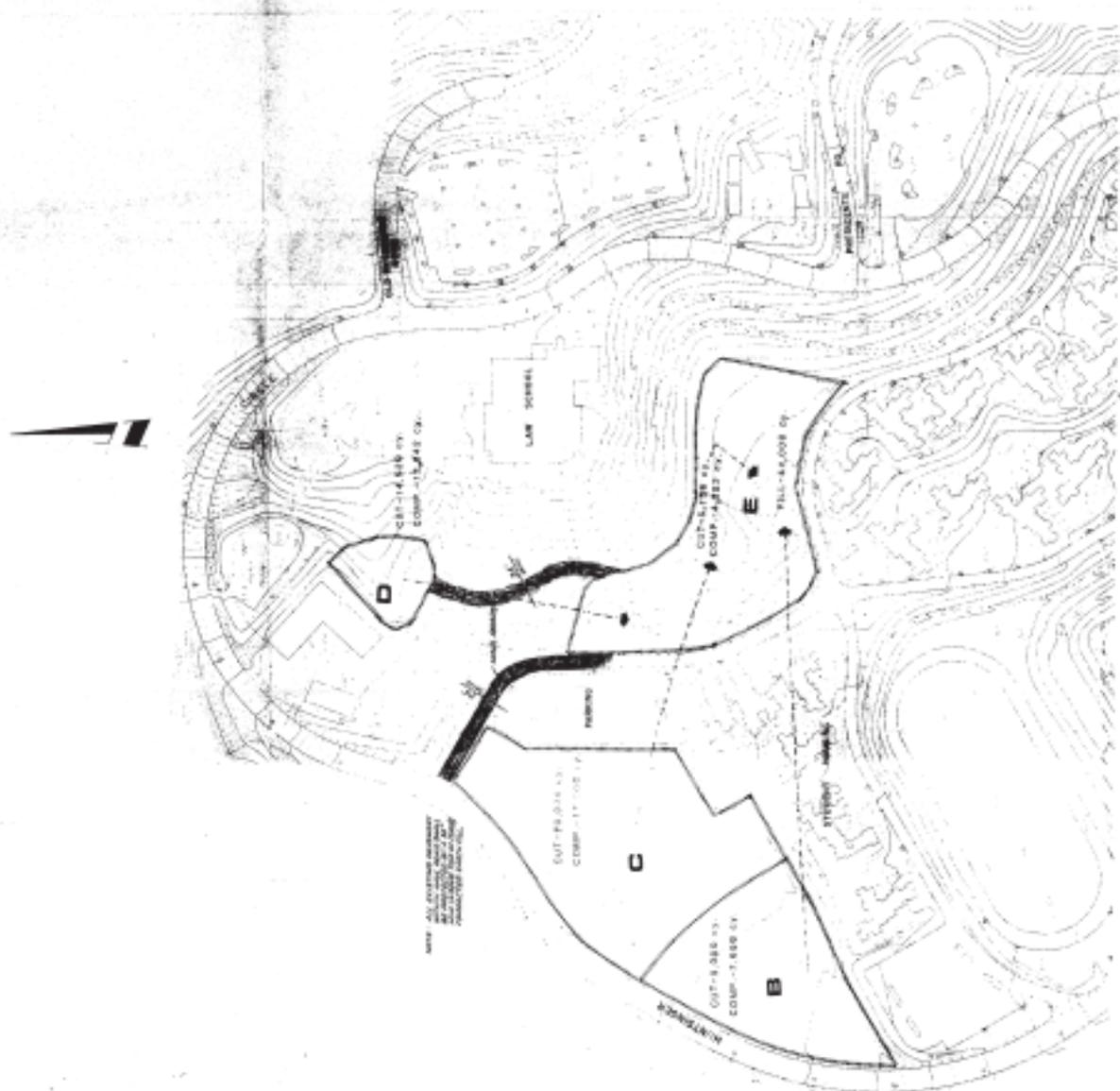


Exhibit B

PEPPERDINE UNIVERSITY

TOTAL 530 ACRES

A-1-1-DP
ZONE BOUNDARY

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

KESA PEAK TRAIL
(DEED RESTRICTED)

OPEN SPACE

COMBINED MESA PEAK
AND CENTRAL SLOPE TRAILS
(DEED RESTRICTED)

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

OPEN SPACE

OPEN SPACE

WALKWAY TRAILS

1/11/86
Notes: This is not and
never shall be an EIR.
See ID #14, dated 3/1/85
in Doc. Ann. 12-7.



Project Location Map

EAI ENVIRONMENTAL AUDIT, INC.
1000-A ORFILA WAY • PASADENA, CA 92307-7128
TEL: 714/835-8100 • FAX: 714/835-8154

Project: Environmental Analysis and
Mitigation
Location: LAUREL RIDGE

DATE	BY	REVISED	DATE	BY	REVISION
1/28/86	PSD	7/28/86			13/03/86 DMS

Exhibit B

• MAP A •

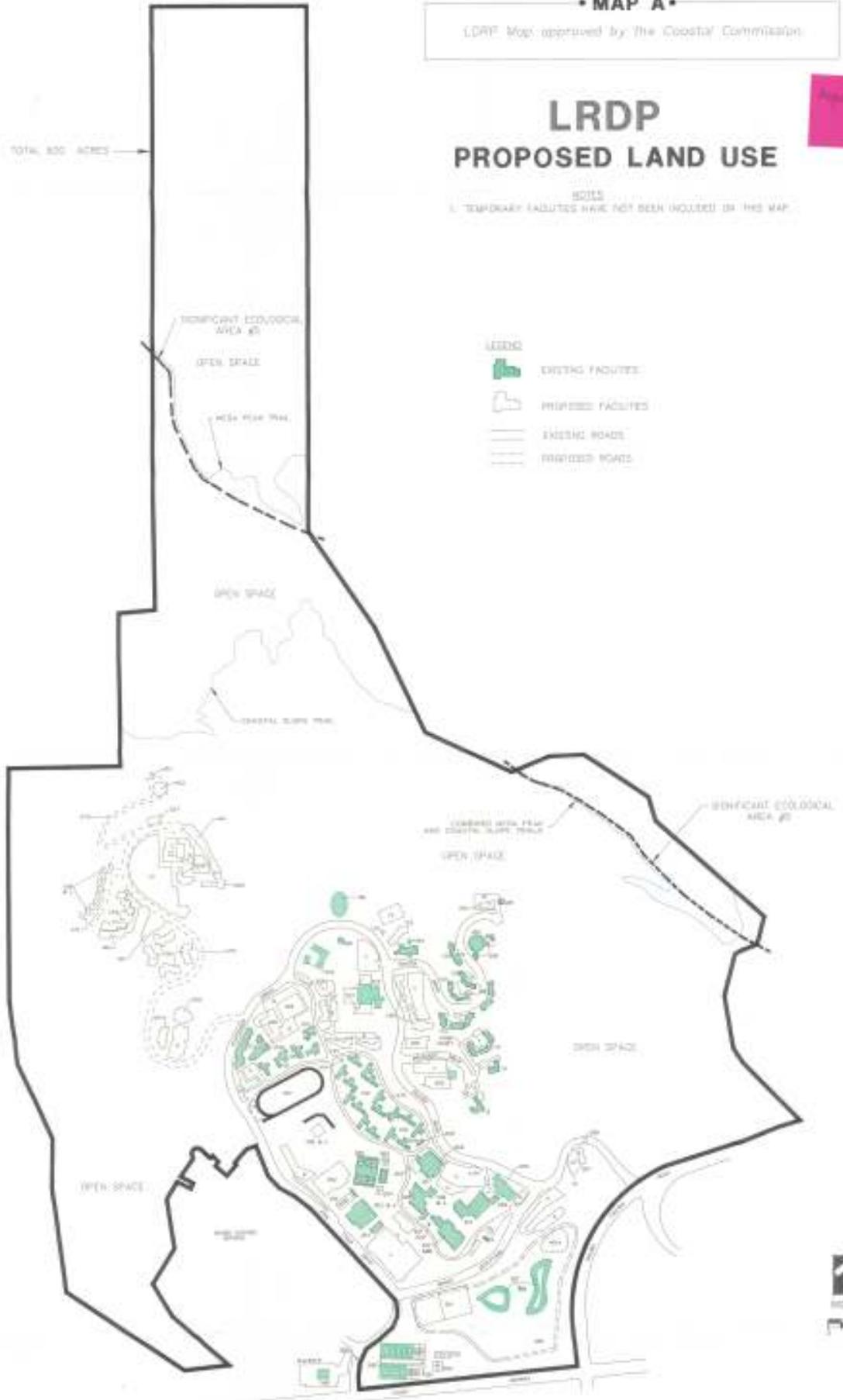
LRDP Map approved by the Coastal Commission

LRDP PROPOSED LAND USE



NOTES
1. TEMPORARY FACILITIES HAVE NOT BEEN INCLUDED ON THIS MAP.

TOTAL 800 ACRES



- LEGEND
- EXISTING FACILITIES
 - PROPOSED FACILITIES
 - EXISTING ROADS
 - PROPOSED ROADS

NOVEMBER 1999

BUILDING NUMBERS, GENERAL DESCRIPTIONS & USES OF BUILDINGS/FACILITIES ARE LISTED IN THE SPECIFIC PLAN

EAJ ENVIRONMENTAL AUDIT, INC.
 1000-A DUNNWAY, SUITE 100 • FARMINGTON, CT 06030-1100
 TEL: 860-638-4100 • FAX: 860-638-4274
 e-mail: Planning.Environmental.Audit@earthlink.net
 Website: www.environmentalaudit.com

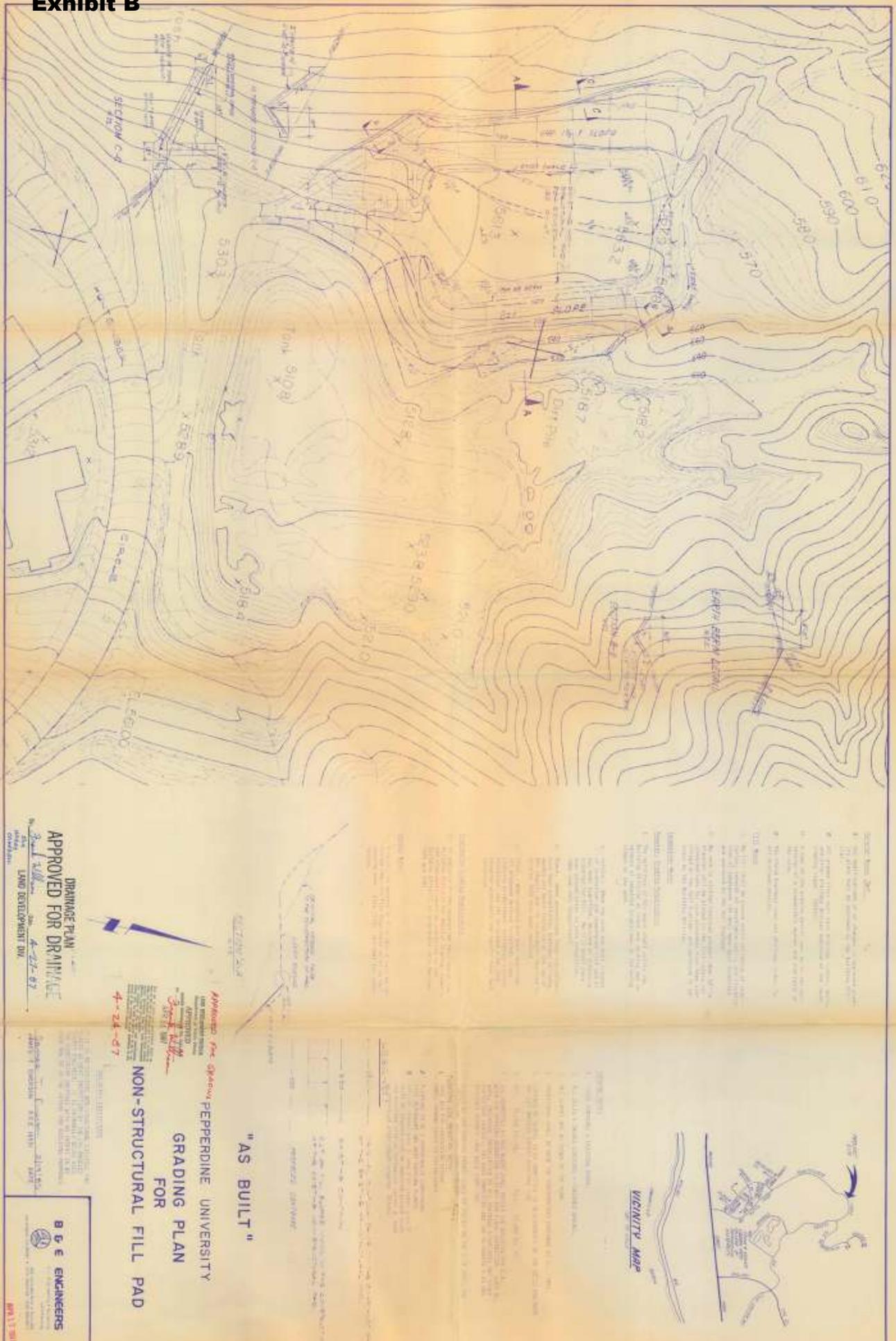
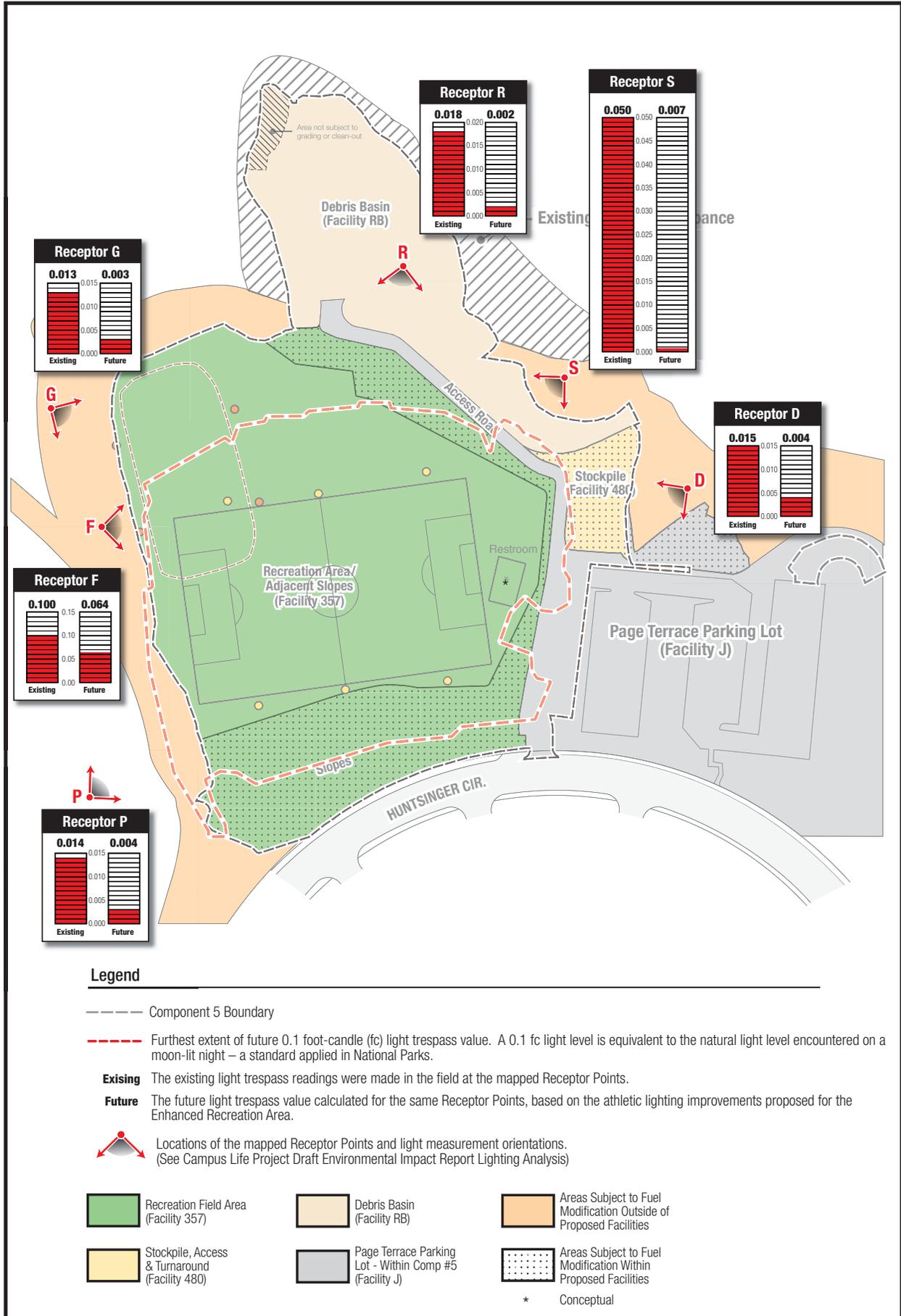


EXHIBIT C



June 10, 2013

CALIFORNIA COASTAL COMMISSION

SOUTH COAST AREA
245 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



December 21, 1989

TO: Commissioners and Interested Persons

FROM: Peter Douglas, Executive Director
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: REVISED FINDINGS ON THE PEPPERDINE UNIVERSITY LONG RANGE DEVELOPMENT PLAN (LRDP) for Public Hearing and Commission Action at the Meeting of January 11, 1990.

SYNOPSIS

Summary of Commission Action

On September 12, 1989, the California Coastal Commission reviewed the Pepperdine University Long Range Development Plan (LRDP). In its action, the Commission denied the LRDP as submitted and certified it with Suggested Modifications regarding public access, hazards, and visual, marine and environmentally sensitive resource protection.

If these Suggested Modifications are adopted by the Board of Regents of the University within six months of the Commission's action (March 11, 1990) and the Commission is so notified, the LRDP will become effectively certified.

Commission Vote

The Commission's action included two resolutions on the LRDP submittal. The Commissioners voting on the prevailing side on the first resolution to deny the LRDP as submitted were:

Glickfeld, Rynerson, MacElvaine, Malcolm, McInnis, Knapp, Neely, Warren, Wright, Hisserich, Franco, and Chairman Wornum

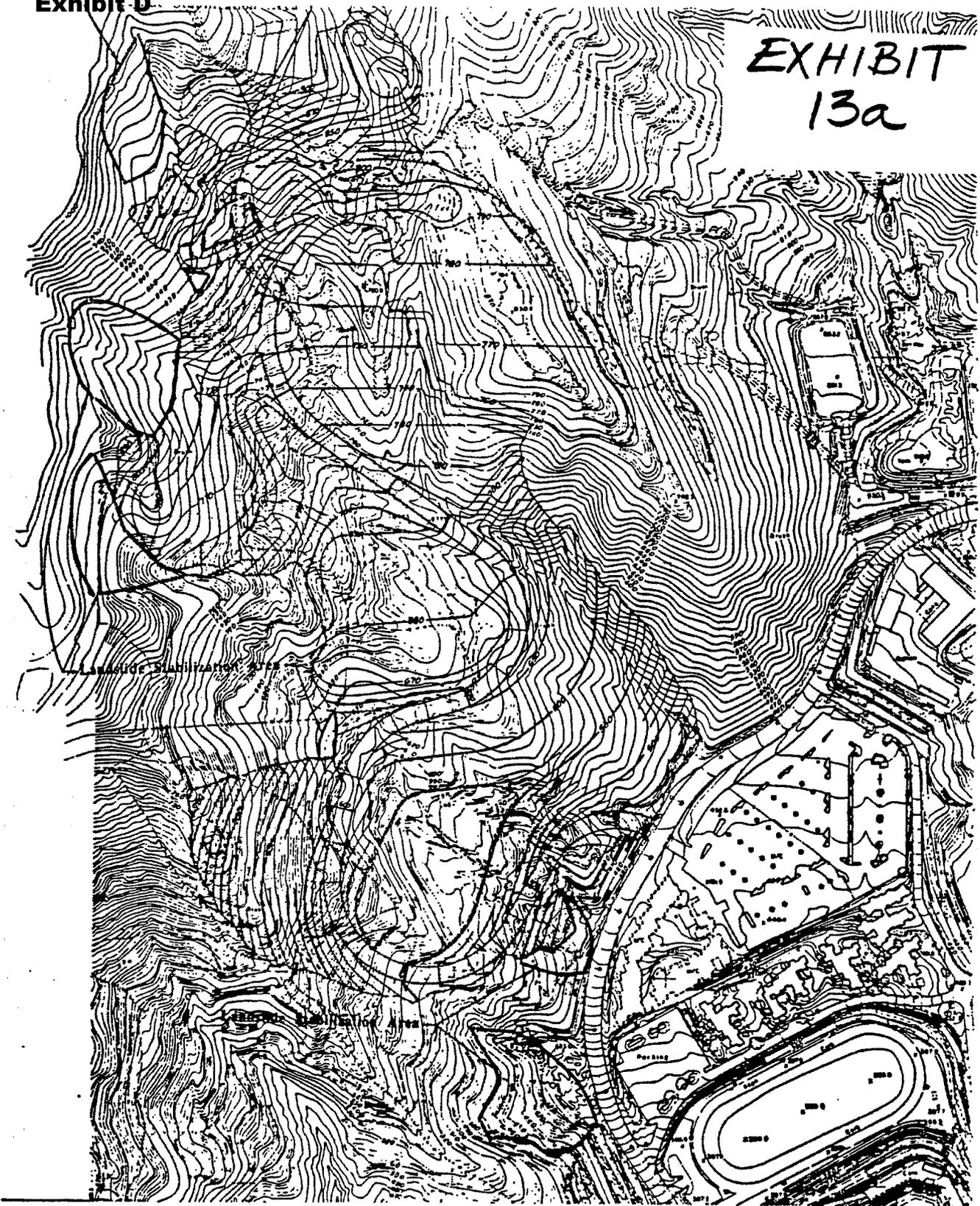
The Commissioners voting on the prevailing side on the second resolution to certify the LRDP with Suggested Modifications were:

Knapp, Neely, Wright, Glickfeld, MacElvaine, Malcolm, McInnis, and Chairman Wornum

Additional Information

Further information on the Pepperdine University Long Range Development Plan may be obtained from Teresa Henry at the South Coast Area Office of the Coastal Commission, 245 West Broadway, Suite 380, Long Beach, CA 90802, (213) 590-5071.

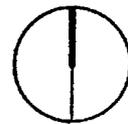
EXHIBIT
13a



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area
Conceptual Grading Plan
 Showing Landslide Stabilization Areas
 Outside of Graded Area.

RECEIVED

AUG 4 1989



ATTACHMENT C-1

CALIFORNIA
COASTAL COMMISSION

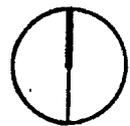
These materials have been provided to Coastal Commission Staff

Exhibit D

EXHIBIT
136



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area
Conceptual Grading Plan
With Proposed Buildings



ATTACHMENT C-2

Albert C. Martin and Assoc.
DATE 7-20-02

Exhibit E



Source: GoogleEarth Pro, August 27, 2012.

VERSION 5

PEPPERDINE UNIVERSITY

**The Campus Life Project: The Next Step in Fulfilling our
Long Range Development Plan**

LRDP Amendment 1-11, Part B

THESE MATERIALS HAVE BEEN PROVIDED TO COASTAL COMMISSION STAFF

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- Pepperdine strongly disagrees with the Staff's recommendations that the existing field and lights were not permitted
 - The existing field and lights were installed pursuant to three CDPs approved by the Commission in the early 1980s; the Commission subsequently certified the existing facility and its lighting in 1990, 1998, and 2012
 - The LRDP encompassed all on-the-ground development at the time of its certification in 1990
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds do not withstand scientific scrutiny
 - Pepperdine used a highly conservative threshold to measure potential impacts; the Commission has previously relied on the 0.1 fc threshold previously and it is consistent with IESNA recommendations
 - The EIR and Pepperdine's supplemental, site-specific biological analysis concluded that the lights would not adversely impact any sensitive resources
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field

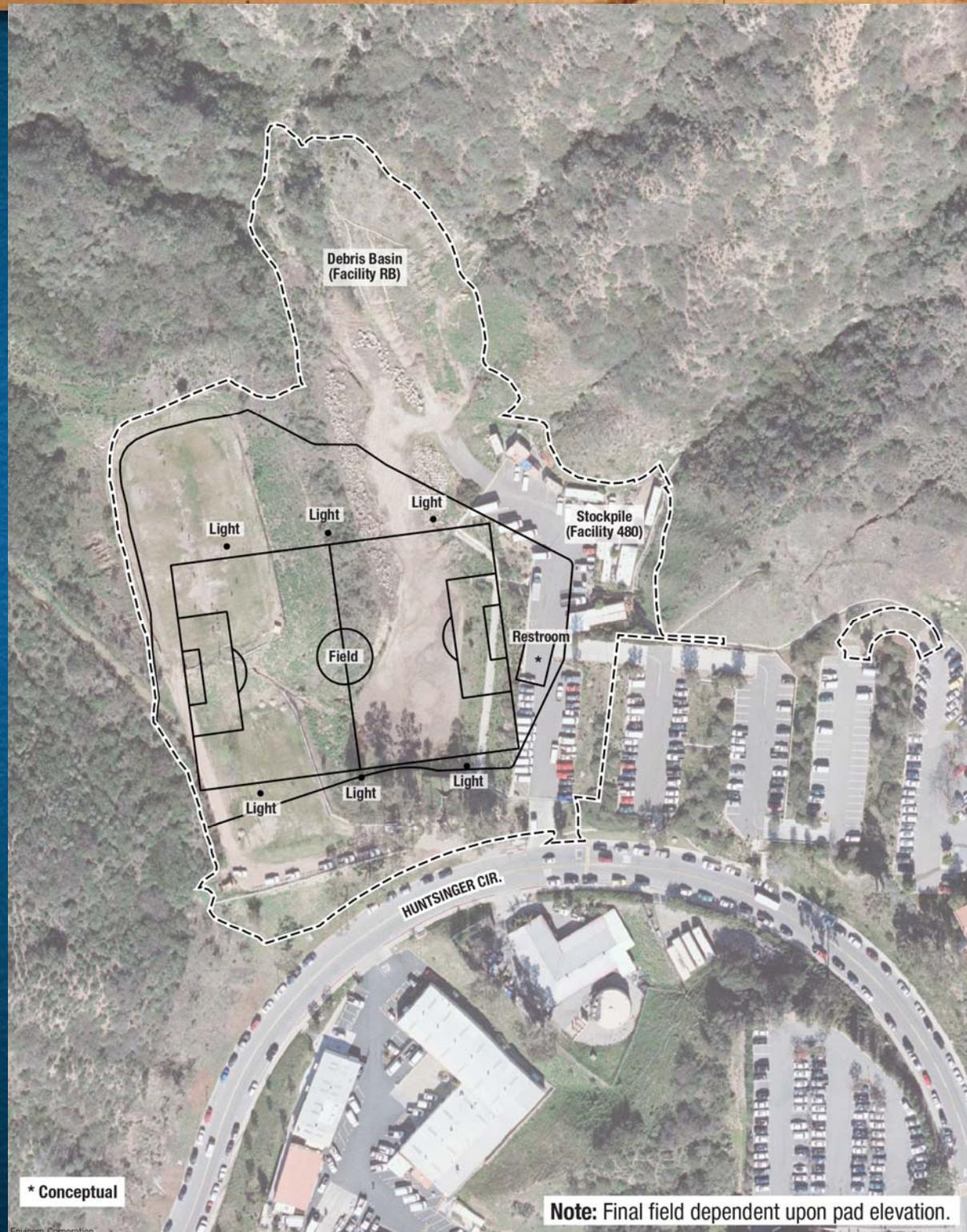
The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- By mutual agreement with Staff, Pepperdine divided its LRDP Amendment 1-11 into two parts (Part A and Part B); the Commission unanimously approved Part A in December 2012
- Part B is a focused review of three elements of the approved Enhanced Recreation Area:
 - Replacement of the existing unshielded "flood lights" with state-of-the-art, shielded fixtures
 - Confirmation of east-west field configuration as requested by Coastal Staff
 - Specific location of the approved small restroom/storage facility

PEPPERDINE
UNIVERSITY



Aerial View of
Approved
Enhanced
Recreation Area,
Proposed
Light/Restroom
Locations, and
Field Orientation

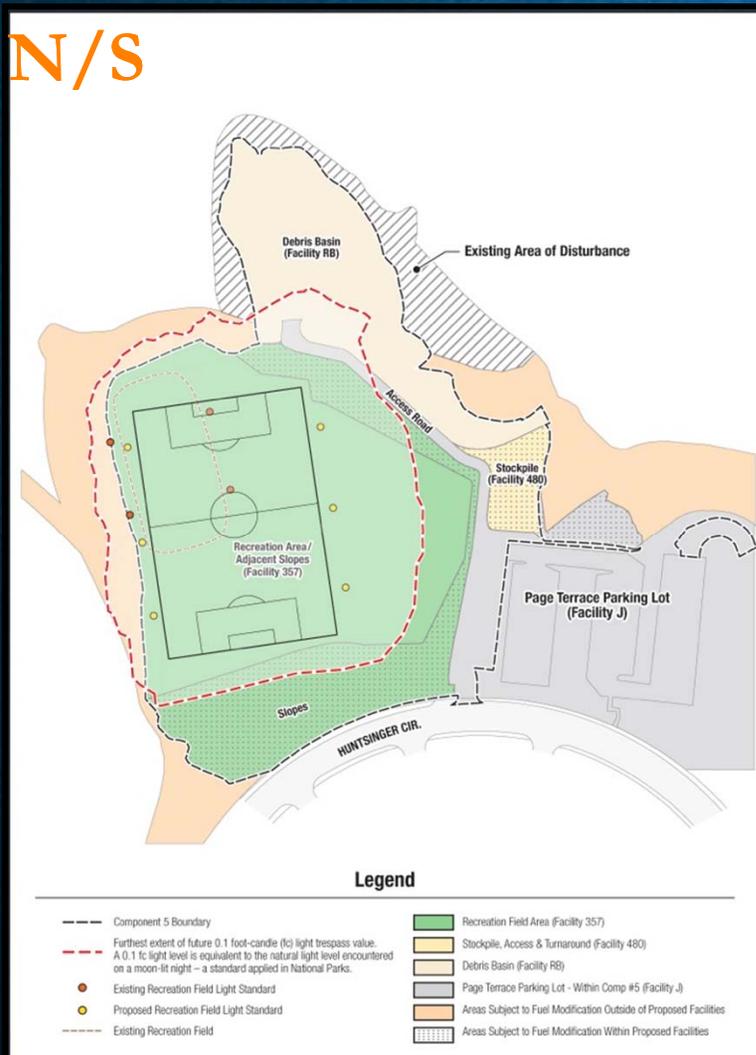


Aerial View of the Proposed Lights Within the Developed Campus Core



Recreation Field Orientation

- Pepperdine would agree to orient the proposed Recreation Field in Staff's preferred "east-west" configuration
- The E/W orientation focuses light further south towards Huntsinger Circle; in this orientation the field would be surrounded by developed and disturbed areas



Importance to Campus Community

- The Campus Life Project provides much needed enhancements to on-campus amenities
- The approved Enhanced Recreation Area will provide all students with safe recreational space for physical health and building community
- Night lighting is critical for all students to enjoy the facility
 - Student days are filled with ever expanding class loads, volunteering, internships, clubs, jobs, etc.
 - **The University has a critical need for additional recreational field space**, and without night lighting, a significant percentage of the Campus's young men and woman will lose the already limited opportunity to recreate and participate in intramural or club sports

PEPPERDINE
UNIVERSITY



Project Need

- The existing field at the site of the approved Enhanced Recreation Area is Pepperdine's only lighted recreational field space
 - This is already significantly deficient when compared with peer institutions
- Key objectives of the Campus Life Project include:
 - Provide an enhanced recreation facility including a lighted field to alleviate the overcrowded conditions
 - Provide needed outdoor recreation field within the existing developed campus
- Without approval of Part B, Pepperdine would be forced to continue using the existing undersized, flood-lit field

PEPPERDINE
UNIVERSITY



Lighted Fields at Peer Institutions

Institution	Lighted Recreational Field Area (acres)*
Pepperdine University	0.46
Loyola Marymount University	3.05
University of California Los Angeles	7.33
University of California Santa Barbara	5.32
University of the Pacific	1.93
Saint Mary's College	1.73
University of San Diego	3.57
University of San Francisco	1.70
Santa Clara University	3.13
University of California San Diego	10.78
University of California Berkeley	5.19
California State University Long Beach	8.63
Stanford University	5.13

* Information compiled by Envicom Corporation August 2013.

Enhanced Recreation Area Lighting Design

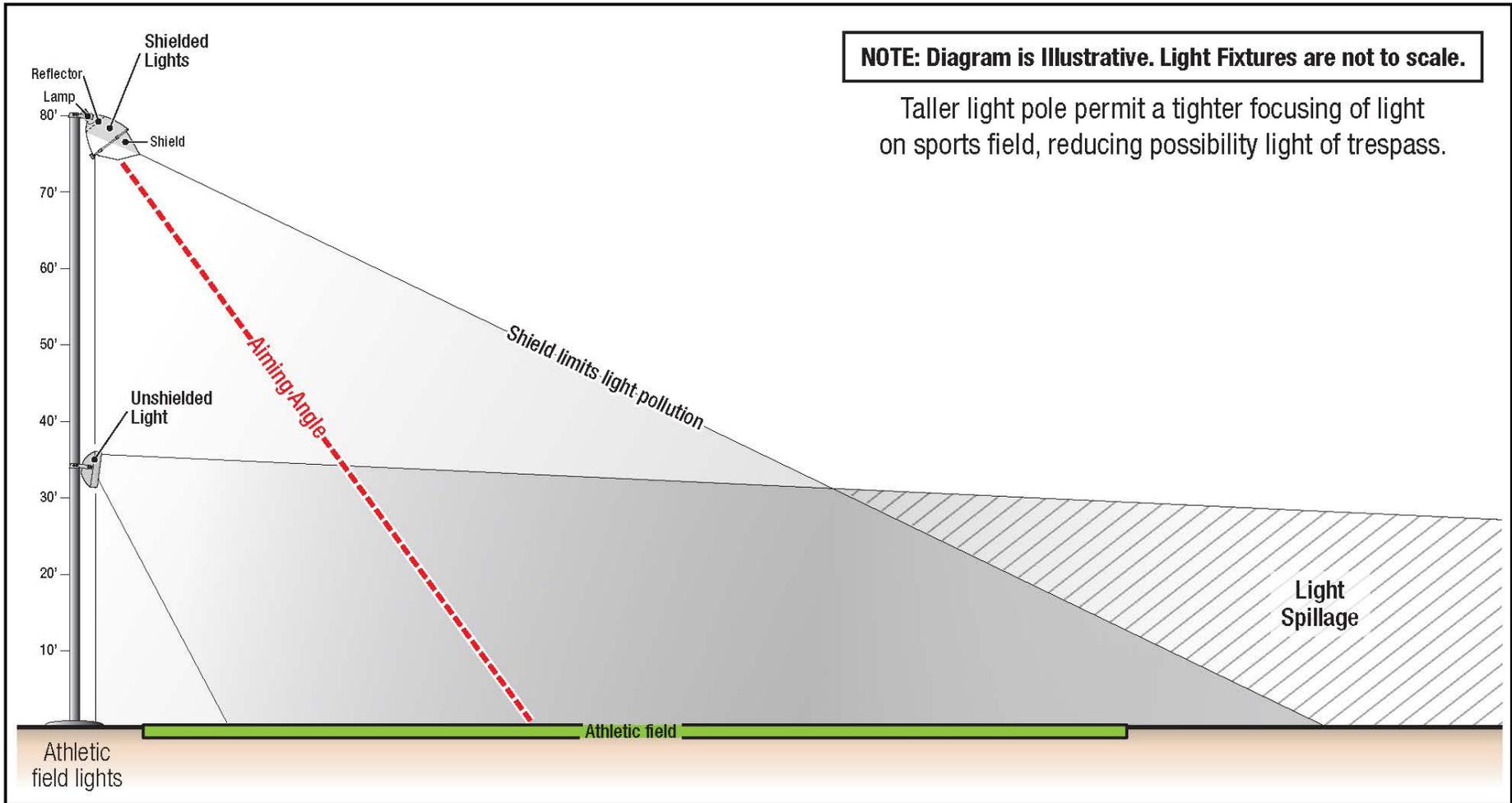
PEPPERDINE
UNIVERSITY

- Proposed lighting features state-of-the-art technology designed to prevent or minimize all forms of light pollution including glare, light trespass, and sky glow
 - The proposed cutoff, angled, and shielded fixtures will direct light onto the field rather than into natural areas and the night sky
 - Would utilize the same advanced fixtures approved by the Commission for the soccer field in Part A
 - Lighting levels would be lower than soccer field due to proposed recreational use
- Would improve existing conditions by replacing the existing, non-cutoff, non-shielded flood lights



Existing Recreation Lighting Proposed for Replacement





Revised: Sep. 23, 2013

Consistency with the LRDP Lighting Policy

- When approving Part A, the Commission proposed a comprehensive LRDP "Lighting Policy," which the University adopted
- The proposed lights fully comply with the terms and intent of the Policy. The lights are:
 - "Qualite" or a superior, state-of-the-art technology designed to dark-sky-compatible standards
 - Minimized, directed downward, and shielded using the best available visor technology and pole height design to minimize light spill, sky glow, and glare
 - Designed to minimize light trespass into adjacent non-target areas, and to limit the illumination of adjacent open space and sensitive habitat areas

PEPPERDINE
UNIVERSITY



Reducing Lighting Impacts

- The EIR lighting study determined there would be no significant light trespass or glare impacts
 - The EIR used a highly conservative 0.1 fc line to measure impacts in the vicinity of the proposed field; Pepperdine's Campus is actually registered as a CEC "Lighting Zone 3," associated with a 0.8 fc threshold level
- For LRDP Amendment 1-11, Pepperdine conducted a supplemental analysis finding:
 - No light trespass greater than 0.1 fc will occur in undisturbed, naturally vegetated or habitat areas
- The 0.1 footcandle (fc) level is the most conservative threshold used in past Commission precedent
 - Staff Biologist Dr. Engel stated in 2011: "[T]he significance threshold for spill light upon sensitive resources is 0.1 [fc] at any receptor location"
 - Dr. Engel agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit

PEPPERDINE
UNIVERSITY



Legend

- Pepperdine University Property Boundary
- Limit of 0.1 foot candles
- Limit of 0.01 foot candles



Reducing Sky Glow Impacts

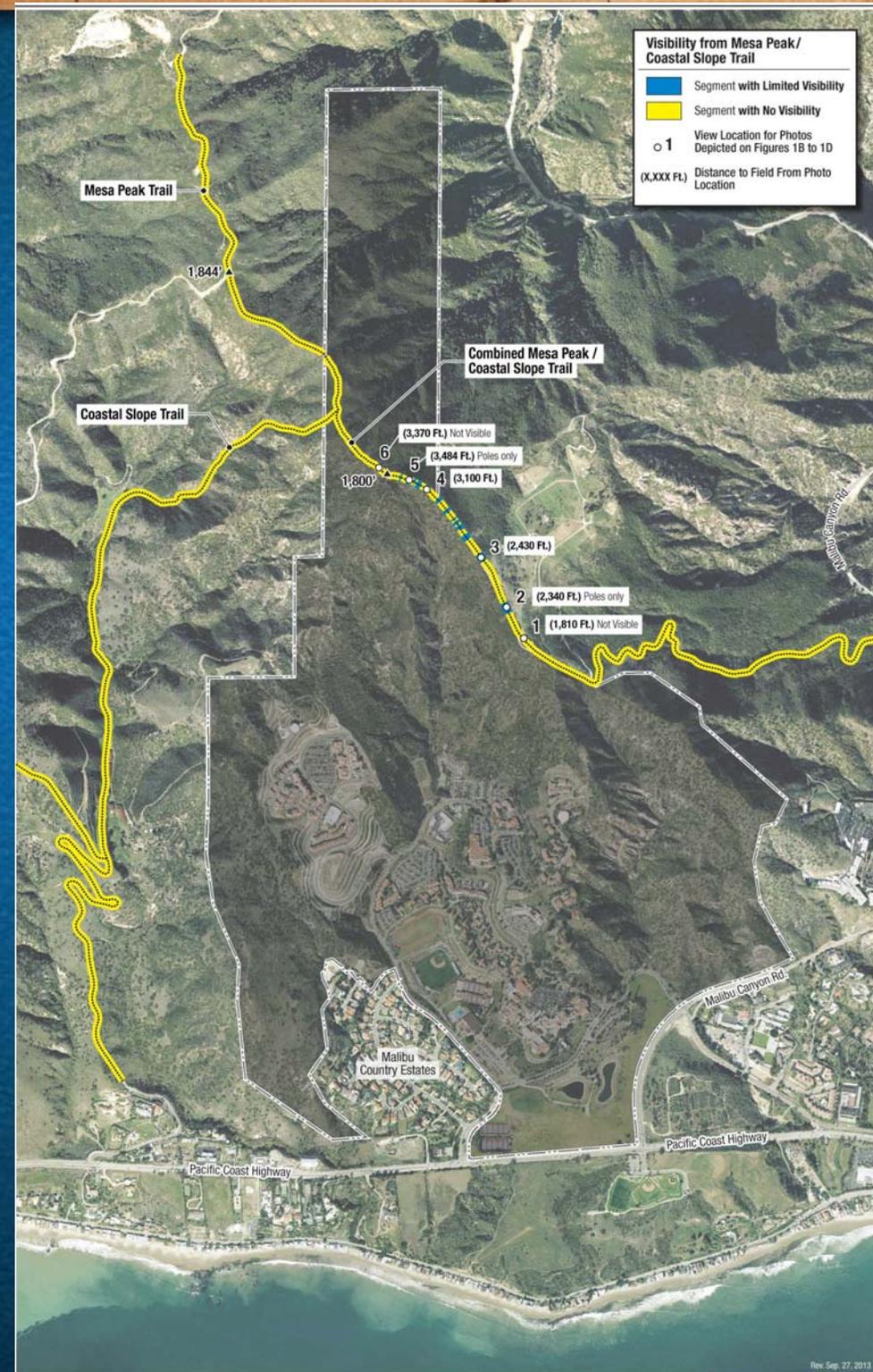
- The lighting incorporates principles and recommendations provided by the International Dark Sky Association and Illuminating Engineering Society of North America to prevent or minimize sky glow and protect Coastal resources
- Light emitted between 80 and 100 degrees has the greatest effect on sky glow
 - The new fixtures will emit light between 16 and 62 degrees, which is far less likely to result in sky glow than conventional lights
 - The existing flood lights emit light at ~ 80 degrees
- If approved, replacement of the existing recreational field lighting along with the Campus globe lights would ***reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%***

PEPPERDINE
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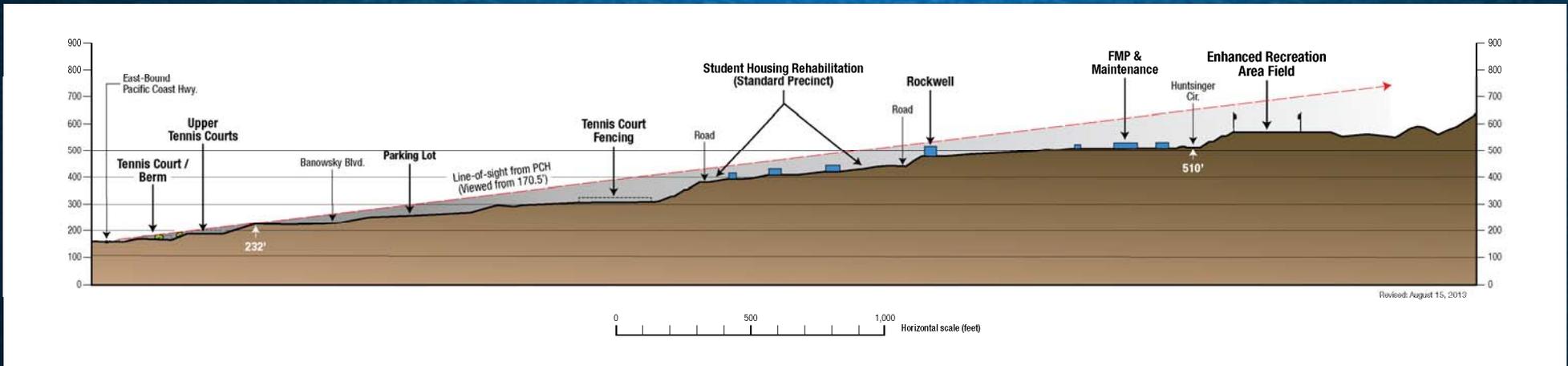


Protecting Visual Resources

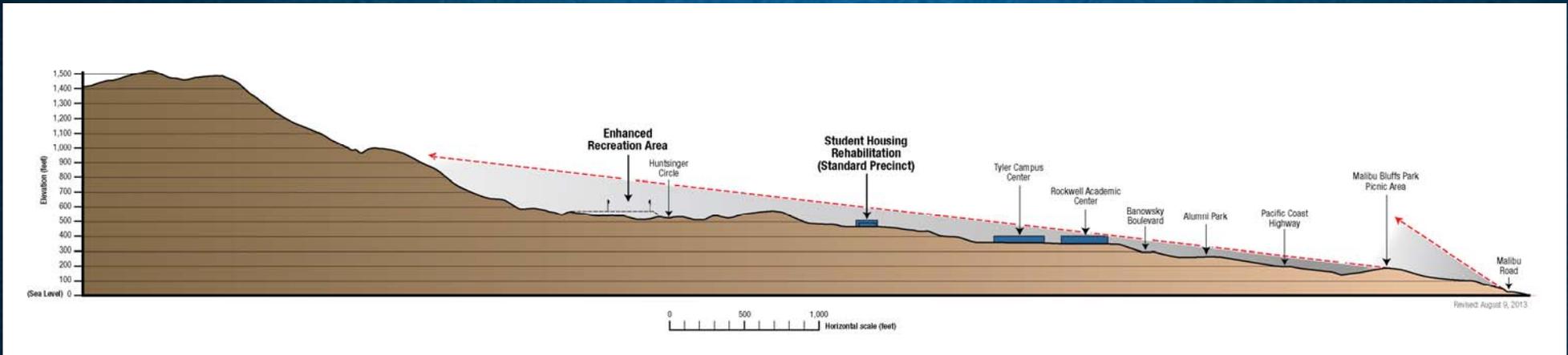
- The light fixtures will not be visible from:
 - Malibu Canyon Road
 - Pacific Coast Highway
 - Santa Monica Mountains Conservancy-Owned Malibu Bluffs
- Fixtures are invisible from the vast majority of area trails - hikers could see the fixtures along less than 4% of the 4.1 miles that comprises the combined Coastal Slope and Mesa Peak trails
- Limited views of fixtures would be consistent with the current views of the developed campus and the City of Malibu



Proposed Light Fixtures are not Visible from PCH



Proposed Light Fixtures are not Visible from Bluffs Park



Protecting Avian Resources

Nesting Birds

- The proposed east-west orientation focuses light further south towards Huntsinger Circle and away from the undeveloped campus
 - Minimizes potential light trespass and glare impacts on nesting birds

Migratory Birds

- Proposed Qualite International fixtures produce "cool" white light (not the type of red light found potentially impactful to avian behaviors in the majority of reviewed studies)
 - Only 11.84% of the light produced falls within the red spectrum

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Conclusions

- The Enhanced Recreation Area lighting is the final piece of the Campus Life Project
- The proposed lights:
 - Are consistent with Pepperdine's Commission-recommended LRDP lighting policy
 - Will limit light trespass consistent with the conservative 0.1 fc threshold used in the past by the Commission for areas near sensitive resources and consistent with IESNA recommendations for areas where light might adversely affect flora and fauna
 - Provide important additional recreational opportunities on Campus
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

The Campus Life Project – Response to Staff Report: Overview

- Pepperdine strongly disagrees with the Staff's recommendations
- Pepperdine disagrees with the assertion that the existing field and its lights were not permitted
- Staff's rejection of the 0.1 fc threshold for significant impacts breaks from Commission precedent, direction provided to Pepperdine during the LRDP process, and IESNA recommendations for areas where light might adversely affect flora and fauna
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds are arbitrary and do not withstand scientific scrutiny
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

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Response to Staff Report – Existing Field and Lighting Approvals

PEPPERDINE
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- The existing recreational field (formerly the equestrian center) and its lighting have been in place in the same location for approximately 30 years
- Pepperdine developed the field and its lights pursuant to three CDPs (P-80-7325, CDP 5-81-395A, and CDP P-81-7818) in the early 1980s
 - While the permits do not specifically refer to lights, the level of permit detail was vastly differently in the 1980s
- When the Commission certified the LRDP in 1990, after the field and lighting had been installed, it also certified that “Development at Pepperdine has been consistent with the goals, policies, rules and regulations of ... the California Coastal Commission”
- The LRDP encompassed all on-the-ground development at the time of the LRDP certification in 1990



Response to Staff Report – Existing Field and Lighting Approvals

PEPPERDINE
UNIVERSITY

- P-80-7325 (Development Description)
 - *Dismantling of an equestrian center and construction of 116 units of law school and undergraduate student housing, parking spaces for 484 cars, staircases to the University Annex, an electrical distribution building and temporary classroom facility. Application includes a request for approval of allocation of the needed portion of the unused sewage treatment capacity to the proposed facilities. Project is included in the University Land Plan.*
- CDP 5-81-395A (Amendment to Permit P-80-7325)
 - *Relocate existing equestrian center to be dismantled for 116 unit housing as approved on P-80-7325.*
- CDP P-81-7818 (Development Description)
 - *Construction of university campus facilities including a heritage hall, music wing, and a visiting professors' duplex, relocation of an equestrian center and expansion of the student housing reception center. These proposals are consistent with the University's Master Plan, previously reviewed and approved by the Commission.*



Response to Staff Report – Existing Field and Lighting Approvals

- Staff bases its position on a “haul route plan” in its CDP 5-81-395A file
 - The plan identifies four pads (B, C, D and E) that would either generate cut or receive fill; **but** the field was balanced onsite (no cut or fill for transport)
 - **And** each of these four pads correlated to a specific proposed facilities at the time of the issuance of CDP 5-81-395A
- **Approved County of Los Angeles Grading Plan (1987)**
 - Shows field as built in its existing location
- **Coastal Commission LRDP Staff Report (August 1989)**
 - .. the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, **equestrian riding ring located just northwest of the existing graded campus**, music hall, and various parking, sports, security, storage, and temporary trailer uses.
- **Coastal Commission-Certified LRDP (1990)**
 - Shows field (as an existing graded facility) on the LRDP Conceptual Grading Map



DATE	9/20/87	SHEET	1	OF	1
SCALE	1"=100'	DESIGNED BY		CHECKED BY	
APPROVED		DATE		JOB NUMBER	8874

HAUL ROUTE PLAN
 OF
 EQUESTRIAN USE AREAS
 PEPPERDINE UNIVERSITY
 MALIBU, CA.

BUILDING AND SAFETY DIVISION
 Department of County Engineer
APPROVAL IN CONCEPT
 SIG. *[Signature]*
 DATE 9/20/87
 PLAN CHECK NO.

Per sec. 27400 et seq. of the
 Public Resources Code and
 Sec 13210(a) Title 14 of the
 Administrative Code, State
 of California.
 THIS IS NOT A PERMIT
 and
 is subject to any conditions
 listed below.

South Coast Regional
 Commission
APPROVAL
 Permit No. *5-045-A*
 By *[Signature]*

FILE COPY

OLIN D. MURPHY - CIVIL ENGINEER
 10000 WILSON AVENUE
 MALIBU, CALIFORNIA 90263



Response to Staff Report – Existing Field and Lighting

PEPPERDINE
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- The Commission certified the existing location of the recreation area (the former equestrian center) in 1998
 - Pepperdine amended its LRDP map to leave the recreation area in its current location (as opposed to moving the field to an undeveloped area of campus)
 - In certifying LRDP 2-97, the Commission recognized that this environmentally sensitive decision would “reflect what currently exists”
- Pepperdine transitioned the equestrian center to the less intensive recreational/intramural use in 2000
- The Commission approved the enhancement of the existing recreational field in LRDP 1-11, Part A



Response to Staff Report – Lighting Impacts

PEPPERDINE
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- Pepperdine used the very conservative 0.1 fc line to measure potential light trespass impacts
 - Pepperdine is actually registered a CEC “Lighting Zone 3,” associated with a 0.8 fc threshold level
- Commission biologist Dr. Engel has stated that “[T]he significance threshold for spill light upon sensitive resources is 0.1 foot-candles at any receptor location”
- The Commission has used the 0.1 fc threshold for other projects in the vicinity of sensitive resources
 - Staff agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit
- Staff now, **for the first time**, rejects the usage of the 0.1 fc line and establishes significance threshold that is not supported Commission precedent and not appropriate for a developed campus setting



Response to Staff Report – Lighting Impacts

PEPPERDINE
UNIVERSITY

- Staff proposes applying a “No Ambient Lighting” threshold of 0.01 fc to the natural areas in the vicinity of the field
 - To our knowledge, no regulatory agency has ever applied this threshold to a project in California
 - Only appropriate for undisturbed wilderness and other areas where little to no light is expected
- Pepperdine is a developed campus, in a developed area where artificial light is expected and continuous
 - Ambient conditions in the natural areas near the proposed field already exceed the 0.01 fc standard by as much as a factor of three (even without taking into account the existing field lighting)
- The EIR and Supplemental Analysis’ conservative 0.1 fc threshold:
 - Is consistent with Commission precedent, staff direction provided to Pepperdine, and IESNA recommendations for areas where light might adversely affect flora and fauna



Response to Staff Report – Lighting Impacts

PEPPERDINE
UNIVERSITY

- The Proposed Lighting Will Not Result in Adverse Impacts to Biological Resources
- The Field is located in the developed campus surrounded by disturbed areas; a supplemental site-specific biological analysis concluded:
 - Light trespass up to 0.01 fc is almost entirely contained in developed or disturbed areas
 - The limited light spill of between 0.09 and 0.01 fc in the 0.2 acres of undisturbed area is consistent with ambient conditions and will not result in adverse impacts to the specific animals, birds and plants in the area
 - The area has very low to no stop-over value for migrating birds
 - Many of the migrating birds that pass the area are only active during the day; night migrating birds in the area will be unaffected due to flight patterns and careful lighting design



Legend

- Pepperdine University Property Boundary
- Limit of 0.1 foot candles
- Limit of 0.01 foot candles



Aerial View of the Proposed Lights Within the Developed Campus Core



Pacific Flyway



EXHIBIT A

8

ORNIA COASTAL COMMISSION

COAST AREA

100 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



DATE: August 28, 1989

TO: Coastal Commissioners and Interested Parties

FROM: Peter Douglas, Executive Director,
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: Pepperdine University Long Range Development Plan, Public hearing
and action (for September 12, 1989 meeting)

SYNOPSIS

Summary of Plan

Pepperdine University has submitted a Long Range Development Plan (LRDP) which proposes development of University facilities to serve up to 5,000 FTE (full-time equivalent) students over the 830 acre campus. The LRDP would permit 212 additional student and faculty/staff housing units, academic and support facilities totalling approximately 854,000 square feet within the 225 acre existing developed campus area. An additional 202 on-campus housing units and academic and support facilities totalling 385,000 sq. ft. and 182,000 sq. ft. of new roads is also proposed on a 72 acre expansion area on undeveloped land northwest of the developed campus area. Development of the expansion area will involve 3 million cubic yards of grading (842,000 cubic yards for stabilization of landslides and 2.2 million cubic yards for roads and building pads). Approval of the expansion of the Malibu Mesa Wastewater Reclamation Plant to 500,000 gallons per day capacity from the current 200,000 gpd is also being sought, to be constructed should the County of Los Angeles abandon its plans for a regional sewer system.

Summary of the Staff Recommendation

Staff is recommending that the Commission (1) deny the LRDP as submitted due to its non conformance with the coastal access, landform alteration and visual resource protection, hazards, and environmentally sensitive habitat protection policies of the Coastal Act; and (2) approve with suggested modifications dealing with public access, visual and environmental resources protection, hazards, and marine resources protection, that portion of the LRDP for the build-out of the existing developed campus area. The existing developed campus area is defined to include that area east of John Tyler Drive, south of Huntsinger Circle and west of Seaver Drive; the northern extent of Baxter Drive; the area northeast of the intersection of Seaver Drive and Baxter Drive; the area east of Seaver Drive between Baxter Drive and President Drive; and the area at the southeast intersection of Seaver Drive and President Drive, as shown on Exhibit 4.

EXHIBIT A

Pepperdine LRDP
Page 11

irrigation and monitoring plan, (2) additional geotechnical analysis to better determine the extent of the landslides on the proposed 72 acre expansion area and the amount of grading necessary for both landslide stabilization and roads and pads, (3) determination of whether the Malibu Coast Fault or any splays thereof exists within the campus, (4) updated traffic analysis and (5) visual impact analysis of the development proposed within the 72 acre expansion area.

B. Current Level of Development

The 830 acre Pepperdine University campus is located in western Los Angeles County, west of the Civic Center area of Malibu, adjacent to the intersection of Pacific Coast Highway and Malibu Canyon Road. The University is bounded on the east by Malibu Canyon Road and the site of the approved Adamson 300-room Adamson Hotel, on the west by the Malibu Mesa Wastewater Reclamation Plant and the Malibu County Estates condominium development, on the north by undisturbed watershed and the LUP designated Malibu Canyon Significant Watershed, and on the south by Pacific Coast Highway, the Malibu Bluffs State parkland, the new Malibu Colony Plaza (Reco) shopping center and the Malibu Road residential community and Amarillo Beach south of the highway.

The existing developed campus covers approximately 225 acres or a little over 25% of the 830 acres. The campus contains roughly 850,000 square feet of development. Additionally there are two 40,000 sq. ft. effluent lakes with a total capacity of 12.4 million gallons of treated water, 3.1 million gallon capacity of water storage tanks, playing fields and running tracks, tennis, racquetball and other sports facilities, water tanks and a retention basin. According to an April, 1989 University report, there are 2150 parking spaces within lots or structures and 990 on-street spaces within the University campus for a total of 3140 parking spaces (See Exhibit 4).

According to the Pepperdine University Specific Plan figures, the 850,000 square feet of facilities is devoted to 16% (135 units) student housing for 1537 students, 29% (52 units) faculty/staff/administration housing and recreational amenities, and the remaining 55% devoted to academic and support uses.

Pepperdine University was formerly located in south central Los Angeles. A program to move the campus to Malibu and to expand the University's facilities began nearly twenty years ago. The Long Range Development Plan (LRDP) which is reviewed here provides for a continuation of that expansion through 1997.

The University acquired its Malibu campus in 1968. In May of 1979 Los Angeles County approved a zone change to allow the campus site to be used for university purposes. On July 11, 1972, the County Planning Commission issued a Conditional Use Permit for the expansion of the university's facilities. Specific Plans were not adopted under this Conditional Use Permit until December 30, 1976.

Under the Coastal Act of 1976, the campus came under the jurisdiction of the Coastal Commission. The University applied for a claim of vested rights for all facilities shown on the 1976 Specific Plan. Prior to the effective date of the Coastal Act, the University had obtained numerous grading and building permits from the county and complete construction of 35 permanent buildings and were under way on 4 additional structures. Under the University's 1976

EXHIBIT A

Pepperdine LRDP
Page 12

Specific Plan the following facilities were yet to be constructed:

1. Undergraduate administration building
2. Fine arts complex
3. Hillside theatre and 2 contemporary arts facilities
4. Sea lodge
5. Temporary offices and administrative facilities (5)
6. Law School housing and parking structures
7. Student dormitory (1)
8. Student/staff housing structures (4)
9. Utility connections, grading, driveways, walkways and retaining walls to accommodate above listed development.

The claim of vested rights to complete the remainder of the facilities under the 1976 Specific Plan was denied by the South Coast Regional Commission on June 6, 1977 (E-2-E-5). A subsequent appeal to the State Coastal Commission resulted in a finding of no substantial issue on July 20, 1977, thus leaving the denial in place (Appeal No. 191-77, Pepperdine University).

Since this time the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, equestrian riding ring located just northwest of the existing graded campus, music hall, and various parking, sports, security, storage, and temporary trailer uses.

The University and Century Malibu, Inc. (Malibu Country Estates) were also given a permit to construct the 200,000 gallon per day (gpd) Malibu Mesa Wastewater Reclamation Plant located at the intersection of John Tyler Drive and Pacific Coast Highway. A spray irrigation management plan (SIMP) to dispose of treated wastewater over the landscaped and natural areas of the campus was also approved.

The Specific Plan states that as of fall, 1983 the enrollment totalled 1,920 full time equivalent (FTE) students. This number of FTE students was made up of 2,540 full and part-time students, of which 1,537 lived in campus housing and 1,003 commuted from other locations. There were 2148 FTE students enrolled in the University as of March, 1989. Under the proposed full build out of 5,000 FTE students, there would be an actual enrollment of 6,500 students, 500 faculty, 777 staff and 17 administrators.

C. Local Government Action on 1988 LRDP Proposal

There has been considered debate among some local citizen groups as to whether or not CEQA procedures have been properly followed with regards to the adequacy of the environmental analysis of the LRDP beyond the CUP for Phase I. The University has responded that the CEQA process has been properly carried out by the County of Los Angeles for the full LRDP as was proposed at the 1988 Commission hearing (see Exhibit 12). The University further contends that while the August, 1989 revisions to the LRDP are significant changes to the LRDP, they are significant reductions to the proposed development and therefore no additional or supplemental EIR is required under CEQA.

The October, 1983 Draft EIR on the University Specific Plan or LRDP was prepared as part of the process for review and consideration of Conditional Use Permit application CUP 2432 (4) requesting approval to development the Pepperdine campus as specified in the Specific Plan. The county zoning board

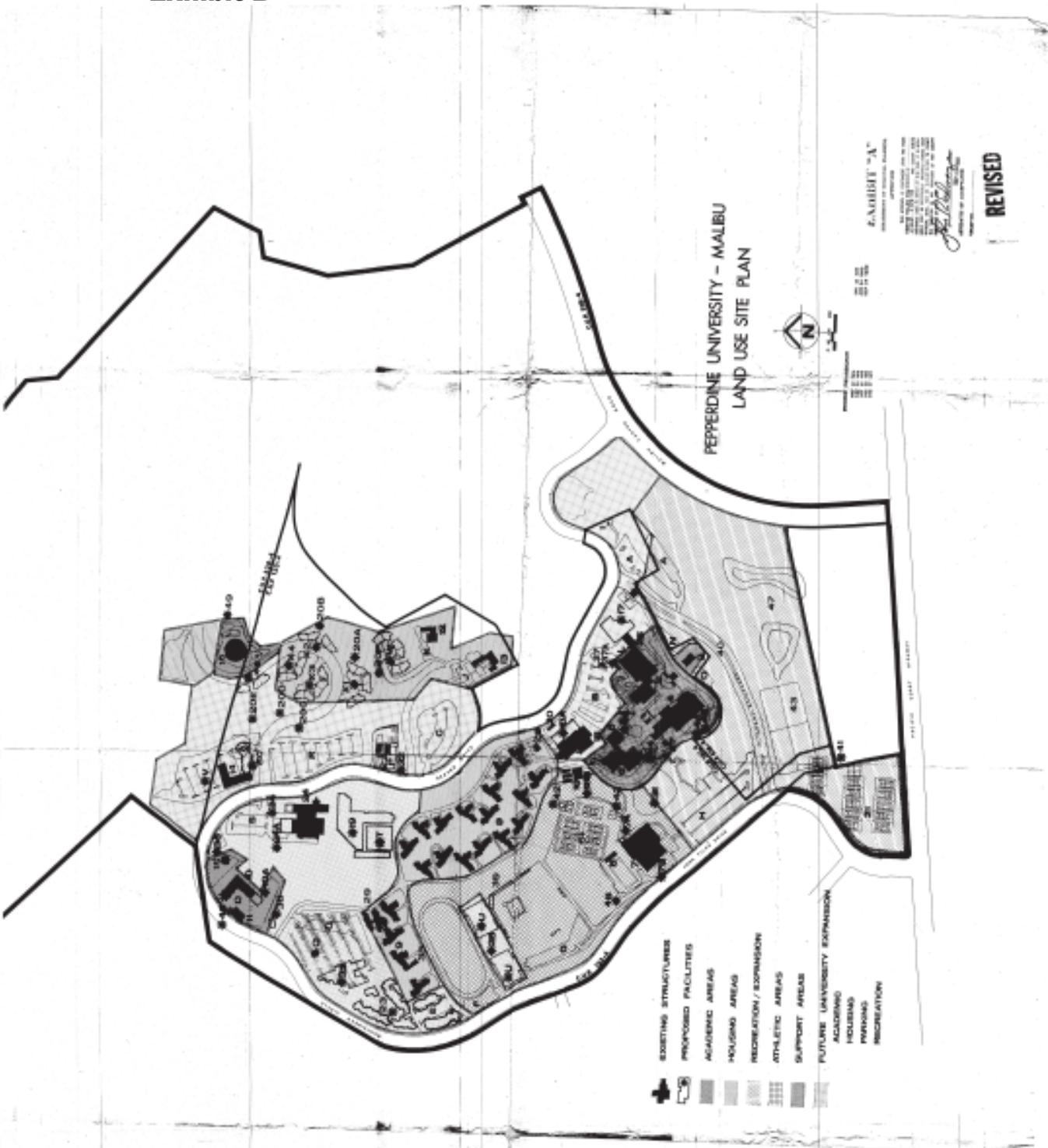
Response to Staff Report – Other Considerations

- The existing field is the only lighted outdoor recreational field on Campus
 - Staff's recommendation would force Pepperdine to continue using the existing field and its inferior lighting
- The proposed denial would actually result in greater environmental impacts to surrounding areas
- As voluntary mitigation for the Campus Life Project athletic field lighting, Pepperdine agreed to replace all existing campus globe lights
 - *This action would reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%*
- Staff would have the Commission accept this mitigation while denying the very project the mitigation was designed to address

PEPPERDINE
UNIVERSITY



Exhibit B



DATE	
BY	
REVISION	
NO.	
DATE	
BY	
REVISION	
NO.	
DATE	
BY	
REVISION	
NO.	

Exhibit B

HAUL ROUTE PLAN
 DEPARTMENT OF AGRICULTURE
 UNIVERSITY OF CALIFORNIA
 MARSH, CA

DAVID J. MERRILL - CIVIL ENGINEER


HAUL ROUTE PLAN
 PROJECT NO. 100-1000
 DATE: 5/19/84
 BY: D. J. Merrill

FILE COPY

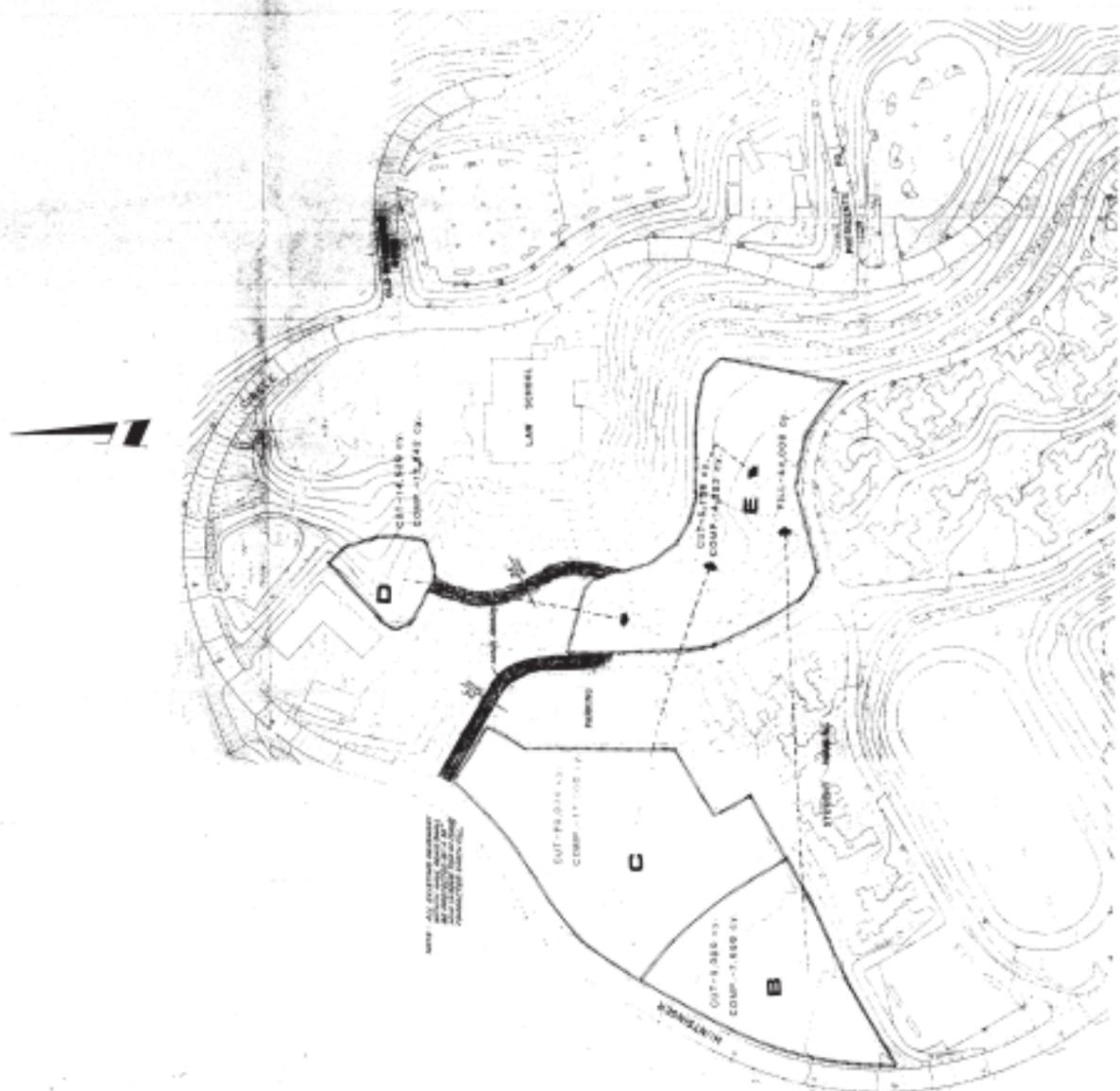


Exhibit B

PEPPERDINE UNIVERSITY

TOTAL 530 ACRES

A-1-1-DP
ZONE BOUNDARY

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

KESA PEAK TRAIL
(DEED RESTRICTED)

OPEN SPACE

COMBINED MESA PEAK
AND CENTRAL SLOPE TRAILS
(DEED RESTRICTED)

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

OPEN SPACE

OPEN SPACE

WALKWAY TRAILS

1/11/86
Notes: This is not and
never shall be an EIR.
See ID #14, dated 3/1/85
in Doc. Ann. 12-7.



Project Location Map

EAI ENVIRONMENTAL AUDIT, INC.
1000-A ORFILA WAY • PASADENA, CA 92307-7128
714/852-8522 • FAX 714/852-8524

Prepared: Environmental Analysis and
Mitigation

DATE: 7/28/82
BY: LAUREL HOOK
PROJECT: 1348P01.DWG

Exhibit B

• MAP A •

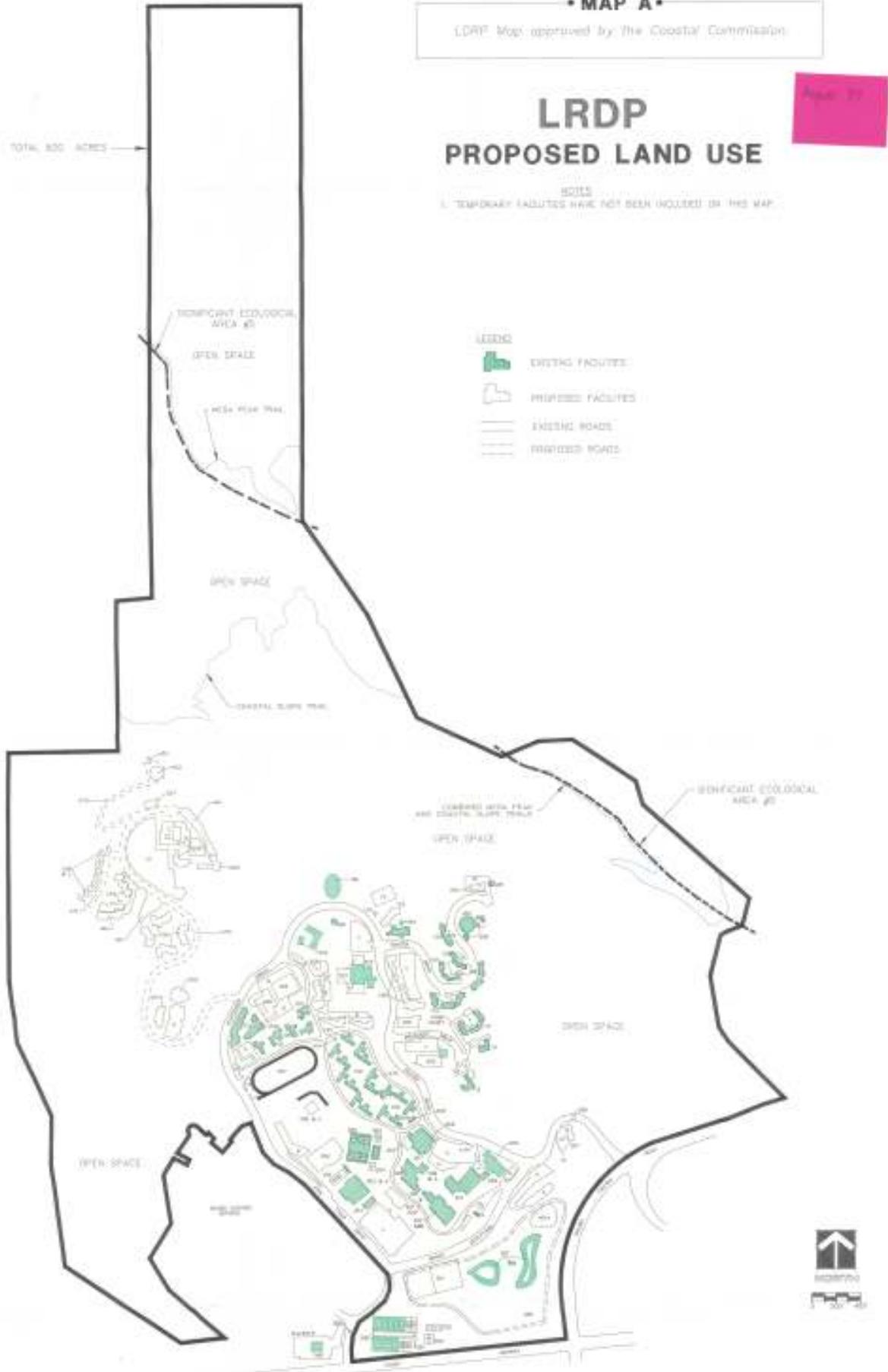
LRDP Map approved by the Coastal Commission

LRDP PROPOSED LAND USE



NOTES
1. TEMPORARY FACILITIES HAVE NOT BEEN INCLUDED ON THIS MAP.

TOTAL 800 ACRES



BUILDING NUMBERS, GENERAL DESCRIPTIONS
& USES OF BUILDINGS/FACILITIES
ARE LISTED IN THE SPECIFIC PLAN

EAI ENVIRONMENTAL AUDIT, INC.
 100-A DUNN RD • FARMINGTON, CT 06030-1129
 TEL: 860-636-4700 FAX: 860-636-4704
 www.environmentalaudit.com
 Planning, Environmental Analysis, and
 Remedial Solutions Management and Construction

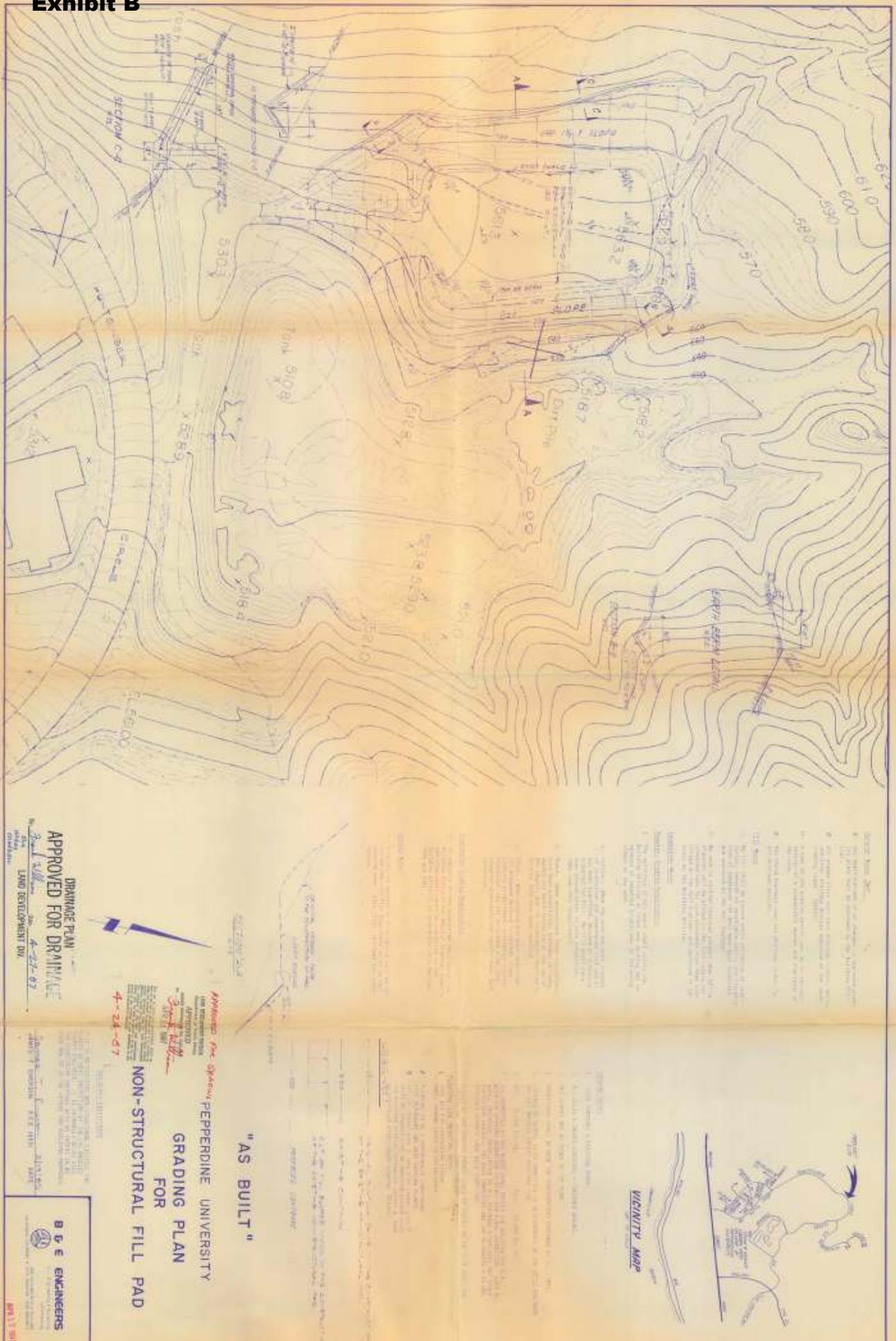
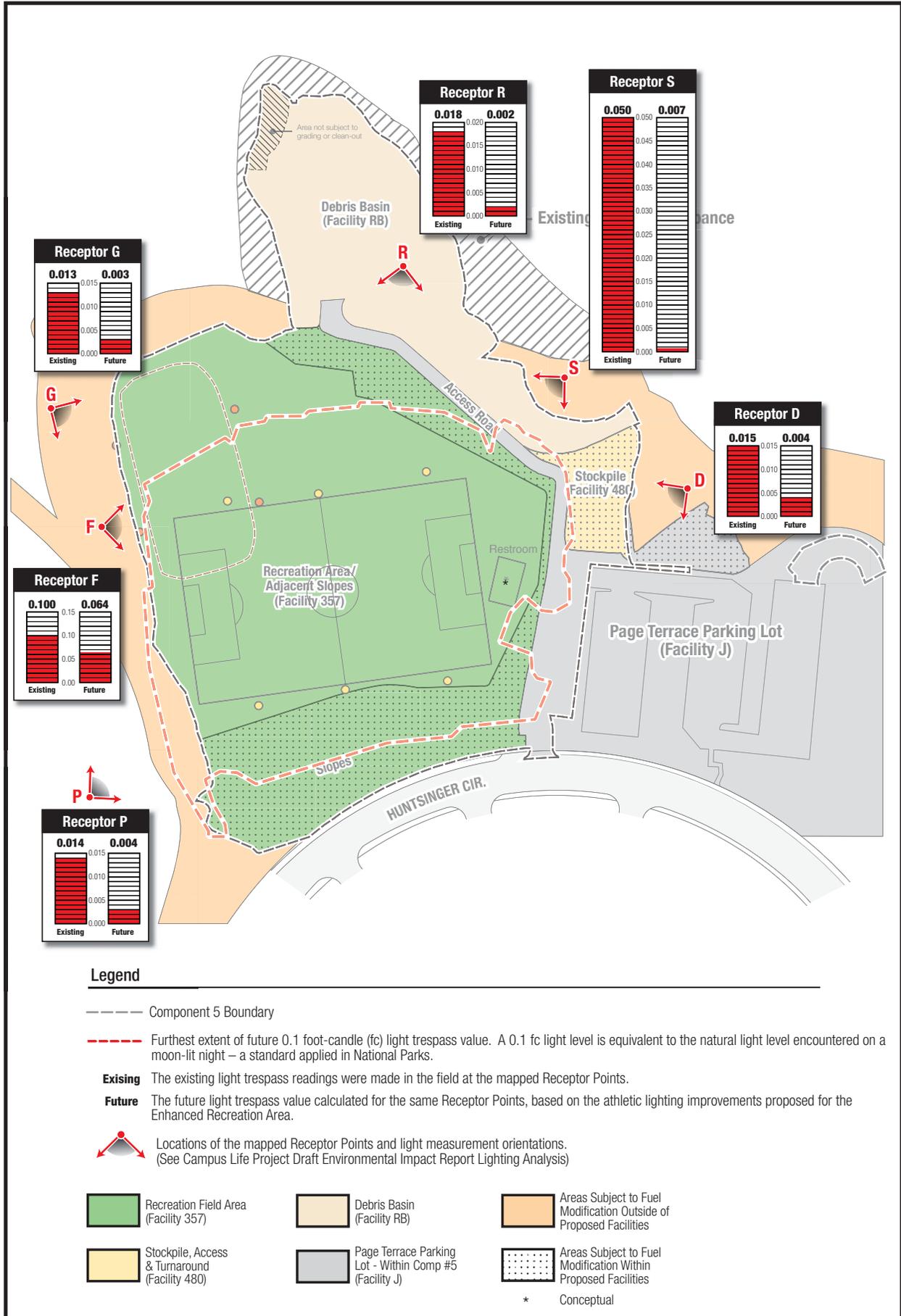


EXHIBIT C



June 10, 2013

CALIFORNIA COASTAL COMMISSION

SOUTH COAST AREA
245 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



December 21, 1989

TO: Commissioners and Interested Persons

FROM: Peter Douglas, Executive Director
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: REVISED FINDINGS ON THE PEPPERDINE UNIVERSITY LONG RANGE DEVELOPMENT PLAN (LRDP) for Public Hearing and Commission Action at the Meeting of January 11, 1990.

SYNOPSIS

Summary of Commission Action

On September 12, 1989, the California Coastal Commission reviewed the Pepperdine University Long Range Development Plan (LRDP). In its action, the Commission denied the LRDP as submitted and certified it with Suggested Modifications regarding public access, hazards, and visual, marine and environmentally sensitive resource protection.

If these Suggested Modifications are adopted by the Board of Regents of the University within six months of the Commission's action (March 11, 1990) and the Commission is so notified, the LRDP will become effectively certified.

Commission Vote

The Commission's action included two resolutions on the LRDP submittal. The Commissioners voting on the prevailing side on the first resolution to deny the LRDP as submitted were:

Glickfeld, Rynerson, MacElvaine, Malcolm, McInnis, Knapp, Neely, Warren, Wright, Hisserich, Franco, and Chairman Wornum

The Commissioners voting on the prevailing side on the second resolution to certify the LRDP with Suggested Modifications were:

Knapp, Neely, Wright, Glickfeld, MacElvaine, Malcolm, McInnis, and Chairman Wornum

Additional Information

Further information on the Pepperdine University Long Range Development Plan may be obtained from Teresa Henry at the South Coast Area Office of the Coastal Commission, 245 West Broadway, Suite 380, Long Beach, CA 90802, (213) 590-5071.

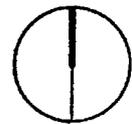
EXHIBIT
13a



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area
Conceptual Grading Plan
 Showing Landslide Stabilization Areas
 Outside of Graded Area.

RECEIVED

AUG 4 1989



ATTACHMENT C-1

CALIFORNIA
COASTAL COMMISSION

These materials have been provided to Coastal Commission Staff

Exhibit D

EXHIBIT
136



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area •
Conceptual Grading Plan
With Proposed Buildings



ATTACHMENT C-2

Albert C. Martin and Assoc.
DATE 7-20-67

Exhibit E



Source: GoogleEarth Pro, August 27, 2012.

VERSION 6

PEPPERDINE UNIVERSITY

**The Campus Life Project: The Next Step in Fulfilling our
Long Range Development Plan**

LRDP Amendment 1-11, Part B

THESE MATERIALS HAVE BEEN PROVIDED TO COASTAL COMMISSION STAFF

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- Pepperdine strongly disagrees with the Staff's recommendations that the existing field and lights were not permitted
 - The existing field and lights were installed pursuant to three CDPs approved by the Commission in the early 1980s; the Commission subsequently certified the existing facility and its lighting in 1990, 1998, and 2012
 - The LRDP encompassed all on-the-ground development at the time of its certification in 1990
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds do not withstand scientific scrutiny
 - Pepperdine used a highly conservative threshold to measure potential impacts; the Commission has previously relied on the 0.1 fc threshold previously and it is consistent with IESNA recommendations
 - The EIR and Pepperdine's supplemental, site-specific biological analysis concluded that the lights would not adversely impact any sensitive resources
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field

The Campus Life Project – LRDP Amendment 1-11 Part B Overview

- By mutual agreement with Staff, Pepperdine divided its LRDP Amendment 1-11 into two parts (Part A and Part B); the Commission unanimously approved Part A in December 2012
- Part B is a focused review of three elements of the approved Enhanced Recreation Area:
 - Replacement of the existing unshielded "flood lights" with state-of-the-art, shielded fixtures
 - Confirmation of east-west field configuration as requested by Coastal Staff
 - Specific location of the approved small restroom/storage facility

PEPPERDINE
UNIVERSITY



Aerial View of
Approved
Enhanced
Recreation Area,
Proposed
Light/Restroom
Locations, and
Field Orientation

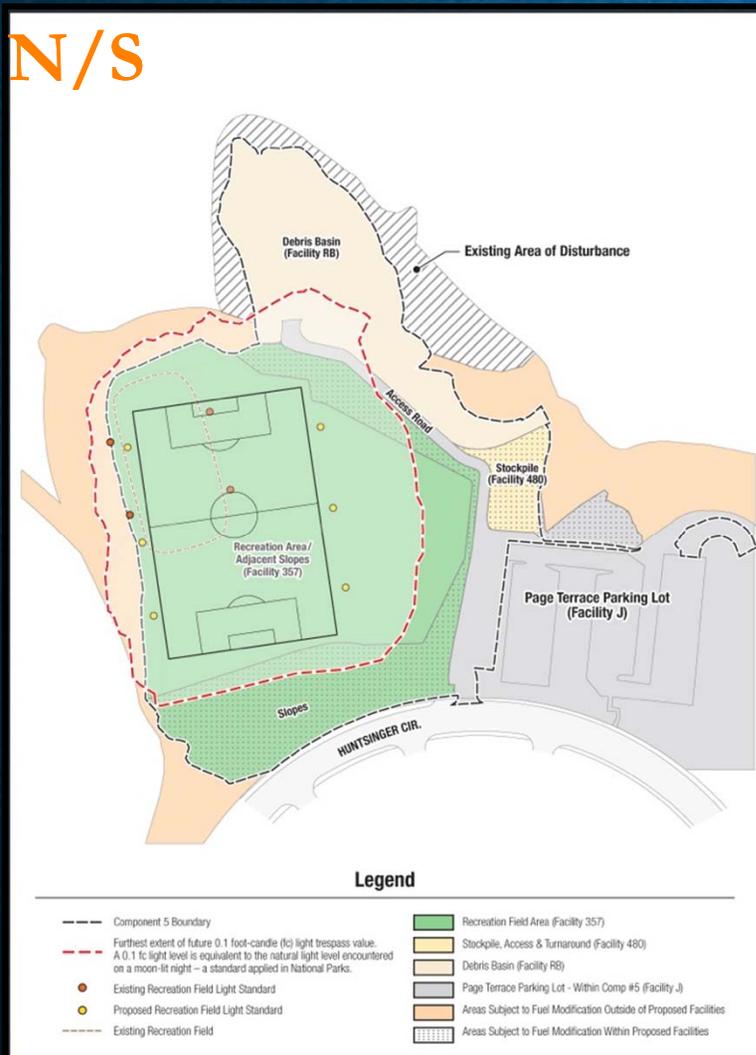


Aerial View of the Proposed Lights Within the Developed Campus Core



Recreation Field Orientation

- Pepperdine would agree to orient the proposed Recreation Field in Staff's preferred "east-west" configuration
- The E/W orientation focuses light further south towards Huntsinger Circle; in this orientation the field would be surrounded by developed and disturbed areas



Importance to Campus Community

- The Campus Life Project provides much needed enhancements to on-campus amenities
- The approved Enhanced Recreation Area will provide all students with safe recreational space for physical health and building community
- Night lighting is critical for all students to enjoy the facility
 - Student days are filled with ever expanding class loads, volunteering, internships, clubs, jobs, etc.
 - **The University has a critical need for additional recreational field space**, and without night lighting, a significant percentage of the Campus's young men and woman will lose the already limited opportunity to recreate and participate in intramural or club sports

PEPPERDINE
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Project Need

- The existing field at the site of the approved Enhanced Recreation Area is Pepperdine's only lighted recreational field space
 - This is already significantly deficient when compared with peer institutions
- Key objectives of the Campus Life Project include:
 - Provide an enhanced recreation facility including a lighted field to alleviate the overcrowded conditions
 - Provide needed outdoor recreation field within the existing developed campus
- Without approval of Part B, Pepperdine would be forced to continue using the existing undersized, flood-lit field

PEPPERDINE
UNIVERSITY



Lighted Fields at Peer Institutions

Institution	Lighted Recreational Field Area (acres)*
Pepperdine University	0.46
Loyola Marymount University	3.05
University of California Los Angeles	7.33
University of California Santa Barbara	5.32
University of the Pacific	1.93
Saint Mary's College	1.73
University of San Diego	3.57
University of San Francisco	1.70
Santa Clara University	3.13
University of California San Diego	10.78
University of California Berkeley	5.19
California State University Long Beach	8.63
Stanford University	5.13

* Information compiled by Envicom Corporation August 2013.

Enhanced Recreation Area Lighting Design

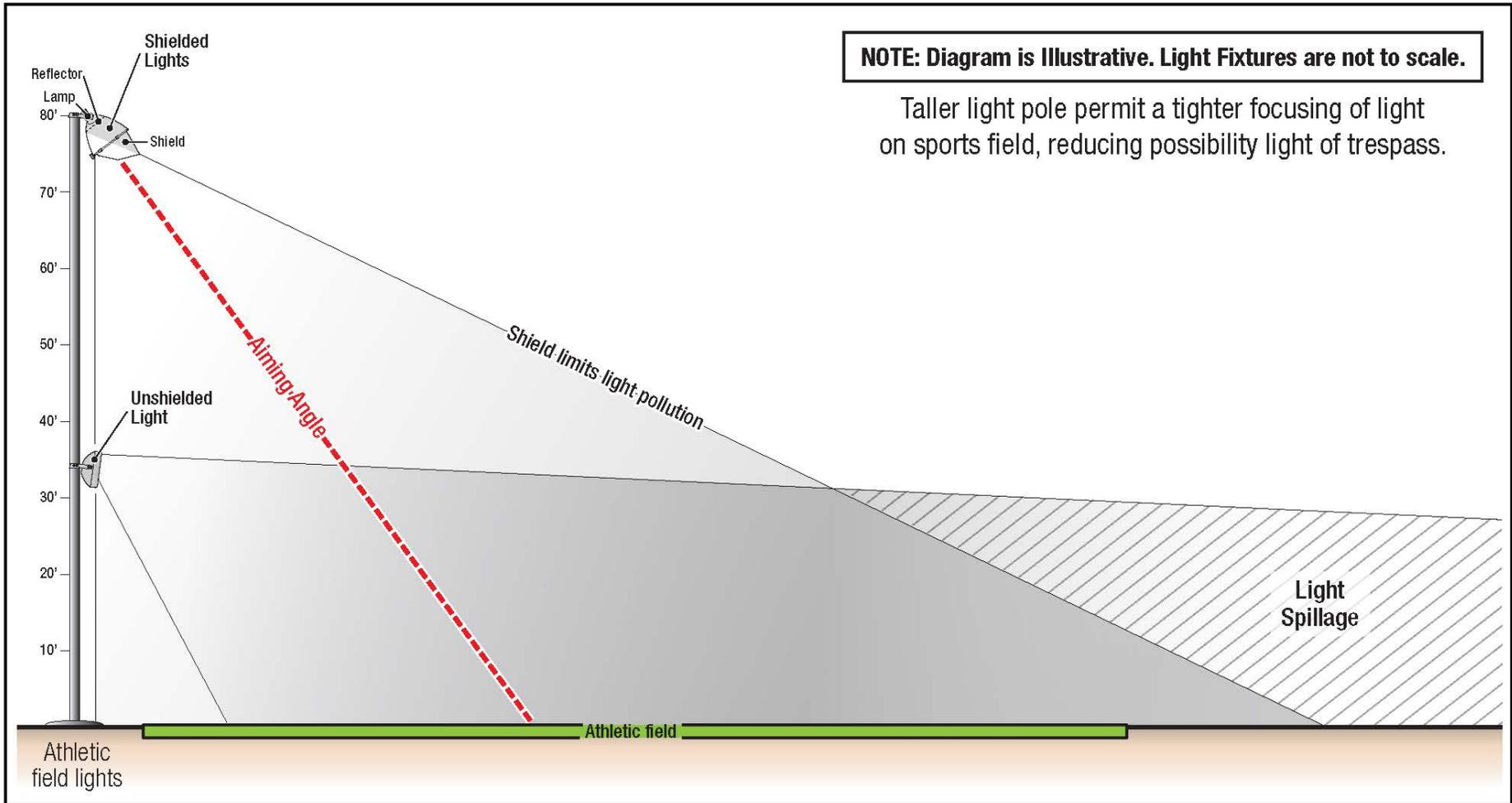
PEPPERDINE
UNIVERSITY

- Proposed lighting features state-of-the-art technology designed to prevent or minimize all forms of light pollution including glare, light trespass, and sky glow
 - The proposed cutoff, angled, and shielded fixtures will direct light onto the field rather than into natural areas and the night sky
 - Would utilize the same advanced fixtures approved by the Commission for the soccer field in Part A
 - Lighting levels would be lower than soccer field due to proposed recreational use
- Would improve existing conditions by replacing the existing, non-cutoff, non-shielded flood lights



Existing Recreation Lighting Proposed for Replacement





Revised: Sep. 23, 2013

Consistency with the LRDP Lighting Policy

- When approving Part A, the Commission proposed a comprehensive LRDP "Lighting Policy," which the University adopted
- The proposed lights fully comply with the terms and intent of the Policy. The lights are:
 - "Qualite" or a superior, state-of-the-art technology designed to dark-sky-compatible standards
 - Minimized, directed downward, and shielded using the best available visor technology and pole height design to minimize light spill, sky glow, and glare
 - Designed to minimize light trespass into adjacent non-target areas, and to limit the illumination of adjacent open space and sensitive habitat areas

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Reducing Lighting Impacts

- The EIR lighting study determined there would be no significant light trespass or glare impacts
 - The EIR used a highly conservative 0.1 fc line to measure impacts in the vicinity of the proposed field; Pepperdine's Campus is actually registered as a CEC "Lighting Zone 3," associated with a 0.8 fc threshold level
- For LRDP Amendment 1-11, Pepperdine conducted a supplemental analysis finding:
 - No light trespass greater than 0.1 fc will occur in undisturbed, naturally vegetated or habitat areas
- The 0.1 footcandle (fc) level is the most conservative threshold used in past Commission precedent
 - Staff Biologist Dr. Engel stated in 2011: "[T]he significance threshold for spill light upon sensitive resources is 0.1 [fc] at any receptor location"
 - Dr. Engel agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit

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Legend

- Pepperdine University Property Boundary
- Limit of 0.1 foot candles
- Limit of 0.01 foot candles



Reducing Sky Glow Impacts

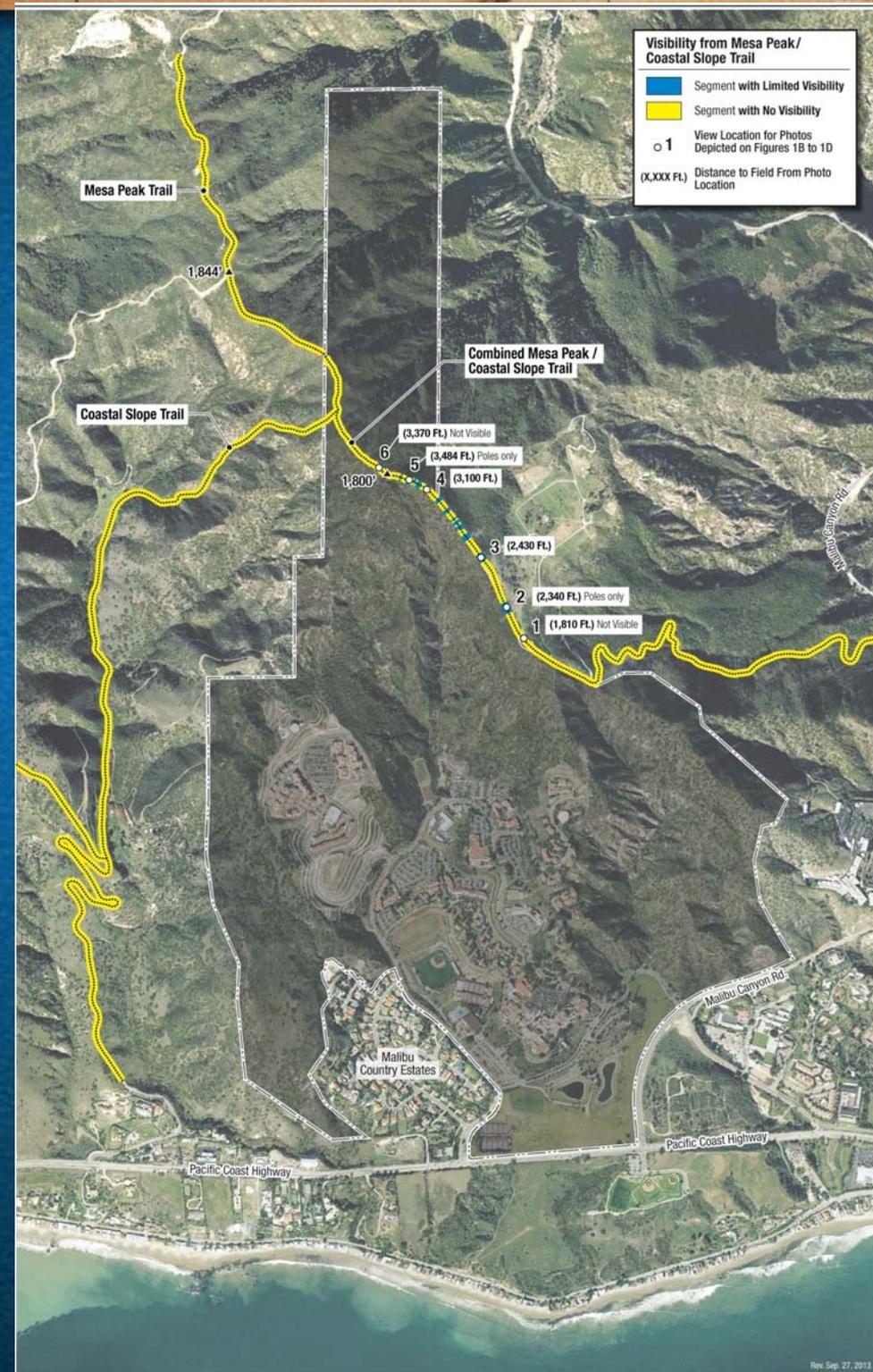
- The lighting incorporates principles and recommendations provided by the International Dark Sky Association and Illuminating Engineering Society of North America to prevent or minimize sky glow and protect Coastal resources
- Light emitted between 80 and 100 degrees has the greatest effect on sky glow
 - The new fixtures will emit light between 16 and 62 degrees, which is far less likely to result in sky glow than conventional lights
 - The existing flood lights emit light at ~ 80 degrees
- If approved, replacement of the existing recreational field lighting along with the Campus globe lights would ***reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%***

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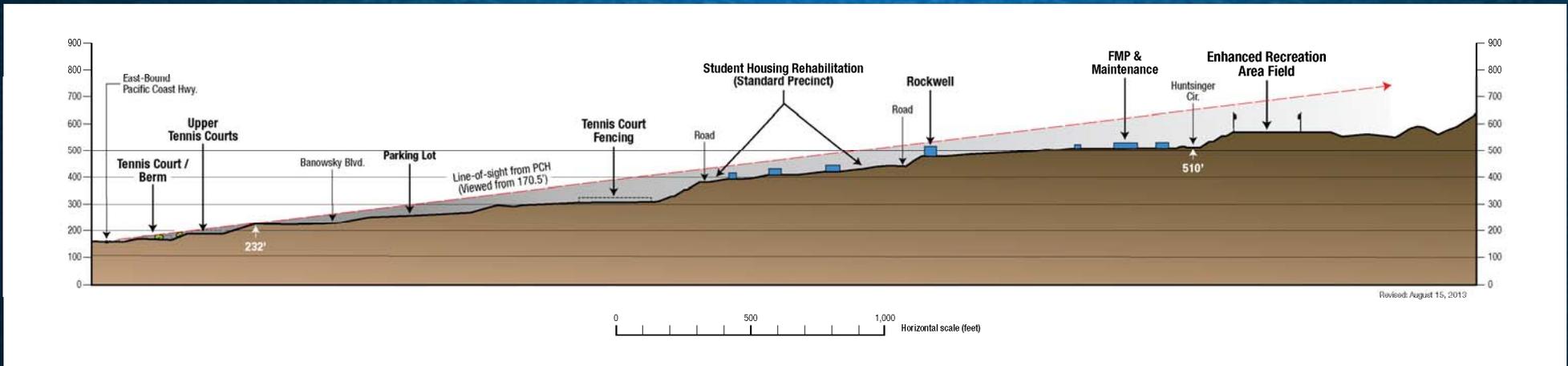


Protecting Visual Resources

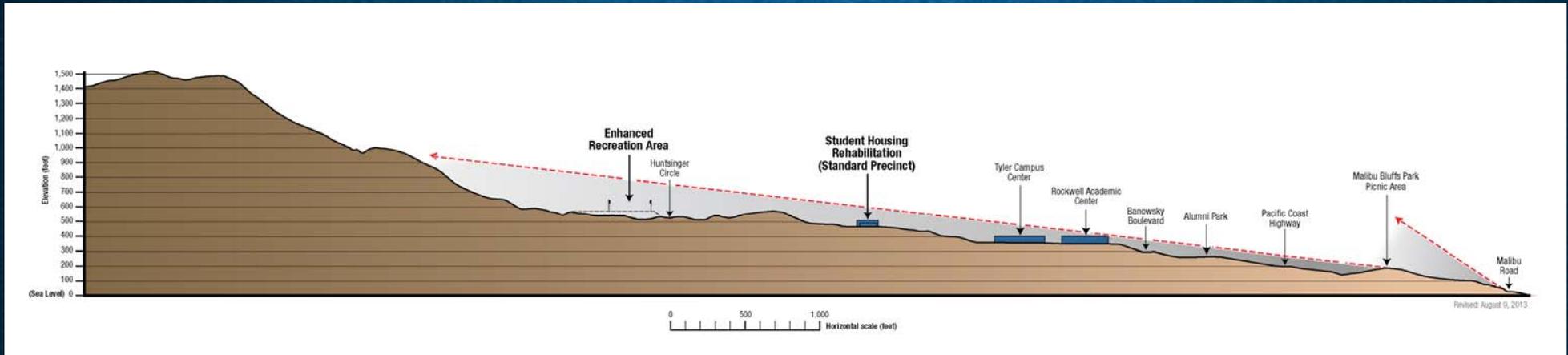
- The light fixtures will not be visible from:
 - Malibu Canyon Road
 - Pacific Coast Highway
 - Santa Monica Mountains Conservancy-Owned Malibu Bluffs
- Fixtures are invisible from the vast majority of area trails - hikers could see the fixtures along less than 4% of the 4.1 miles that comprises the combined Coastal Slope and Mesa Peak trails
- Limited views of fixtures would be consistent with the current views of the developed campus and the City of Malibu



Proposed Light Fixtures are not Visible from PCH



Proposed Light Fixtures are not Visible from Bluffs Park



Protecting Avian Resources

Nesting Birds

- The proposed east-west orientation focuses light further south towards Huntsinger Circle and away from the undeveloped campus
 - Minimizes potential light trespass and glare impacts on nesting birds

Migratory Birds

- Proposed Qualite International fixtures produce "cool" white light (not the type of red light found potentially impactful to avian behaviors in the majority of reviewed studies)
 - Only 11.84% of the light produced falls within the red spectrum

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Conclusions

- The Enhanced Recreation Area lighting is the final piece of the Campus Life Project
- The proposed lights:
 - Are consistent with Pepperdine's Commission-recommended LRDP lighting policy
 - Will limit light trespass consistent with the conservative 0.1 fc threshold used in the past by the Commission for areas near sensitive resources and consistent with IESNA recommendations for areas where light might adversely affect flora and fauna
 - Provide important additional recreational opportunities on Campus
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

The Campus Life Project – Response to Staff Report: Overview

- Pepperdine strongly disagrees with the Staff's recommendations
- Pepperdine disagrees with the assertion that the existing field and its lights were not permitted
- Staff's rejection of the 0.1 fc threshold for significant impacts breaks from Commission precedent, direction provided to Pepperdine during the LRDP process, and IESNA recommendations for areas where light might adversely affect flora and fauna
- Staff's conclusions that the proposed lights would have adverse impacts on ESHA and migratory birds are arbitrary and do not withstand scientific scrutiny
- Failure to approve the replacement lights at the approved Enhanced Recreation Area would result in Pepperdine having **NO** lighted outdoor recreational field and force it to continue using its existing, flood-lit field
- Approval of the new lights is the environmentally superior outcome

PEPPERDINE
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Response to Staff Report – Existing Field and Lighting Approvals

PEPPERDINE
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- The existing recreational field (formerly the equestrian center) and its lighting have been in place in the same location for approximately 30 years
- Pepperdine developed the field and its lights pursuant to three CDPs (P-80-7325, CDP 5-81-395A, and CDP P-81-7818) in the early 1980s
 - While the permits do not specifically refer to lights, the level of permit detail was vastly differently in the 1980s
- When the Commission certified the LRDP in 1990, after the field and lighting had been installed, it also certified that “Development at Pepperdine has been consistent with the goals, policies, rules and regulations of ... the California Coastal Commission”
- The LRDP encompassed all on-the-ground development at the time of the LRDP certification in 1990



Response to Staff Report – Existing Field and Lighting Approvals

PEPPERDINE
UNIVERSITY

- P-80-7325 (Development Description)
 - *Dismantling of an equestrian center and construction of 116 units of law school and undergraduate student housing, parking spaces for 484 cars, staircases to the University Annex, an electrical distribution building and temporary classroom facility. Application includes a request for approval of allocation of the needed portion of the unused sewage treatment capacity to the proposed facilities. Project is included in the University Land Plan.*
- CDP 5-81-395A (Amendment to Permit P-80-7325)
 - *Relocate existing equestrian center to be dismantled for 116 unit housing as approved on P-80-7325.*
- CDP P-81-7818 (Development Description)
 - *Construction of university campus facilities including a heritage hall, music wing, and a visiting professors' duplex, relocation of an equestrian center and expansion of the student housing reception center. These proposals are consistent with the University's Master Plan, previously reviewed and approved by the Commission.*



Response to Staff Report – Existing Field and Lighting Approvals

- Staff bases its position on a “haul route plan” in its CDP 5-81-395A file
 - The plan identifies four pads (B, C, D and E) that would either generate cut or receive fill; **but** the field was balanced onsite (no cut or fill for transport)
 - **And** each of these four pads correlated to a specific proposed facilities at the time of the issuance of CDP 5-81-395A
- Approved County of Los Angeles Grading Plan (1987)
 - Shows field as built in its existing location
- Coastal Commission LRDP Staff Report (August 1989)
 - .. the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, **equestrian riding ring located just northwest of the existing graded campus**, music hall, and various parking, sports, security, storage, and temporary trailer uses.
- Coastal Commission-Certified LRDP (1990)
 - Shows field (as an existing graded facility) on the LRDP Conceptual Grading Map



DATE	9/20/87	SHEET	1	OF	1
SCALE	1"=100'	DESIGNED BY		APPROVED BY	
PROJECT		DATE		DATE	

HAUL ROUTE PLAN
 OF
 EQUESTRIAN USE AREAS
 PEPPERDINE UNIVERSITY
 MALIBU, CA.

BUILDING AND SAFETY DIVISION
 Department of County Engineer

APPROVAL IN CONCEPT
 SIG. *[Signature]*
 DATE 9/20/87
 PLAN CHECK NO.

Per sec. 27400 et seq. of the
 Public Resources Code and
 Sec 13210(a) Title 14 of the
 Administrative Code, State
 of California.
 THIS IS NOT A PERMIT
 and
 is subject to any conditions
 listed below.

South Coast Regional
 Commission
 APPROVAL
 Permit No. *5-045-A*
 By *[Signature]*

FILE COPY

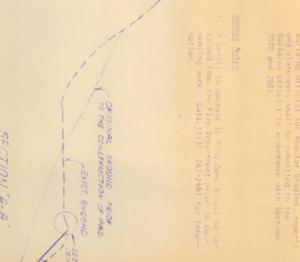
OLIN D. MURPHY - CIVIL ENGINEER
 10000 WILSON AVENUE
 MALIBU, CALIFORNIA 90263
 (310) 316-1111



- SECTION BERM DETAIL**
1. No fill shall be placed until satisfactory of compacted subgrade has been established, and shall be approved by the Soil Engineer.
 2. No rock or similar material greater than 1/4" in diameter shall be placed in the fill. The fill shall be compacted by the Soil Engineer and approved in advance by the Soil Engineer.
 3. The fill Engineer shall set distance stakes for all drainage devices.
- INSPECTION NOTES**
1. The contractor on this sheet shall notify the presence of required inspections at following stages of the work.
 2. Initial: When the site has been cleared and the subgrade has been established, and shall be approved by the Soil Engineer. (See note 1 above.)
 3. Before: When the contractor is required to place the fill. The contractor shall notify the Soil Engineer in advance of the placement of the fill.
 4. Final: When the contractor has been approved for all drainage devices, including all required inspections and reports, have been completed.

Business Entity Requirements

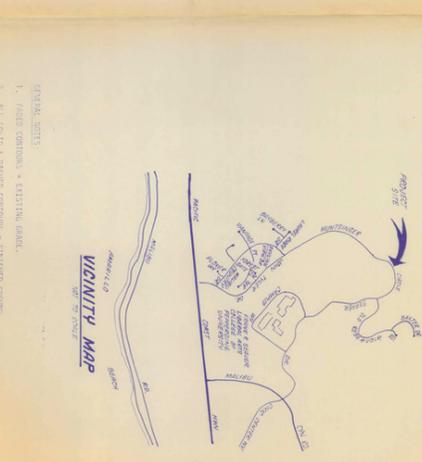
1. The contractor shall be a duly organized and existing corporation or partnership, and shall be licensed to do business in the State of California.
2. The contractor shall be bonded for the full amount of the contract.
3. The contractor shall be bonded for the full amount of the contract.
4. The contractor shall be bonded for the full amount of the contract.



APPROVED FOR DRAINAGE

By *Paul Wilson* Date 4-27-87

LAND DEVELOPMENT DIV.



- GENERAL NOTES**
1. THESE CONDITIONS - EXISTING GROUND.
 2. ALL GROUND IS SHOWN ON THE PLAN.
 3. ALL CONTOUR LINES ARE SHOWN ON THE PLAN.
 4. PROPOSED CONTOUR LINES ARE SHOWN ON THE PLAN.
 5. CONTOUR LINES SHALL BE SPACED TO REPRESENT THE GROUND SURFACE.
 6. CONTOUR LINES SHALL BE SPACED TO REPRESENT THE GROUND SURFACE.
 7. CONTOUR LINES SHALL BE SPACED TO REPRESENT THE GROUND SURFACE.
 8. CONTOUR LINES SHALL BE SPACED TO REPRESENT THE GROUND SURFACE.



"AS BUILT"

NON-STRUCTURAL FILL PAD

Approved For Grading PEPPERDINE UNIVERSITY GRADING PLAN FOR

By *Paul Wilson* Date 4-27-87

LAND DEVELOPMENT DIV.

B & E ENGINEERS

211 N. G Street, Suite 200
 Los Angeles, CA 90012
 (213) 475-1111

APR 17 1987

Response to Staff Report – Existing Field and Lighting

PEPPERDINE
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- The Commission certified the existing location of the recreation area (the former equestrian center) in 1998
 - Pepperdine amended its LRDP map to leave the recreation area in its current location (as opposed to moving the field to an undeveloped area of campus)
 - In certifying LRDP 2-97, the Commission recognized that this environmentally sensitive decision would “reflect what currently exists”
- Pepperdine transitioned the equestrian center to the less intensive recreational/intramural use in 2000
- The Commission approved the enhancement of the existing recreational field in LRDP 1-11, Part A



Response to Staff Report – Lighting Impacts

PEPPERDINE
UNIVERSITY

- Pepperdine used the very conservative 0.1 fc line to measure potential light trespass impacts
 - Pepperdine is actually registered a CEC “Lighting Zone 3,” associated with a 0.8 fc threshold level
- Commission biologist Dr. Engel has stated that “[T]he significance threshold for spill light upon sensitive resources is 0.1 foot-candles at any receptor location”
- The Commission has used the 0.1 fc threshold for other projects in the vicinity of sensitive resources
 - Staff agreed with Pepperdine that the 0.1 fc threshold was appropriate during a site visit
- Staff now, **for the first time**, rejects the usage of the 0.1 fc line and establishes significance threshold that is not supported Commission precedent and not appropriate for a developed campus setting



Response to Staff Report – Lighting Impacts

PEPPERDINE
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- Staff proposes applying a “No Ambient Lighting” threshold of 0.01 fc to the natural areas in the vicinity of the field
 - To our knowledge, no regulatory agency has ever applied this threshold to a project in California
 - Only appropriate for undisturbed wilderness and other areas where little to no light is expected
- Pepperdine is a developed campus, in a developed area where artificial light is expected and continuous
 - Ambient conditions in the natural areas near the proposed field already exceed the 0.01 fc standard by as much as a factor of three (even without taking into account the existing field lighting)
- The EIR and Supplemental Analysis’ conservative 0.1 fc threshold:
 - Is consistent with Commission precedent, staff direction provided to Pepperdine, and IESNA recommendations for areas where light might adversely affect flora and fauna



Response to Staff Report – Lighting Impacts

PEPPERDINE
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- The Proposed Lighting Will Not Result in Adverse Impacts to Biological Resources
- The Field is located in the developed campus surrounded by disturbed areas; a supplemental site-specific biological analysis concluded:
 - Light trespass up to 0.01 fc is almost entirely contained in developed or disturbed areas
 - The limited light spill of between 0.09 and 0.01 fc in the 0.2 acres of undisturbed area is consistent with ambient conditions and will not result in adverse impacts to the specific animals, birds and plants in the area
 - The area has very low to no stop-over value for migrating birds
 - Many of the migrating birds that pass the area are only active during the day; night migrating birds in the area will be unaffected due to flight patterns and careful lighting design



Legend

-  Pepperdine University Property Boundary
-  Limit of 0.1 foot candles
-  Limit of 0.01 foot candles



Hymelinger Cir

Seaver Dr

John Tyler Dr

Banowsky Blvd

Malibu Canyon Rd

Pacific Coast Hwy

Aerial View of the Proposed Lights Within the Developed Campus Core



Pacific Flyway



EXHIBIT A

8

ORNIA COASTAL COMMISSION

COAST AREA

100 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



DATE: August 28, 1989

TO: Coastal Commissioners and Interested Parties

FROM: Peter Douglas, Executive Director,
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: Pepperdine University Long Range Development Plan, Public hearing
and action (for September 12, 1989 meeting)

SYNOPSIS

Summary of Plan

Pepperdine University has submitted a Long Range Development Plan (LRDP) which proposes development of University facilities to serve up to 5,000 FTE (full-time equivalent) students over the 830 acre campus. The LRDP would permit 212 additional student and faculty/staff housing units, academic and support facilities totalling approximately 854,000 square feet within the 225 acre existing developed campus area. An additional 202 on-campus housing units and academic and support facilities totalling 385,000 sq. ft. and 182,000 sq. ft. of new roads is also proposed on a 72 acre expansion area on undeveloped land northwest of the developed campus area. Development of the expansion area will involve 3 million cubic yards of grading (842,000 cubic yards for stabilization of landslides and 2.2 million cubic yards for roads and building pads). Approval of the expansion of the Malibu Mesa Wastewater Reclamation Plant to 500,000 gallons per day capacity from the current 200,000 gpd is also being sought, to be constructed should the County of Los Angeles abandon its plans for a regional sewer system.

Summary of the Staff Recommendation

Staff is recommending that the Commission (1) deny the LRDP as submitted due to its non conformance with the coastal access, landform alteration and visual resource protection, hazards, and environmentally sensitive habitat protection policies of the Coastal Act; and (2) approve with suggested modifications dealing with public access, visual and environmental resources protection, hazards, and marine resources protection, that portion of the LRDP for the build-out of the existing developed campus area. The existing developed campus area is defined to include that area east of John Tyler Drive, south of Huntsinger Circle and west of Seaver Drive; the northern extent of Baxter Drive; the area northeast of the intersection of Seaver Drive and Baxter Drive; the area east of Seaver Drive between Baxter Drive and President Drive; and the area at the southeast intersection of Seaver Drive and President Drive, as shown on Exhibit 4.

EXHIBIT A

Pepperdine LRDP
Page 11

irrigation and monitoring plan, (2) additional geotechnical analysis to better determine the extent of the landslides on the proposed 72 acre expansion area and the amount of grading necessary for both landslide stabilization and roads and pads, (3) determination of whether the Malibu Coast Fault or any splays thereof exists within the campus, (4) updated traffic analysis and (5) visual impact analysis of the development proposed within the 72 acre expansion area.

B. Current Level of Development

The 830 acre Pepperdine University campus is located in western Los Angeles County, west of the Civic Center area of Malibu, adjacent to the intersection of Pacific Coast Highway and Malibu Canyon Road. The University is bounded on the east by Malibu Canyon Road and the site of the approved Adamson 300-room Adamson Hotel, on the west by the Malibu Mesa Wastewater Reclamation Plant and the Malibu County Estates condominium development, on the north by undisturbed watershed and the LUP designated Malibu Canyon Significant Watershed, and on the south by Pacific Coast Highway, the Malibu Bluffs State parkland, the new Malibu Colony Plaza (Reco) shopping center and the Malibu Road residential community and Amarillo Beach south of the highway.

The existing developed campus covers approximately 225 acres or a little over 25% of the 830 acres. The campus contains roughly 850,000 square feet of development. Additionally there are two 40,000 sq. ft. effluent lakes with a total capacity of 12.4 million gallons of treated water, 3.1 million gallon capacity of water storage tanks, playing fields and running tracks, tennis, racquetball and other sports facilities, water tanks and a retention basin. According to an April, 1989 University report, there are 2150 parking spaces within lots or structures and 990 on-street spaces within the University campus for a total of 3140 parking spaces (See Exhibit 4).

According to the Pepperdine University Specific Plan figures, the 850,000 square feet of facilities is devoted to 16% (135 units) student housing for 1537 students, 29% (52 units) faculty/staff/administration housing and recreational amenities, and the remaining 55% devoted to academic and support uses.

Pepperdine University was formerly located in south central Los Angeles. A program to move the campus to Malibu and to expand the University's facilities began nearly twenty years ago. The Long Range Development Plan (LRDP) which is reviewed here provides for a continuation of that expansion through 1997.

The University acquired its Malibu campus in 1968. In May of 1979 Los Angeles County approved a zone change to allow the campus site to be used for university purposes. On July 11, 1972, the County Planning Commission issued a Conditional Use Permit for the expansion of the university's facilities. Specific Plans were not adopted under this Conditional Use Permit until December 30, 1976.

Under the Coastal Act of 1976, the campus came under the jurisdiction of the Coastal Commission. The University applied for a claim of vested rights for all facilities shown on the 1976 Specific Plan. Prior to the effective date of the Coastal Act, the University had obtained numerous grading and building permits from the county and complete construction of 35 permanent buildings and were under way on 4 additional structures. Under the University's 1976

EXHIBIT A

Pepperdine LRDP
Page 12

Specific Plan the following facilities were yet to be constructed:

1. Undergraduate administration building
2. Fine arts complex
3. Hillside theatre and 2 contemporary arts facilities
4. Sea lodge
5. Temporary offices and administrative facilities (5)
6. Law School housing and parking structures
7. Student dormitory (1)
8. Student/staff housing structures (4)
9. Utility connections, grading, driveways, walkways and retaining walls to accommodate above listed development.

The claim of vested rights to complete the remainder of the facilities under the 1976 Specific Plan was denied by the South Coast Regional Commission on June 6, 1977 (E-2-E-5). A subsequent appeal to the State Coastal Commission resulted in a finding of no substantial issue on July 20, 1977, thus leaving the denial in place (Appeal No. 191-77, Pepperdine University).

Since this time the Coastal Commission has approved further development within the existing graded portion of the campus including student, faculty and staff housing, fine arts theatre, art exhibit halls, heritage hall, equestrian riding ring located just northwest of the existing graded campus, music hall, and various parking, sports, security, storage, and temporary trailer uses.

The University and Century Malibu, Inc. (Malibu Country Estates) were also given a permit to construct the 200,000 gallon per day (gpd) Malibu Mesa Wastewater Reclamation Plant located at the intersection of John Tyler Drive and Pacific Coast Highway. A spray irrigation management plan (SIMP) to dispose of treated wastewater over the landscaped and natural areas of the campus was also approved.

The Specific Plan states that as of fall, 1983 the enrollment totalled 1,920 full time equivalent (FTE) students. This number of FTE students was made up of 2,540 full and part-time students, of which 1,537 lived in campus housing and 1,003 commuted from other locations. There were 2148 FTE students enrolled in the University as of March, 1989. Under the proposed full build out of 5,000 FTE students, there would be an actual enrollment of 6,500 students, 500 faculty, 777 staff and 17 administrators.

C. Local Government Action on 1988 LRDP Proposal

There has been considered debate among some local citizen groups as to whether or not CEQA procedures have been properly followed with regards to the adequacy of the environmental analysis of the LRDP beyond the CUP for Phase I. The University has responded that the CEQA process has been properly carried out by the County of Los Angeles for the full LRDP as was proposed at the 1988 Commission hearing (see Exhibit 12). The University further contends that while the August, 1989 revisions to the LRDP are significant changes to the LRDP, they are significant reductions to the proposed development and therefore no additional or supplemental EIR is required under CEQA.

The October, 1983 Draft EIR on the University Specific Plan or LRDP was prepared as part of the process for review and consideration of Conditional Use Permit application CUP 2432 (4) requesting approval to development the Pepperdine campus as specified in the Specific Plan. The county zoning board

Response to Staff Report – Other Considerations

- The existing field is the only lighted outdoor recreational field on Campus
 - Staff's recommendation would force Pepperdine to continue using the existing field and its inferior lighting
- The proposed denial would actually result in greater environmental impacts to surrounding areas
- As voluntary mitigation for the Campus Life Project athletic field lighting, Pepperdine agreed to replace all existing campus globe lights
 - *This action would reduce on-campus light with the largest potential to contribute to sky glow by approximately 50%*
- Staff would have the Commission accept this mitigation while denying the very project the mitigation was designed to address

PEPPERDINE
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FEDERAL INTERESTS IN FEDERAL LANDS

Section 104. (a) The United States, through the Department of the Interior, Bureau of Land Management, has an interest in the following lands...

SECTION 104. FEDERAL INTERESTS IN FEDERAL LANDS

Table with columns: SECTION NUMBER, ACRES, and FEDERAL INTEREST. Lists various land sections and their corresponding acreage.

SECTION 104. FEDERAL INTERESTS IN FEDERAL LANDS. TOTAL ACRES: 1,400. FEDERAL INTEREST: 1,400.00.

EXHIBIT I

PEPPERDINE UNIVERSITY - MALIBU LEGEND FOR LAND USE SITE PLAN

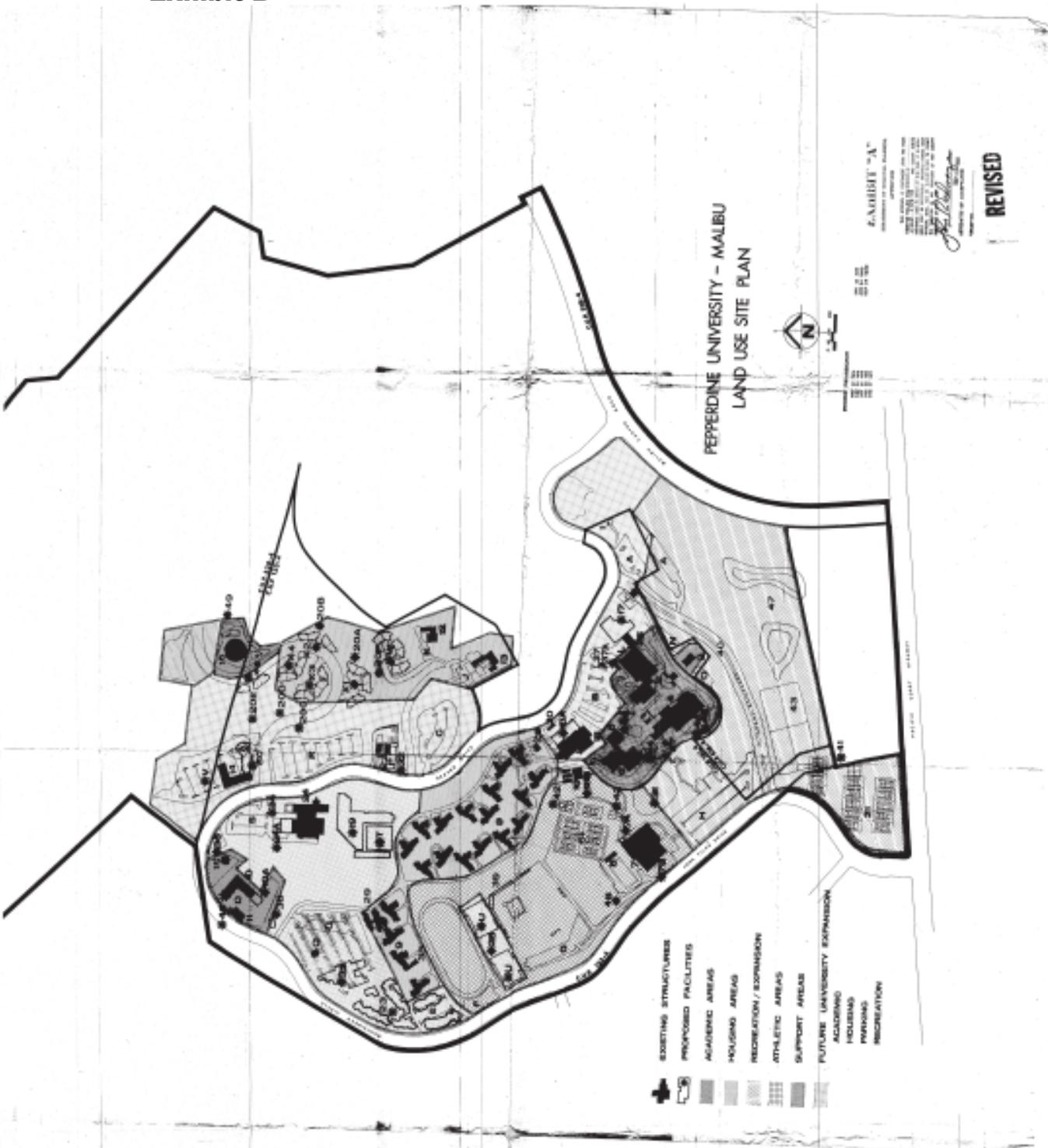
DATE: 10/1/68



- 1. The land shown on this map is owned by the State of California, Department of Public Works, and is subject to the following conditions...

- 2. The land shown on this map is owned by the State of California, Department of Public Works, and is subject to the following conditions...

Exhibit B



DATE	DESCRIPTION	BY

Exhibit B

HAUL ROUTE PLAN
 DEPARTMENT OF AGRICULTURE
 UNIVERSITY OF CALIFORNIA
 MARSH, CA

DAVID J. MERRILL - CIVIL ENGINEER
 1000 S. GARDEN AVENUE
 SUITE 100
 ANAHEIM, CA 92810
 (714) 771-1111
 FAX (714) 771-1112
 WWW.DJMERRILL.COM



HAUL ROUTE PLAN
 DEPARTMENT OF AGRICULTURE
 UNIVERSITY OF CALIFORNIA
 MARSH, CA

David J. Merrill - Registered
 Professional Engineer
 No. 51864
 State of California
 License No. 51864
 by 2/28/2004

FILE COPY

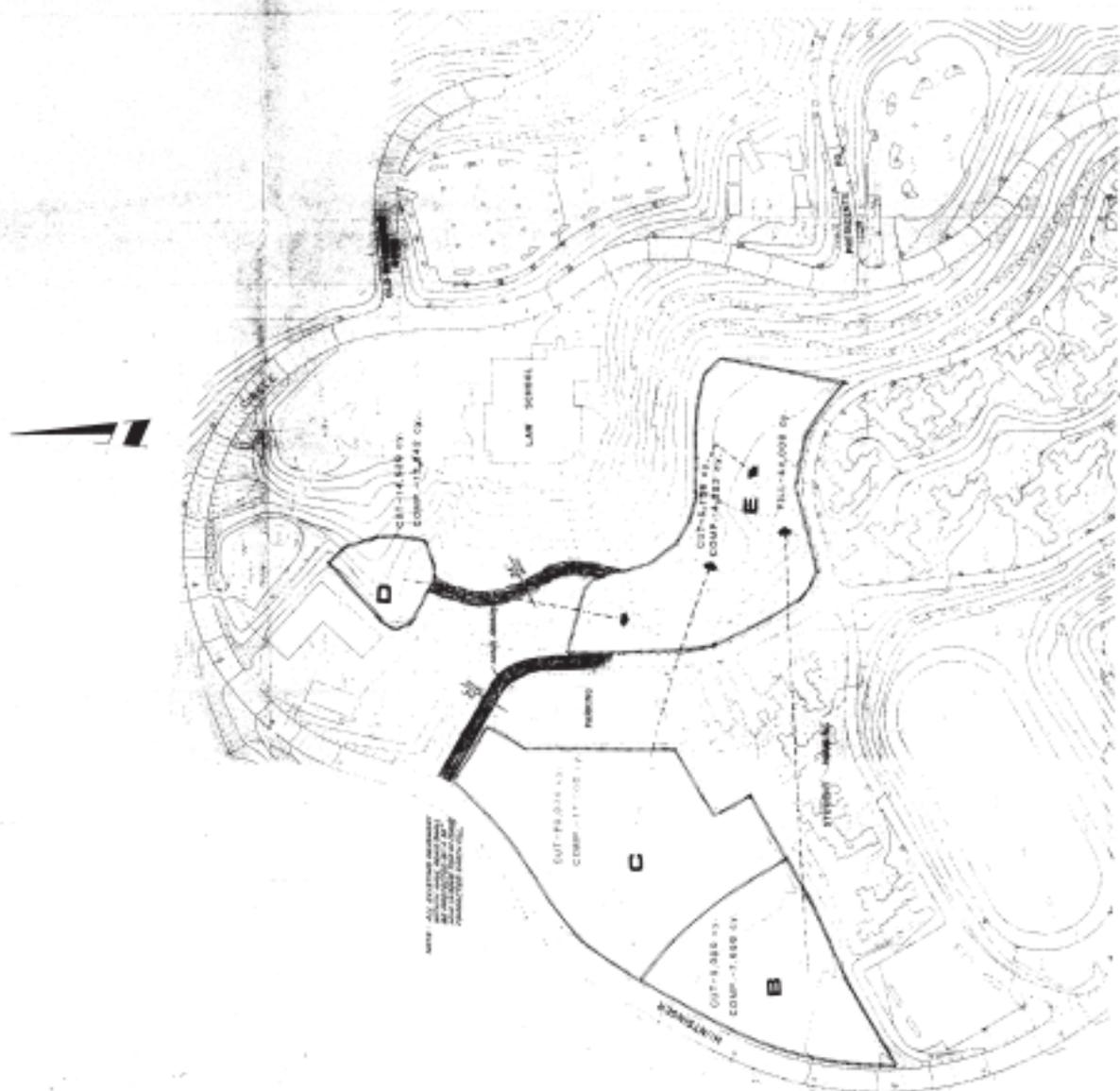


Exhibit B

PEPPERDINE UNIVERSITY

TOTAL 530 ACRES

A-1-1-DP
ZONE BOUNDARY

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

KESA PEAK TRAIL
(DEED RESTRICTED)

OPEN SPACE

COMBINED MESA PEAK
AND CENTRAL SLOPE TRAILS
(DEED RESTRICTED)

SIGNIFICANT ECOLOGICAL
AREA #5 (DEED RESTRICTED
OPEN SPACE)

OPEN SPACE

OPEN SPACE

WALKWAY TRAILS

1/11/86
Notes: This is not a
recent CADP map. The
area is 100% deeded
in Dec. Ann. 12-7.



Project Location Map

EAI ENVIRONMENTAL AUDIT, INC.
 1000-A ORFILA WAY • PASADENA, CA 92307-7125
 TEL: 714/835-8100 • FAX: 714/835-8154

Project: Environmental Analysis and
 Remediation of Pepperdine University
 LAUREL RIDGE

DATE	BY	REVISED	DATE	BY	REVISION
1/11/86	PSD	7/28/82			13484241.DWG

Exhibit B

• MAP A •

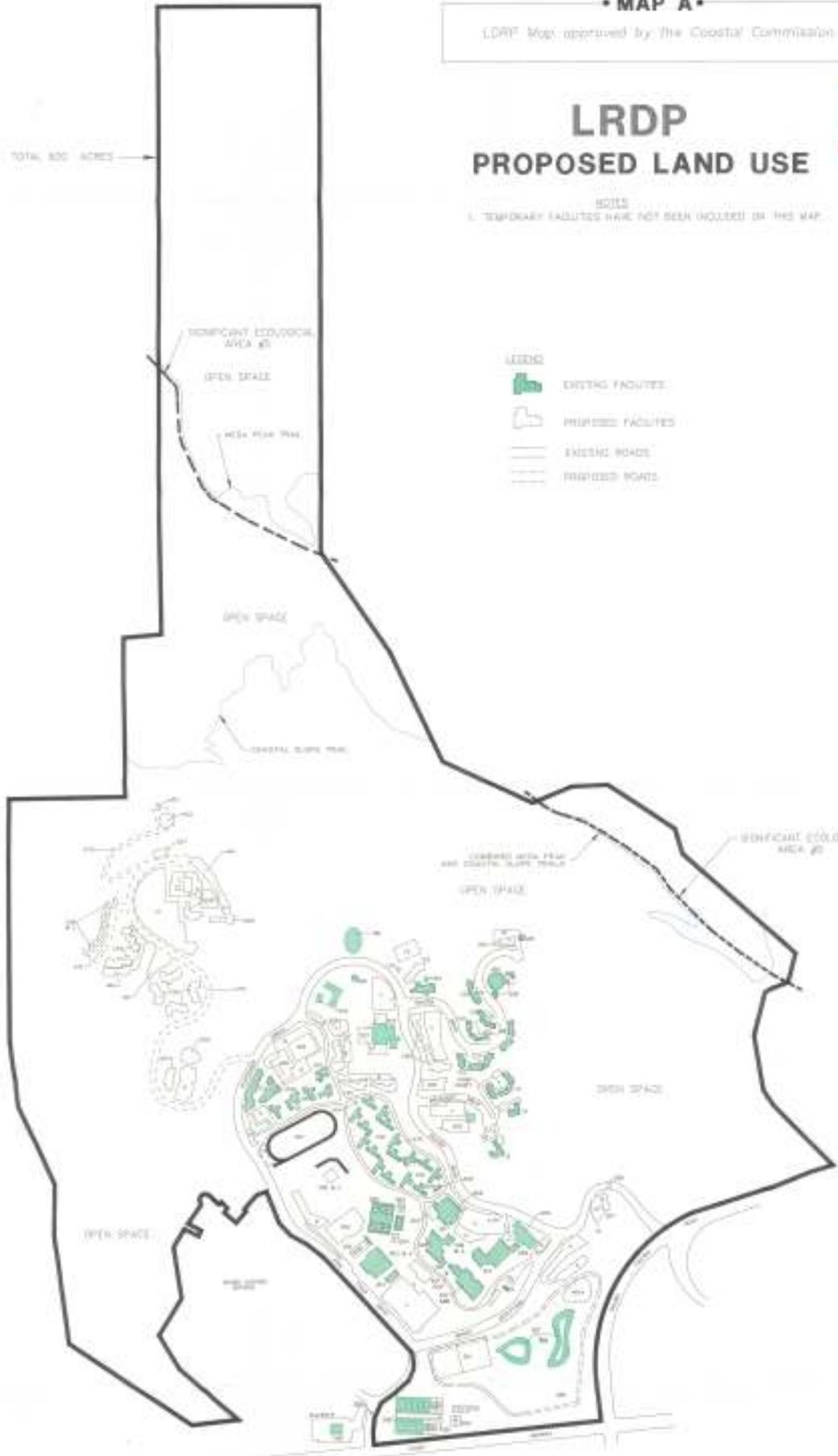
LRDP Map approved by the Coastal Commission

LRDP PROPOSED LAND USE



NOTES
1. TEMPORARY FACILITIES HAVE NOT BEEN INCLUDED ON THIS MAP.

TOTAL 800 ACRES



- EXISTING FACILITIES
- PROPOSED FACILITIES
- EXISTING ROADS
- PROPOSED ROADS



BUILDING NUMBERS, GENERAL DESCRIPTIONS
& USES OF BUILDINGS/FACILITIES
ARE LISTED IN THE SPECIFIC PLAN

EAI ENVIRONMENTAL AUDIT, INC.
 100-A DUNN WAY • FARMINGDALE, NY 11735-1129
 TEL: 516-833-4700 FAX: 516-833-4704
 e-mail: info@environmentalaudit.com
 www.environmentalaudit.com

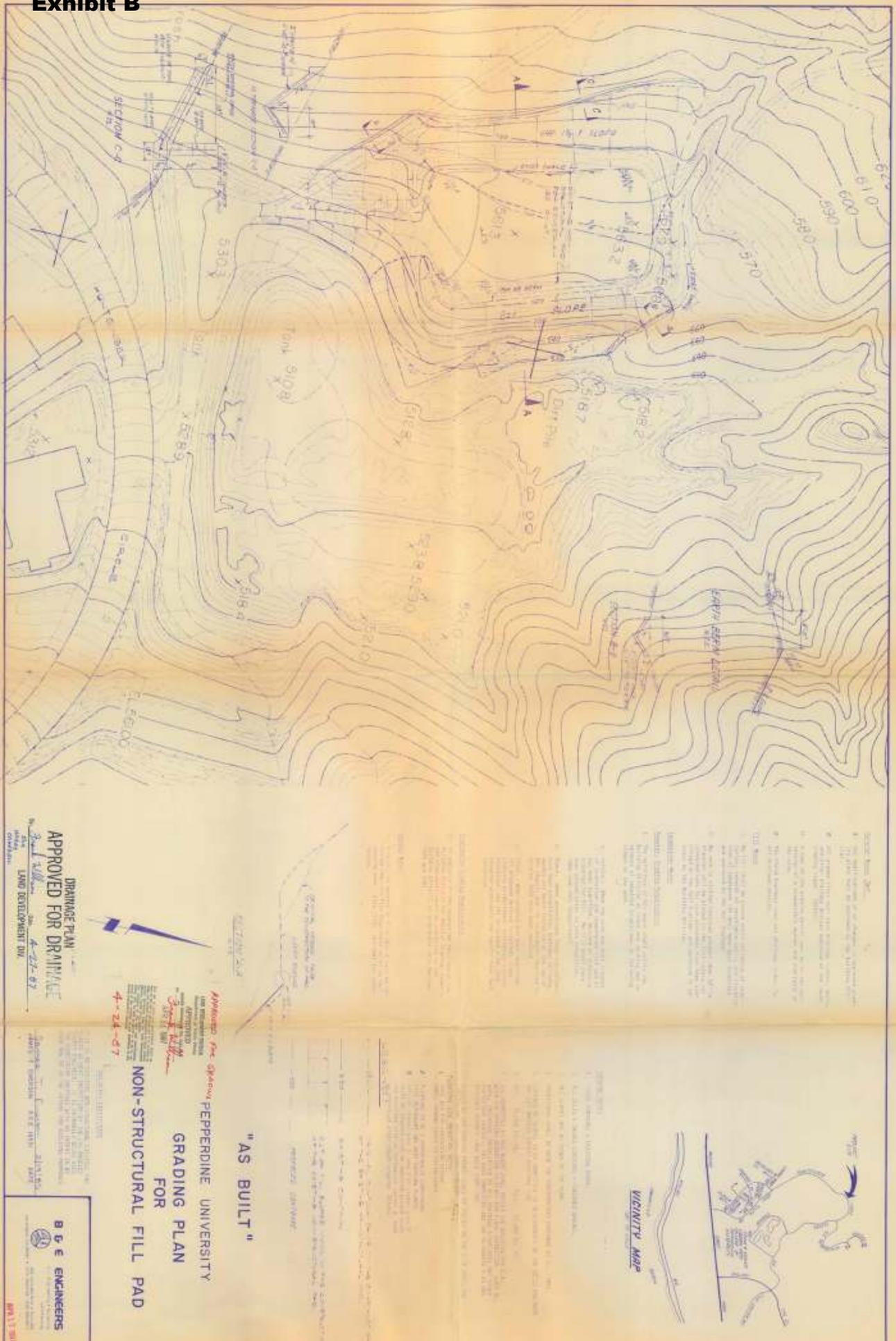
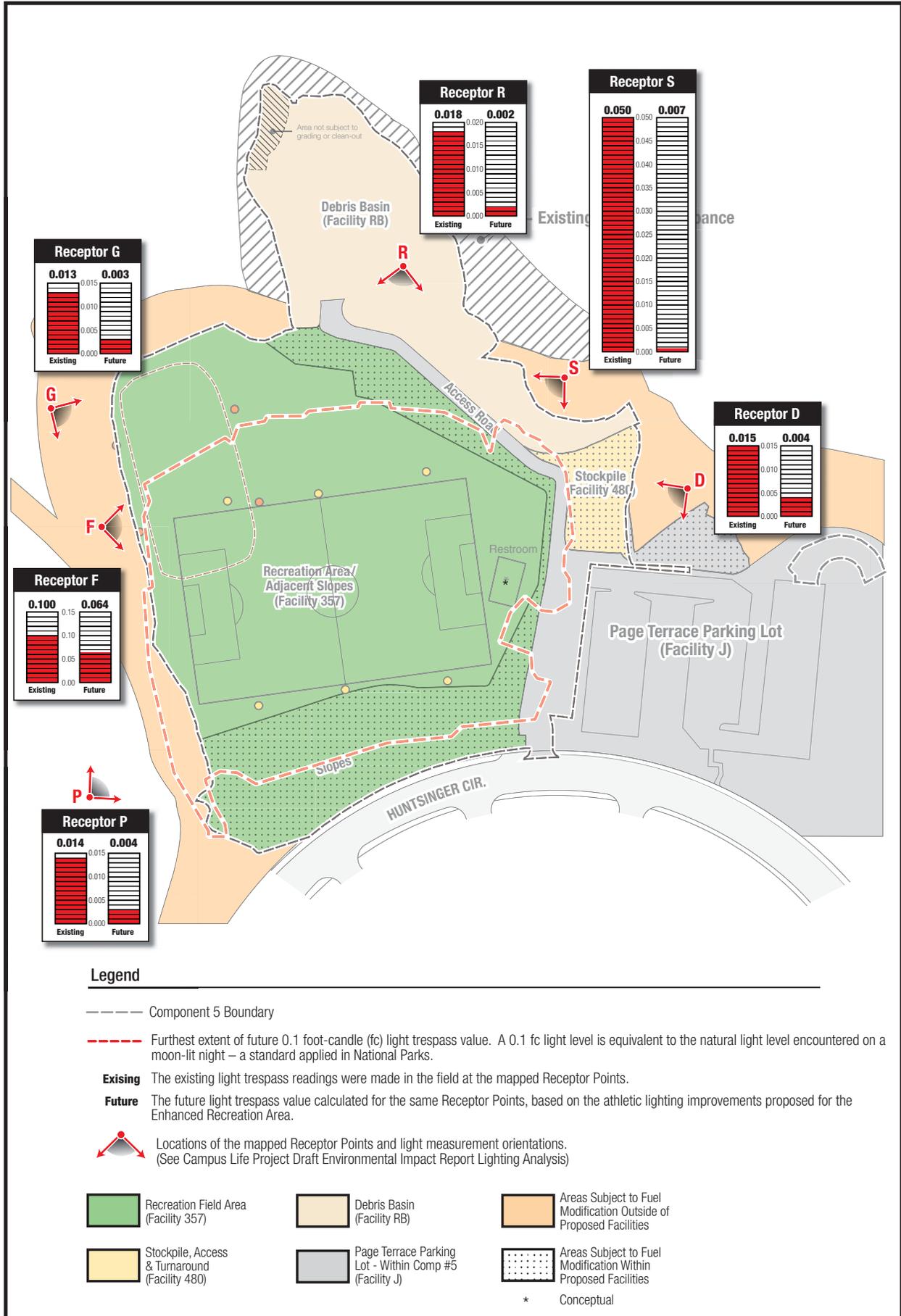


EXHIBIT C



June 10, 2013

CALIFORNIA COASTAL COMMISSION

SOUTH COAST AREA
245 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-5071



December 21, 1989

TO: Commissioners and Interested Persons

FROM: Peter Douglas, Executive Director
Charles Damm, South Coast District Director
Teresa Henry, Assistant District Director/Project Analyst

SUBJECT: REVISED FINDINGS ON THE PEPPERDINE UNIVERSITY LONG RANGE DEVELOPMENT PLAN (LRDP) for Public Hearing and Commission Action at the Meeting of January 11, 1990.

SYNOPSIS

Summary of Commission Action

On September 12, 1989, the California Coastal Commission reviewed the Pepperdine University Long Range Development Plan (LRDP). In its action, the Commission denied the LRDP as submitted and certified it with Suggested Modifications regarding public access, hazards, and visual, marine and environmentally sensitive resource protection.

If these Suggested Modifications are adopted by the Board of Regents of the University within six months of the Commission's action (March 11, 1990) and the Commission is so notified, the LRDP will become effectively certified.

Commission Vote

The Commission's action included two resolutions on the LRDP submittal. The Commissioners voting on the prevailing side on the first resolution to deny the LRDP as submitted were:

Glickfeld, Rynerson, MacElvaine, Malcolm, McInnis, Knapp, Neely, Warren, Wright, Hisserich, Franco, and Chairman Wornum

The Commissioners voting on the prevailing side on the second resolution to certify the LRDP with Suggested Modifications were:

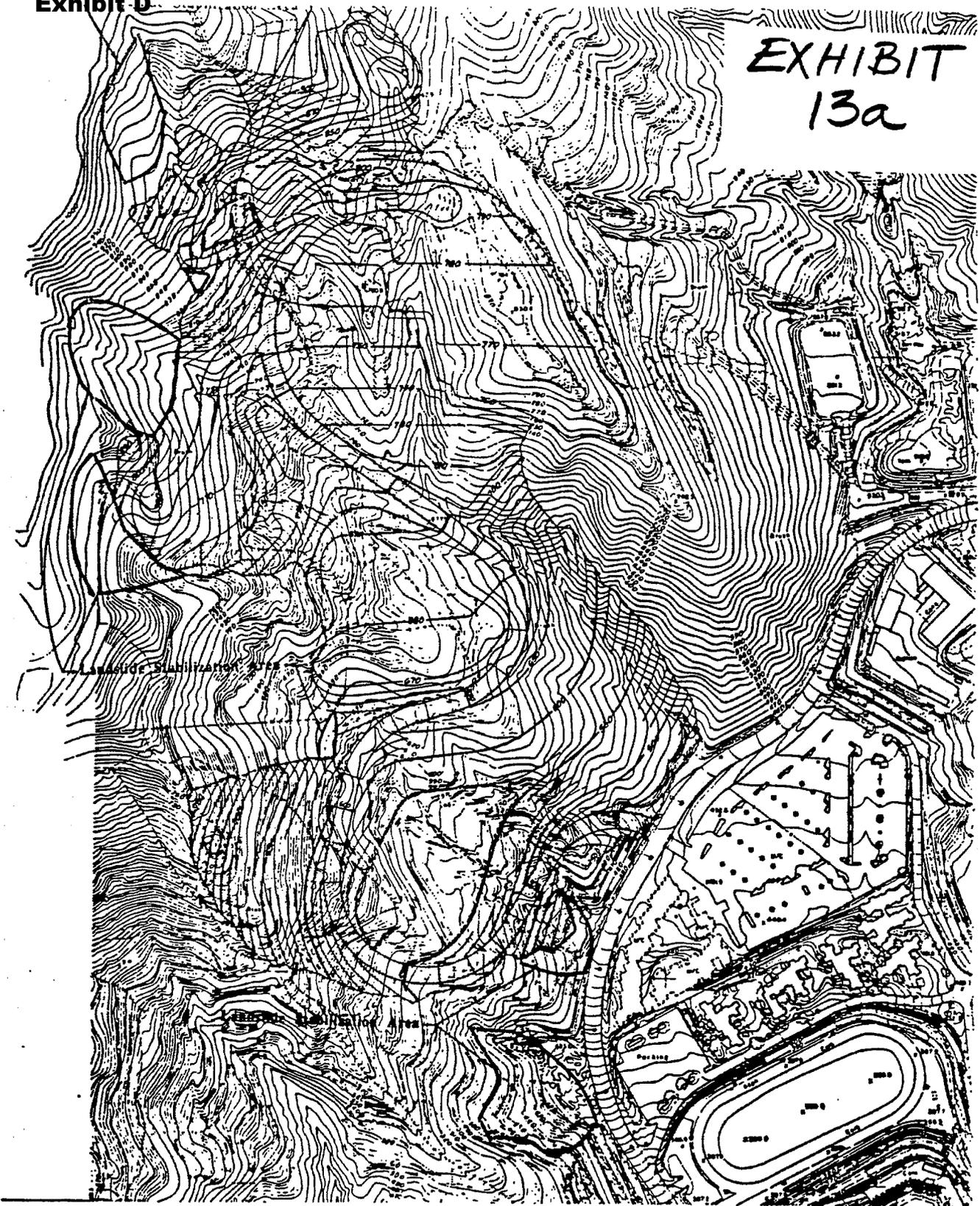
Knapp, Neely, Wright, Glickfeld, MacElvaine, Malcolm, McInnis, and Chairman Wornum

Additional Information

Further information on the Pepperdine University Long Range Development Plan may be obtained from Teresa Henry at the South Coast Area Office of the Coastal Commission, 245 West Broadway, Suite 380, Long Beach, CA 90802, (213) 590-5071.

Exhibit D

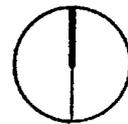
EXHIBIT
13a



Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area
Conceptual Grading Plan
 Showing Landslide Stabilization Areas
 Outside of Graded Area.

RECEIVED

AUG 4 1989



ATTACHMENT C-1

CALIFORNIA
COASTAL COMMISSION

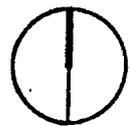
These materials have been provided to Coastal Commission Staff

Exhibit D

EXHIBIT
136



**Pepperdine University • L.R.D.P. Units Outside of Existing Developed Area •
 Conceptual Grading Plan
 With Proposed Buildings**



ATTACHMENT C-2

Albert C. Martin and Assoc.
DATE 7-20-67

Exhibit E



Source: GoogleEarth Pro, August 27, 2012.