UCLA LAKE ARROWHEAD LODGE
WILLOW CREEK STAFF HOUSING, CEDAR SUITES, AND GLAMPING PROJECT

Project No. 941018.01

Draft Initial Study and Mitigated Negative Declaration

Lead Agency

University of California, Los Angeles
1060 Veteran Avenue
Los Angeles, California 90095-1365

Prepared by

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December 2021

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December 2021

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LAKE ARROWHEAD LODGE
WILLOW CREEK STAFF HOUSING, CEDAR SUITES, AND GLAMPING PROJECT
UNIVERSITY OF CALIFORNIA, LOS ANGELES

Project No. 941018.01
Initial Study and Environmental Checklist Form

I. PROJECT INFORMATION

1. PROJECT TITLE

UCLA Lake Arrowhead Lodge Willow Creek Staff Housing, Cedar Suites, and Glamping

2. LEAD AGENCY NAME AND ADDRESS

University of California, Los Angeles
1060 Veteran Avenue
Los Angeles, California 90095-1365

3. CONTACT PERSON AND PHONE NUMBER

Edward Paek, AICP, Environmental Planner
University of California, Los Angeles
Capital Programs, Capital Planning and Finance
1060 Veteran Avenue
Los Angeles, California 90095-1365
(310) 562-5388

4. PROJECT LOCATION

UCLA Lake Arrowhead Lodge
850 Willow Creek Road
Lake Arrowhead, California 92352
(Refer to Figure 1)

5. PROJECT SPONSOR'S NAME AND ADDRESS

UCLA Housing & Hospitality
345 DeNeve Drive, Ste. H001
Building 109H Holly Ridge
Los Angeles, California 90024

6. CUSTODIAN OF THE ADMINISTRATIVE RECORD FOR THIS PROJECT

Same as listed under No. 3 above.

7. IDENTIFICATION AND LOCATION OF ENVIRONMENTAL IMPACT REPORT(S) BEING RELIED ON FOR TIERING

Because the Project is located off campus, this Initial Study/Mitigated Negative Declaration (referred to herein as the IS or IS/MND) was not tiered from the *UCLA Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact*

Report (referred to herein as the "LRDP Amendment Final SEIR" or "Final SEIR") (State Clearinghouse [SCH] No. 2017051024), which was certified by the University of California Board of Regents (The Regents) in January 2018 (UCLA, 2018).[1] However, pursuant to Section 15150 of the State CEQA Guidelines, the LRDP Amendment Final SEIR is hereby incorporated by reference, primarily for the discussion of planning and regulatory documents relevant to University of California (UC) projects, and identification of relevant campus programs, procedures, and practices (PPs), and mitigation measures (MMs). The LRDP Amendment Final SEIR is located at the address listed under No. 3 above and is available online at:
http://www.capitalprograms.ucla.edu/Planning/LongRangeDevelopmentPlan

Introduction

The California Environmental Quality Act (CEQA) requires that government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. Therefore, in accordance with CEQA (Public Resources Code §§21000 et seq., specifically, §21094), the CEQA Guidelines (14, California Code of Regulations [CCR], §§15000 et seq.), and the University of California Procedures for the Implementation of CEQA, this IS has been prepared as documentation for a MND to analyze the potential environmental effects of the proposed Willow Creek Staff Housing, Cedar Suites, and Glamping Project (Project). This IS/MND includes a description of the Project and location of the Project sites, evaluation of the potential environmental impacts of Project implementation, and recommended mitigation measures to lessen or avoid impacts on the environment.

Because the Project is not located on the UCLA campus, this IS was not tiered from the LRDP Amendment Final SEIR. However, as noted above, pursuant to Section 15150 of the State CEQA Guidelines, the LRDP Amendment Final SEIR is hereby incorporated by reference, primarily for the discussion of planning and other regulatory documents relevant to UC projects. Also, in conjunction with certification of the LRDP Amendment Final SEIR and approval of the LRDP Amendment (2017) and Student Housing Projects, The Regents adopted a Mitigation Monitoring and Reporting Program (MMRP). The MMRP ensures that mitigation measures that are the responsibility of the University of California are implemented in a timely manner. This IS identifies campus PPs, and MMs from the LRDP Amendment Final SEIR MMRP that would reduce potential impacts of the Project and includes new MMs identified to reduce Project-specific environmental impacts to a less than significant level, where applicable. These PPs and MMs have been incorporated into the Project. Throughout the IS, where LRDP Amendment Final SEIR PPs or MMs have been identified, the PPs and/or MMs have been exactly referenced as in the LRDP Amendment Final SEIR. This numbering system enables the public and other users of this document to cross reference these procedures and measures with the LRDP Amendment Final SEIR and align the mitigation monitoring procedures for the Project with the adopted LRDP Amendment Final SEIR MMRP.

Following review of the Project, it has been determined that the Project is a "project" under CEQA and the UC proposes to adopt an MND. In accordance with the CEQA Guidelines, an MND is the appropriate environmental document for the Project because, after incorporation of Project-specific MMs, the Project would not result in any significant and unavoidable impacts. All Project-level impacts can be mitigated to a level that is considered less than significant. Specifically, this IS identifies and proposes for adoption, Project-specific MMs to reduce potential construction-related environmental impacts related to biological resources, cultural resources, geology and

[1] January 2018 Regents Action: Approval of Amendment #6 to the UCLA 2002 Long Range Development Plan for Additional On-Campus Student Housing Following Action Pursuant to the California Environmental Quality Act, Los Angeles Campus, which is available at https://regents.universityofcalifornia.edu/minutes/2018/fin1.pdf..

soils, and tribal cultural resources. In addition to addressing the potential environmental impacts that would result from the Project, this IS serves as the primary environmental document for all future activities associated with the Project, including all discretionary approvals requested or required to implement the Project.

This IS, along with a Notice of Intent to Adopt an MND, has been circulated by the State Office of Planning and Research (State Clearinghouse) for review by State agencies, and has also been circulated to any responsible agencies, trustee agencies, and interested parties, as required by CEQA, for a 30-day public review. Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the UC will determine whether any substantial new environmental issues have been raised. It is anticipated that the Project will subsequently be submitted to UCLA Chancellor for consideration in early 2022.

II. PROJECT DESCRIPTION

The Project consists of the following three components located in the eastern portion of the UCLA Lake Arrowhead Lodge (LAL), in the Lake Arrowhead community of San Bernardino County: (1) Willow Creek Staff Housing, (2) Cedar Suites, and (3) Glamping. The Glamping component of the Project is distinct from the Willow Creek Staff Housing and Cedar Suites components; however, due to proximity and overlapping construction schedules, each component is conservatively being evaluated in this single IS.

In summary, the Cedar Suites and Willow Creek Staff Housing components of the Project include redevelopment of the sites currently developed with the 8,470-square foot (sf) Cedar Lodge staff housing building (herein referred to as the "Cedar Suites site"), and the existing approximately 2,220-sf maintenance building and surface parking lot (herein referred to as the "Willow Creek site"). The proposed approximately 10,000-sf Willow Creek Staff Housing building would be located on the Willow Creek site and would replace the staff housing accommodations (54 beds) and meeting space currently provided at Cedar Lodge, which would be demolished as part of the Project. Two new guest condolets would be constructed on the Cedar Suites site. Each condolet would be approximately 2,375 sf and would have 6 guest rooms. Infrastructure to serve the new buildings would also be installed.

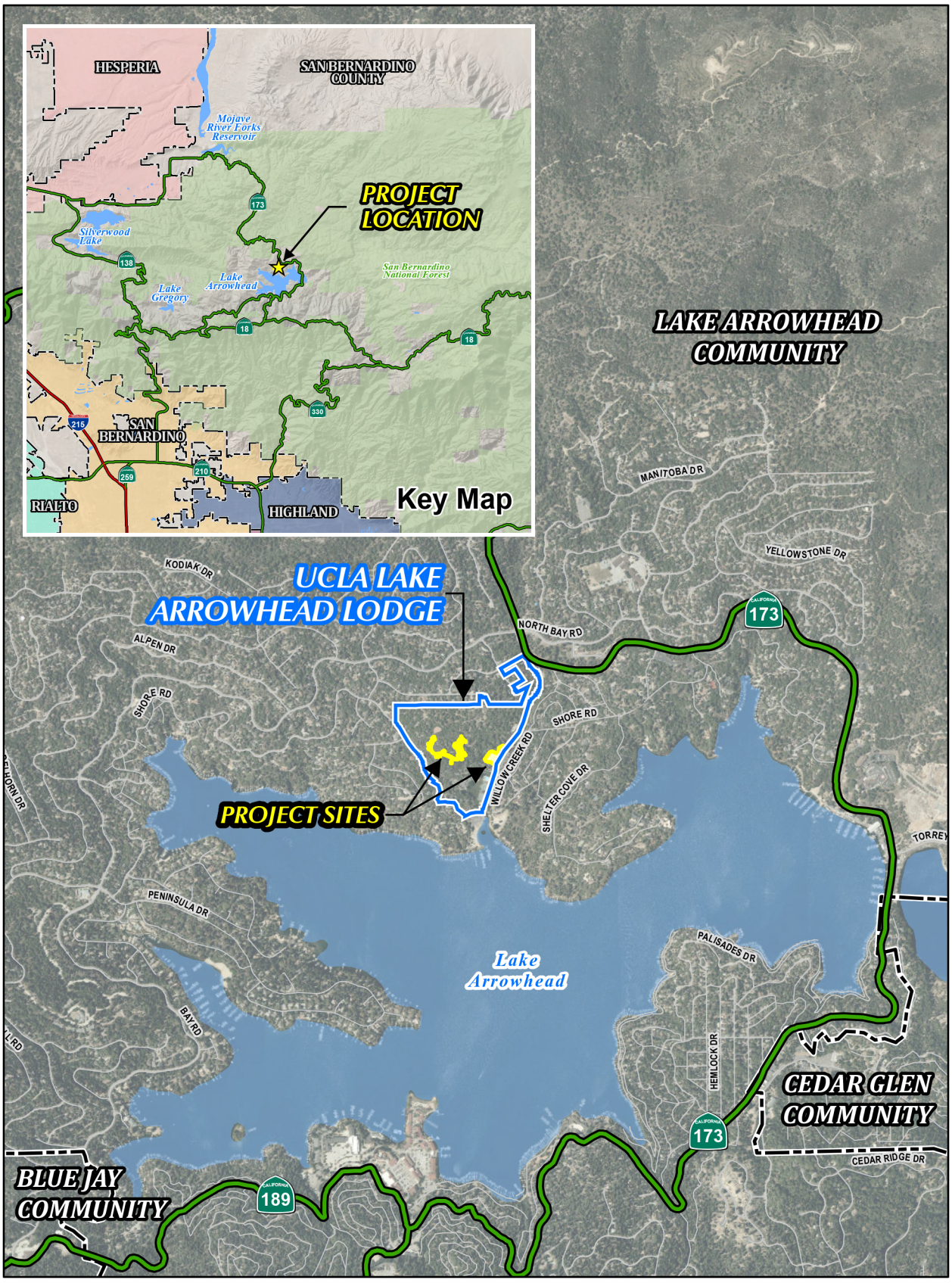
The Glamping component of the Project includes the construction of 10, approximately 200-sf, pre-fabricated cabins on raised foundations and decks. Two restroom buildings would be constructed, and infrastructure to serve the proposed uses would also be installed.

For purposes of description in this IS, the "Project area" includes the area that encompasses the Project sites and the surrounding areas within the UCLA LAL. More detailed information regarding the Project Description is provided in Section II.5, Project Components.

1. PROJECT LOCATION

The Project is located at the approximately 50-acre UCLA LAL (850 Willow Creek Road), in the San Bernardino Mountains, within the unincorporated community of Lake Arrowhead in San Bernardino County.[2] The UCLA LAL is located on the northern side of Lake Arrowhead near Tavern Bay; the Project sites are approximately 0.2-mile north of the Lake Arrowhead shoreline. Figure 1 depicts the regional location and local vicinity of the Project.

[2] The Willow Creek and Cedar Suites sites are within Assessor Parcel Number (APN) 032-903-120, and the Glamping site is located within APN 032-910-111.



Source(s): Esri (2020), SB County (2020)

Figure 1

0 500 1,000 2,000 Feet

Regional Location and Local Vicinity

The Willow Creek and Cedar Suites sites are located in the eastern portion of the UCLA LAL, immediately west of Willow Creek Road and generally north of North Shore Road. The Glamping site is located in the northern portion of the UCLA LAL, north of the existing condolets and immediately south-southeast of the existing ball field

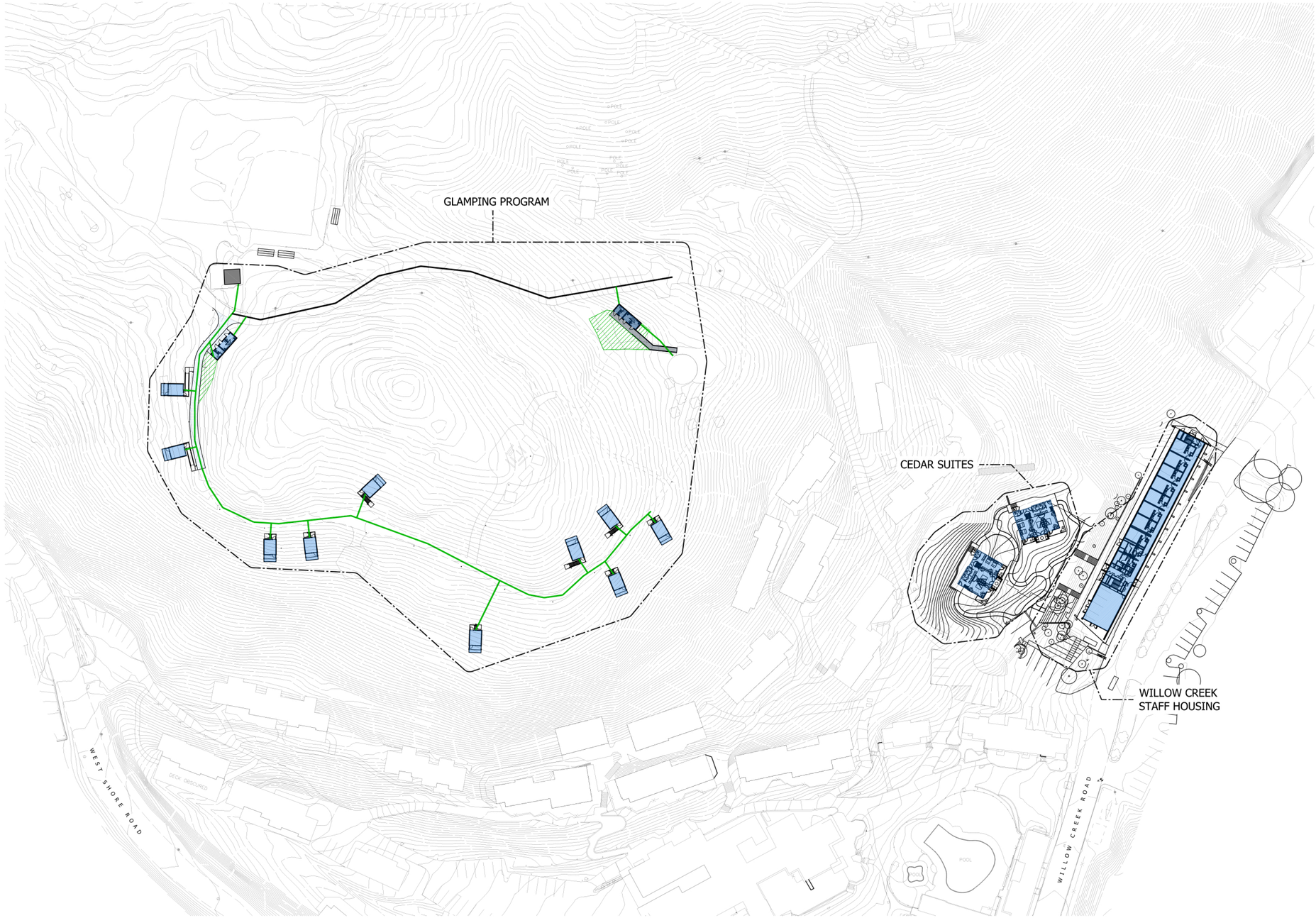
2. ENVIRONMENTAL SETTING

As shown on Figure 1, the UCLA LAL is located just north of Lake Arrowhead. The Project is located in the San Bernardino National Forest (SBNF), but in an area designated as "Non-Forest Service Land". Existing operations at the UCLA LAL are described in Section 5, Project Components. Figure 2 depicts the consolidated Project site plan. Figure 3 provides an illustrative depiction of the existing uses at the UCLA LAL.

The UCLA LAL is generally situated in the southern edge of the Transverse Ranges Province, and is within Sections 10 and 15, Township 2 North, Range 3 West of the United States Geological Survey (USGS) 7.5-minute Lake Arrowhead Quadrangle (refer to Figure 4). Lake Arrowhead is located at an elevation of 5,114 feet above mean sea level (AMSL). Elevations within the Project area range from approximately 5,123 feet AMSL to 5,270 feet AMSL (Geotechnologies, 2021). The mountains and their subparallel valleys run almost perpendicular in contrast to most of the mountain ranges in California. The Transverse Ranges Province includes the Little San Bernardino Mountains to the east, which can be traced westward through the San Bernardino, San Gabriel, and Santa Monica mountains and continuing west through Ventura and southern Santa Barbara County.

Existing site conditions are shown on the aerial photograph presented on Figure 5, and on Figure 6. As shown, the Willow Creek site is currently developed with a 1-story, approximately 2,220-sf maintenance building (21-feet high), a surface parking area for the maintenance facility, and other accessory structures. The portion of the Willow Creek site that is currently developed is approximately 215 feet long and 40 feet wide, extending parallel to and west of Willow Creek Road. The Cedar Suites site is located upslope from the Willow Creek site and is developed with the existing, approximately 8,470-sf Cedar Lodge, which would be demolished as part of the Project. Cedar Lodge is 3-levels above ground (approximately 40 feet high above grade), and has a partial basement level. Cedar Lodge accommodates 21 sleeping rooms (54 beds) for UCLA Bruin Woods Family Resort (Bruin Woods) staff, and a 1,320-sf multi-purpose gathering space. The existing structure was determined to have a Seismic Performance Rating of VI, and has been partially retrofitted to a Seismic Performance Rating of V for diminished temporary use until alternative staff accommodations can be developed (i.e., the Willow Creek Staff Housing building). The Cedar Lodge was built in 1946 and is it has been determined that it is ineligible for listing on the California Register of Historical Resources (CRHR) (refer to the Cultural Resource section of this IS). The area surrounding the Willow Creek and Cedar Suites sites is developed with existing uses associated with the UCLA LAL to the east, west, and south. The area to the north is undeveloped with the exception of existing UCLA LAL facilities buildings to the north of the Willow Creek site, also west of and adjacent to Willow Creek Road.

As shown on the aerial photograph presented on Figure 7, the Glamping site is located in the northern portion of the UCLA LAL and is currently undeveloped with the exception of the existing trail system that would also provide access to the proposed cabins. The area surrounding the Glamping site includes various recreational facilities (i.e., the Wall, Frontier Village, Tree House, and Yurt). Other recreational facilities are located to the north, and housing accommodations are to the south.



Source(s): UCLA (September 2021)

Figure 2

Not to Scale

Consolidated Project Site Plan

Source(s): UCLA (September 2021)

Not to Scale

Figure 3

UCLA Lake Arrowhead Lodge Illustrative Map

Source(s): USGS (2018)

Figure 4

Not to Scale

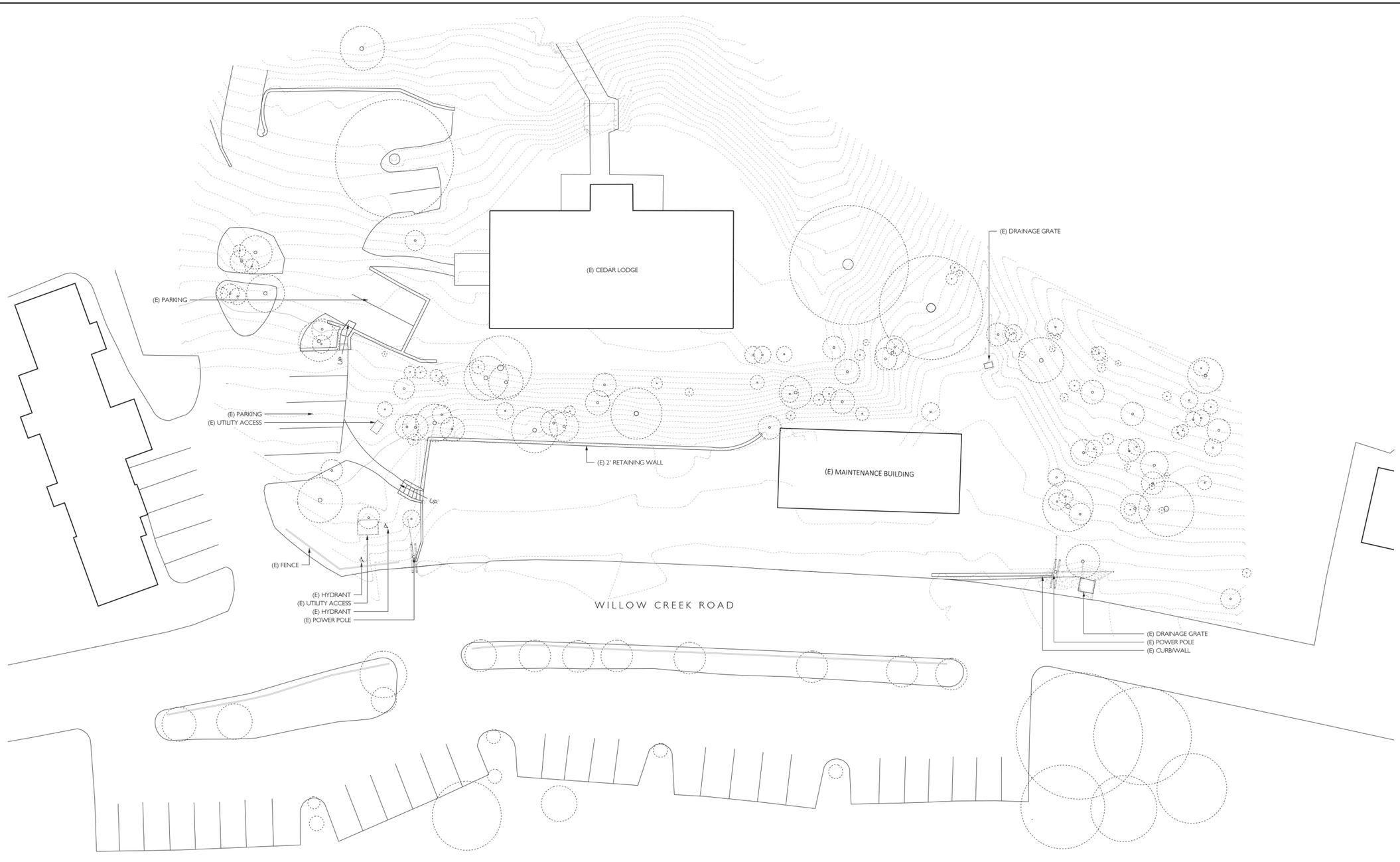
Topographic Map

Source(s): Esri, SB County (2020)

0 18.75 37.5 75 Feet

Figure 5

Aerial Photograph –
Willow Creek and Cedar Suites Sites

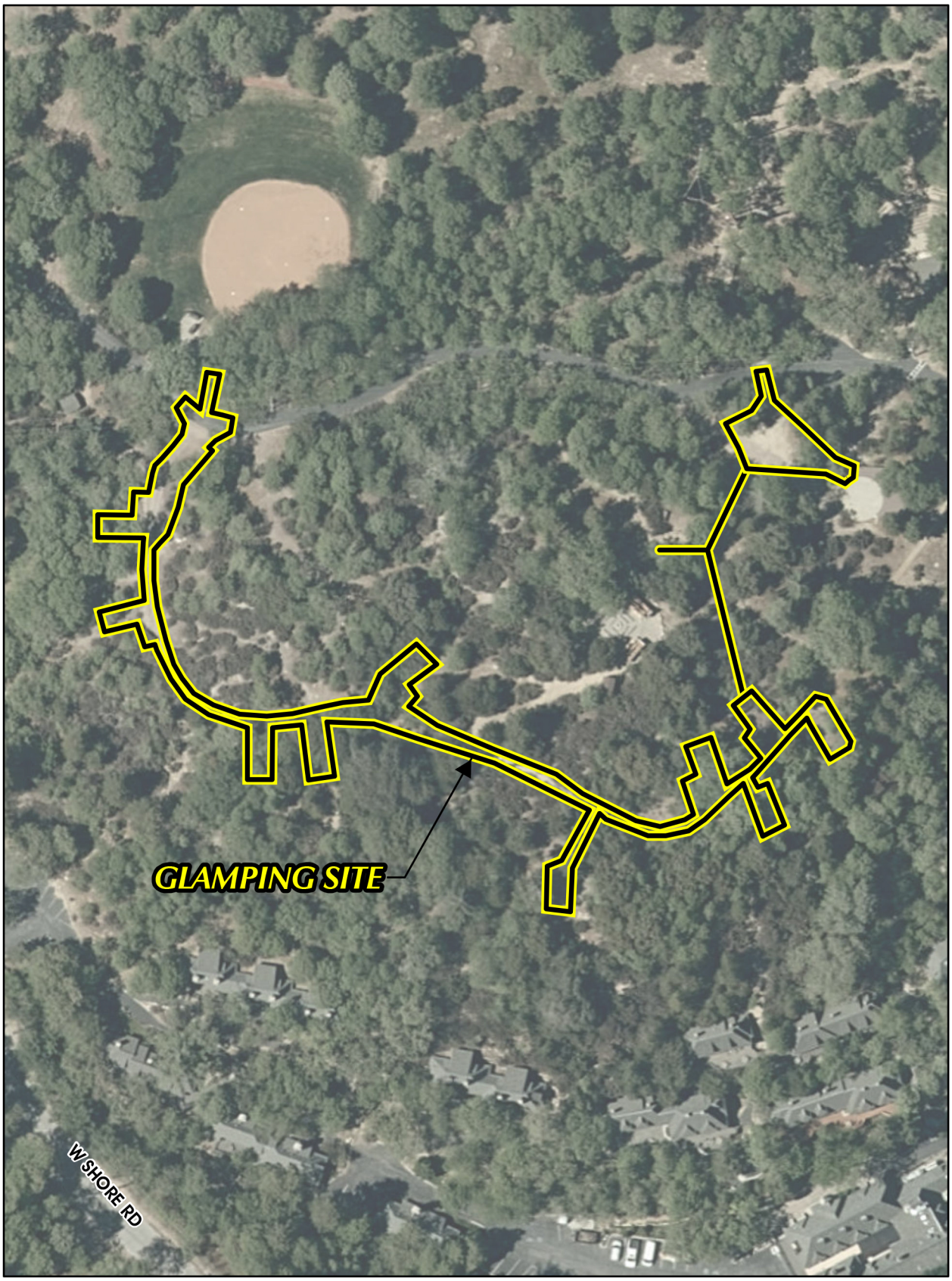


Source(s): 64North Architecture, Ltd. (September 2021)

Figure 6

Not to Scale

Existing Site Conditions – Willow Creek Staff Housing and Cedar Suites



Source(s): Esri, SB County (2020)

0 25 50 100 Feet

Figure 7

Aerial Photograph – Glamping Site

Vehicular access to the Willow Creek and Cedar Suites sites is provided from existing driveways along Willow Creek Road. Service vehicle access to recreational amenities in the northern portion of the UCLA LAL and the Glamping site is provided from a service road access from roadways internal to the UCLA LAL or from a gated entry along West Shore Road.

As further discussed in the Wildfire section of this IS, according to the California Department of Forestry and Fire Protection (CalFire), the UCLA LAL, including the Project sites, is within a Very High Fire Hazard Severity Zone (VHFHSZ) within a State Responsibility Area (SRA) (CalFire, 2021). As further discussed in the Biological Resources section of this IS, the Project area has been subject to anthropogenic disturbances from existing development and use. These disturbances have generally eliminated the natural plant communities that once occurred within the Project area, with the exception of the existing pine trees around the buildings, reducing the ability of the sites to provide suitable habitat for special-status plant and wildlife species. The Project area consists of two land cover types that would be classified as disturbed and developed, and mixed conifer forest. No riverine or other freshwater resources are mapped within the boundaries of the Project sites. A small ephemeral drainage feature was observed off-site bordering the northwest corner of the Willow Creek site. The nearest recognized resource is a freshwater/forested/shrub wetland associated with Willow Creek, east of the Willow Creek site, and east of Willow Creek Road.

Due to the density and height of existing trees within and near the Project site, and variations in topography, public views of the Willow Creek and Cedar Suites sites are limited to vantage points along Willow Creek Road. Views of the Glamping site are limited to vantage points within the UCLA LAL. The visual character of the Project site and surrounding areas is shown in the photographs presented in Section V.1, Aesthetics, of this IS.

As further discussed in the Hydrology and Water Quality section of this IS, stormwater from the Project area sheet flows or flows via existing drainage facilities to Willow Creek located parallel to and east of Willow Creek Road. Both Willow Creek and Lake Arrowhead route north joining with Deep Creek eventually discharging into the Mojave River Basin north of the San Bernardino Mountain range. Groundwater was not encountered during exploration and water is not anticipated to be within excavation depth (Geotechnologies, 2021).

As further discussed in the Geology and Soils section of this IS, the Project sites are underlain by fill colluvium, and granitic bedrock. The fill soil is distributed across the Project sites and is up to 4 feet in thickness. There are no known faults that underlie the UCLA LAL, including the Project sites. (Geotechnologies, 2021)

The area surrounding the UCLA LAL includes residential uses to the west, north and east, and the Tavern Bay Beach Club to the south. These uses are within the Lake Arrowhead Community, and development in this area is governed by the Lake Arrowhead Community Plan (LACP). Community Plans focus on a community within the overall area covered by the San Bernardino Countywide Plan, which includes the Policy Plan/General Plan. Community Plans implement the goals and policies of the General Plan. The UCLA LAL and adjacent parcels are within the RS, Single Residential (RS-14M) Land Use District of the Lake Arrowhead Community Plan and are zoned LA/RS-14M, which requires a minimum of 14,000-sf lots.

3. BACKGROUND AND NEED FOR THE PROJECT

Beginning in 1957, the UCLA LAL, which was known as the UCLA Lake Arrowhead Conference Center until 2020, operated as a conference center under the direction of various UC campuses. In 1982, leadership of the property was transferred to UCLA. Since then, it has been used for

UCLA meetings, conferences, retreats, team-building events and other educational gatherings. Additionally, the UCLA LAL hosts the Bruin Woods program, which is an all-inclusive summer camp that offers outdoor recreation, arts and crafts, and activities for guests. Due to the loss of bookings as a result of the COVID-19 pandemic, and to keep the UCLA LAL financially viable, UCLA has opened the facility to non-University affiliates (except when the facility is being used for the Bruin Woods program, which continues to be open only to UCLA alumni, faculty, staff and students).

Summer employees, which include 54 university students who serve as camp counselors and support staff for the Bruin Woods program, are currently housed onsite at Cedar Lodge. Cedar Lodge is scheduled to be demolished as part of the UCLA Housing & Hospitality's plan to address deficient properties per the UCOP Seismic Safety Policy, necessitating the development of alternative staff accommodations. The existing gathering space at Cedar Lodge is also currently one of the largest meeting spaces on property, and will thus need to be replaced to maintain conference functions. As previously identified, the existing structure has been partially retrofitted to a Seismic Performance Rating of V for diminished temporary use until alternative staff accommodations can be developed. The proposed Willow Creek Staff Housing structure would provide replacement accommodations for staff housing and the meeting space.

With a current capacity for 225 guests, the UCLA LAL has a shortage of overnight guest accommodations for conferences. The Cedar Suites component of the Project would add 12 guestrooms accommodating 24 guests to help address this shortage. Conference clients also prefer having an option for hotel-style single guest rooms, which are more private than UCLA LAL typical multi-bedroom condolets; the proposed Cedar Suite would provide this type of guest room.

Bruin Woods always has a long waiting list for reservations. The proposed Glamping facility would expand guest capacity with 10 new cabins accommodating 20 guests, and would offer additional lower-cost guest accommodations to make the Bruin Woods program more attainable for more alumni families, and could be used year-round for the same purpose. Additionally, the proposed Cedar Suites guest rooms would remain adaptable for use as suite-style condolets during the summer months to also expand guest capacity for the Bruin Woods program.

4. PROJECT OBJECTIVES

The objectives of the proposed UCLA LAL Willow Creek Staff Housing, Cedar Suites, and Glamping Project are consistent with UCLA's academic, research, and community service mission, and are as follows:

- Comply with the UCOP Seismic Safety Policy.
- Provide safe housing for support staff and camp counselors.
- Provide additional lower-cost overnight guest accommodations.
- Address the shortage in overnight guest accommodations and conference space at UCLA LAL.

5. PROJECT COMPONENTS

Following is a description of the Project components and Project assumptions that form the basis for the analysis presented in this IS.

Willow Creek Staff Housing and Cedar Suites

Buildings

- **Willow Creek Staff Housing.** As described above, the Willow Creek Staff Housing component of the Project involves redevelopment of the Willow Creek site, which is currently developed with a maintenance building, surface parking, and associated facilities. One new building would be constructed to accommodate staff housing and meeting space that is currently accommodated in the Cedar Lodge building, which would be demolished as part of the Cedar Suites component of the Project, discussed below.

  As shown on the conceptual Willow Creek Staff Housing site plan presented on Figure 8, the Willow Creek Staff Housing component of the Project involves the construction of a rectangular shaped building extending parallel to Willow Creek Road. As shown on the conceptual building elevations provided on Figure 9, the building would be approximately 39-feet high, with two levels for living space, and a third level with attic space.

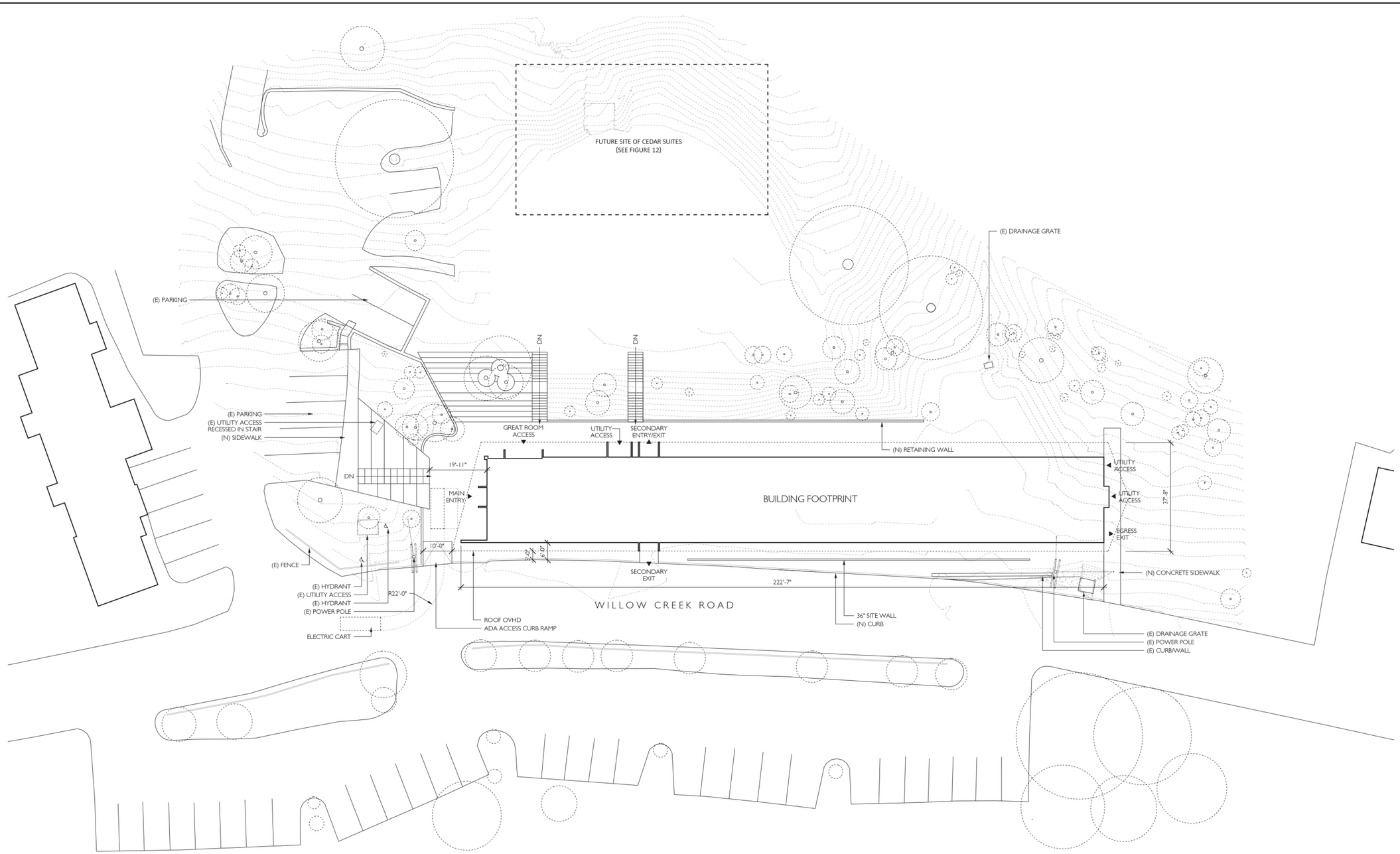
  As shown on the conceptual renderings provided on Figure 10, the new building is designed to complement the existing Norman English aesthetic of the Lake Arrowhead Lodge property, with a steep shingle roof, fieldstone bases and accents, exposed timber trim, and cement plaster exterior finish. The building would be constructed using a combination of in-situ wood-framed construction and panelized factory-prefabricated building elements in order to shorten construction time and reduce on-site construction activities. Building finishes and systems would be selected as appropriate for construction in Wildland Urban Interface areas, and to reduce greenhouse gas (GHG) emissions. Glazing and architectural coatings would thus be minimized, and where necessary for views and ventilation, would be low-e^3 glass, oriented to reduce solar heat gain and direct glare to neighboring buildings.

  As shown on the conceptual floor plans provided on Figure 11, the approximately 10,000 sf, two-story building would include 18 rooms with en suite bathrooms, each designed to accommodate up to 3 staff members, for a total occupancy of 54 beds, consistent with the existing Cedar Lodge. Approximately 1,230 sf of meeting space would also be provided to replace the existing 1,320 sf meeting space in Cedar Lodge. This meeting space would serve as social space for seasonal staff and as meeting space during the conference season.

- **Cedar Suites.** The Cedar Suites component of the Project would involve redevelopment of the Cedar Suites site with two new, approximately 2,375-sf guest cottages (approximately 4,750 sf total) (refer to the conceptual site plan provided on Figure 12 and the conceptual elevations provided on Figure 14). The two new cottages would provide 12 hotel-style private guest rooms to accommodate a total of 24 guests. Each room would be double occupancy, but could be adapted for use as the suite-style of “condolet” typical at UCLA LAL. The new buildings would not exceed the height of the existing Cedar Lodge, which is 40-feet high. The Cedar Suites buildings would also be designed consistent with the Norman English aesthetic of the existing Lake Arrowhead Lodge condolets, and would incorporate green building strategies (refer to the architectural description for the Willow Creek Staff Housing building).

Circulation and Parking

Primary vehicular access to the Willow Creek and Cedar Suites site would be provided via an existing driveway south of the Willow Creek site along Willow Creek Road, which enters into an



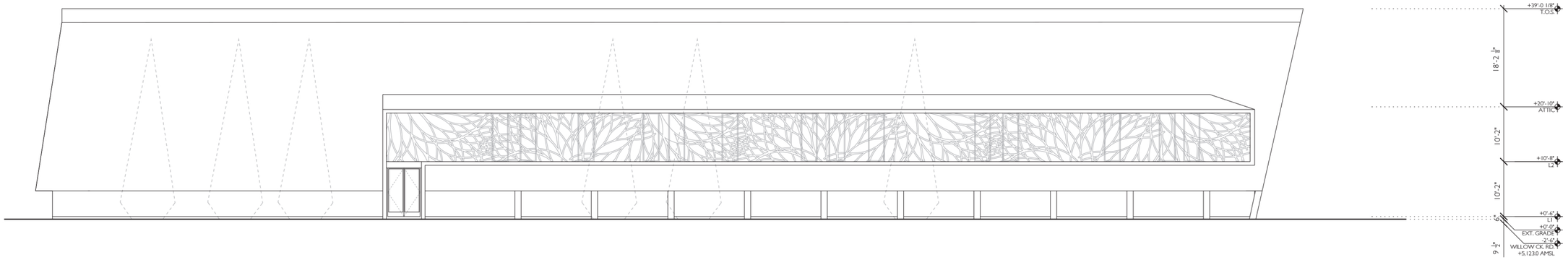
Source(s): 64North Architecture, Ltd. (September 2021)

Figure 8

Not to Scale

Willow Creek Staff Housing Conceptual Site Plan

02 WEST ELEVATION
SCALE 3/32" = 1'-0"



01 EAST ELEVATION
SCALE 3/32" = 1'-0"

Source(s): 64North Architecture, Ltd. (September 2021)

Figure 9

Not to Scale

Willow Creek Staff Housing Conceptual Building Elevations

PERSPECTIVE FROM SOUTHWEST

PERSPECTIVE FROM SOUTHWEST

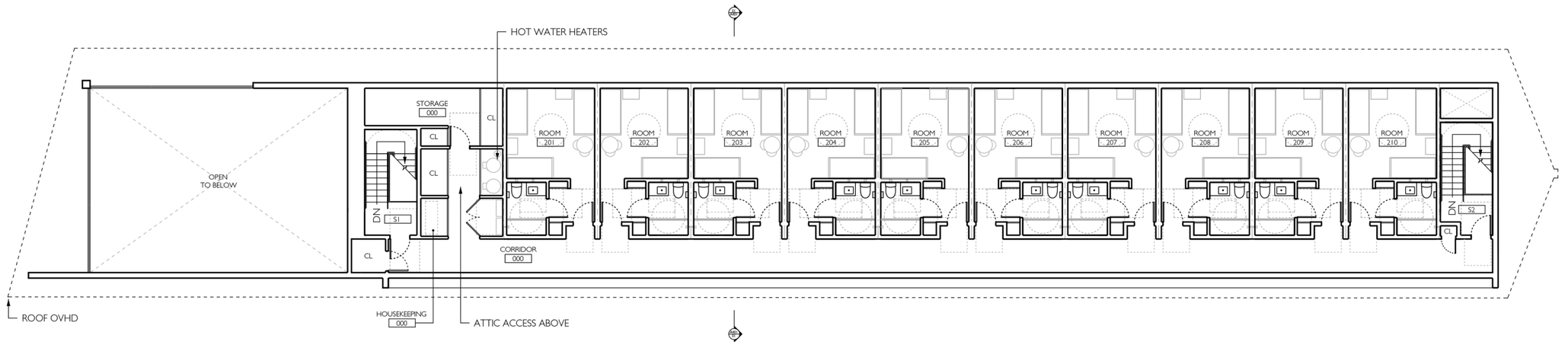
PERSPECTIVE FROM NORTHEAST

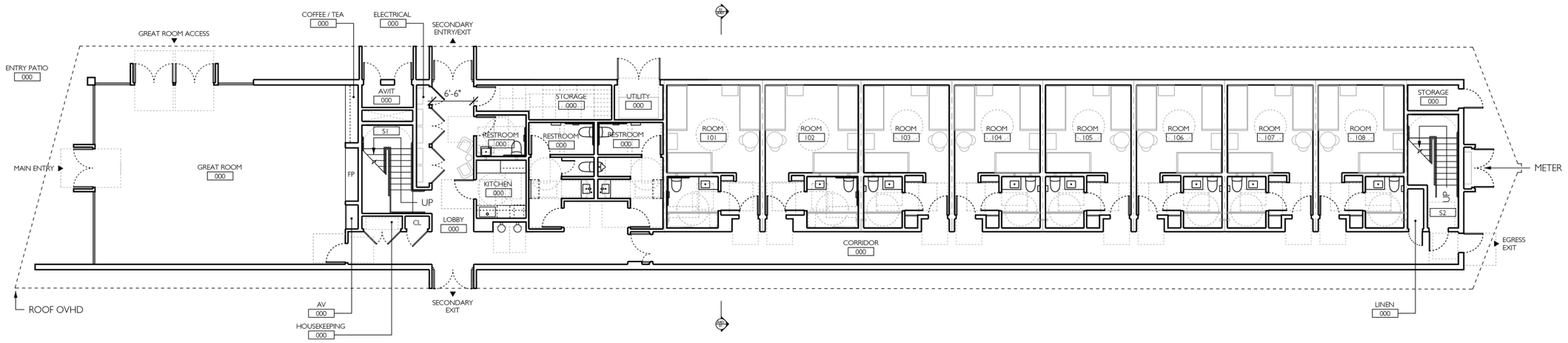
Source(s): 64North Architecture, Ltd. (September 2021)

Figure 10

Not to Scale

Willow Creek Staff Housing Conceptual Renderings



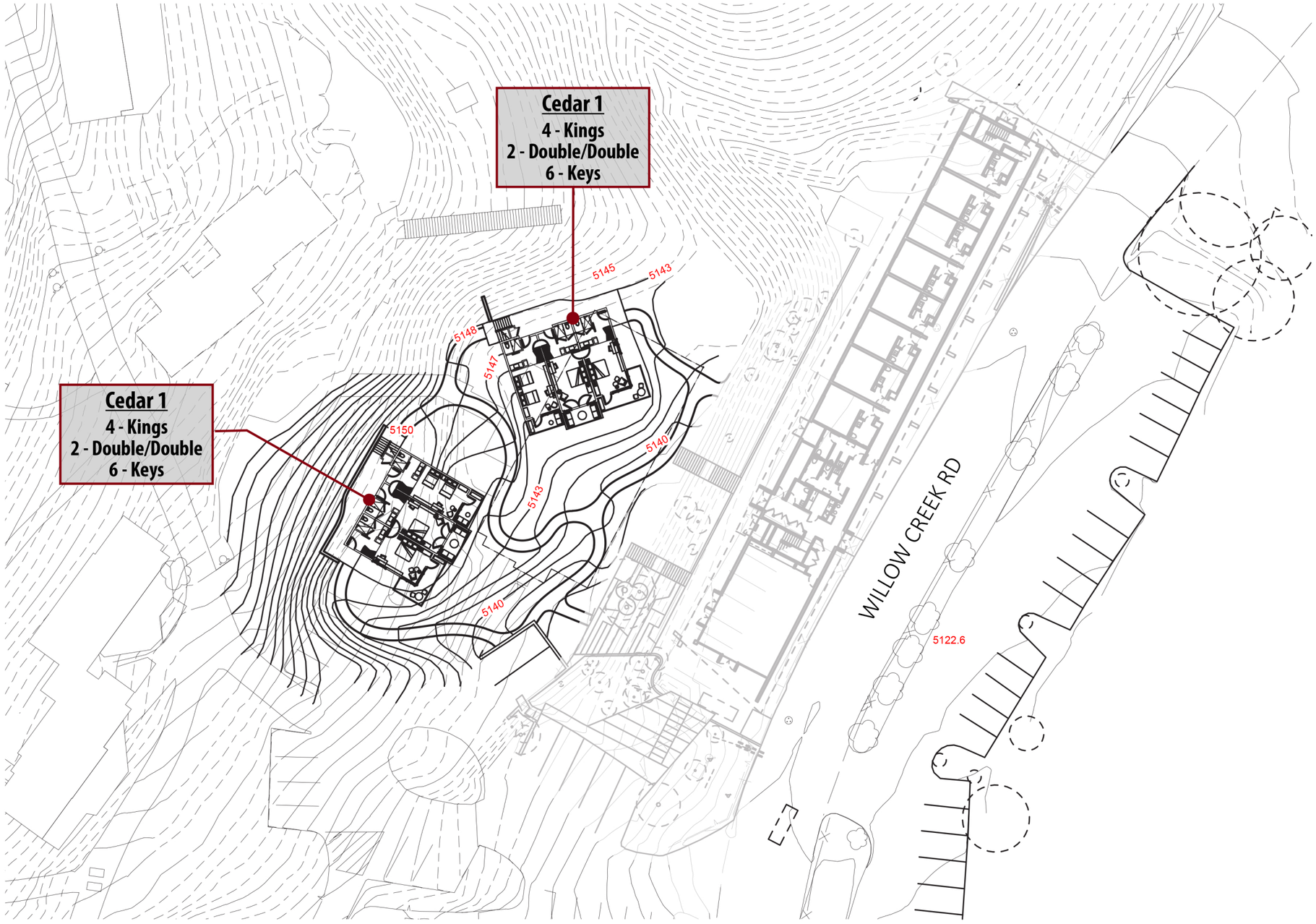


Source(s): 64North Architecture, Ltd. (September 2021)

Figure 11

Not to Scale

Willow Creek Staff Housing Floor Plan



Source(s): UCLA (September 2021)

Figure 12

Not to Scale

Cedar Suites Conceptual Site Plan

existing surface parking area. No new driveways or parking would be provided. The two existing driveways into the maintenance facility and surface parking area would be removed, and curb and sidewalk would be installed. The sidewalk would provide accessible connections to the proposed Willow Creek Staff Housing building and the existing surface parking area south of the proposed building. Accessible pathways would also be provided around the proposed building.

Accessible pathways would be provided around the proposed Cedar Suite buildings and would connect to the existing parking area and to new stair cases that would extend down to the Willow Creek site.

Landscaping and Lighting

Similar to existing uses at the UCLA LAL, exterior lighting would be provided at ground level, as necessary, for security, safety, and wayfinding. New landscaping would consist of native species, ground covers and low shrubs.

Brush Management

As previously identified, the UCLA LAL, including the Project sites, is within a VHFHSZ in a SRA. As such, brush management activities directed by the Campus Fire Marshal would be conducted in accordance with CalFire requirements, and in accordance with the California Building Code (CBC) and California Fire Code (CFC). Notably, a defensible space of 100-feet from each side and from the front and rear of the proposed buildings would be maintained within the UCLA LAL property. The defensible space clearance would be maintained in two distinct zones: Zone 1 and Zone 2. Zone 1 extends 30 feet out from each building/structure or to the property line, whichever comes first, and generally requires the removal of dead and dying vegetation and trees, and removal of flammable vegetation that could catch fire, which are adjacent to or under combustible features. Zone 2 extends from 30 feet to 100 feet from the building (but not beyond the property line), and involves the creation of horizontal and vertical spacing among shrubs and trees using the “Fuel Separation” method, the “Continuous Tree Canopy” method or a combination of both. With both of these methods, the following standards apply:

- Dead and dying woody surface fuels and aerial fuels shall be removed. Loose surface litter (e.g., fallen leaves/needles, twigs, bark, cones, small branches) shall be permitted to a maximum depth of 3 inches.
- Cut annual grasses and forbs down to a maximum height for 4 inches.
- All exposed wood piles must have a minimum of 10 feet of clearance, down to bare mineral soil in all directions.
- “Ladder fuels” up to 6-feet in height at existing trees inside the defensible area would be removed.

Sustainable Building Features

The Project would be implemented in compliance with the UC Policy on Sustainable Practices. Leadership in Energy and Environmental Design (LEED™) is a green building rating system that contains prerequisites and credits in five areas: (1) environmentally sensitive site planning; (2) water conservation; (3) energy efficiency; (4) conservation of materials and resources; and (5) indoor air quality. A minimum standard of a LEED for New Construction (NC) Silver rating has been established for applicable UC projects, with a target for LEED Gold, including each of the structures proposed as part of the Project. To achieve this rating, the design, construction, and

operation of the Project would adhere to CalGreen Code requirements, would participate in applicable Savings by Design Conservation Programs, and would incorporate a series of green building strategies including, but not limited to, the following required features:

- Outperforming CBC Title 24 energy efficiency requirements, that are in effect at the time of building design, by 20 percent;
- Selecting water fixtures (e.g., taps, toilets, shower heads, and other fixtures) to achieve a reduction in water demand and increase water efficiency;
- Including recycled content construction materials and regional construction materials in Project design to reduce the effects of resource consumption; and
- Restricting use of natural gas for space and water heating.

Utility Infrastructure

The Willow Creek Staff Housing and Cedar Suites buildings would involve the installation of onsite utility infrastructure, which would connect to existing utilities (domestic water, sewer, storm drains, electrical, and telecommunications systems) that are currently located within or adjacent to the sites (refer to Figure 13). No new or expanded utilities would be required off-site. The final sizing and design of the required utility infrastructure would occur during final design. Following is a description of proposed utility systems:

- **Water.** Water service to the UCLA LAL is provided by the Lake Arrowhead Community Services District (LACSD). There is a 6-inch water main south of the Willow Creek and Cedar Suites sites, which connects to an existing 8-inch water main under Willow Creek Road. Two-inch water laterals connect existing uses to the existing 6-inch water main. Existing laterals would be removed and a new 2-inch lateral water line would be installed to serve the proposed Willow Creek Staff Housing building. The proposed Cedar Suites would connect via a new 2-inch branch service lateral off the existing 6-inch water main with new 1-inch individual connections to each of the 2 new buildings. The Willow Creek and Cedar Suites buildings would also be sprinklered.
- **Sewer.** The LACSD also provides wastewater services to the UCLA LAL and there is an existing 8-inch sewer main under Willow Creek Road. The proposed Willow Creek Staff Housing building would tie into an existing manhole in Willow Creek Road via a single 8-inch house connection into the existing manhole. The proposed Cedar Suites would include removal of the existing 6-inch sewer lateral that serves Cedar Lodge and connects to the existing sewer manhole in Willow Creek Road, and replacement of this sewer line with a new 6-inch sewer lateral. The proposed 6-inch lateral would serve both buildings with a second 6-inch sewer lateral from the northern building that would connect to the proposed lateral extension.
- **Drainage and Water Quality.** As further discussed in the Hydrology and Water Quality section of this IS, the Willow Creek and Cedar Suites sites are divided into three drainage areas (A-1, A-2, and A-3). The existing Cedar Lodge is located in the A-1 drainage area and storm water drains to an 8-inch corrugated metal pipe (CMP) culvert outlet that outlets to the adjacent parking area. The existing parking lot and maintenance building are in subarea A-2, and the vegetated hillside is in subarea A-3. These areas sheet flow into the Willow Creek Road right-of-way, and then into the existing northerly catch basin. The existing catch basin in Willow Creek Road routes all surface runoff via a 36-inch culvert under Willow Creek Road ultimately discharging into Willow Creek to the east.

Source(s): Fuscoe Engineering (10-22-2021)

Figure 13

Not to Scale

Willow Creek Staff Housing and Cedar Suites Schematic Utility Plan

The Project would maintain the same drainage pattern and subareas to convey excess stormwater to Willow Creek Road. New onsite storm drains and catch basins would be installed and would route stormwater to the existing catch basin. A drainage channel may be installed north and northwest of the proposed Willow Creek Staff Housing building to capture overflow runoff in the event that the catch basin becomes clogged, which occurs under existing conditions.

The Project is required to meet Low Impact Development (LID) Best Management Practice (BMP) requirements. Due to site conditions that preclude infiltration, harvest, and use LID BMP strategies, it is anticipated that a volume-based planter biofiltration BMP system or proprietary flow through biofiltration BMP would be installed. Pursuant to the 2010 Municipal Separate Storm Sewer System Permit (MS4 Permit), adopted by the Santa Ana Regional Water Quality Control Board (RWQCB), and issued to San Bernardino County, if all BMP solutions are infeasible, the Project may consider San Bernardino County's fee in-lieu program. In addition to structural BMPs, the Project would implement non-structural BMPs at the Project site related to maintenance and use of parking areas; education and training; and monitoring and maintenance of structural BMPs.

- **Electricity and Telecommunications.** Southern California Edison (SCE) provides electric service to the Willow Creek and Cedar Suites sites via overhead cables and an existing pole at the northeast corner of the Willow Creek site. Electrical service provided by SCE would be increased to accommodate the new construction, and would be sourced from the same SCE pole, and would extend underground from the pole to the new building service connections. Telecommunication Services are provided by Spectrum/Charter via a hard-line connection to the main server in the Main Lodge. Because the UC does not allow the use of natural gas for water heating, an electric heat pump water heater and storage tank would be provided as part of the Project.

Construction Activities

For purposes of analysis, it is estimated that construction of the Willow Creek Staff Housing component of the Project would be initiated in July 2022 and extend through May 2023 (approximately 11 months). Following completion of the Willow Creek Staff Housing building, demolition of Cedar Lodge and construction of the Cedar Suites would be initiated. It is estimated that construction of the Cedar Suites component of the Project would be initiated in May 2023 and extend to March 2025 (approximately 23 months). Construction activities would occur Monday through Friday, with the exception of federal holidays.

The physical impact area for the Willow Creek Staff Housing and Cedar Suites components of the Project is approximately 0.8-acre. In addition, there would be site adjacent offsite impacts associated with work in the public right-of-way along Willow Creek Road (for utility connections, curb construction and replacement, and driveway access).

Initial demolition activities would include the removal of the existing maintenance building, prefabricated shed, and adjacent surface parking lot. The required earthwork/grading would be minimal due to the relatively flat nature of the Project site. A limited amount of excavation would be required to accommodate a storm drain channel north and northwest of the building. Additionally, a new retaining wall approximately 6 feet high would be installed on the west side of the building at the bottom of the slope between the Willow Creek site and Cedar Suites site, and would replace the existing retaining wall that is approximately 2 feet high.

Following completion of the Willow Creek Staff Housing building, the existing Cedar Lodge would be demolished and the new Cedar Suites would be constructed. A conceptual topography

analysis for the Cedar Suites is provided in Figure 14. As shown, the building sites would be excavated; however, there would be minimal changes to the overall topography. There would be approximately 1,110 cubic yards (cy) of cut and 405 cy of fill, with a net cut of approximately 705 cy.

In addition to the construction area, construction staging areas are needed to receive, lay down, and prepare materials for use during construction. The construction staging area for the Willow Creek and Cedar Suites sites would be located within the UCLA LAL primarily at the existing parking lot across Willow Creek Road, UCLA LAL leases from the Lake Arrowhead Association, and additionally at the existing Maintenance and Guestrooms yards (Facility 1 and Facility 2) to the north of the Willow Creek site.

Depending on the construction phase, implementation of the Project would require common equipment, such as a backhoe, front loader, bobcat, excavator, forklifts, compressors, concrete trucks and pumps, and cement and mortar mixers. Because of the limited size of the site, the number of pieces of equipment on site at any given time would be limited.

Operations

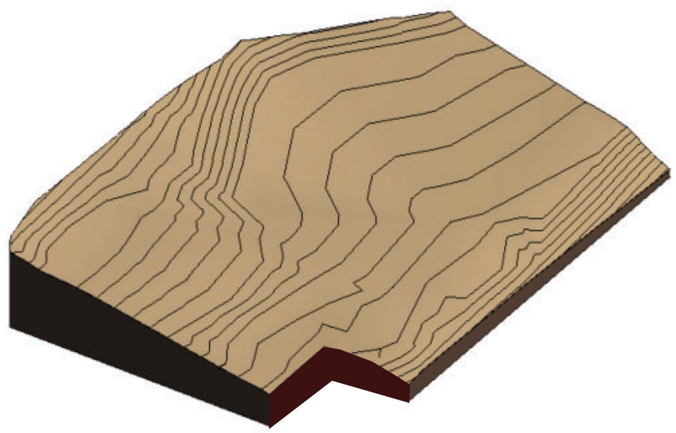
The Willow Creek Staff Housing component of the Project would provide up to 54 replacement staff beds and replacement meeting space and would not increase the total number of staff at the UCLA LAL, or increase operational activities. The existing maintenance facility operations at the Willow Creek site would be housed at the adjacent facilities building to the north.

As discussed above, the new Cedar Suites would result in a net increase of 12 suites. As designed, adjoining access would be provided between adjacent suites. As such, the Cedar Suites would operate more like 6 suites versus 12 during the peak periods. The 12 individual suites are anticipated to provide lodging to guests year-round. During the Summer peak period (i.e., Memorial Day through Labor Day) and major holidays (i.e., the week of Thanksgiving, two weeks of Christmas/New Year's and selected 3-day weekends), the suites would be occupied as part of the ongoing UCLA LAL Bruin Woods program and would be available to University affiliates only. The Bruin Woods program is an all-inclusive resort experience where guests stay for one week (Saturday afternoon to Saturday morning) and seldom leave the facility, if at all. When not being used for the Bruin Woods Program, the UCLA LAL is available for conferences and the new Cedar Suites would also be available for the conference program. Conference attendees also rarely leave the facility, if at all. Due to the loss of bookings as a result of the COVID-19 pandemic, and to keep the UCLA LAL financially viable, UCLA has opened the facility to non-University affiliates (except when the facility is being used for the Bruin Woods program). It is estimated that 75 percent of these non-summer bookings would be associated with conferences, and the remaining 25 percent of the bookings would be for individual travelers. The proposed Cedar Suites would operate the same way. The Cedar Suites component of the Project would not require an increase in the number of employees at the UCLA LAL.

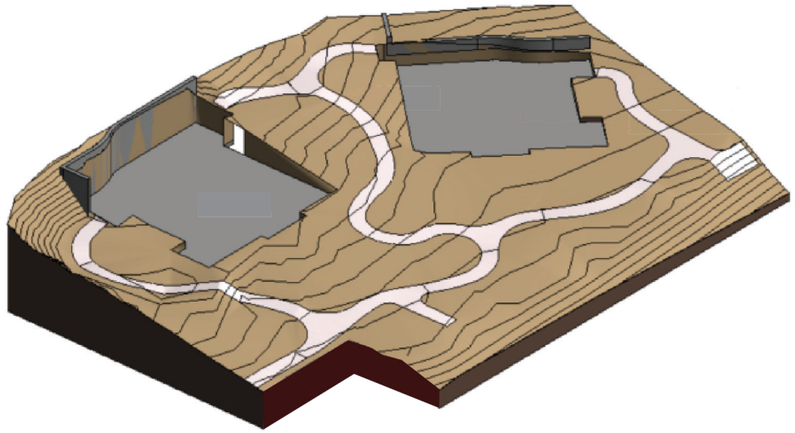
Glamping

Buildings

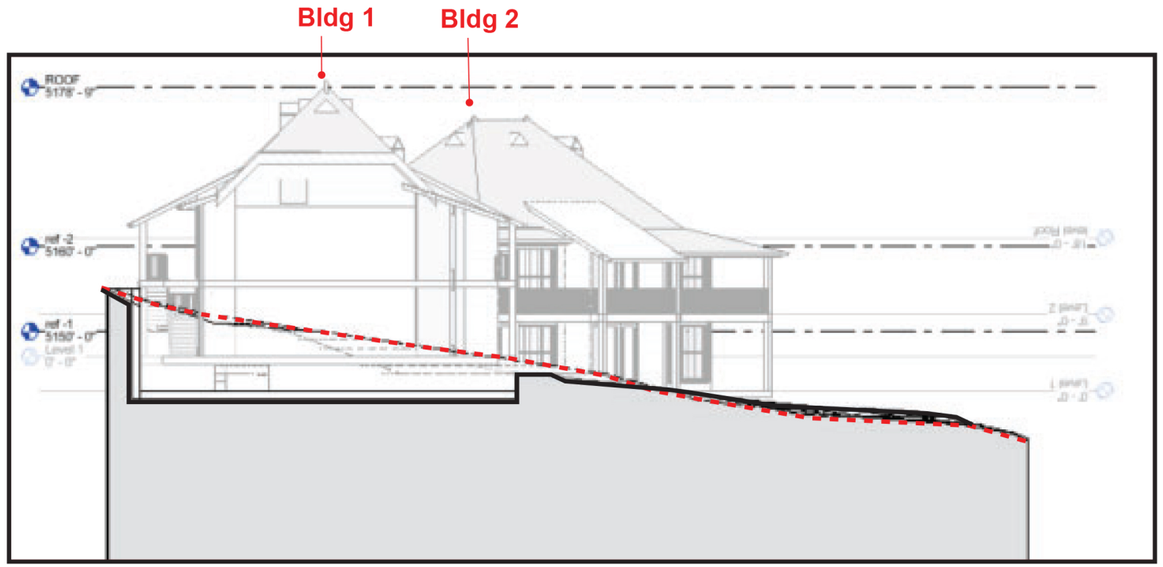
The Glamping component of the Project would involve the installation of 10 prefabricated cabins on in-situ constructed foundations and decks located along the existing trail that connects the ball field and the existing Yurt deck, and the construction of two restroom facilities (refer to the conceptual site plan provided on Figure 15). The proposed cabins would be approximately 200 sf each (16 feet by 12.5 feet), and 11.5 feet tall and would be constructed on 300-sf (24 feet by 12



EXISTING TOPO



PROPOSED TOPO



SECTION THROUGH BLDG-1

Source(s): Hornberger + Worstell (10-26-2021)

Figure 14

Not to Scale

Cedar Suites Conceptual Topography Analysis

feet) decks supported above grade by 4 piers. Building elevations and platform plans are provided on Figure 16 and conceptual rendering are provided on Figure 17. The restroom facilities would be 275 sf and located at each end of the existing trail, near the existing ball field and Yurt deck.

Circulation and Parking

As shown on Figure 15, primary access to the Glamping facilities would be provided via an existing asphalt paved service road north of the Glamping site, with accessible drop-off areas at each of the restroom buildings. A portion of the existing trail near the western restroom building would be paved and the two adjacent cabins would be accessible. The remainder of the existing trail extending through the Glamping site would be retained to provide access to the remaining cabins and to the existing system of trails and pedestrian pathways. UCLA LAL would transport guests that need assistance, to the Glamping cabins. Other guests would walk to the cabins via the existing system of recreation trails.

Landscaping and Lighting

Similar to existing uses at the UCLA LAL, exterior lighting would be provided at the proposed structures and along the access road/trail, as necessary, for security, safety and wayfinding. The cabins would also have interior lighting.

Brush Management

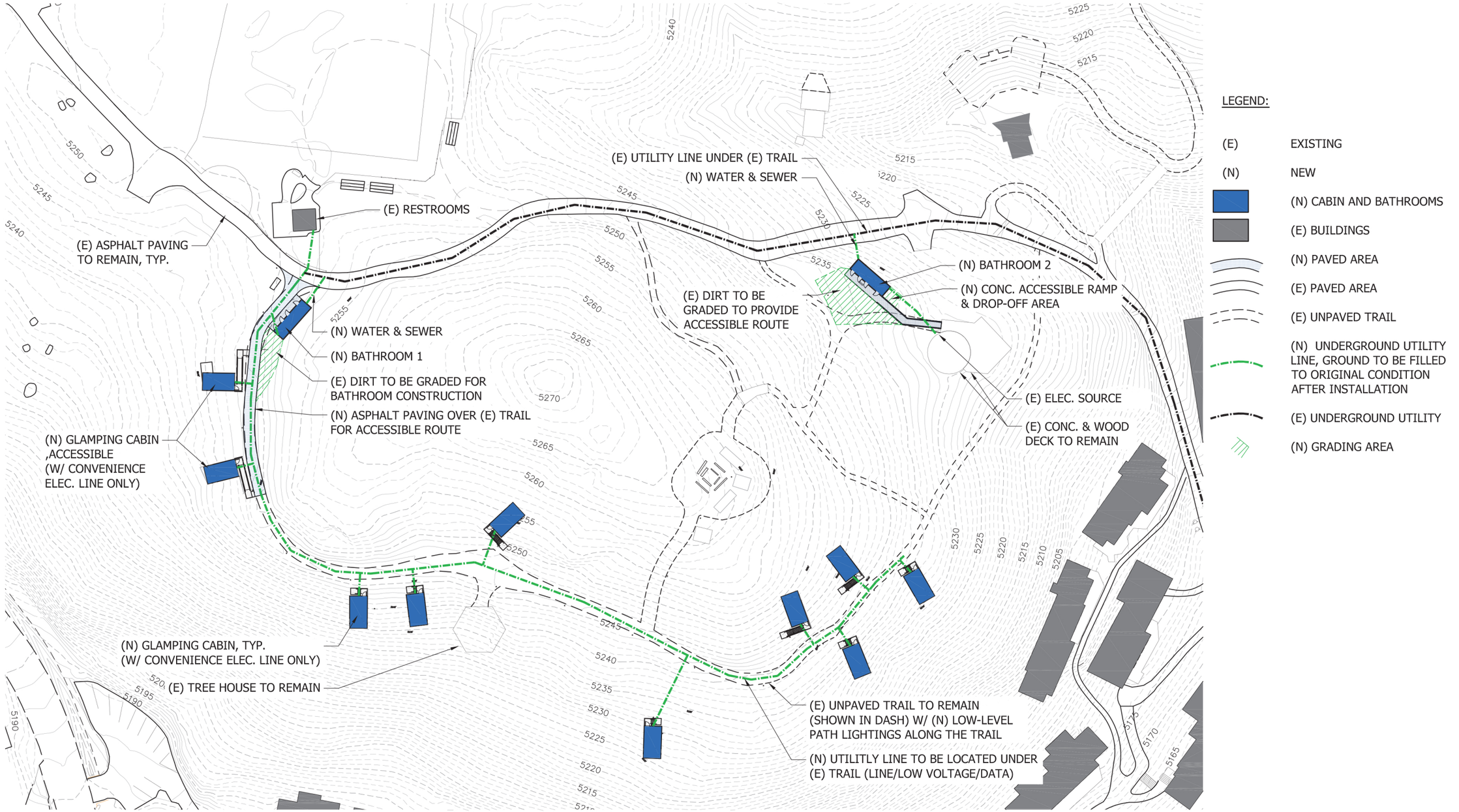
As with the Willow Creek Staff Housing and Cedar Suites buildings described above, brush management activities directed by the Campus Fire Marshal would be conducted in accordance with CalFire requirements, and in accordance with the California Building Code (CBC) and California Fire Code (CFC), as further described in the Wildfire section of this IS.

Sustainable Building Features

As with the Willow Creek Staff Housing and Cedar Suites buildings, the proposed Glamping cabins would be implemented in compliance with the UC Policy on Sustainable Practices and Guidelines. Although the Glamping component of the Project does not meet the USGBC minimum threshold for scope and square footage to qualify as a LEED project, it would also be designed to a LEED Silver minimum equivalent, to be approved by UCLA Capital Programs and UC Office of the President. To achieve this equivalent rating, the design, construction, and operation of the Project would still be required to adhere to CalGreen Code requirements, would still participate in applicable Savings by Design Conservation Programs where applicable, and would still be required to exceed Title 24 energy use restrictions by 20 percent. The Project would incorporate a series of passive green building strategies, including high-performance insulation and glazing. Energy use modeling will be performed for high- and low-temperature days, to determine Energy Use Intensity (EUI) and appropriate specifications for insulation and glazing. The Project EUI would also be used to determine the electricity required for heating on low-temperature days in order to quantify solar panel needs to achieve net-zero energy in the future (solar power is not required and would not be a part of the current Project).

Utility Infrastructure

The Glamping component of the Project would involve the installation of onsite utility infrastructure, which would connect to existing utilities (domestic water, sewer, electrical, and telecommunications systems) that are currently located under the existing trail north of the site or in the vicinity (refer to Figure 15). Following is a description of proposed utility systems:

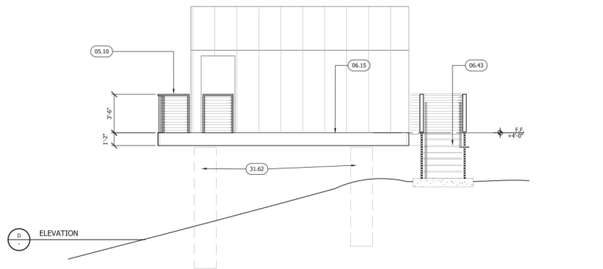


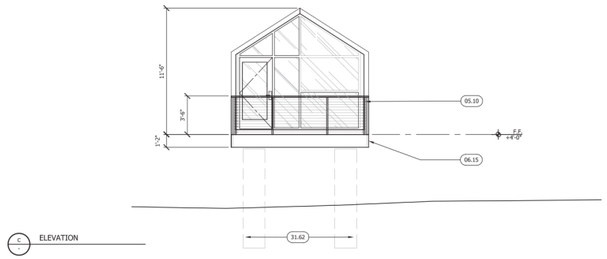
Source(s): UCLA (September 2021)

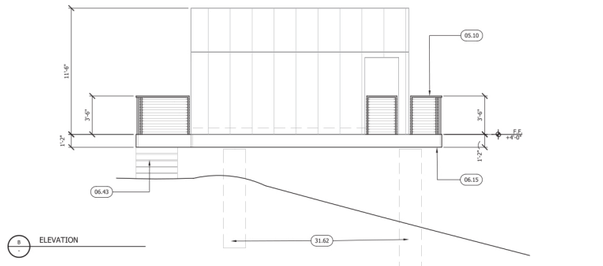
Figure 15

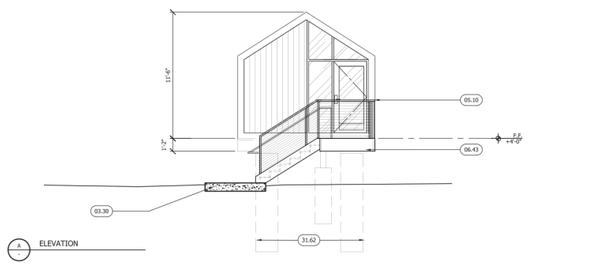
Not to Scale

Glamping Facility Conceptual Site Plan

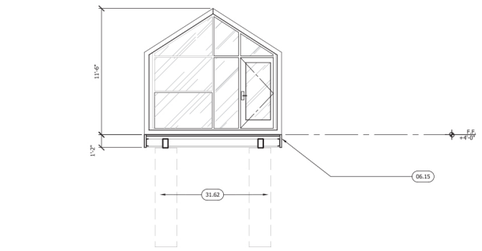


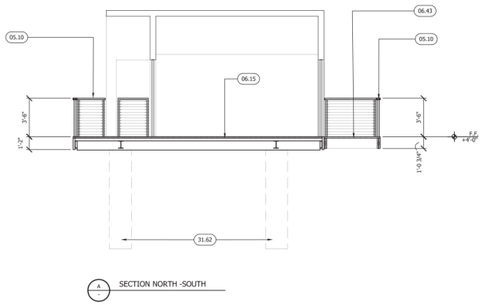




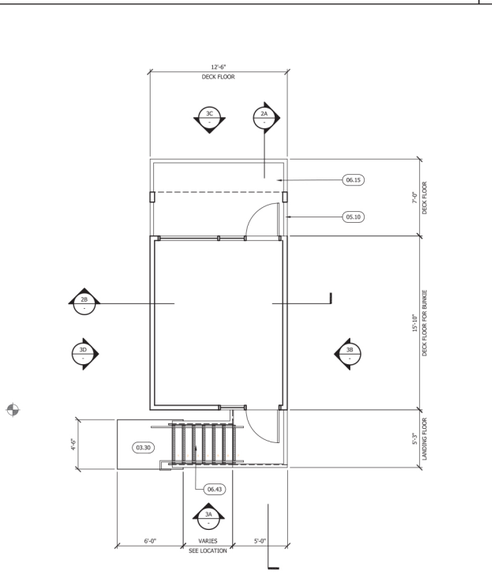


PLATFORM ELEVATIONS | SCALE: 1/4"=1'-0" | 3





PLATFORM SECTIONS | SCALE: 1/4"=1'-0" | 2



TYPICAL PLATFORM PLAN | SCALE: 1/4"=1'-0" | 1

GENERAL NOTE:

a. CONTRACTOR TO FIELD SURVEY AND VERIFY EXISTING CONDITIONS. NOTIFY THE UNIVERSITY REPRESENTATIVE OF DISCREPANCIES.

b. SEE MECHANICAL, ELECTRICAL, PLUMBING AND STRUCTURAL DRAWINGS FOR NEW WORK.

c. LOCATIONS OF THE EXISTING UTILITIES ARE APPROXIMATE. THE CONTRACTORS SHALL BE RESPONSIBLE FOR DETERMINING ACTUAL LOCATION.

d. CONTRACTOR TO UNCOVER AND MARK UTILITY LINES BEFORE CONSTRUCTION.

e. CONTRACTOR SHALL BEAR ALL RESPONSIBILITY AND COST OF REPAIR OR REPLACEMENT OF EXISTING UTILITIES, DAMAGED OR INTERRUPTED AS A RESULT OF THIS CONSTRUCTION PROJECT.

f. CONTRACTOR SHALL NOTIFY UNIVERSITY REPRESENTATIVE OF ANY DAMAGED OR INTERRUPTED UTILITIES IMMEDIATELY.

g. CONTRACTOR SHALL NOTIFY UNIVERSITY REPRESENTATIVE PRIOR TO BEGINNING WORK.

NOTES:

03.30 CONCRETE STAIR LANDING, SEE STRUCT. DWG FOR DETAIL.

05.10 GUARDRAIL ASSEMBLY, ATTACHED TO SIDE OF DECK, SEE X/X FOR DETAIL.

06.14 WOOD STRUCTURE. SEE STRUCT.DWG.

06.15 BALAU WOOD DECKING MATCH STAIN COLOR TO (E) DECKING BY CONDOLETS; SEE STRUCT. DWG.

06.43 WOOD STAIRS, SEE STRUCT. DWG. NUMBER OF STEPS VARIES PER EACH DECK LOCATIONS. SEE SITE PLANS FOR LOCATION OF STAIRS AND NUMBER OF STEPS.

31.62 CONCRETE FOUNDATION, SEE STRUCT. DWG.

Source(s): C & T Structural Engineering Consultants (07-05-2021)

Figure 16

Not to Scale

Glamping Structure Elevations and Platform Plans

PROPOSED UNIT

PROPOSED RENDERING FOR REFERENCE

PROPOSED RENDERING FOR REFERENCE

Source(s): UCLA (September 2021)

Figure 17

Not to Scale

Conceptual Glamping Structure Renderings

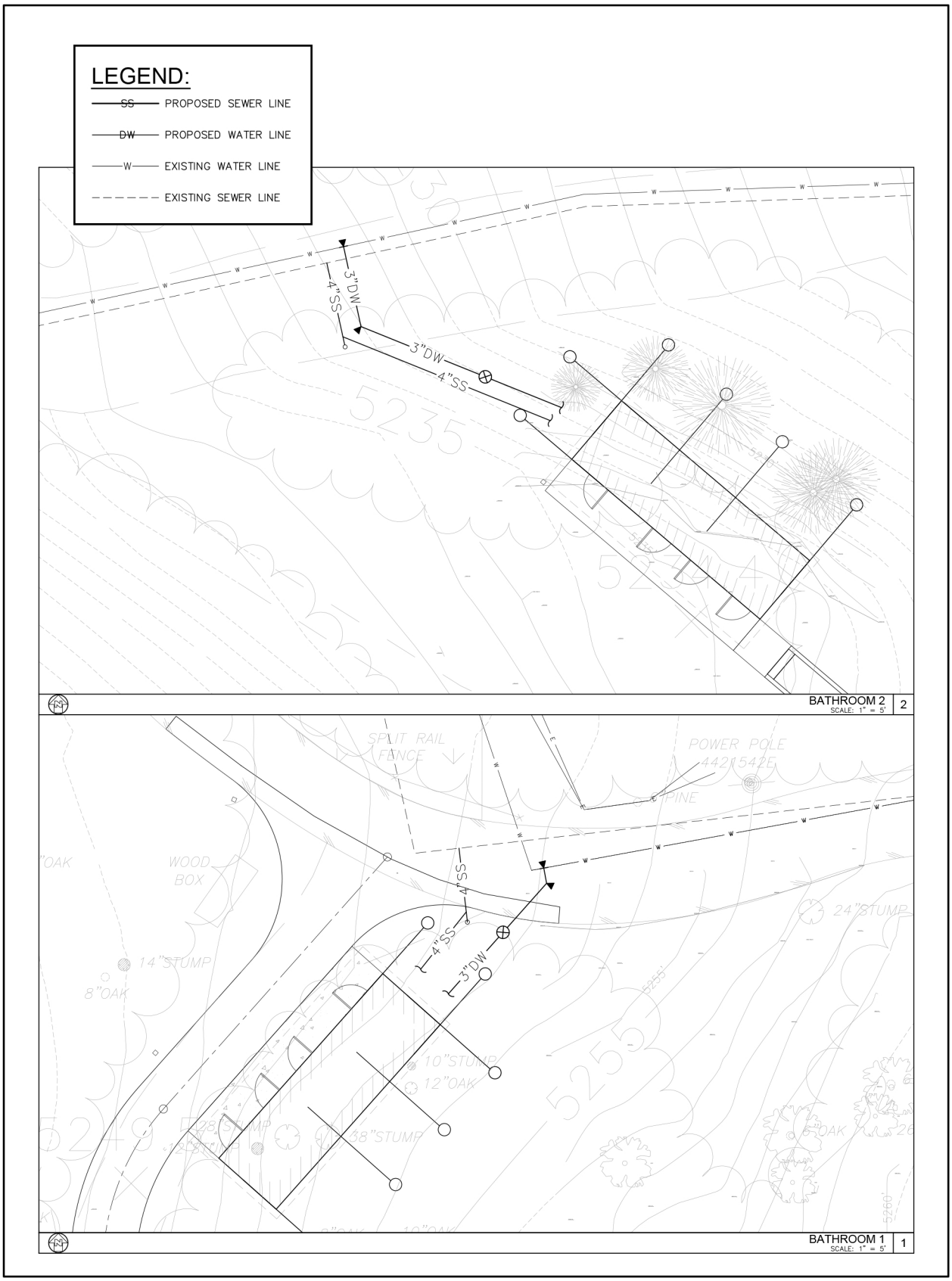
- **Water.** There is an existing 3-inch water lateral that serves the existing restroom adjacent to the ball field. This line branches off the existing 2-inch onsite private water lateral, which connects to the existing public 8-inch water main in Willow Creek Road at a vault southeast of the Glamping site (refer to Figure 18). Two new 3-inch branch service laterals would be installed off the existing onsite private 3-inch lateral to service the two restrooms. Water service would not be provided to the proposed cabins.
- **Sewer.** There is an existing sewer lateral servicing the existing restroom adjacent to the ball field, which is served by a 4-inch sewer lateral that connects to an existing 4-inch sewer lateral eventually connecting to a public sewer manhole and 8-inch public sewer line in Willow Creek Road. Two additional 4-inch sewer laterals would be installed to serve the two new restroom buildings and would connect to the existing 4-inch sewer lateral (refer to Figure 18). Sewer service would not be provided to the proposed cabins.
- **Drainage and Water Quality.** As further discussed in the Hydrology and Water Quality section of this IS, the flow generated from the eastern portion of the Glamping site drains towards the public right-of-way (Willow Creek Road) which then flows north into existing catch basins located along the road. The two existing catch basins route the runoff via a 24-inch CMP culvert located by the existing tennis courts and a 36-inch CMP culvert located northeast of the site under Willow Creek Road ultimately discharging into Willow Creek to the east.

  The western portion of the Glamping site flows towards West Shore Road into an asphalt gutter located along the road which connect to several CMP that routes the surface runoff through the existing site and vegetative swales and ultimately south towards a culvert located at the intersection of North Shore Road and Willow Creek Road. The existing culvert drains the surface runoff towards the southern portion of Willow Creek, which is divided by a dam structure that separates runoff between flowing south and north. The culvert routes the flow south into Lake Arrowhead.

  The Glamping component of the Project would maintain the same drainage pattern and subareas to convey excess storm water runoff generated by the eastern portion of the site to Willow Creek Road and storm water runoff generated western portion of the site into the existing culverts. As with the Willow Creek Staff Housing and Cedar Suites components of the Project, the Glamping component is required to meet LID BMP requirements. Due to site conditions that preclude infiltration, harvest, and use LID BMP strategies, it is anticipated that a volume-based planter biofiltration BMP system or proprietary flow through biofiltration BMP would be installed. If all BMP solutions are infeasible, the Project may consider San Bernardino County's fee in-lieu program. In addition to structural BMPs, the Project would implement non-structural BMPs at the Project site.
- **Electricity and Telecommunications.** There is existing electric and telecommunications infrastructure under the existing trail north of the site, and extending to the existing yurt in the eastern portion of the site. Electric and telecommunication service to the proposed cabins would be provided through installation of infrastructure under the trail that extends through the site, and a connection to the existing lines. Consistent with UC requirements, no natural gas would be used.

Construction Activities

For purposes of analysis, it is estimated that construction of the Glamping facility would be initiated in October 2022 and extend through May 2023 (approximately 8 months). This construction period would overlap with the construction period for the Willow Creek Staff Housing component of the



Source(s): VCA Engineers, Inc.

Figure 18

Not to Scale

Glamping Schematic Water and Sewer Plan

Project. Construction activities would occur Monday through Friday, with the exception of federal holidays.

The physical impact area for the Glamping component of the Project is approximately 0.4-acre, including areas that would be impacted during construction of roadway/trail improvements and installation of utility infrastructure. A limited amount of grading would be required to prepare building pads for the restrooms, to prepare the slopes for the piles to support the cabin platforms, and to complete the adjacent access improvements. The piles to support the platforms would be extended to the underlying bedrock (up to 10 feet below the ground surface). Trenching for the installation of utility infrastructure would occur along the existing trail or other areas that have been previously disturbed.

In addition to the construction area, construction staging areas are needed to receive, lay down, and prepare materials for use during construction. The construction staging area for the Glamping site would be located at the existing ball field, which is unused during the conference season.

Depending on the construction phase, implementation of this component of the Project would require common equipment, such as a loader or bobcat (for grading at the accessible cabins and restrooms, tripod-type drilling rigs for the piers, concrete trucks and pumps, and cement and mortar mixers. Because of the limited size and accessibility of the site, the number of pieces of equipment on site at any given time would be limited. Due to the lack of existing electric service to much of the site, there may also be a need for use of temporary generators.

Operations

The Glamping component of the Project would provide 10 guest cabins with double occupancy. There would be no increase in the number of staff at the UCLA LAL. Similar to the Cedar Suites discussed above, the Glamping facilities would be available as part of the UCLA Bruin Woods program, and during conferences. Additionally, the cabins would be available for use by non-University affiliates (except when the facility is being used for the Bruin Woods program). It is estimated that 10 percent of off-season bookings would be associated with conferences, and the remaining 90 percent of the bookings would be for individual travelers.

6. ANTICIPATED DISCRETIONARY APPROVALS

Under the delegated-authority process, The Regents delegate approval authority to the Chancellor for projects that meet certain criteria. The Project and IS/MND would be considered by the UCLA Chancellor for approval. UCLA and the responsible agencies identified below are expected to use the information contained in this IS for consideration of approvals related to and involved in the implementation of the Project. This IS/MND has been prepared to inform all State, regional, and local government approvals needed for construction and/or operation of the Project, whether or not such actions are known or are explicitly listed. Although analyzed together in this IS, each Project component would have separate approvals. Anticipated approvals required to implement the Project include, but are not limited to, those listed below.

University of California, Los Angeles – Chancellor

- Adoption of the Final IS and MND
- Approval of the Willow Creek Staff Housing Project
- Approval of the Cedar Suites Project
- Approval of the Glamping Project

Responsible Agencies

- **State Water Resources Control Board.** Coverage under the statewide general National Pollutant Discharge Elimination System (NPDES) for stormwater discharges from construction sites.
- **San Bernardino County.** Coordination and compliance with guidelines for construction activities within County rights-of-way, including utility connection(s) and street improvements along Willow Creek Road.
- **Lake Arrowhead Community Services District (LACSD).** Approval of utility connections, if needed.

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

IV. DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	☐
I find that although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	☒
I find that the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	☐
I find that the Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	☐
I find that although the Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Project, nothing further is required.	☐

DocuSigned by:
Edward Paek
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Signature

12/14/2021
Date

Edward Paek, Environmental Planner, Capital Planning and Finance

UCLA Capital Programs
For

V. EVALUATION OF ENVIRONMENTAL IMPACTS

The University has defined the column headings in the IS checklist as follows:

A) "**Potentially Significant Impact**" is appropriate if there is substantial evidence that the project's effect may be significant even with the incorporation of LRDP mitigation measures and campus programs, practices, and procedures identified in the LRDP EIR. If there are one or more "Potentially Significant Impacts" a Project EIR will be prepared.

B) "**Less Than Significant With Project-level Mitigation Incorporated**" applies where the incorporation of project-specific mitigation measures will reduce an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All project-level mitigation measures must be described, including a brief explanation of how the measures reduce the effect to a less than significant level.

C) "**Less Than Significant Impact**" applies where the Project will not result in any significant effects. The project impact is less than significant without the incorporation of project-level mitigation.

D) "**No Impact**" applies where a project would not result in any impact in the category or the category does not apply. "No Impact" answers need to be adequately supported by the information sources cited, which show that the impact does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

IMPACT QUESTIONS AND RESPONSES

1. AESTHETICS

As described previously in Section II, Project Description, of this IS, relevant elements of the Project related to aesthetics/visual character include: redevelopment of the Willow Creek site with a new replacement staff housing building, the redevelopment of the Cedar Suites site with two condolets, and the development of the Glamping site with 10 new cabins on platform structures and two new restroom buildings. The proposed buildings would feature a Norman English architectural design that compliments the surrounding structures within the UCLA LAL. Landscape treatments would be planted at the Project sites, and exterior lighting would be provided for pedestrian safety and site security.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed. Changes have been made so the stated requirement better applies to the Project, which is off campus.

PP 4.1-1(a) *The design process shall evaluate and incorporate, where appropriate, factors including, but not necessarily limited to, building mass and form, building proportion, roof profile, architectural detail and fenestration, the texture, color, and quality of building materials, focal views, pedestrian and vehicular circulation and access, and the landscape setting to ensure preservation and enhancement of the visual character and quality of the ~~campus and the~~ surrounding area. Landscaped open space (including plazas, courts, gardens, walkways, and recreational areas) shall be integrated with development to encourage use through placement and design.*

MM 4.1-3(a) *Design for specific projects shall provide for the use of textured non-reflective exterior surfaces and non-reflective glass.*

MM 4.1-3(b) *All outdoor lighting shall be directed to the specific location intended for illumination (e.g., roads, walkways, or recreation fields) to limit stray light spillover onto adjacent residential areas. In addition, all lighting shall be shielded to minimize the production of glare and light spill onto adjacent uses.*

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in PRC Section 21099:				
a) Would the project have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

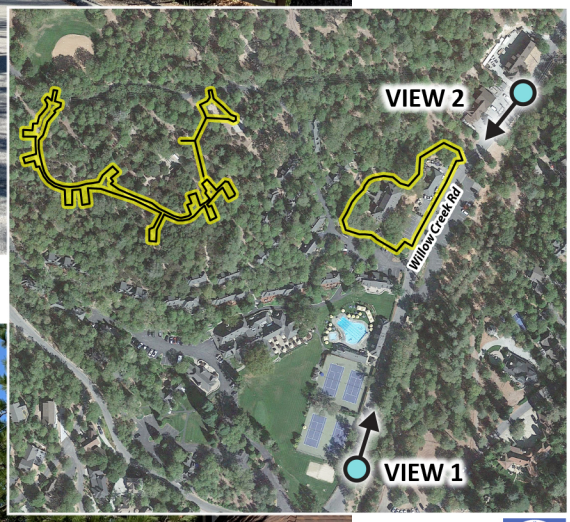
Discussion

Scenic vistas are publicly accessible viewpoints. The San Bernardino Countywide Plan Program Environmental Impact Report (Countywide Plan PEIR) indicates that the County's Mountain Region offers scenic views of mountains, prominent ridgelines, forested landscapes, and lakes but there are no growth areas planned for the Mountain Region. Growth would largely consist of individual single-family homes or other small developments that would not be expected to combine and block or otherwise adversely affect notable scenic views or vistas. In many cases, such development would occur in the region's forested areas, where scenic vistas are already fragmented by trees and topography. (County of San Bernardino, 2020a) .

The Project sites are located within the Lake Arrowhead Community, in the County of San Bernardino scenic Mountain Region. As illustrated in the site photographs presented in Figure 19 through Figure 23, due to the topography, location, intervening development, and mature and dense tree coverage, scenic views from public vantage points that include the Project sites (along Willow Creek Road) are limited to the forested landscape. Lake Arrowhead, which is located approximately 0.2-mile to the south, is not visible, from vantage points along Willow Creek Road near the sites. As illustrated in the site photographs presented on Figures 24 through 26, the Glamping site is located in a sloped wooded area within the UCLA LAL. From certain vantage points on the south facing slopes, there are obstructed scenic views of Lake Arrowhead and surrounding mountains.

View 1

Key Map



View 2

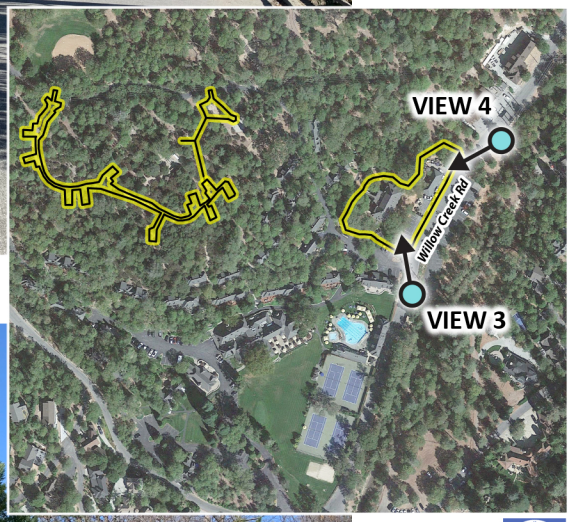
Figure 19

Not to Scale

Site Photos – Views 1 and 2

View 3

Key Map



View 4

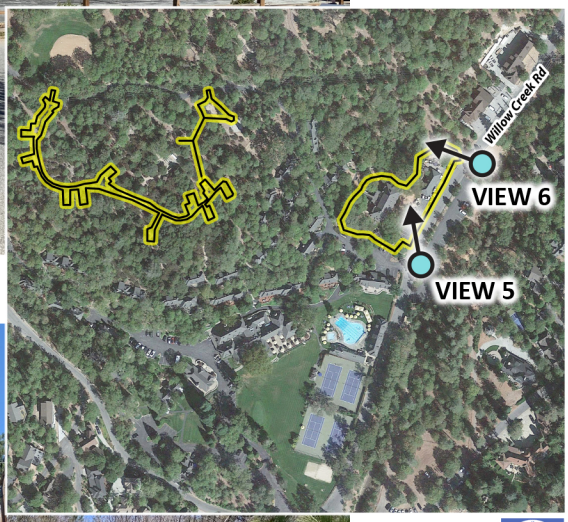
Figure 20

Not to Scale

Site Photos – Views 3 and 4

View 5

Key Map



View 6

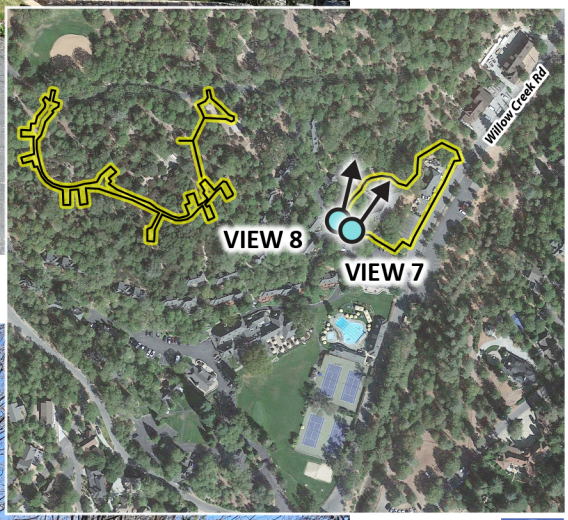
Figure 21

Not to Scale

Site Photos – Views 5 and 6

View 7

Key Map



View 8

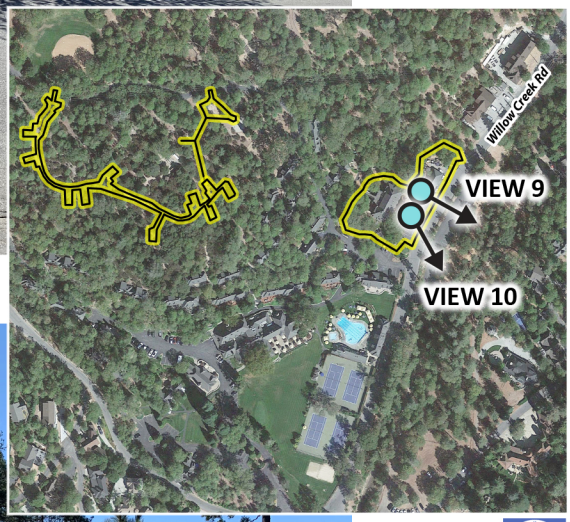
Figure 22

Not to Scale

Site Photos – Views 7 and 8

View 9

Key Map



View 10

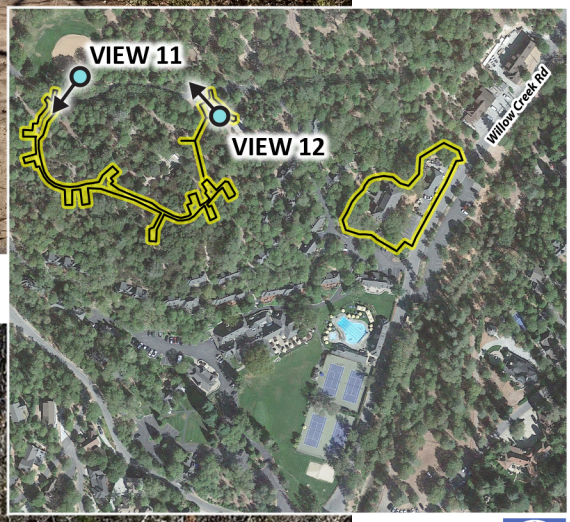
Figure 23

Not to Scale

Site Photos – Views 9 and 10

View 11

Key Map



View 12

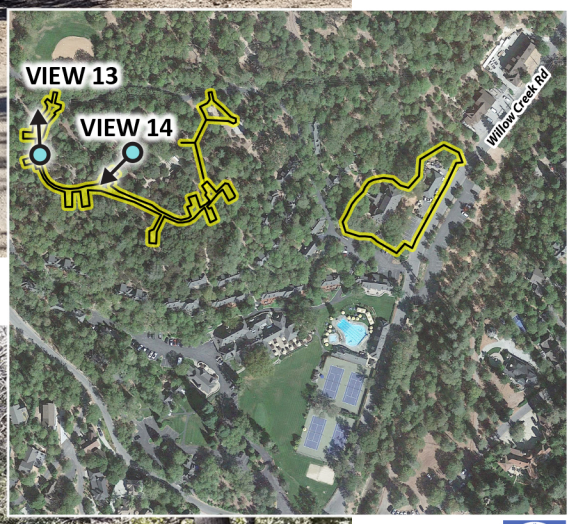
Figure 24

Not to Scale

Site Photos – Views 11 and 12

View 13

Key Map



View 14

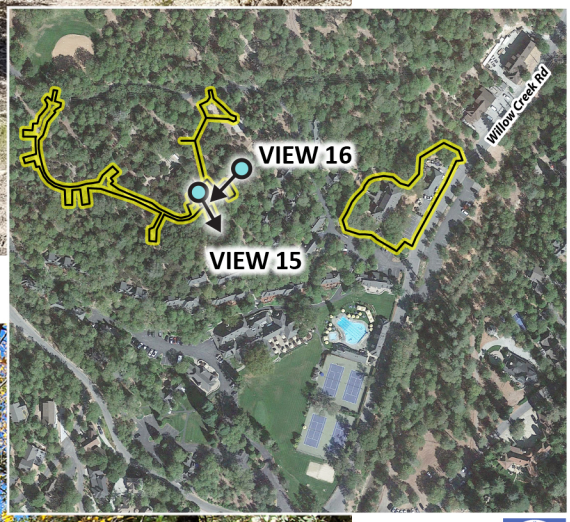
Figure 25

Not to Scale

Site Photos – Views 13 and 14

View 15

Key Map



View 16

Figure 26

Not to Scale

Site Photos – Views 15 and 16

The Willow Creek and Cedar Suites sites are currently developed with the maintenance facility and surface parking along Willow Creek Road, and Cedar Lodge, which is at a higher elevation but still prominently visible from Willow Creek Road. Redevelopment of these sites with the Willow Creek Staff Housing building and Cedar Lodge would not impact scenic views as the forested landscape would be retained, and there would be no impacts to scenic views of the mountains or Lake Arrowhead.

The Glamping site is undeveloped but is an area with established trails and recreational facilities. Due to its location internal to the UCLA LAL, and density of surrounding vegetation, the Glamping cabins and restrooms would not be visible from public vantage points and would not impact scenic views.

Therefore, implementation of the Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant impact on scenic vistas.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

Discussion

There are no officially designated State scenic highways located near the Project sites; the nearest officially designated State scenic highway to the Project site is a portion of State Route (SR)-38 from near State Lane to South Fork Campground, located approximately 21 miles to the southeast (Caltrans, 2021). The Project would not be visible from this roadway due to distance. The nearest eligible State scenic highway is SR-173, which extends north, east and south of Lake Arrowhead, and is approximately 0.25 mile to the north of the Project sites, at its closest point (Caltrans, 2021). Due to distance an intervening topography and mature forest, there are not view of the Project site from SR-173. Therefore, the Project would not substantially damage scenic resources within a State scenic highway and there would be no impact.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

There would be no impact to scenic resources within a state scenic highway.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

Discussion

As discussed in Section II.2, Environmental Setting, of this IS, the Project sites are part of the UCLA LAL. The forest trees and Lake Arrowhead are prominent visual features in the area. Most of the UCLA LAL buildings are clustered in the southern portion of the property, which has a gentle slope and been graded for development, while the northern two-thirds of the property is steep hillside with dense trees and some recreational amenities constructed among the trees. The Willow Creek and Cedar suites sites are in the developed southern portion of the property while the Glamping site is in the northern portion of the property. The Willow Creek and Cedar Suites sites are developed with existing structures, parking areas, and ancillary uses associated with the existing maintenance facility and Cedar Lodge. Other UCLA LAL structures and facilities surround the Project sites to the north, east, and south. Existing buildings at the UCLA LAL, including Cedar Lodge and the maintenance building, have typical elements of the Norman English architectural style, such as steeply-pitched roofs, stone bases or accents, and wood shingle or stucco exterior walls (Page & Turnbull, 2019). The Glamping site is undeveloped and near the existing recreational amenities. Public views of the UCLA LAL are limited to the adjacent public roadways. This includes Willow Creek Road, which is adjacent to and has views of the Willow Creek and Cedar Suites sites. There are no public views of the Glamping site.

While not relevant to the assessment of the quality of public views, private single-family residences surround the UCLA LAL; there are single family residences located east of the Willow Creek site on the east side of Willow Creek. As demonstrated by the site photographs, there is substantial tree coverage between these residences and the Project sites, which serve to obstruct views. Lake Arrowhead and associated private amenities and supporting uses owned and maintained by the Arrowhead Lake Association are located to the south-southeast of the UCLA LAL.

The existing visual character of the Project sites and surrounding areas, as viewed from nearby public vantage points, is depicted in the site photographs provided in Figure 19 through Figure 26, which are briefly described below.

- **Views 1 and 2 – Views of the Project site looking north and south along Willow Creek Road.** These photographs are representative of the views experienced by pedestrians and motorists traveling north and south along Willow Creek Road, immediately east of the Project site. View 1 demonstrates views experienced while traveling north along Willow Creek Road toward the Willow Creek and Cedar Suites sites. As shown, the existing Cedar Lodge building is not visible from this viewpoint as mature trees and intervening UCLA LAL buildings obstruct views. Additionally, the existing surface parking lot and maintenance building are partially visible from the View 1 viewpoint. View

2 demonstrates views experienced while traveling south along Willow Creek Road toward the Willow Creek and Cedar Suites sites. Cedar Lodge and with surface parking lot at the maintenance facility are not visible and views of the maintenance building are partially obstructed by mature trees and the existing on-site wooden fencing. Existing UCLA LAL facility buildings are prominent in the foreground views. Consistent with the mountain environment, mature trees are a focal point in these views. Additionally, other structures associated with the UCLA LAL, utility poles, and transmission lines are visible from public views along Willow Creek Road.

- **Views 3 and 4 – Views of the southeast and northeast areas of the Willow Creek and Cedar Suites Project sites from Willow Creek Road.** These photographs provide additional views of the Project site experienced by pedestrians and motorists traveling north and south along Willow Creek Road closer to the Project sites. View 3 provides views of the southeast corner of the Willow Creek site. From this viewpoint, partial views of the existing Cedar Lodge building are provided. The existing surface parking lot and maintenance building are visible in the middle ground view. View 4 provides views of the northeast corner of the Willow Creek site. From this viewpoint, Cedar Lodge is not visible due to the mature trees and maintenance building. The maintenance building and surrounding fencing is visible. Mature trees are a focal point in these views. Additionally, other structures associated with the UCLA LAL, utility poles, and transmission lines are visible along Willow Creek Road.
- **Views 5 and 6 – Views of the Willow Creek and Cedar Suites Project site from the existing surface parking lot on the opposite side of Willow Creek Road looking west.** These photographs provide closer views of the Project site experienced by pedestrians and motorists adjacent to Project sites. Cedar Lodge and surface parking area adjacent to the maintenance building are prominent focal point in View 5. View 6 provides partial views of the maintenance building and associated facilities. As shown, existing fencing partially obstructs views of the maintenance building and screens views of the maintenance equipment stored on-site. Mature trees continue to be a prominent visual feature, and existing utility pole and transmission lines along Willow Creek Road are also visible.
- **Views 7 and 8 – Views of Cedar Lodge from the surface parking lot to the south.** While not public views, these photographs are intended to demonstrate the visual character of the Cedar Suites site, which is internal to the UCLA LAL. View 7 provides unobstructed views of the existing Cedar Lodge and shows the relationship to the building to the north (connected by a pedestrian bridge), and topography of the site, which slopes to the east down to the Willow Creek site. View 7 shows that there are obstructed distance views of the mountains to the east.
- **Views 9 and 10 – Views from the Project site looking east.** These photographs are representative of views experienced by motorists and pedestrian traveling along Willow Creek Road and looking east toward Willow Creek and private residences to the east of the Creek. In addition to Willow Creek Road and Willow Creek, the existing surface parking area east of Willow Creek Road and mature trees provide a physical and visual buffer between the Project sites and private residence to the east. Mature trees and vegetation are prominent in the background. The mature trees also screen views of the Arrowhead Lake Association Tavern Bay surface parking lot and other associated uses.
- **Views 11 through 16 – Views of the Glamping facility area.** The photographs provided on Figures 24 through 26 are provided to depict the setting for the Glamping component of the Project. These photographs are taken from vantage points within the UCLA LAL property; there are no public views of these sites. As shown the area is undeveloped and

includes various trails and disturbed areas along the trails between the trees. The trees largely obstruct distant views.

The Project site is not in an urbanized area; therefore, potential impacts of the Project under this threshold are assessed based on whether the Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Construction activities would include the demolition of the existing structures on the Cedar Suites and Willow Creek sites and a limited amount of grading. There would not be substantial topographic changes and vegetation removal would be limited to the areas surrounding the proposed buildings, and as necessary for brush management. Construction activities including the use and storage of construction equipment and materials would be visible during the construction period from vantage points along Willow Creek Road; however, the construction sites and staging areas would be screened from public views. Following the completion of construction activities, all construction equipment would be removed from the site. Project-related changes to the visual character of the site and surrounding area during construction would be less than significant due to the temporary nature of construction activities, and limited public views and viewers from Willow Creek Road.

Redevelopment of the Willow Creek and Cedar Suites sites would change the visual character of the sites with the removal of the existing buildings and accessory uses and the introduction of new buildings, and notably the Willow Creek Staff Housing building that would encompass the Willow Creek site and would be a prominent visual feature from vantage points along Willow Creek Road (refer to the conceptual building rendering provided on Figure 10). As shown on the consolidated site plan provided on Figure 2, the new Cedar Suites buildings would be located behind the Willow Creek Staff Housing building. Although new buildings would be introduced and the Willow Creek Staff Housing building would be taller than the existing maintenance building (40-feet high compared to 21-feet high), none of the buildings would exceed the current building elevation of the existing Cedar Lodge, which is the most prominent building at the Project sites. Rather, as shown in Table 1, the top of the existing Cedar Lodge roof is at an elevation of approximately 5,185.4 feet AMSL, and the top of the proposed Willow Creek Staff Housing building would be at an elevation of approximately 5,163 feet AMSL, approximately 22 feet lower than the existing elevation of Cedar Lodge (at the top of the roof).

TABLE 1
SUMMARY OF PROPOSED BUILDING ELEVATIONS

Building	Building Height	Building Elevation
Willow Creek Site		
Existing Maintenance Building	21-feet	5,144 feet AMSL
Proposed Willow Creek Staff Housing Building	40-feet	5,163 feet AMSL
Cedar Suites Site		
Existing Cedar Lodge	36-feet	5,185.4 feet AMSL
Proposed Cedar Suites	40-feet	5,178 feet AMSL

The proposed Willow Creek Staff Housing and Cedar Suites buildings would be designed, in accordance with PP 4.4-1(a), with an architectural style that compliments the architecture of existing buildings featured throughout the UCLA LAL. Notably, the new buildings would complement the existing Norman English aesthetic of the UCLA LAL property, with a steep shingle roof, fieldstone bases and accents, exposed timber trim, and cement plaster exterior finish. Additionally, while there would be select tree/vegetation removal and thinning at and adjacent to the building sites to accommodate construction of the buildings and required brush

management for fire protection, because the sites are already developed, this would not result in a substantial change to the visual character of the area as viewed from public vantage points along Willow Creek Road, which is visually dominated by the forest setting with interspersed development and buildings.

The implementation of the Glamping component of the Project would result in the construction of 10 small cabins on platform decks, two new bathroom facilities, and improvements to the existing trail for accessibility. As previously identified, the Glamping component of the Project is located in a relatively undeveloped area in the northern portion of the UCLA LAL that includes various recreational amenities. The cabin and bathroom facilities have been located on sites that were either previously disturbed or that require a relatively limited amount of earth work and tree removal. Additionally, the proposed cabins and restroom buildings would also be designed to complement the existing architectural style within the UCLA LAL. Further, the Glamping facilities would not be visible from public vantage points.

Therefore, the Project would not anticipated substantially degrade the existing visual character or quality of public views of the site and its surroundings and impacts would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have less than significant impacts related to the existing visual character and quality of the Project site and surrounding area.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion

The UCLA LAL includes existing development and associated uses that include exterior lighting. Other existing sources of light include vehicle headlights along roadways within and near UCLA LAL, and interior building lighting. The type and amount of lighting that would be implemented with the Project would be similar to the lighting generated at existing UCLA LAL facilities, including at the developed Willow Creek and Cedar Suites sites, and exterior lighting in surrounding residential and recreational areas. The additional illumination from the Project would not noticeably increase the intensity of nighttime ambient light from the Project site as compared to existing conditions. Additionally, MM 4.1 3(b), which is incorporated into the Project, requires that lighting be specifically directed to the intended illumination site to prevent spill onto adjacent areas.

Glare is a common daytime phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight. Excessive glare not only restricts visibility but also increases the ambient heat reflectivity (i.e., albedo) in a given area.

Existing potentially reflective surfaces at and in the Project vicinity include windows on buildings and automobiles traveling and parked within the surface parking lots in proximity to the Project site. The Project would not change the location or intensity of potential glare from automobiles. Additionally, consistent with MM 4.1-3(a), glazing and architectural coatings would be minimized, and where necessary for views and ventilation, would be low-e glass, oriented to reduce solar heat gain and direct glare to neighboring buildings. With the incorporation of MM 4.1-3(a), impacts resulting from glare from the Project would be less than significant.

With incorporation of MM 4.3-1(a) and MM 4.3-1(b), the Project would not result in a substantial new source of light or glare and this impact would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would result in a less than significant impact associated with the creation of a new source of substantial light or glare affecting day or nighttime views in the area.

2. AGRICULTURE AND FORESTRY RESOURCES

There are no relevant elements of the Project related to agriculture and forestry resources.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

Discussion

The UCLA LAL, which includes the Project sites, is within an area that is not mapped as part of the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), as confirmed by review of the currently available FMMP Important Farmland Map for San Bernardino County (DOC, 2016). The Project site is currently zoned LA/RS-14M, which permits single-family residential uses on minimum 14,000-sf lots (San Bernardino County, 2021); the Project sites are not zoned for agricultural land and no agricultural activities occur within the UCLA LAL or in surrounding areas. Therefore, the Project would not convert Farmland to nonagricultural uses and no impact would occur.

The Williamson Act Contract enables private landowners to voluntarily enter into contracts with local governments for the purpose of restricting specific parcels of land to agricultural or related

open space use. The UCLA LAL, including the Project sites, is not under a Williamson Act Contract nor are there any within the surrounding area. Therefore, the implementation of the Project would not conflict with a Williamson Act Contract and no impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would result in no impact related to agricultural resources.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

Public Resources Code (PRC) Section 12220(g) defines forest land as "… land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (CA Legislative Info, 2008). PCR Section 4526 defines timberland as "other land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of commercial species used to produce lumber and other forest products, including Christmas trees" (CA Legislative Info, 2012). Government Code Section 51104(g) defines timberland zoned Timberland Production as "an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h)" (CA Legislative Info, 1982).

The Project sites are zoned LA/RS-14M by San Bernardino County. According to the United States Department of Agriculture (USDA), the UCLA LAL, which includes the Project sites, is identified as Non-Forest Service Land (USDA, 2021). Non-Forest Service Land is land that is not identified as a part of the National Forest National Grasslands, Land Utilization Projects, or other Federal land for which the Forest Service has administrative jurisdiction (LII, 1979). Although the Project sites are within a forested area of the San Bernardino National Forest, which is under the jurisdiction of the United States Forest Service, the Project sites are not identified as Forest Land. The Project sites are owned by the UC, which uses the site as a resort/conference facility. As such, the Forest Service would not have administrative jurisdiction over the Project sites. No forest land, or timberland exists on or in the vicinity of the Project site. The implementation of the Project would not result in conflicts with existing zoning for forest land, timberland or timberland zoned

Timberland Production and would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would result in no impact related to forestry resources.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

As addressed in the analysis above, the Project is not located on or in proximity to Farmland or forest land as defined above. The Project is located within the San Bernardino National Forest. Indirect impacts on forest land can occur in two ways: 1) by urban development increasing property values, or extending infrastructure, there by placing pressure on adjacent forest land to convert to non-forest use; or 2) through land use conflicts between the proposed use and the forest use leading to the diminishment of the forest (i.e., reduction of forest land due to deforestation because of development). The lands surrounding the Project are zoned LA/RS-14M. Therefore, the Project would not convert farmland to non-agricultural use and would not convert forest land to non-forest use. No impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would result in no impact related to conversion of agricultural or forest land to non-agricultural or non-forest uses.

3. AIR QUALITY

Relevant elements of the Project related to air quality include the demolition of approximately 10,690 sf of existing buildings and associated parking; construction of the Willow Creek Staff Housing building to replace the existing Cedar Lodge to be demolished; construction of the Cedar Suites buildings to accommodate 12 guest rooms; and installation of infrastructure to serve these buildings. The Project also includes the installation of 10 glamping cabins and associated restrooms, and utility infrastructure. The use of diesel-powered construction equipment would contribute to local and regional emissions (refer to discussion of “Construction Activities” in Section II.5, Proposed Project Components, of this IS). Long-term operational emissions of the

Project would include emissions from vehicles used by the guests, consumer products, and fireplaces.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the Project and are assumed in the analysis presented in this section.

Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the Project, which is off campus.

PP 4.2-2(a) *~~The campus~~**UCLA** shall continue to implement dust control measures consistent with SCAQMD Rule 403—Fugitive Dust during the construction phases of new project development. The following actions are currently recommended to implement Rule 403 and may be quantified in the CalEEMod program:*

- *Minimize land disturbance to the extent feasible.*
- *Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer's specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days).*
- *Apply water three times daily to all active disturbed areas.*
- *Replace ground cover in disturbed areas as quickly as possible.*
- *Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content.*
- *Water active grading sites at least twice daily.*
- *Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period.*
- *All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.*
- *Sweep streets at the end of the day if visible soil material is carried over to adjacent roads.*
- *Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.*
- *Apply water three times daily or chemical soil stabilizers according to manufacturers' specifications to all unpaved parking or staging areas or unpaved road surfaces.*
- *Post and enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.*

PP 4.2-2(b) *~~The campus~~**UCLA** shall continue to require by contract specifications that construction equipment engines will be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction.*

PP 4.2-2(c) *~~The campus~~**UCLA** shall continue to require by contract specifications that construction operations rely on the ~~campus'~~ existing electricity infrastructure rather than electrical generators powered by internal combustion engines to the extent feasible.*

PP 4.2-2(d) *~~The campus~~**UCLA** shall purchase and apply ultra-low VOC architectural coatings with reactivity-adjusted VOC content that meets or exceeds the requirements of SCAQMD Rule 1113, thereby ensuring the limitation of VOCs during construction.*

MM 4.2-2(a) *~~The campus~~**UCLA** shall require by contract specifications that construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than five minutes.*

MM 4.2-2(b) *~~The campus~~**UCLA** shall encourage contractors to utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and low-NOx fuel) to the extent that the equipment is reasonably commercially available and cost effective.*

MM 4.2-2(c) *~~The campus~~**UCLA** shall require by contract specifications that construction-related equipment used on site and for on-road export of soil meet USEPA Tier III certification requirements, as feasible.*

In addition, PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), 4.14-3, and 4.14-9, included in the Utilities and Service Systems section of this IS, require that UCLA continue to implement energy and water conservation measures, which would, in turn, reduce associated air pollutant emissions. PP 4.15-1 included in the Greenhouse Gas Emissions section of this IS requires UCLA to continue to implement provisions of the UC Policy on Sustainability Practices, which would also reduce associated air pollutant emissions.

Air Quality Background

The Project is located within the South Coast Air Basin (SoCAB), which was named as such since its geographical formation is that of a basin with the surrounding mountains trapping the air and its pollutants in the valleys (or basins) below. The SoCAB is characterized by relatively poor air quality. This area includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. The South Coast Air Quality Management District (SCAQMD) is responsible for ensuring that the approximately 10,743 square-mile SoCAB meets the national and State ambient air quality standards. The regional climate within the SoCAB is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity.

Air pollutant emissions within the SoCAB are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point sources and area sources. Point sources are usually subject to a permit to operate from the SCAQMD, occur at a specific identified location, and are usually associated with manufacturing and industry. Area sources are widely distributed, produce many small emissions, and do not require permits from the SCAQMD to operate. Examples of area sources include residential water heaters, painting operations, lawn mowers, and consumer products (such as cleaning solutions and hair spray). Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road sources. On-road sources are those that are legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, racecars, and construction vehicles. Mobile sources account for the majority of the air pollutant emissions within

the SoCAB. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and are suspended in the air during high winds.

Regulatory Framework

Federal and State

The Federal Clean Air Act (42 U.S.C. §7401) requires the adoption of National Ambient Air Quality Standards (NAAQS) to protect the public health, safety, and welfare from known or anticipated effects of air pollution. These pollutants are called criteria pollutants. The State of California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS) for the federal criteria pollutants that are generally more restrictive than the NAAQS, and additional standards for atmospheric sulfates, vinyl chloride, hydrogen sulfide, and visibility. Specific geographic areas are classified as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with federal and state standards. The criteria pollutants for which federal standards have been promulgated and that are most relevant to this air quality impact analysis are discussed below and include: ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), and particulate matter (PM10 and PM2.5). O_3 is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NOx)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Thus, VOCs and NOx are O_3 precursors.

As part of its enforcement responsibilities, the United States Environmental Protection Agency (USEPA) requires each State with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and maintain the federal standards. The California Clean Air Act (CCAA) also requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the CAAQS. The AQMPs from each district are compiled into the California SIP. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

Regional

The SCAQMD is principally responsible for air pollution control and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. On March 3, 2017, the SCAQMD adopted the 2016 AQMP, which is a regional and multi-agency effort (SCAQMD, ARB, SCAG, and USEPA), and is further discussed in the LRDP Amendment Final SEIR. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as, explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016–2040 RTP/SCS); updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts.[3] The main purpose of an AQMP is to bring an area into compliance with the

[3] For purposes of finding consistency with the 2016 AQMP, the 2016 RTP/SCS remains the applicable document rather than the more recent SCAG 2020–2045 RTP/SCS (Connect SoCal).

requirements of federal and State air quality standards. The 2016 AQMP develops integrated strategies and measures to meet the following NAAQS (SCAQMD, 2017):

- 8-hour O_3 (75 parts per billion [ppb]) by 2031[4,5]
- Annual PM2.5 (12 µg/m^3) by 2025
- 8-hour O_3 (80 ppb) by 2023
- 1-hour O_3 (120 ppb) by 2022
- 24-hour PM2.5 (35 µg/m3) by 2019

Local

Section 83.01.040 of the San Bernardino County Code contains the County's air quality performance standards. Included are the following requirements:

> (c) Diesel Exhaust Emissions Control Measures. The following emissions control measures shall apply to all discretionary land use projects approved by the County on or after January 15, 2009:
>
> (2) Off-Road Diesel Vehicle/Equipment Operations. All business establishments and contractors that use off-road diesel vehicle/equipment as part of their normal business operations shall adhere to the following measures during their operations in order to reduce diesel particulate matter emissions from diesel-fueled engines:
>
> (A) Off-road vehicles/equipment shall not be left idling on site for periods in excess of five minutes. The idling limit does not apply to:
>
> (I) Idling when queuing;
>
> (II) Idling to verify that the vehicle is in safe operating condition;
>
> (III) Idling for testing, servicing, repairing or diagnostic purposes;
>
> (IV) Idling necessary to accomplish work for which the vehicle was designed (such as operating a crane);
>
> (V) Idling required to bring the machine system to operating temperature; and
>
> (VI) Idling necessary to ensure safe operation of the vehicle.
>
> (B) Use reformulated ultra-low-sulfur diesel fuel in equipment and use equipment certified by the U.S. Environmental Protection Agency (EPA) or that pre-dates EPA regulations.
>
> (C) Maintain engines in good working order to reduce emissions.

[4] On October 1, 2015, the USEPA lowered the 8-hour O_3 standard to 0.070 ppm (70 ppb). The SIP (or AQMP) for the 70 ppb standard are due 4 years after the attainment/non-attainment designations are issued by the USEPA, which occurred in 2017. Thus, meeting the 70 ppb standard will be addressed in a 2021 AQMP.

[5] Some attainment dates have changed since writing of the AQMP; see previous text.

(D) Signs shall be posted requiring vehicle drivers to turn off engines when parked.

(G) On-site electrical power connections shall be provided for electric construction tools to eliminate the need for diesel-powered electric generators, where feasible.

(H) Maintain construction equipment engines in good working order to reduce emissions. The developer shall have each contractor certify that all construction equipment is properly serviced and maintained in good operating condition.

(I) Contractors shall use ultra-low sulfur diesel fuel for stationary construction equipment as required by Air Quality Management District (AQMD) Rules 431.1 and 431.2 to reduce the release of undesirable emissions.

(J) Substitute electric and gasoline-powered equipment for diesel-powered equipment, where feasible.

LRDP Amendment Final SEIR PP 4.2-2(b), PP 4.2-2(c), MM 4.2-2(a), and MM 4.2-2(b) are consistent with these standards.

Criteria Pollutants and Health Effects

As identified above, the criteria pollutants for which air quality standards have been promulgated and that are most relevant to this air quality impact analysis are the following:

- **O_3** is a highly reactive and unstable gas that is formed when VOCs) and NO_X undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects.
- **PM10** consists of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles, about 0.0004 inches or less, allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Particulate matter pollution is a major cause of reduce visibility (haze) which is caused by the scattering of light and consequently the significant reduction air clarity.
- **PM2.5** is a subgroup of PM10 that consists of smaller particles that have an aerodynamic diameter of 2.5 micrometers or less. PM2.5 is also formed in the atmosphere from gaseous emissions from power plants, industrial facilities, automobiles and other combustion sources. A consistent correlation between elevated ambient fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children and to school and kindergarten absences.
- **NO_2** is typically created during combustion processes and is a major contributor to smog formation and acid deposition. NO_2 absorbs blue light, resulting in a brownish-red cast to

the atmosphere and reduced visibility. The strongest health evidence, and the health basis for the ambient air quality standard for NO_2, is results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.

- **CO** Is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or in wildfires. Because CO is emitted directly from internal combustion engines, motor vehicles operating at slow speeds are the primary source of CO in the urban environment. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. The most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects.

Related Pollutants

- **VOCs** are Hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O3, which is a criteria pollutant. The SCAQMD uses the terms VOC and Reactive Organic Gases (ROG) interchangeably.
- **NOx** consists of nitric oxide (NO), nitrogen dioxide (NO_2) and nitrous oxide (N_2O) and are formed when nitrogen (N_2) combines with oxygen (O_2). Their lifespan in the atmosphere ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition.

Existing Air Quality Setting

Specific geographic areas are classified as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with federal and state standards. Table 1, Attainment Status of Criteria Pollutants in the SoCAB, summarizes the attainment designations for the SoCAB. All of San Bernardino County is designated as a nonattainment area for O_3, PM10, and PM2.5; a portion of the County, not including the Project area is designated nonattainment for NO_2.

TABLE 2
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOCAB

Pollutant	State	Federal
O_3 (1 hour)	Nonattainment	No standards
O_3 (8 hour)	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment/Nonattainment[b]	Attainment/Maintenance
SO_2	Attainment	Attainment
Lead	Attainment	Attainment/Nonattainment[a]
All others	Attainment/Unclassified[c]	No standards

O_3: ozone; $PM_{2.5}$: respirable particulate matter 10 microns or less in diameter; $PM_{2.5}$: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; NO_2: nitrogen dioxide; SO_2: sulfur dioxide; SoCAB: South Coast Air Basin.

[a] Los Angeles County is classified nonattainment for lead; the remainder of the SoCAB is in attainment of the State and federal standards.

[b] The near-road portion of CA-60 in San Bernardino, Riverside, and Los Angeles Counties is classified as nonattainment for NO_2; the remainder of the SoCAB is in attainment of State standards.

[c] "Unclassified" designation indicates that the air quality data for the area are incomplete and do not support a designation of attainment or nonattainment.

Source: (CARB, 2021a; USEPA, 2021)

The SCAQMD has divided the region into 38 source receptor areas (SRAs) in which 37 air monitoring stations operate. Lake Arrowhead is located within SRA 37, Central San Bernardino Mountains. Ambient air pollutant concentrations within SRA 37 are monitored on Lake Drive near Lake Gregory in Crestline, approximately 5.5 miles west-southwest of the Project. Of the criteria air pollutants, ambient concentrations of O_3, PM2.5 and PM10 are monitored at this station. Monitoring data from the Crestline station between 2017 and 2019 shows that O_3 concentrations exceeded the 2015 national O_3 standard and State standard of 0.070 parts per million (ppm) 111 days in 2017, 113 days in 2018, and 102 days in 2019 (CARB, 2021b). PM10 concentrations exceeded the California standard 2 days in 2017 and 1 day in 2018; the national standard was not exceeded in 2017 and 2018. There was insufficient PM10 data to determine exceedances for PM10 in 2019 and for PM2.5 in all three years.

Existing air pollutant emissions at the Project site include the consumer products and vehicles used by staff occupying the existing Cedar Lodge. Nearby off-site emissions occur at the remainder of the UCLA Conference Center and the private residences on or near Willow Creek Road.

Air Quality Sensitive Receptors

The SCAQMD defines typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The Project uses would be sensitive receptors. The off-site sensitive receptors nearest to the Project site are the residences approximately 245 feet east of the Willow Creek site and the residences approximately 220 feet southwest of the Glamping site. Potential impacts to sensitive receptors are assessed under the analysis of Threshold "c" below.

Methods

The SCAQMD recommends that projects be evaluated in terms of their quantitative thresholds, which have been established to assess both the regional and localized impacts of project-related air pollutant emissions. The significance thresholds are updated, as needed, to appropriately represent current ambient air quality standards and attainment statuses. UCLA utilizes the SCAQMD-recommended thresholds that are in place at the time development projects are proposed to assess the significance of quantifiable emissions. The current SCAQMD thresholds are identified in Table 3 and are applied to the Project.

TABLE 3
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
THRESHOLDS OF SIGNIFICANCE

Mass Daily Thresholds (lbs/day)		
Pollutant	**Construction**	**Operation**
VOC	75	55
NOx	100	55
CO	550	550
PM10	150	150
PM2.5	55	55
SOx	150	150
Lead	3	3
Toxic Air Contaminants		
TACs[a]	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO_2eq for industrial facilities	
Ambient Air Quality For Criteria Pollutants[b]		
NO_2	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 1-hour average 0.18 ppm (state) Annual arithmetic mean 0.03 ppm (state) and 0.0534 ppm (federal)	
CO	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 1-hour average 20.0 ppm (State) and 35 ppm (federal) 8-hour average ≥ 9.0 ppm (State/federal)	
PM10	24-hour average ≥ 10.4 µg/m^3 (construction)[c] 24-hour average ≥ 2.5 µg/m^3 (operation) Annual average ≥ 1.0 µg/m^3	
PM2.5	24-hour average ≥ 10.4 µg/m^3 (construction)[c] 24-hour average ≥ 2.5 µg/m^3 (operation)	
SO_2	1-hour average≥0.25 ppm (State) and 0.075 ppm (federal-99th percentile) 24-hour average ≥ 0.4 ppm (State)	
Sulfate	24-hour average ≥ 1.0 µg/m^3	
Lead 30-day average Rolling 3-month average	1.5 µg/m^3 (state) 0.15 µg/m^3 (federal)	

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; SOx: sulfur oxides; TACs: toxic air contaminants; SCAQMD: South Coast Air Quality Management District; GHG: greenhouse gas; MT/yr: metric tons per year; CO_2eq: carbon dioxide equivalent; NO_2: nitrogen dioxide; ppm: parts per million; $\mu g/m^3$: micrograms per cubic meter.

[a] TACs (carcinogenic and noncarcinogenic)
[b] Ambient air quality threshold based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.
[c] Ambient air quality threshold based on SCAQMD Rule 403

Source: (SCAQMD, 2019a).

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

Discussion

As identified above, the applicable AQMP for the Project is the SCAQMD 2016 AQMP described above. For a specific project to be consistent with the AQMP, the pollutants emitted from the Project should not:

(1) Result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

(2) Conflict with or exceed the assumptions in the AQMP.

Consistency Criterion No. 1 refers to new or increasing violations of the CAAQS and NAAQS. These violations are assumed to occur if regional significance thresholds are exceeded and may potentially occur if localized significance thresholds (LST) are exceeded. As evaluated under Threshold b and Threshold c, below, the Project's regional and localized construction-source emissions would not exceed applicable regional significance and LST thresholds. As such, a less than significant impact is expected. Therefore, the Project is determined to be consistent with Criterion No. 1.

With respect to Criterion 2, the 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the SCAQMD are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections for the County of San Bernardino is consistent with the AQMP. As further discussed in the Population and Housing section of this Initial Study, the Project would not increase permanent residents or employment at the UCLA LAL. The increase in the number of transient visitors would be small. Further, there would be no change in land use or zoning. Therefore, the Project would not conflict with the 2016–2040 RTP/SCS and 2016 AQMP per Criterion No. 2.

The Project would result in a less than significant impact related conflict with the 2016 AQMP.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not conflict with or obstruct implementation of the applicable air quality plan resulting in a less than significant impact.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

Discussion

As discussed in the Regulatory Framework section above, the SoCAB is a federal or State nonattainment area for O_3, PM10, and PM2.5. The Project would generate PM10, PM2.5, and O_3 precursors (NOx and VOC) during short-term construction and long-term operations. The Project would have an incremental, cumulative contribution to O_3, PM10, and PM2.5 levels in the region. SCAQMD's policy with respect to cumulative impacts associated with criteria pollutants and their precursors is that impacts that would be directly less than significant would also be cumulatively less than significant (SCAQMD, 2003).

Land uses such as the Project affect air quality through construction-source and operational-source emissions. Emissions from the Project were estimated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0 computer program (CAPCOA, 2021). CalEEMod is designed to model construction and operational emissions for land development projects and allows for the input of project- and County-specific information. As further described in Section II.5, Project Components, of this IS, for purposes of analysis, construction activities associated with the Project are estimated to begin in July 2022 and be complete in March 2025.[6]

Regional Construction Impacts

Air pollutant emissions during construction activities would primarily occur from construction equipment exhaust; fugitive dust from demolition and site grading; exhaust and particulate emissions from trucks hauling soil and/or building materials to and from the Project sites, and from vehicles driven to and from the Project sites by construction workers; and, VOCs from painting and asphalt paving operations. The Project would comply with the LRDP EIR PPs and MMs described above, which serve to reduce air pollutant emissions. The CalEEMod input for construction emissions was based on the Project's construction schedule and equipment assumptions and default factors from CalEEMod.

[6] Construction of the Willow Creek Staff Housing component of the Project is estimated to occur between July 2022 and May 2023, construction of the Cedar Suites component is estimated to occur between May 2023 and March 2025, and construction of the Glamping component is estimated to occur between October 2022 and May 2023.

Table 4 presents the estimated maximum daily emissions during each year of Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. As shown, Project construction mass daily emissions would be less than the SCAQMD's thresholds for all criteria air pollutants. This impact would be less than significant and no additional mitigation is required.

TABLE 4
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS

Year	Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
2022	4	28	33	<0.5	3	2
2023	5	33	43	<0.5	3	2
2024	2	16	22	<0.5	1	1
2025	2	15	21	<0.5	1	1
SCAQMD Thresholds (Table 3)	***75***	***100***	***550***	***150***	***150***	***55***
Exceeds SCAQMD Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SO_2: sulfur dioxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

Source: (SCAQMD, 2019b) (thresholds); see Appendix A for CalEEMod model outputs.

Operations

Operational emissions are comprised of area and mobile source emissions. Area source emissions include consumer products, routine painting, and landscaping equipment and are based on CalEEMod assumptions for the specific land uses and population. Area sources also include fireplace emissions. The input for operational mobile emissions was based on ITE 10th Edition vehicle trip generation rates for a hotel room (8.36 daily trips per room), resulting in 184 weekday daily vehicle trips[7] (Urban Crossroads, 2021). Operation inputs also include the building areas; no natural gas use for space or hot water heating, in accordance with UC Sustainability Policy; and fireplaces in the Cedar Suites. Additional input details are included in Appendix A. Estimated maximum daily operational emissions are shown in Table 5.

As shown in Table 5, the Project's operational emissions would be substantially less than the SCAQMD CEQA significance thresholds for all criteria pollutants. This estimate is conservative because it does not include "credit" for air pollutant emissions associated with existing operations at the Willow Creek and Cedar Suites sites. This impact would be less than significant and no additional mitigation is required. Although not quantified, incorporation of PPs 4.2-2(b) and (c), MM 4.2-2(a) and (b) identified above into the Project would provide further emissions reductions, principally to NOx and CO.

As shown in Tables 4 and 5, the Project's construction and operational emissions would be less than significant. Therefore, consistent with SCAQMD policy, the cumulative construction and operational impacts of the Project would also be less than significant.

[7] The ITE Trip Generation Manual 11th Edition was subsequently published and the hotel rate ADT trip generate rate has been reduced to 7.99 daily per hotel room, resulting in 176 ADT for the Project.

TABLE 5
ESTIMATED MAXIMUM DAILY OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Area sources	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Mobile sources	1	1	5	<0.5	1	<0.5
Total Operational Emissions*	**1**	1	**5**	<0.5	1	<0.5
SCAQMD Significance Thresholds (Table 2)	***55***	***55***	***550***	***150***	***150***	***55***
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SO2: sulfur dioxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

* Some totals may not add due to rounding.

Note: CalEEMod model data sheets are included in Attachment A.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

Construction and operation of the Project would result in a less than significant cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under an applicable federal or State ambient air quality standard.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

Discussion

Construction Emissions

As part of the SCAQMD's environmental justice program, attention has focused on local air quality impacts from nearby sources. The SCAQMD has promulgated exposure standards and a conservative, simple Localized Significance Thresholds (LST) screening method for construction sites less than five acres in area (SCAQMD, 2008a). The LST method provides tables of emissions limits based on the location of a project in the SoCAB, the area of the Project site, and distance to the sensitive receptors. The emissions limits are then compared to the on-site emissions from the Project. Localized impacts are assessed for NO_2 and CO at receptors where persons could be for 1 hour and for PM10 and PM2.5 where persons could be for 24 hours.

As previously identified, the non-UCLA LAL receptors closest to the Willow Creek site are the residential buildings east of the Project site (the Cedar Suites site is further away). The non-UCLA LAL receptors closest to the Glamping site are to the southwest. Emissions at other receptors

would be less than at these locations. For the LST analysis for the Project, although each of the Project sites encompasses less than one-acre, for purposes of analysis, it is assumed the construction area for the Project site is 1 acre (i.e., the minimum area in the screening tables), and the distance to the sensitive receptor is 25 meters, which is the minimum distance prescribed for the LST methodology for all source-to-receptor distances of 25 meters or less. Based on these parameters, LST emissions and thresholds for the Project are shown in Table 6. Thresholds are specific to Receptor Source Area 37, Central San Bernardino Mountains. Only onsite emissions (i.e., no on-road mobile source emissions) are considered for the LST analysis; therefore, the emissions shown in Table 6 may be less than those in Table 3.

TABLE 6
LOCAL CONSTRUCTION EMISSIONS TO NEAREST SENSITIVE RECEPTORS

Pollutant	Maximum Daily On-Site Emissions[a] (lbs/day)	LST Thresholds[b] (lbs/day)	Exceed Threshold?
NOx	33	118	**No**
CO	43	667	**No**
PM10	3	4	**No**
PM2.5	2	2	**No**

lbs/day: pounds per day; LST: Localized Significance Threshold; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; CalEEMod: California Emissions Estimator Model.

[a] CalEEMod data sheets are included in Appendix A.
[b] LSTs from SCAQMD 2009.

The peak on-site emissions for would occur in 2023 during concurrent construction of the Willow Creek Staff Housing and Glamping projects. As shown, the Project's estimated local construction emissions would not exceed the SCAQMD's LSTs, and the impact from exposure to construction emissions at the adjacent and nearby sensitive receptors would be less than significant. No additional mitigation is required.

Operational Emissions

Criteria Pollutants

With respect to operational vehicular emissions, exposure of sensitive receptors to Project-related pollutants that are generated off site is of concern if the Project contributes substantial traffic to severely congested, high-volume, signalized intersections with an associated potential increase in local CO concentrations (i.e., CO hotspots). An initial screening procedure is provided in the *Transportation Project-Level Carbon Monoxide Protocol* (CO Protocol) to determine whether a project poses the potential to generate a CO hotspot (UCD ITS 1997). The key criterion is whether the Project would worsen traffic congestion at signalized intersections operating at level of service (LOS) E or F. If a project poses a potential for a CO hotspot, a quantitative screening is required.

It is conservatively estimated that the Project, with a net increase of 22 "guest rooms" (12 suites at Cedar Suites and 10 Glamping cabins), would generate 10 AM peak hour trips and 13 PM peak hour trips, based on trip generation rates for traditional hotel rooms (Institution of Transportation Engineers [ITE] Land Use Code 310). However, operations at the UCLA LAL, which is an all-inclusive resort, are such that visitors associated with the Bruin Woods program and conferences seldom leave the facility, it at all. Further the check-in/check-out day for the Bruin Woods program

is Saturday. Use of the UCLA LAL by non-University affiliates, which would be limited to periods when Bruin Woods is not occurring, would not represent all of the bookings at any given time. Therefore, the estimated daily peak our trips would be less than that using the ITE code rate for hotel rooms. Considering the low trip generation and the lack of signalized intersections in the vicinity of the Project, it is presumed that the Project would not worsen traffic at a signalized intersection.

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The Project, which consists of staff housing and transient visitor lodging, does not include such uses. Due to the lack of significant stationary source emissions, operational LST impacts would be less than significant.

Toxic Air Contaminant (TAC) Emissions

TACs are airborne substances that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. CARB identified particulate exhaust emissions from diesel-fueled engines (diesel particulate matter [PM]) as TACs in 1998. Project construction would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. The Project would result in the generation of diesel PM emissions from the use of off-road diesel equipment required for construction activities and from on-road diesel equipment used to transport materials to and from the Project site. Exposure is a combination of the emissions rate and the length of time exposed, with exposures calculated over periods of 30 to 70 years. Due to site constraints, and type of construction, the Project would use relatively little diesel construction equipment. The maximum amount of diesel equipment operating concurrently is estimated to be a small crane or lift, and three tractors/loaders/backhoes or equivalent. Diesel trucks would occasionally be arriving and leaving the site. The total period of construction would be approximately 3 years, which is also considerably less than the 30 to 70-year exposure time frame. Therefore, occupants of the nearby residences and buildings would not be exposed to substantial toxic air pollutants from construction equipment exhaust. Implementation of the Project would not result in exposure of sensitive receptors to substantial concentrations of TACs. There would be a less than significant impact.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

Construction and operation of the Project would have a less than significant impact related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project result in other emissions (such as those leading to odors) affecting a substantial number of people?	☐	☐	☒	☐

Discussion

Construction activities may generate some odors during construction, such as diesel exhaust associated with operating construction vehicles. These odors are typical of construction projects and would be subject to construction and air quality regulations, including proper maintenance of machinery to minimize engine emissions. These emissions would occur during daytime hours and would be isolated to the immediate vicinity of construction activities. The odors would not be objectionable because any odors that occur would quickly disperse into the atmosphere. There would be a less than significant impact.

The Project does not propose an odor-generating use identified by the SCAQMD (e.g., wastewater treatment plants, agricultural operations, landfills, composting, food processing plants, chemical plants, refineries) and would not create an odor nuisance pursuant to SCAQMD Rule 402. Furthermore, none of these odor-generating land uses are located in the vicinity of the Project site. Long-term operations may involve minor odor-generating activities such as cooking and painting for maintenance purposes. These types and concentrations of odors are typical for hotel-type uses and residential uses, and currently occur at the UCLA LAL and nearby residential uses. Construction and operation of the Project would not result in other emissions that would be objectionable and would affect a substantial number of people.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would create a less than significant impact associated with other emissions, including odor, affecting a substantial number of people.

4. BIOLOGICAL RESOURCES

Relevant elements of the Project related to biological resources include the removal of existing trees and other vegetation located at and adjacent the building sites to accommodate building construction and meet brush management requirements for fire protection.

Information in this section is based on the following technical reports included in Appendix B1 and Appendix B2 of this IS:

- *Habitat and Jurisdictional Assessment for UCLA's Cedar Suites and Willow Creek Staff Housing Project Located in Lake Arrowhead, San Bernardino County, CA,* prepared by ELMT Consulting (October 25, 2021) (ELMT, 2021a)

- *Habitat and Jurisdictional Assessment for UCLA's Lake Arrowhead Glamping Project Located in Lake Arrowhead, San Bernardino County, CA,* prepared by ELMT Consulting (October 25, 2021) (ELMT, 2021b)

It should be noted that to be conservative the study area established in these reports extended beyond the physical limits of the Project sites that is shown on the aerial photographs presented on Figure 5 and Figure 7 (i.e., the physical impact areas).

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the Project, which is off campus.

PP 4.3-1(a) *Mature trees to be retained and protected in place during construction, shall be fenced at the drip-line, and maintained by the contractor in accordance with landscape specifications contained in the construction contract.*

PP 4.3-1(b) *Trees shall be examined by an arborist and trimmed, if appropriate, prior to the start of construction.*

PP 4.3-1(c) *Construction contract specifications shall include the provision for temporary irrigation/watering and feeding of these trees during construction, as recommended by the designated arborist.*

PP 4.3-1(d) *Construction contract specifications shall require that no building material, parked equipment, or vehicles shall be stored within the fence line of any tree.*

MM 4.3-1(c) *In conjunction with CEQA documentation required for each project ~~proposal under the 2002 LRDP, as amended,~~ that would result in the removal of one or more mature trees, the project will include a tree replacement plan with a 1:1 tree replacement ratio at the development site where feasible and/or elsewhere within the ~~campus~~ **project** boundaries where feasible. If it is not feasible to plant replacement trees at a 1:1 ratio within the ~~campus~~ **project** boundaries, the tree replacement plan will include the planting of native shrubs in ecologically appropriate areas within the ~~campus~~ **project** boundaries that would provide nesting, foraging or roosting habitat for birds so that the replacement number of trees and shrubs will result in a 1:1 replacement ratio.*

Regulatory Framework

As previously discussed, the Project is located at the UCLA LAL in the Lake Arrowhead Community of San Bernardino County, in the San Bernardino National Forest. The Willow Creek and Cedar Suites sites are currently developed, and the Glamping site is currently undeveloped with the exception of unimproved trails. The LRDP Amendment Final SEIR, which has been incorporated by reference, includes a detailed discussion of the federal, State, and local regulatory framework for biological resources. Additional information about regulations addressing biological resources is presented in Attachment D of the technical reports included in Appendix B1 and B2 of this IS. Biological resource regulations that are most relevant to the Project

include the federal Migratory Bird Treaty Act (MBTA) and the provisions of the *California Fish and Game Code* regarding the protection of birds of prey and migratory birds.

Pursuant to the MBTA of 1918, as amended in 1972, federal law prohibits the taking of migratory birds, their nests, or their eggs (16 United States Code [U.S.C.] §703), except as allowed by permit (pursuant to 50 CFR §21). Also, Fish and Game Code Sections 3503, 3503.5, 3511, and 3513 are applicable to natural resource management. For example, Section 3503 of the Code makes it unlawful to destroy any birds' nest or any birds' eggs that are protected under the MBTA. Further, any birds in the orders Falconiformes or Strigiformes (Birds of Prey, such as hawks, eagles, and owls) are protected under Section 3503.5 of the Fish and Game Code which makes it unlawful to take, possess, or destroy their nest or eggs. A consultation with California Department of Fish and Wildlife (CDFW) may be required prior to the removal of any bird of prey nest that may occur on a project site. Section 3511 of the Fish and Game Code lists fully protected bird species, where the CDFW is unable to authorize the issuance of permits or licenses to take these species. Pertinent species that are State fully protected by the State include golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*). Section 3513 of the Fish and Game Code makes it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Existing Vegetation and Common Species

The technical reports provide detailed information about the existing general vegetation and habitat conditions. In summary, due to existing land uses, limited native plant communities were observed on or within 500 feet of the Willow Creek and Cedar Suites sites. The Willow Creek and Cedar Suites sites and surrounding areas consist of a mixture of land developed with structures and scattered pine trees. Existing development and continued anthropogenic disturbances have significantly altered the plant communities on and surrounding these sites, which consist of two land cover types that would be classified as disturbed and developed, and mixed conifer forest (refer to Figure 27). Developed areas generally encompass all building/structures and paved/impervious surfaces. The developed areas within these sites consist of the existing Cedar Lodge, maintenance building, surface parking lot adjacent to the maintenance building, and landscaped areas. The sites primarily support developed areas that are landscaped with ornamental plants species. In addition, the areas immediately bordering the existing building support disturbed areas that are generally devoid of vegetation with leaf litter on the ground. The pine trees on and adjacent to the Project sites composed a mixed conifer forest plant community. Common tree species present within this forest community include Jeffery pine (*Pinus jeffreyi*), white fir (*Abies concolor*), sugar pine (*Pinus lambertiana*), ponderosa pine (*Pinus ponderosa*), and California black oak (*Quercus kelloggii*).

The Glamping facilities would be installed within previously disturbed areas along existing trails associated with the UCLA LAL, and are also within a mixed conifer forest plant community. The Glamping site and surrounding areas consists of a land cover types that would also be classified as disturbed, and mixed conifer forest (refer to Figure 28).

The Project sites provide limited habitat for wildlife species except those adapted to a high degree of anthropogenic disturbances and development. No fish, amphibians, or hydrogeomorphic features with frequent sources of water that would support populations of fish or amphibians were observed on or within the vicinity of the Project sites. Therefore, no fish or amphibians are expected to occur and are presumed absent. The Project sites provide limited foraging and refuge habitat for reptile species adapted to a significant degree of human disturbance. Common reptilian species have the potential to occur within the Project sites, and various common reptile species

Source(s): ELMT Consulting (10-25-2021)

Figure 27

Not to Scale

Vegetation - Willow Creek and Cedar Suites Sites

Source(s): ELMT Consulting (10-25-2021)

Figure 28

Not to Scale

Vegetation – Glamping Site

were detected during the field surveys (refer to the technical reports included in Appendix B1 and Appendix B2 of this IS).

The Project sites and immediately surrounding habitat provide limited foraging and cover habitat for a variety of mammalian species adapted to mountain environments. However, most mammal species are nocturnal and are difficult to observe during a diurnal field survey. Mammals and/or sign detected during the field survey and mammals expected to occur are also listed in the technical reports included in Appendix B1 and Appendix B2 of this IS.

The Project sites and surrounding area provides limited foraging and nesting habitat for a variety of bird species adapted to a significant degree of human disturbance. Common bird species that were detected during the field survey, or that are expected to occur are also listed in the technical reports included in Appendix B1 and Appendix B2 of this IS. No active nests or birds displaying nesting behavior were observed during the field investigation in April 2021. The Project sites and surrounding areas provide limited foraging habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Discussion

As previously identified, site-specific habitat and jurisdictional assessments were prepared for the Project sites. The purpose of these reports is to document the baseline conditions and assess the potential for special-status plant and wildlife species to occur within the Project sites that could pose a constraint to the implementation of the Project. Special attention was given to the suitability of the Project sites to support the southern rubber boa (*Charina umbratical*), California spotted owl (*Strix occidentialis*), and the San Bernardino flying squirrel (*Glaucomys sabrinus californicus*), and other special-status plant and wildlife species identified by the CDFW CNDDB, and other electronic databases as potentially occurring in the general vicinity of the Project sites. As described in the site-specific habitat and jurisdictional assessments, a literature review and records search were conducted to determine which special-status biological resources have the potential to occur on or within the general vicinity of the Project sites. In addition, a general habitat assessment/field investigation of the Project sites was conducted on April 22, 2021, to document existing conditions and assess the potential for special-status biological resources to occur within the Project sites. Species determined to have the potential to occur within the general vicinity of the Project sites are presented in Attachment C, Potentially Occurring Special-Status Biological Resources, of the Habitat and Jurisdictional Assessment included in Appendix B1 and Appendix B2 of this IS.

Special-Status Plant Species

According to the CNDDB and California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California, 21 special-status plant species have been recorded in the Harrison Mountain, Lake Arrowhead, San Bernardino North, and Silverwood Lake USGS 7.5-minute quadrangles. However, no special-status plant species were observed onsite during the habitat assessment (field survey conducted by ELMT on April 22, 2021). The Project site has been subject to anthropogenic disturbances from the existing development and continued human use. These disturbances have reduced, if not eliminated, the suitability of the habitat onsite to support special-status plant species known to occur in the general vicinity of the Project sites. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, ELMT determined that the Project site does not provide suitable habitat for any of the special-status plant species known to occur in the area and are presumed to be absent from the Project sites. As such, the implementation of the Project would not result in substantial adverse impacts to special-status plant species.

Special-Status Wildlife Species

According to the CNDDB, 47 special-status wildlife species have been reported in the Harrison Mountain, Lake Arrowhead, San Bernardino North, and Silverwood Lake USGS 7.5-minute quadrangles. No special-status wildlife species were observed during the field survey. ELMT determined, based on habitat requirements for specific special-status wildlife species and the availability and quality of habitats needed by each species, the Project sites have a low potential to support the San Bernardino flying squirrel and purple martin (*Progne subis*). All remaining special-status wildlife species identified in the CNDDB are presumed to be absent from the Project site based on habitat requirements, availability/quality of habitat needed by each species, and known distributions.

Purple martin is not federally or state listed as endangered or threatened; it is a California species of special concern. The pre-construction nesting bird clearance survey identified in MM BIO-1, required to comply with the MBTA and other regulations protecting nesting birds, would be conducted prior to ground disturbance. With completion of the nesting bird clearance survey, impacts to the purple martin would be less than significant.

Based on regional significance, the potential occurrence of the southern rubber boa, San Bernardino flying squirrel, and California spotted owl within the Project site are described in further detail below.

Southern Rubber Boa

The southern rubber boa (SRB) is designated by the CDFW as a threatened species under the California Endangered Species Act and is considered a sensitive species in the San Bernardino National Forest by the U.S. Forest Service. SRB inhabits oak-conifer and mixed conifer forests at elevations between 5,000 and 8,200 feet where rocks and logs, or other debris provide shelter. It is semi-fossorial with either nocturnal or crepuscular tendencies, making it difficult to find in a general diurnal field survey. It is restricted to the San Bernardino and San Jacinto Mountains. The SRB emerge from hibernation in April and generally disappear during the summer months though they can appear after rains or periods of high humidity. Almost all collections of SRB were on or around small to large rock outcrops which are important for hibernacula. The Project sites are developed and/or have areas that are heavily disturbed. The Project sites lack rocky outcrops, needed for hibernacula. The Project sites lack suitable habitat for the SRB. Additionally, the existing developed and continued anthropogenic disturbances within the Project sites preclude

SRB from occurring. As such, the SRB is presumed absent and the implementation of the Project would not impact the SRB.

San Bernardino Flying Squirrel

The San Bernardino Flying Squirrel (SBFS) is not a listed species by the United States Fish and Wildlife Service (USFWS) or CDFW. However, CDFW has designated the SBFS as a species of special concern. It is also considered a sensitive species in the San Bernardino National Forest by the U.S. Forest Service. The historic distribution of the SBFS includes both the San Bernardino and San Jacinto Mountains; however, recent data analysis suggests that this subspecies may now only be extant in the San Bernardino Mountains. The SBFS occurs in a range of coniferous and deciduous forests, including riparian forests and mixed conifer forests, and are usually found within mature old-growth forests, although forests with second-growth stands may also suffice. SBFS require somewhat dense tree cover (less than 120 feet between tall trees and preferably around 65 feet). Trees with snags and cavities suitable for nesting and denning are required, and trees that are greater than 100 feet tall and greater than 30 inches diameter at breast height are preferred. The SBFS depends strongly on truffles and arboreal moss for food, as well as to a much lesser degree seeds, nuts, insects, fruit, bird eggs, and even tree sap. Larger, older trees with associated woody debris and decaying logs tend to indicate a higher potential for healthy truffle growth in the underlying soil.

The Willow Creek and Cedar Suite site support low quality habitat and generally consist of existing buildings and surface parking with surrounding young and old pine trees, with most of the trees spaced. The Glamping site generally consists of disturbed areas along existing recreational trails that have been subject to anthropogenic disturbances, adjacent to a mixed conifer forest plant community that supports young and old growth pine trees. The tree canopies at the Project sites are generally very open with few areas of closed canopy and most younger trees that lack the habitat requirements for this species that includes nesting/denning opportunities, gliding needs and the development of an understory with adequate woody debris. Due to site onsite disturbances and developed areas, the SBFS was determined to have a very low potential to occur at the Project sites and the implementation of the Project would not result in substantial adverse effects to the SBFS. Impacts would be less than significant.

California Spotted Owl

The California Spotted Owl (CSO) is designated by the CDFW as a species of special concern and considered a sensitive species in the San Bernardino National Forest by the U.S. Forest Service. In the San Bernardino Mountains, CSOs nest in mixed conifer habitat, oak/Douglas-fir habitat, and hardwood/conifer habitat, and the average elevation of occupied nest habitat is at 6,000 feet. Eighty percent of nesting trees have a canopy cover greater than seventy percent, with surrounding nesting habitat having at least two canopy layers. The Project sites support low quality CSO habitat as the Project sites consist of primarily disturbed areas, and/or existing buildings and surface parking with surrounding young and old pine trees, with most of the trees spaced. The canopy is generally open with few closed canopies needed for cover and only a few trees that are tall and mature enough to provide nesting cavities and hunting perches for this species. As such, CSO was determined to have a very low potential to occur at the Project sites and the implementation of the Project would result in substantial adverse effects to the CSO. Impacts would be less than significant.

Special-Status Plant Communities

The Project is expected to avoid impacts to adjacent natural vegetation to the maximum extent possible. Vegetation removal to implement the Project, including for brush management, would be limited, and impacts would not be considered significant. The vegetation that could potentially be impacted by Project implementation is located adjacent to existing buildings and landscaped areas, or previously disturbed areas that do not provide suitable habitat for special-status species.

According to the CNDDB, 7 special-status plant communities have been reported in the Harrison Mountain, Lake Arrowhead, San Bernardino North, and Silverwood Lake USGS 7.5-minute quadrangles: Mixed Montane Chaparral, Riversidean Alluvial Fan Sage Scrub, Semi Desert Chaparral, Southern Mixed Riparian Forest, Southern Sycamore Alder Riparian Woodland, Southern Willow Scrub, and Westside Ponderosa Pine Forest. There are no special-status plant communities that occur on the Project sites. The vegetation that could be impacted does not comprise a special-status plant community. As such, the implementation of the Project would not result in substantial adverse effects to special-status plant communities. No impacts would occur.

Critical Habitats

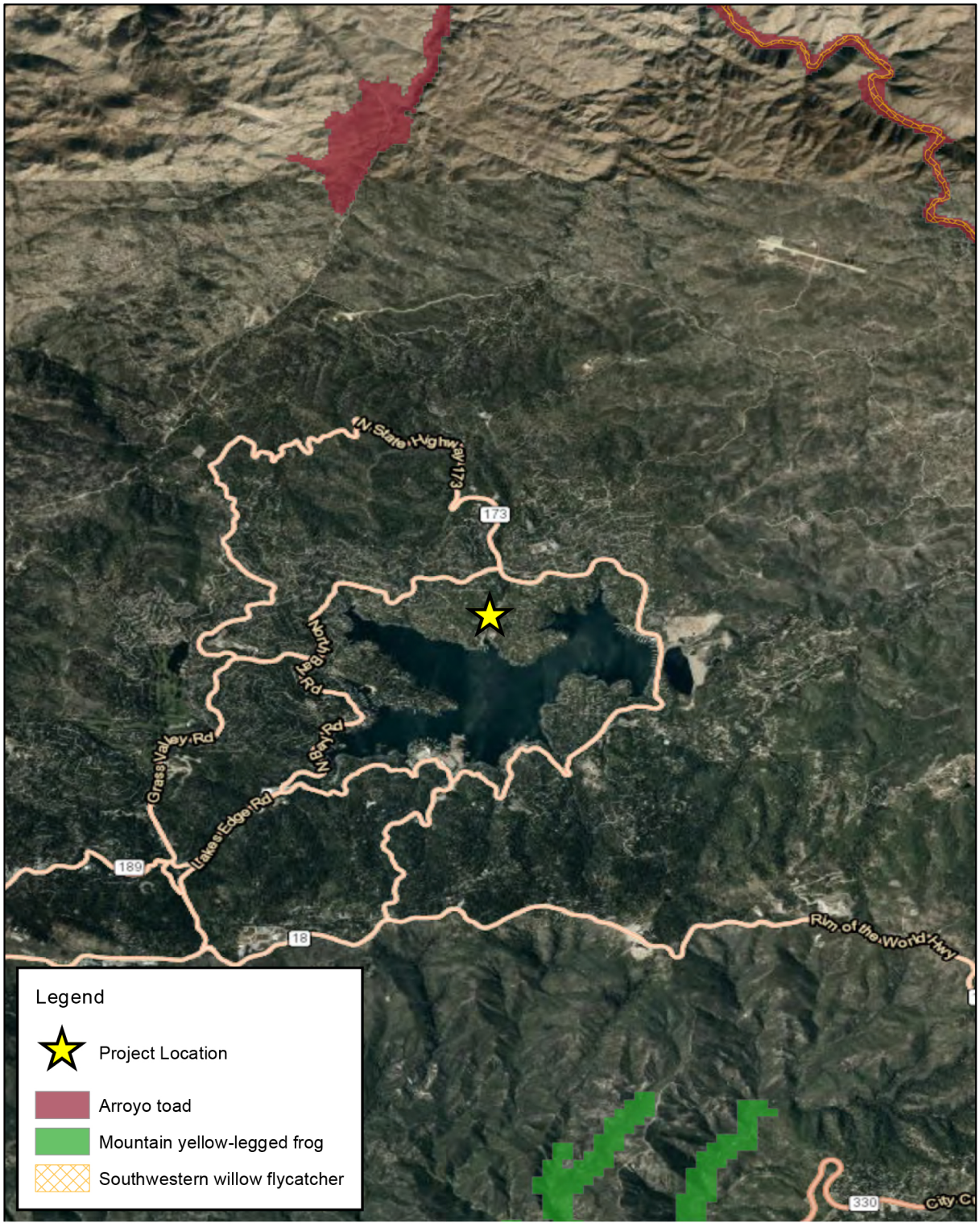
Under the federal Endangered Species Act, "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. The Project is not located within federally designated Critical Habitat. As shown on Figure 29, the nearest designated Critical Habitat is located approximately 3 miles north of the UCLA LAL for arroyo toad (*Anaxyrus californicus*), 3.8 miles to the north for southwestern willow flycatcher (*Empidonax traillii extimus*), and 3.6 miles to the south for mountain yellow-legged frog (*Rana mucosa*). Therefore, the loss or adverse modification of Critical Habitat would not occur as a result of the Project and consultation with the USFWS would not be required.

Additional Project-Level Mitigation Measures

The UCLA LRDP Amendment Final SEIR MMRP includes mitigation measures for on campus projects that require pre-construction surveys during the nesting season for special status avian species and raptors, and identify actions to take if active nests are found (MM 4.3-1[a] and MM 4.3-1[b] from the Final SEIR). The intent of these mitigation requirements is met with MM BIO 1 below, which has been developed to comply with the MBTA and state requirements for protection of migratory birds, and to address the biological resource conditions at the Project sites:

BIO-1 All construction activities shall comply with the federal Migratory Bird Treaty Act of 1918 (MBTA) and California Fish and Game Code Sections 3503, 3511 and 3513. The MBTA governs the taking and killing of migratory birds, their eggs, parts, and nests and prohibits the take of any migratory bird, their eggs, parts, and nests. Sections 3503, 3503.5, 3511 and 3513 of the California Fish and Game Code protect active nests of any raptor species, including common raptor species Compliance with the MBTA and Fish and Game Code shall be accomplished by completing the following:

- Construction activities involving vegetation removal shall be conducted between September 1 and January 31. If construction occurs inside the peak nesting season (between February 1 and August 31), a pre-construction survey by a qualified Biologist shall be conducted within 72 hours prior to construction activities to identify any active nesting locations. If the Biologist does not find any



Source(s): ELMT Consulting (10-25-2021)

Figure 29

Not to Scale

Critical Habitat

active nests, the construction work shall be allowed to proceed. The biologist conducting the clearance survey shall document a negative survey with a report indicating that no impacts to active avian nests shall occur.

If the Biologist finds an active nest within the pre-construction survey area and determines that the nest may be impacted, the Biologist shall delineate an appropriate buffer zone around the nest. The size of the buffer shall be determined by the Biologist and shall be based on the nesting species, its sensitivity to disturbance, expected types of disturbance, and location in relation to the construction activities. These buffers are typically 300 feet from the nests of non-listed species and 500 feet from the nests of raptors and listed species. Any active nests observed during the survey shall be mapped on an aerial photograph. Only construction activities (if any) that have been approved by a Biological Monitor shall take place within the buffer zone until the nest is vacated. The Biologist shall serve as a Construction Monitor when construction activities take place near active nest areas to ensure that no inadvertent impacts on these nests occur. Results of the pre-construction survey and any subsequent monitoring shall be provided to the Capital Programs University Representative. The monitoring report shall summarize the results of the nest monitoring, describe construction restrictions currently in place, and confirm that construction activities can proceed within the buffer area without jeopardizing the survival of the young birds.

Level of Significance

The Project would have a less than significant impact on candidate, sensitive, or special status plant and wildlife species.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐
c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐

Discussion

As previously discussed under Threshold a, the Project sites do not support any riparian habitat or other sensitive natural community on-site and. no impacts to such resources would occur.

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates discharge of dredge or fill materials into “waters of the United States” pursuant to Section 404 of the Clean Water Act (CWA) and

Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Regional Board regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

A query of the USFWS National Wetland Inventory conducted during preparation of the Habitat and Jurisdictional Assessment determined that there are no riverine or other freshwater resources mapped within the boundaries of the Project sites. The nearest recognized resource is a freshwater/forested/shrub wetland associated with Willow Creek, east of the Project sites, east of Willow Creek Road. Within the limits of the Project sites, no discernible drainage courses, inundated areas, or wetland features that would be considered jurisdictional by the Corps, Regional Board, or CDFW were observed. Based on the location of the proposed uses, the Project would not result in impacts to Corps, Regional Board, or CDFW jurisdictional areas and regulatory approvals would not be required.

A small ephemeral drainage feature was observed bordering the northwest corner of the Willow Creek site (refer to the proposed hydrology map provided in Figure 31). The drainage feature follows a topographic low spot at the bottom of a small slope north of the Cedar Suites sites and enters a culvert on the northwest corner of the Willow Creek site before being conveyed through a storm drain under the existing maintenance building where it outlets east of the site and paved street into the Willow Creek.

To ensure no indirect impacts occur to Willow Creek or the adjacent ephemeral drainage feature, a Storm Water Pollution Prevention Program (SWPPP) shall be implemented by the construction contractors as further discussed in the Hydrology and Water Quality section of this IS. The SWPPPs shall identify Best Management Practices (BMPs) related to the control of toxic substances, including construction fuels, oils, and other liquids. These BMPs would be implemented by the contractors prior to the start of any ground disturbing activity, and would be maintained throughout the construction period and remain in place until all landscape and permanent BMPs are in place. BMPs shall be monitored and repaired if necessary to ensure maximum erosion, sediment, and pollution control. Further, as identified in MM BIO-2, temporary fencing (e.g., silt fencing or snow fencing) shall be placed around the adjacent drainage feature to mark the limits of the drainage to ensure no encroachment occurs during construction. Within implementation of these protection measures during construction, indirect impacts to jurisdictional areas would be less than significant.

Additional Project-Level Mitigation Measures

BIO-2 Prior to the initiation of grading activities, the contractor specifications for the Willow Creek Staff Housing Project and Cedar Suites Project shall include a note requiring installation of temporary fencing (e.g., silt fencing or snow fencing) around the adjacent drainage feature to mark the limits of the drainage and ensure no encroachment occurs during construction. The Capital Programs University Representative shall review the contractor specifications to confirm the required note is included, and shall verify installation of the required fencing in the field.

Level of Significance

The Project would have no impact on any riparian habitat or other sensitive natural community, and potential direct impacts on wetlands would be less than significant.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐

Discussion

Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

No wildlife movement corridors or open space areas have been designated by the San Bernardino County Policy Plan Open Space Element on or immediately adjacent to the Project site. The Project would be confined to the existing developed/disturbed areas within the UCLA LAL. The Project would be isolated from regional wildlife corridors and linkages. Additionally, there are no riparian corridors, creeks, or useful patches of steppingstone habitat within or connecting the Project sites to any identified wildlife corridors or linkages. As such, the implementation of the Project would not disrupt or result in substantial adverse effect on any migratory corridors or linkages in the surrounding area, resulting in a less than significant impact.

Birds and raptors protected by the MBTA and/or the California Fish and Game Code may nest in trees and shrubs within the Project sites. The removal or thinning of trees and shrubs to allow for construction of the Project and for brush management could directly impact nesting birds, including nesting raptors. In addition, the dust, noise, and/or increased human presence associated with Project construction could indirectly impact nesting birds, including nesting raptors. The loss of an occupied nest as a result of construction or demolition activities would constitute a substantial adverse effect (i.e., “take” or “destruction” under Section 3513 of the California Fish and Game Code) and, in the case of raptors, would constitute the “take” or “destruction” of the nest or egg under Section 3503.5 of the California Fish and Game Code. Should construction activities begin during the nesting season for avian species or raptors, the contractor would comply with the requirements outlined in MM BIO-1, presented under Threshold a, which requires pre-construction nesting bird surveys and identifies protection measures to be implemented if nests are present. With adherence to the requirements established by the MBTA and the California Fish and Game Code, as presented in MM BIO-1, potential impacts to nesting birds and raptors would be less than significant.

Additional Project-Level Mitigation Measures

Refer to MM BIO-1.

Level of Significance

The Project would have a less than significant impact on the movement of any native resident or migratory fish or wildlife species, and no impact on established native resident or migratory wildlife corridors, or on the use of native wildlife nursery sites.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Discussion

Although the University of California is not subject to local zoning and planning ordinances, including the County of San Bernardino Development Code, it considers the plans and policies of the County of San Bernardino as part of its planning process. County of San Bernardino Development Code Chapter 88.08 (Plant Protection and Management) provides regulations and guidelines for the management of plant resources. According to Section 88.01.030 (Exempt Activities), the Project would be exempt from the regulations and Guidelines presented in Chapter 88.01 because the Project sites are owned by a State entity. Because the Project is exempt from Chapter 88.01 of the County of San Bernardino Development Code, the Project would not result in a conflict with policies protecting biological resources such as trees.

It should be noted that the Project also incorporates UCLA LRDP Amendment Final SEIR MM 4.3-1(c), as modified for the Project, which requires that mature trees (greater than 12 inches dbh) that are removed during construction be replaced at a 1:1 ratio. Further, it is possible that trees protected in place could be damaged during construction activities. Protection of these trees would be accomplished through of the incorporation of PP 4.3-1(a) through PP 4.3-1(d) identified above, which outline UCLA's tree protection requirements that are applicable to the Project.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not conflict with any applicable policies protecting biological resources.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

The UCLA LAL, which includes the Project sites, is within the Lake Arrowhead Community Planning Area. This Community Planning Area is not within an adopted Habitat Conservation Plan (HCP) or other approved local, regional, or State HCP. Additionally, no habitat conservations plans were approved and none are currently in the process of approval for the lands within the San Bernardino National Forest at the time this IS was prepared. Therefore, implementation of the Project would not conflict with such plans and there would be no impact.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

There is no impact because the Project would not conflict with the provisions of an adopted HCP, NCCP, or other applicable habitat conservation plan.

5. CULTURAL RESOURCES

Relevant elements of the Project related to cultural resources include excavation to a depth of up to 10 feet for the Cedar Suite component of the Project that could extend into native sediments, and limited excavation for the Willow Creek Staff Housing and Glamping components of the Project.

Information in this section is based on the following technical reports prepared for the Project:

- *Cedar Lodge Historic Resource Evaluation, UCLA Lake Arrowhead Conference Center* (Historic Resource Evaluation) prepared by Page & Turnbull (March 13, 2019), and included in Appendix C1 of this IS ((Page & Turnbull, 2019) included in Appendix C1 of this IS.

- *Cultural Resources Study for the Cedar Suites and Willow Creek Housing Project, Lake Arrowhead, San Bernardino County, California* prepared by Brian F. Smith and Associates, Inc. (October 21, 2021) (BFSA, 2021a) included in Appendix C2 of this IS.

- *Cultural Resources Study for the UCLA Glamping Facility Project, Lake Arrowhead, San Bernardino County, California* (October 21, 2021) (BFSA, 2021b) included in Appendix C3 of this IS.

It should be noted that to be conservative the study area established in the Cultural Resources Studies extended beyond the physical limits of the Project sites that is shown on the aerial photographs presented on Figure 5 and Figure 7 (i.e., the physical impact areas). The study area for the Willow Creek Staff Housing and Cedar Suites components of the Project encompasses approximately 1.4 acres (compared to the approximately 0.8-acre impact area), and the study area for the Glamping component of the Project encompasses approximately 4.85 acres (compared to the approximately 0.4-acre impact area).

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒

Discussion

Regulatory Framework

Section 4.4, Cultural and Tribal Cultural Resources, of the LRDP Amendment Final SEIR, which is incorporated by reference, and the Historic Resource Evaluation prepared for Cedar Lodge (included in Appendix C1) include a detailed discussion of the regulatory framework for cultural and historic resources, including categories of historic resources, as outlined in Section 15064.5(a) of the CEQA Guidelines, and the thresholds for significant impacts to historic resources as outlined in Section 15064.5(b) of the CEQA Guidelines. Following is a summary of regulations particularly relevant to the Project. It should also be noted that San Bernardino County does not have a historic preservation ordinance or local landmark program.

National Register of Historic Places

The National Register of Historic Places (NRHP) is the nation's most comprehensive inventory of historic resources. The NRHP is administered by the National Park Service and includes districts, sites, buildings, structures and objects significant in American history, architecture, archeology, engineering, and culture. These resources contribute to an understanding of the historical and cultural foundations of the Nation at the national, state, or local level. Typically, properties over 50 years of age may be eligible for listing in the NRHP if they meet any one of the four significance criteria and if they retain sufficient historic integrity to convey that significance. Properties under 50 years of age may be determined eligible if it can be demonstrated that they are of "exceptional importance." Other criteria considerations apply to cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed buildings, and properties primarily commemorative in nature. NRHP criteria are defined in depth in *National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation*. The NRHP has four basic criteria under which a property may be considered eligible for listing. It can be found significant under one or more of the following criteria:

- **Criterion A (Event).** Properties associated with events that have made a significant contribution to the broad patterns of our history;
- **Criterion B (Person).** Properties associated with the lives of persons significant in our past;
- **Criterion C (Design/Construction).** Properties that embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or have yielded; and

- **Criterion D (Information Potential).** Properties that may be likely to yield information important in prehistory or history.

In order to be eligible for listing in the NRHP, a property must retain sufficient integrity to convey its significance. National Register Bulletin 15 establishes how to evaluate the integrity of a property. In summary, to retain historic integrity, a property must possess several, and usually most, aspects of integrity: location, design, setting, materials, workmanship, feeling and association.

California Register of Historical Resources

The California Register of Historical Resources (California Register) is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change." A property may be eligible for listing in the California Register if it meets one or more of the following criteria:

- **Criterion 1 (Event).** Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- **Criterion 2 (Persons).** Associated with the lives of persons important in our past;
- **Criterion 3 (Design/Construction).** Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- **Criterion 4 (Information Potential).** Has yielded, or may be likely to yield, information important in prehistory or history.

These criteria are based upon NRHP criteria; however, the California Register does not impose as specific requirements for integrity and age as the NRHP. Properties eligible for listing in the California Register must retain enough of their historic character or appearance to be recognizable as historic resources and to convey the reasons for their significance. While the NRHP guidelines for integrity can be applied for California Register eligibility, it is possible that resources, which may not retain sufficient integrity for listing in the NRHP, may still be eligible for the California Register. With the exception of some properties with additional criteria consideration (50 years or less, moved buildings, etc.), properties that meet the NRHP criteria typically also meet the California Register criteria and vice versa and are often evaluated together.

California Environmental Quality Act

CEQA requires a lead agency to determine whether a project would have a significant effect on the environment, including historical resources. CEQA Guidelines Section 15064.5, Determining the Significance of Impacts to Archeological and Historical Resources, requires that all private and public activities not specifically exempted should be evaluated against the potential for environmental damage, including effects to historical resources. A building may qualify as a historic resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a), which are defined as:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register) (PRC Section 5024.1, Title 14 CCR, Section 4850 et seq.).

2. A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in an historical resource survey meeting the requirements of PRC Section 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1, Title 14 CCR, Section 4852).
4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or identified in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.5.

Records Search

During preparation of the Cultural Resources Studies, BFSA conducted a records search for a one-half-mile radius around the established study areas for the Project components at the South Central Coastal Information Center (SCCIC) at California State University (CSU) Fullerton on April 20, 2021. The records search indicated that there are 12 historic resource locations recorded within one-half-mile radius of the Glamping study area, and 13 historic resource locations within one-half-mile radius of the Willow Creek Staff Housing and Cedar Suites study area. These sites included 2 prehistoric sites discussed under Threshold b below. Historic sites include one historic fish hatchery, one historic water control feature, three historic structures, and five historic road alignments within one-half-mile radius of each of the Project sites, and 1 additional site for which no records were available within one-half-mile of the Willow Creek and Cedar Suites study areas. In addition, BFSA reviewed the following historic sources provided by the SCCIC: the National Register of Historic Places (NRHP) Index; the Office of Historic Preservation, Archaeological Determinations of Eligibility; the Office of Historic Preservation, Built Environment Resources Directory in the Historic Property Data File; historic USGS data; and historic aerial photographs. The only history period structure identified within the study areas for the Project was the Cedar Lodge built in 1946. The existing maintenance building at the Willow Creek site that would be removed to accommodate the Willow Creek Staff Housing component of the Project was built in the late 1980s and is not a historic resource.

Cedar Lodge

Cedar Lodge is not currently listed in the NRHP or the California Register. It does not appear to have been previously identified or surveyed as a historic resource. It is not listed in the most recent available published version of the California Historic Resources Information System (CHRIS) database from 2012 with any status code, which means that the property has not been previously surveyed using California Historical Resource Status Codes or that the surveys were not submitted to the California Office of Historic Preservation. Because Cedar Lodge is over 50

years old, the building's eligibility for individual listing in the NRHP and the California Register has been evaluated.

As presented in the Historic Resource Evaluation included in Appendix C1 of this IS, Cedar Lodge at the UCLA LAL does not appear to be individually eligible for listing in the NRHP or the California Register under any criteria. As Cedar Lodge was constructed as an employee dormitory over 20 years after the property was first developed as the clubhouse on Lake Arrowhead's north shore, it is not associated with the development of Lake Arrowhead as a resort destination. No significant individuals have been identified in association with Cedar Lodge. The building has typical elements of the Norman English style found at LAL, but it is not a particularly distinctive example of the style. No architect or designer has been found associated with the building's original design. In addition, there does not appear to be an eligible historic district at the conference center property. Although the Main Lodge and several cottages at UCLA LAL were among the earliest buildings constructed by the Arrowhead Lake Company for their resort project, not enough of the original 1922 buildings remain to constitute a historic district associated with Lake Arrowhead's early development. Several of the original cottages were demolished and replaced with new, larger condolets in 1995. Only the Main Lodge, which has had several additions, and three bungalows (Brookside, Stonewall, and Willow Creek) remain from the 1920s. As such, Cedar Lodge is not considered a historic resource for the purposes of CEQA.

Further, as Cedar Lodge does not meet any significance criteria for listing in the NRHP or California Register, a full integrity assessment is not required. Notwithstanding, based on the alterations plans from 1984 and 1995 and observations made during the site visit conducted by Page & Turnbull during preparation of the Historic Resources Evaluation, it appears the exterior of the building has been somewhat altered with the removal of a porch and balcony at the west façade, along with three of four doors that led to the porch/balcony. The primary entrance seems to have been relocated from the west façade to the south façade, where a new porch was added in 1984. In addition, a sizable deck and bridge were added at the west façade to offer direct access to the third-floor conference room, which required altering a number of windows into doors at the third floor. With very little of the original interiors remaining after the 1995 renovations, Cedar Lodge's integrity of design and feeling have been compromised to a certain extent, as has its materials and workmanship to a lessor extend, though it retains its integrity of location, setting, and association.

Because Cedar Lodge is not a historic resource for purposes of CEQA, no impact to historic resources would result with implementation of the Project, and no mitigation is required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have no impact related to the potential to cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐

Discussion

Based on the records search conducted by BFSA, there are no previously recorded archaeological sites within the establish cultural resources study areas. There is one prehistoric bedrock milling feature site (P-36-020265), and one prehistoric habitation site (P-36-000441), within a one-half-mile radius. Notably, the bedrock milling feature is within the study area boundaries for the Glamping component of the Project; however, it is not within the physical impact limits.

BFSA also conducted an archaeological survey on April 20, 2021 consisting of a series of survey transects across the cultural resource study areas for each Project component. The entirety of the Willow Creek and Cedar Suites study area was accessible; however, a large portion of the study area has been previously developed and is covered with structures and hardscape. A variety of native trees are present throughout the western portion of the study area, dirt and paved roads traverse the area, and most of the eastern, central, and southern portions of the area is covered in hardscape. According to aerial imagery, the Cedar Suites site has been largely disturbed by the development of the Cedar Lodge since 1946. The archaeological survey did not result in the identification of any prehistoric cultural resources within the study area.

The archaeological survey of the Glamping cultural resource survey area included an intensive pedestrian reconnaissance that employed a series of parallel survey transects spaced at approximately five-meter intervals to locate archaeological sites within the study area. The entire study area was covered by the survey process, and photographs were taken to document conditions during the survey (see Section 4.2 of the Cultural Resources Survey included in Appendix C3 of this IS). During the survey, bedrock outcroppings were identified and checked for signs of prehistoric use. As a result, the previously recorded prehistoric bedrock milling site (P-36-020265) consisting of two bedrock milling features, was relocated within the north-central portion of the study area. Previously recorded Site P-36-020257 was mapped on the edge of the study area (not within the Glamping impact area); however, the site was not identified in the study area as a result of the current survey. To determine the significance of this site, which encompasses approximately 17.0-square-meters, an archaeological testing program was conducted by BFSA on May 12, 2021, as detailed in the Cultural Resources Study included in Appendix C3, and summarized in the Tribal Cultural Resources section of this IS. The testing program determined that the site does not qualify as a significant archaeological resource under any of the stated criteria and is ineligible for listing on the CRHR. No further archaeological investigations are required for the evaluation of Site P-36-020265. Although Site P-36-020265 is not a CEQA-significant resource, preservation of any prehistoric Native American site is recommended. The site would not be directly impacted by the Glamping project, thus preserving the site; however, MM CULT-1 requires that temporary fencing be installed around the milling features during construction to ensure the milling features are avoided by construction crews and equipment.

Given that the prior development at the Willow Creek and Cedar Suites sites might have masked archaeological deposits, and based upon the presence of Cedar Lodge, constructed in 1946, and the limited visibility during the survey, there is a potential that buried archaeological deposits exist

that may be impacted by construction of the Willow Creek Staff Housing and Cedar Suites components of the Project. Given that construction for the Glamping facilities would generally consist of excavating post holes for footings to install supports for platforms, which would take place on slopes where it is highly unlikely that any cultural resources would be encountered, and the installation of supporting uses and facilities (utility infrastructure, restrooms, and roadway improvements) would occur along existing trails or previously disturbed areas, the potential for impacts to unrecorded cultural resources is low. Therefore, the Glamping component of the Project is not expected to have an adverse effect upon any cultural resources. However, due to the presence of the bedrock milling features, which indicate prehistoric use of this property, and the density of cultural resources within one-half mile of the study areas, the potential exists that other unidentified cultural resources may exist that may be uncovered during construction.

The potential to encounter unknown archaeological resources during Project construction activities is considered a potentially significant impact. Therefore, it is recommended that all earth disturbances associated with the development of the Project (Willow Creek Staff Housing, Cedar Suites, and Glamping) be monitored by an archaeologist and Tribal monitor, as identified in MM CULT-2 and MM CULT-3. Further, MM CULT-4 identifies actions to take in the event that archaeological or tribal cultural resources are discovered during construction, and MM CULT-5 identifies the required treatment of cultural resources.

With implementation of MM CULT-1 through MM CULT-5, potential impacts to archaeological resources would be less than significant.

Additional Project-Level Mitigation Measures

The following measure is required to protect Site P-36-020265 from disturbance during construction.

CULT-1 Prior to the initiation of grading activities, the contractor specifications for the Glamping Project shall include a note requiring installation of temporary fencing (e.g., silt fencing or snow fencing) around the existing milling features (Site P-36-020265) to ensure no encroachment occurs during construction. The Capital Programs University Representative shall review the contractor specifications to confirm the required note is included, and shall verify installation of the required fencing in the field.

The following measures are required to protect unknown archaeological and tribal cultural resources that could potentially be encountered during construction. These measures meet or exceed the requirement outlined in LRDP Amendment Final SEIR MM 4.4-2(b), which describes procedures to be followed in the event that cultural resources are discovered; and MM 4.4-2(c), which requires that projects that would occur on a site with native sediments/soils have a qualified archaeological monitor present during earth-disturbing activities.

CULT-2 Monitor(s) Shall Be Present During Grading/Excavation/Trenching

1. Due to the heightened cultural sensitivity of the proposed project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of archaeological monitors shall be

present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.

2. A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist and submitted to the Capital Programs University Representative for dissemination to the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI). Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.
3. The principal investigator (PI) may submit a detailed letter to the Capital Programs University Representative during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating previous grading/trenching activities, presence of fossil formations, or native soils is encountered that may reduce or increase the potential for resources to be present. The Capital Programs University Representative shall disseminate the letter to the SMBMI.

CULT-3 Tribal Monitoring

1. Due to the heightened cultural sensitivity of the proposed project area, Tribal monitors representing the SBMI shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of Tribal monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.
2. A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist, as detailed within "A" above, and submitted to the Capital Programs University Representative for dissemination to the SMBMI. Once all parties review and agree to the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

CULT-4 Discovery Notification Process

1. In the event of an archaeological discovery, either historic or prehistoric, the archaeological monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources, and immediately notify the Native American monitor and Capital Programs University Representative, as appropriate.
2. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery.

CULT-5 Treatment of Cultural Resources

1. If human remains are involved, follow protocol in MM CULT-6, below. The PI shall evaluate the significance of the resource.

a. If a pre-contact cultural resource is discovered during archaeological presence/absence testing, the discovery shall be properly recorded and then reburied in situ. A research design shall be developed by the archaeologist that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from the SMBMI, the archaeologist/applicant, and the Capital Programs University Representative shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the archaeological significance of the resource, its potential as a Tribal Cultural Resource (TCR), avoidance (or other appropriate treatment) of the discovered resource, and the potential need for construction monitoring during project implementation. Should any significant resource and/or TCR not be a candidate for avoidance or preservation in place, and the removal of the resource(s) is necessary to mitigate impacts, the research design shall include a comprehensive discussion of sampling strategies, resource processing, analysis, and reporting protocols/obligations. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the SMBMI, unless otherwise decided by SMBMI. All plans for analysis shall be reviewed and approved by the Capital Programs University Representative and SMBMI prior to implementation, and all removed material shall be temporarily curated on-site. It is the preference of SMBMI that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by SMBMI, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, California Historical Resource Information System (CHRIS), and SMBMI. All reburials are subject to a reburial agreement that shall be developed between the landowner and SMBMI outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, etc.).

b. Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with SMBMI to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

c. All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Capital Programs University Representative and SMBMI for their review and comment. After approval from all parties, the final reports and site/isolate

records are to be submitted to the local CHRIS Information Center, the Capital Programs University Representative, and SMBMI.

d. If the resource is not significant, the PI shall submit a letter to the Capital Programs University Representative and SMBMI indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that no further work is required.

Level of Significance

The Project would have a less than significant impact related to the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion

As discussed under Threshold b, archaeological records searches and Sacred Land Files checks for the Project, have not yielded evidence of known archaeological resources, including human burials. However, because the Project would involve excavation, including into native sediment, the potential exists for previously unidentified human burials to be present and for excavation during construction activities to disturb these resources, although the likelihood of such a discovery is extremely low.

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in PRC Section 5097. Disturbing human remains could violate the health code and destroy the resource and would be considered a significant impact. Consistent with LRDP Amendment Final SEIR PP 4.4-5, MM CULT-6 identifies procedures that shall be taken in the event that human remains are discovered, including compliance with State law. With implementation of MM CULT-6, potential impacts related to disturbance of human remains would be less than significant.

Additional Project-Level Mitigation Measures

CULT-6 Discovery of Human Remains

If human remains are discovered, work shall halt in that area until a determination can be made regarding the provenance of the human remains, and the following procedures as set forth in CEQA Section 15064.5(e), the California PRC (Sec. 5097.98), and the State Health and Safety Code (Sec. 7050.5) shall be undertaken:

1. In the event that any human remains are discovered within the project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The on-site lead/foreman shall then immediately who shall notify SMBMI, and the

Capital Programs University Representative. The Capital Programs University Representative shall then immediately contact the San Bernardino County Medical Examiner and Coroner's Office regarding the discovery. If the medical examiner/coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the medical examiner/coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5(c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code §5097.98(a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD and the Capital Programs University Representative agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of the site visit, as required by California PRC §5097.98.

2. Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California PRC §5097.98(a) and (b). The MLD, in consultation with the Capital Programs University Representative, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The University of California should accommodate on-site reburial in a location mutually agreed upon by the Parties.

   It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The medical examiner/coroner, parties, and lead agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254(r).

3. If human remains are **NOT** Native American

   - The PI shall contact the medical examiner and notify them of the historic-era context of the burial.
   - The medical examiner will determine the appropriate course of action with the PI and lead agency staff (PRC Section 5097.98).
   - If the remains are of historic origin, they shall be appropriately removed and conveyed to the lead agency. The decision for internment of the human remains shall be made in consultation with the lead agency/property owner, and any known descendant group.

Level of Significance

The Project has a less than significant potential to disturb any human remains, including those interred outside of formal cemeteries.

6. ENERGY

Relevant elements of the Project related to energy include the use of construction equipment for the demolition of existing buildings and associated parking and accessory uses at the Willow Creek and Cedar Suites sites; site preparation and grading; and construction of the Willow Creek Staff Housing building, Cedars Suites, Glamping facilities (cabins and bathrooms); and associated paving and utility installation. Operation of the Project would require the direct use of electrical energy for heating, lighting, and typical household appliances. Natural gas would not be used. Indirect use of electrical energy would be required to provide water and to treat wastewater. As described in Section II.5, Project Components, under the discussion of "Sustainable Building Features", and discussed below, the Project would comply with the UC Policy on Sustainable Practices. The Project would achieve a minimum LEED NC Silver rating, but UCLA would strive to achieve a LEED Gold rating.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs and MMs from the Final EIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the Project and are assumed in the analysis presented in this section: PP 4.2-2(b), MM 4.2-2(a), and MM 4.2-2(c) from the Air Quality section, which address requirements for construction equipment; and PP 4.15-1 from the Greenhouse Gas Emissions section, which addresses compliance with the UC Policy on Sustainable Practices.

In addition, PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), 4.14-3, and 4.14-9, included in the Utilities and Service Systems section of this IS, require that UCLA continue to implement energy and water conservation measures, and reduce solid waste generation, which would, in turn, reduce associated energy consumption.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

Discussion

Construction

Construction of the Project would consume energy in the use of fossil-fueled and electrically driven construction equipment, fossil-fueled haul trucks, and fossil-fueled and electrically driven worker commute vehicles. LRDP Amendment Final SEIR PPs and MMs adopted for the purpose of reducing construction phase air pollutant or GHG emissions also result in positive energy use benefits. PP 4.2-2(b) requires that the equipment be maintained in good condition and in proper tune, and also results in energy efficiency. MM 4.2-2(a) limits idle time on equipment and delivery trucks and also reduces energy consumption. MM 4.2-2(c) requires that diesel equipment be Tier 3 or better, which means that the equipment would be newer and more efficient than older models that might otherwise be used.

Federal and State regulations also promote construction-phase energy efficiency. USEPA Phase 1 regulations required heavy-duty truck engines manufactured after 2014 to meet fuel efficiency standards (USEPA/NHTSA, 2011). Phase 2 regulations increased fuel efficiency requirements for medium- and heavy-duty engines manufactured in the years 2018-2027 (USEPA/NHTSA, 2016). CARB's Statewide Truck and Bus Regulation requires that heavy-duty diesel vehicles must upgrade to model year 2010 or newer, more efficient engines with separate compliance schedules for lighter and heavier trucks (CARB, 2021). CARB's Diesel-Fueled Commercial Motor Vehicle Idling Regulation requires heavy-duty diesel truck operators to turn off engines after five minutes of idling. 2008 and newer engines are required to be equipped with five-minute automatic engine shutdown system, thus reducing energy use from unnecessary idling.

The equipment used for Project construction would conform to federal and CARB regulations. There are no unique or unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities nor is the use of any equipment anticipated that would not conform to current requirements relative to fuel efficiency or equipment operation. Therefore, it is concluded that with the implementation of the applicable Final SEIR PPs and MMs, construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, resulting in a less than significant impact.

Operations

Operational energy uses would include direct electrical use for HVAC, lighting, and appliances; indirect energy use for process and distribution of water and wastewater; and fossil-fueled and electrically driven guest vehicles. There are no aspects of the Project that would contribute to wasteful, inefficient, or unnecessary energy consumption. Conversely, as described in Section II.5, Project Components, the Project would achieve a minimum LEED NC Silver rating, but would strive to achieve LEED Gold. To achieve this rating, the design, construction, and operation of the Project would adhere to CalGreen Code requirements, would participate in applicable Savings by Design Conservation Programs, and would incorporate a series of green building strategies including, but not limited to, the following required features:

- Outperforming CBC Title 24 energy efficiency requirements, that are in effect at the time of building design, by 20 percent;
- Selecting water fixtures (e.g., taps, toilets, shower heads, and other fixtures) to achieve a reduction in water demand and increase water efficiency;
- Including recycled content construction materials and regional construction materials in Project design to reduce the effects of resource consumption; and
- Restricting use of natural gas for space and water heating.

Further, the following specific energy conservation measures have been implemented at the UCLA LAL, and would also be applicable to the Project:

- **Energy**. Energy efficiency is reached by LED lighting, ENERGY STAR appliances, and HVAC sensors.
- **Water**. In response to California’s drought, Lake Arrowhead installed hydration stations throughout the center to refill reusable water bottles, as well as designed a native landscape with drought tolerant vegetation. Additionally, water saving efforts have been focused in bathrooms, automatic faucets, and toilets that are in all public areas. The guest rooms also have ultra-low-flow toilets.

- **Transportation**. Sustainable transportation measures include electric golf carts and electric vehicles for on-site transportation, as well as electric vehicle charging stations for guests.

Summarizing, the Project would conserve energy with building and systems design reducing direct and indirect electrical use. Operational energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would result in a less than significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

Regulatory Framework

Although Energy was added in December 2018 as a new topic in the Environmental Checklist included in Appendix G of the CEQA Guidelines, addressing energy consumption/conservation is not a new requirement. This issue is addressed in Section 6.7, Energy Conservation, and Section 4.6, Greenhouse Gas Emissions, of the LRDP Amendment Final SEIR, which is incorporated by reference. Various State and/or University regulations, plans, and policies for greenhouse gas (GHG) emissions reduction focus on energy efficiency and renewable energy. State and University regulations addressed in the Final SEIR relative to energy include the following; information has been updated, as appropriate:

- **Executive Order B-30-15.** On April 29, 2015, Governor Edmund Brown signed EO B-30-15, which orders “A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050” (COOG, 2015). Three of the five key goals for reducing GHG emissions through 2030 relate to energy: (1) increasing renewable electricity to 50 percent; (2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; and (3) reducing petroleum use in cars and trucks by up to 50 percent.
- **Senate Bill 350.** SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of EO B-30-15. The objectives of SB 350 are (CEC, 2021a) :

(1) To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.

(2) To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

The text of SB 350 sets a December 31, 2030, target for 50 percent of electricity to be generated from renewable sources.

- **Title 24 Energy Efficiency Standards.** The Title 24 Energy Efficiency Standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The currently applicable standards are the 2019 Standards, effective January 1, 2020. The 2019 standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The ventilation measures improve indoor air quality, protecting homeowners from air pollution originating from outdoor and indoor sources (CEC 2021). The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Both natural gas and electricity use produce GHG emissions. The goal of the standards is to reduce energy use in new homes by more than 50 percent. It should also be noted that on August 11, 2021, the CEC adopted the 2022 Energy Code which will be presented to the California Building Standards Commission (CBSC) for approval into the California Building Standards Code in December 2021. If approved, the 2022 Energy Code will go into effect on January 1, 2023 and will be applicable to Projects that are initiated after this date (CEC, 2021b).
- **Title 24 Green Building Standards (CalGreen Code).** The CalGreen Code is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went into effect on January 1, 2011, and is administered by the CBSC. CalGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 CalGreen Code that went into effect January 1, 2020 (DGS, 2021a). The CalGreen Code is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.
- **UC Policy on Sustainable Practices.** In June 2004, the UC developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the University as a leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, it has been revised several times (with the most recent version effective July 2020). Notably, the UC Policy on Sustainable Practices covers the areas of green building design, clean energy, and sustainable transportation. Particularly relevant to the Project, the UC Policy on Sustainable Practices, under the category of Green Building Design, requires that new buildings meet a minimum rating of LEED Silver, outperform Title 24 Energy Efficiency Standards by 20 percent, and register with the Savings by Design program in order to document compliance with the requirement to outperform energy efficiency standards by at least 20 percent (UC, 2020).

- **Senate Bill 100.** In September 2018, the Governor signed into law the California Clean Energy Act (SB 100), which accelerated the State Renewables Portfolio Standard (RPS)[8] to 60 percent by 2030. The bill also requires that 100 percent of all retail sales of electricity come from eligible renewable energy and zero-carbon resources by 2045. (CEC, 2021c)
- **EO B-55-18** sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045, and achieve net negative emissions thereafter.

Section California PRC Section 21100(b)(3) and Appendix F to the State CEQA Guidelines require a discussion of potential energy impacts of proposed projects. Appendix F states:

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

(1) Decreasing overall per capita energy consumption,

(2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and

(3) Increasing reliance on renewable energy sources.

Consistency Analysis

The UCLA LAL purchases power from Southern California Edison (SCE). As identified in SCE's 2020 Sustainability Report:

> In line with the state of California's climate objectives and policies, SCE's 2045 goal is to deliver 100% carbon-free power to customers in terms of retail sales. More than 40% of the power SCE delivered to customers in 2020 is estimated to have come from carbon-free sources, including predominantly California Renewables Portfolio Standard (RPS)-eligible resources such as wind and solar, along with other carbon-free sources such as large hydroelectric and nuclear power.

Thus, the Project is consistent with the renewable energy elements of EO B-30-15, SB 350, SB 100, and EO B-55-18. The Project is also consistent with the CEQA goal of increasing reliance on renewable energy sources. As discussed in Section II.5, Project Components, and above, the Project would meet the requirements and intent of the UC Policy on Sustainable Practices as it pertains to green building design and energy efficiency. The Project would achieve a minimum LEED Silver NC rating and UCLA would strive to achieve a LEED Gold rating. The Project would outperform the required provisions of Title 24 Energy Efficiency Standards by at least 20 percent, and would comply with CalGreen Code Mandatory Measures.

Notable features of the Project to address improving energy efficiency are described in the response to question a above. The new buildings would be all-electric, and the provision of EV charging stations at UCLA LAL decreases reliance on fossil fuels.

Therefore, the Project would be implemented in compliance with the UC Policy on Sustainable Practices, Title 24 Energy Efficiency Standard, and the CalGreen Code. The Project would result in a less than significant impact related to conflict with or obstruction of a state or local plan for renewable energy or energy efficiency.

[8] The Renewables Portfolio Standard (RPS) is one of California's key programs for advancing renewable energy. The program sets continuously escalating renewable energy procurement requirements for the State's load-serving entities. Generation must be procured from RPS-certified facilities.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency resulting in a less than significant impact.

7. GEOLOGY AND SOILS

Relevant elements of the Project related to geology and soils include removal of the Cedar Lodge, which is seismically deficient; proposed excavation of up to 10 feet below the ground surface (bgs) for removal of the existing Cedar Lodge; other earth-moving activities; construction of new buildings at the Willow Creek and Cedar Suites sites, which are currently developed with existing structures; and, installation of 10 cabins on platforms and new bathroom structures at the currently undeveloped Glamping site. The piles to support the platforms would be extended to the underlying bedrock (also up to 10 feet bgs).

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the Project, which is off campus.

PP 4.5-1(a) *During project-specific building design, a site-specific geotechnical study shall be conducted under the direct supervision of a California Registered Engineering Geologist or licensed Geotechnical Engineer to assess detailed seismic, geological, soil, and groundwater conditions at each construction site and develop recommendations to prevent or abate any identified hazards in accordance with the requirements of the applicable California Building Code in effect at the time of construction. Recommendations from the site-specific geotechnical study shall be included in the grading plans and/or building design specifications for each project. The study shall follow applicable recommendations of CGS Special Publication 117 and shall include, but not necessarily be limited to:*

- *Determination of the locations of any suspected fault traces and anticipated ground acceleration at the building site;*
- *Potential for displacement caused by seismically induced shaking, fault/ground surface rupture, liquefaction, differential soil settlement, expansive and compressible soils, landsliding, or other earth movements or soil constraints;*
- *Evaluation of depth to groundwater.*

PP 4.5-1(c) *~~The campus~~**UCLA** shall continue to comply with the University Policy on Seismic Safety effective May 19, 2017 or with any subsequent revision to the policy that provides an equivalent or higher level of protection with respect to seismic hazards.*

PP 4.5-1(d) *Development projects ~~under the LRDP Amendment~~ shall continue to be subject to structural peer review; following this review, any site-specific geotechnical study*

recommendations, including any recommendations added as a result of the peer review, shall be incorporated in the project design as appropriate.

In addition, PP 4.7-1 and MM 4.7-1 presented in the Hydrology and Water Quality section of this IS are also incorporated into the Project and address implementation of BMPs to protect water quality.

Section 4.5, Geology and Soils, of the LRDP Amendment Final SEIR, includes a detailed discussion of the federal, State, and University regulatory framework related to geology and soils and is hereby incorporated by reference. As identified, the national model code standards (i.e., the International Building Code) adopted into Title 24 apply to all occupancies in California except for modifications adopted by State agencies and local governing bodies. The current version of the CBC is the 2019 triennial edition, which became effective in January 2020. The Project will be subject to the CBC in effect at the time of construction.

Consistent with LRDP Final SEIR PP 4.5-1(a), a site-specific geotechnical study (Geotechnical Investigation) was prepared for the Project by Geotechnologies, Inc., (July 9, 2021) (Geotechnologies, 2021) and is provided in Appendix D of this IS. The Geotechnical Investigation involved excavation of 16 exploratory soil borings to depths between 4 feet and 8 feet; laboratory testing of representative soil samples collected from the borings; a review of public geologic data and available geotechnical engineering information; and a geotechnical engineering analysis of the Project based on the collected data. The results of the Geotechnical Investigation are summarized in the analysis below, as applicable.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐

Discussion

Based on review of available literature and performance of site reconnaissance, the Geotechnical Investigation concluded that there are no known active or potentially active faults with the potential for surface rupture traversing the Project site. The Project site is not within an Alquist-Priolo Earthquake Fault Zone, as established by the California Geological Survey (CGS). Therefore, the potential for surface rupture from a known active fault at the Project sites is considered low. Buried

thrust faults are faults without a surface expression but are a significant source of seismic activity. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. However, the risk for surface rupture potential of these buried thrust faults is inferred to be low.

Other seismic-related hazards investigated in the Geotechnical Investigation include liquefaction and slope stability (i.e., landslides). Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. The Geotechnical Investigation indicates the Project sites are underlain by moderately hard bedrock at a shallow depth. Bedrock is not considered liquifiable due to its long tectonic history and hardness. The potential for liquefaction occurring at the Project sites is negligible.

Regarding landslides, the Geotechnical Investigation concluded that no landslides or areas of instability were noted during the geologic reconnaissance. As such, the potential for seismically induced landslides occurring within the Project boundaries is low due to the lack of fracture and planar discontinuities in the bedrock.

Based on the foregoing analysis, the Project would not result in substantial adverse effects related to seismically induced geologic hazards including ground rupture, liquefaction, and landslides. This impact would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant impact related to directly or indirectly causing potential substantial adverse effects from a known earthquake fault, seismic-related liquefaction, and seismic-related landslides.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
ii) Strong seismic ground shaking?	☐	☒	☐	☐

Discussion

The Project is in the seismically active southern California region, and as identified in the Geotechnical Investigation, the primary geologic hazard at the Project sites is moderate to strong ground motion (acceleration) caused by an earthquake on any of the local or regional faults. According to the United States Geological Survey's (USGS) U.S. Quaternary Faults Map, the nearest surface trace of an active fault to the Project sites is the Tunnel Ridge Fault Zone located

approximately 2.1 miles to the northwest and the active San Andreas Fault Zone is located approximately 8.1 miles south of the Project (USGS, 2021).

Further, as previously identified, due to the buried nature of buried thrust faults, their existence is usually not known until they produce an earthquake. The seismic risk of buried thrust faults in terms of recurrence and maximum potential magnitude is not well established. Therefore, the potential for surface rupture on these surface-verging splays at magnitudes higher than 6.0 cannot be precluded.

The Geotechnical Investigation reports that the Project sites are classified as Site Class C, corresponding to a "Stiff Soil" Profile. This classification is used as the basis for seismic design parameters to be implemented for the Project in accordance with 2020 CBC standards, which are currently in effect. Potential impacts related to strong seismic ground shaking would be less than significant with implementation of (1) recommendations from the Project-specific geotechnical investigation as required by LRDP Amendment Final SEIR PP 4.5-1(a); (2) compliance with the current CBC (required by PP 4.5-1[a]); (3) incorporation of PP 4.5-1(c), which requires compliance with the University Policy on Seismic Safety; and (4) incorporation of PP 4.5-1(d), which requires structural peer review[9] and incorporation of peer review recommendations into project design. Pursuant to the University Policy on Seismic Safety, which was last updated in February 2021, no University facility with a Seismic Performance Rating (SPR) of V, VI, or VII can be occupied after December 31, 2030 (UC, 2021). Cedar Lodge, which was building in 1946, was determined to have a Seismic Performance Rating of VI, and has been partially retrofitted to a Seismic Performance Rating of V for diminished temporary use until the alternative staff accommodations can be developed (i.e., the Willow Creek Staff Housing building). Therefore, implementation of the Project would remove a building that is currently seismically deficient, in compliance with the University Policy on Seismic Safety, reducing seismic risks at the Cedar Suite site.

Although there would be less than significant impacts with incorporation of identified PPs, additional Project-level MM GEO-1 below would be required to ensure that potential impacts resulting from implementation of the Project related to seismic shaking remain less than significant.

In summary, the primary geologic hazard for the Project is moderate to strong ground shaking as a result of an earthquake. The Geotechnical Investigation concludes that neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the Project components provided the recommendations presented therein (and required by MM GEO-1) are followed and implemented during design and construction. There would be less than significant impacts related to strong seismic ground shaking with incorporation of LRDP Amendment Final SEIR PPs, and MM GEO-1 would be required to ensure that recommendations from the site-specific Geotechnical Investigation are included in the Project design.

Additional Project-Level Mitigation Measures

MM GEO-1 would be required to ensure that potential impacts resulting from implementation of the Project remain less than significant by requiring any recommendations from the Project-specific Geotechnical Investigation be incorporated into the Project design, as required by LRDP Amendment Final SEIR PP 4.5-1(a).

GEO-1 Prior to approval of final building design for the proposed structures at UCLA LAL, a qualified Engineer shall review the final designs and contract specifications to verify that

[9] Project-specific structural designs prepared by licensed structural engineers are subject to additional review by another independent licensed Structural Engineer to confirm and validate design appropriateness in accordance with regulatory requirements.

all geotechnical recommendations provided in the site-specific geotechnical investigation(s) for the Project have been fully and appropriately incorporated. At a minimum, the following shall be incorporated: Geotechnical Engineering Investigation Proposed Cottages and Tent Platforms UCLA Conference Center, 850 Willow Creek Road Lake Arrowhead, California (dated July 9, 2021 and prepared by Geotechnologies, Inc.). The recommendations for the Project include, but are not limited to, the following geotechnical engineering topics:

- Seismic Design Considerations
- Soils
- Water-Soluble Sulfates
- Grading Guidelines
- Foundation Design
- Retaining Wall Design
- Temporary Excavations
- Slabs on Grade
- Pavement
- Site Drainage
- Stormwater Disposal
- Design Review
- Construction Monitoring

Level of Significance after Mitigation

There would be a less than significant impact related to seismic ground shaking.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Discussion

The Project sites are not currently used, and are not intended to be used, for agricultural or other purposes that require topsoil. Therefore, the Project would not result in the long-term loss of topsoil.

Earth-disturbance associated with construction of the Project would include removing existing site improvements and vegetation and excavations of up to 10 feet (for the removal of Cedar Lodge building foundations). During construction activities, soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. Erosion can occur due to, and can be accelerated by, site preparation activities associated with development. Vegetation

removal in landscaped (pervious) areas could reduce soil cohesion and reduce the protection from wind, water, and surface disturbance, which could render exposed soils more susceptible to erosive forces. Additionally, excavation or grading may result in erosion during construction activities, regardless of whether hardscape previously existed at the construction site since exposed bare soils could be more easily eroded by wind or water. Additionally, during a storm event, soil erosion could occur at an accelerated rate.

Construction activities would comply with all provisions of the CBC related to excavation activities, grading activities, erosion control, and construction of foundations and retaining walls to minimize or eliminate soil erosion or loss of topsoil. In addition to compliance with the CBC, the Project would also minimize or eliminate soil erosion through preparation and implementation of a SSWPPP as required by LRDP Amendment Final SEIR PP 4.7-1 and incorporation of Final SEIR MM 4.7-1, which requires implementation of structural, nonstructural, and treatment control BMPs. Final SEIR PP 4.7-1 and MM 4.7-1 are included in the Hydrology and Water Quality section of this IS, and are incorporated into the Project. Although the SWPPP is specifically focused on water quality, as opposed to geology or geotechnical issues, it would specifically incorporate erosion control BMPs. When these required construction-level BMPs are applied, they significantly reduce the erosion potential of any project development to negligible amounts. Erosion control BMPs are designed to prevent erosion and include, but are not limited to, slope stabilization using rock or revegetation, revegetation, and hydroseeding. Incorporation of Final SEIR PP 4.7-1 and MM 4.7-1 would ensure that potential erosion impacts remain less than significant during construction.

Following completion of construction activities, soil flowing off site (by wind or water erosion) would be reduced by development and landscaped areas. Areas of exposed soils within the physical impact area of the Project components would be minimal following construction of the Project, and potential erosion impacts would be less than significant during operation.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would result in a less than significant impact related to substantial soil erosion or loss of topsoil.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒

Discussion

Preparation of the site-specific Geotechnical Investigation included excavation of test pits that varied in depth from 4 to 8 feet, collection of representative samples, laboratory testing, and engineering analysis to identify the distribution and engineering properties of the earth materials underlying the Project sites, and to provide geotechnical recommendations for the design of the proposed development. The Geotechnical Investigation identifies that the Project site is underlain by fill, colluvium, and granitic bedrock. The fill soil is distributed across the sites and is up to 4 feet in thickness. The fill soil consists of silty-sand that is dark brown, moist, and medium dense. The colluvium consists of silty-sands that is dark brown, moist, and medium dense; roots were identified in the colluvium. The bedrock consists of granite that is assigned to the Monzogranite of City Creek Formation and is yellowish brown and dark brown, moist, and moderately hard. The upper 2 feet of the bedrock is very weathered and relatively easy to excavate. The bedrock is less weathered at a depth of approximately 2 feet below the contact with colluvium. Joints or fractures were not identified in the bedrock. The onsite materials are considered satisfactory for reuse in the controlled fills as long as any debris and/or organic matter, and rock greater than 6 inches in dimension is removed from the fill.

As previously addressed under Threshold a above, groundwater was not encountered during exploration and groundwater is not anticipated to be encountered within the excavation depth (10 feet); therefore, the potential for liquefaction (and lateral spreading) is negligible. The potential for landslides is low due to the stability of the bedrock; however, the Geotechnical Investigation includes recommendations for hillside grading. Further, the Geotechnical Investigation determined that the on-site geologic materials have very low to low expansion potential and no special reinforcement considerations are required.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. These activities are not currently occurring or proposed as part of the Project; therefore, no impact related subsidence would result.

The Portland cement portion of concrete is subject to corrosion when exposed to water-soluble sulfates. The Geotechnical Investigation determined that the water-soluble sulfate content of the soils at the Project site was less than 0.01 percent by weight, considered to be a negligible sulfate exposure. There would be a less than significant impact related to corrosive soils with implementation of MM GEO-1, which ensures that recommendations from the Geotechnical Investigation are included in the Project design.

The Geotechnical Investigation concluded that the Project components would be feasible with implementation of the geotechnical recommendations outlined in the Geotechnical Investigation, as required by LRDP Amendment Final SEIR PP 4.5-1(a). Therefore, because the Project includes and incorporates Final SEIR PP 4.5-1(a), PP 4.5-1(c), and PP 4.5-1(d) and with the implementation of MM GEO-1 to ensure implementation of recommendations from the Geotechnical Investigation, there would be less than significant impacts related to unstable or expansive soils.

Additional Project-Level Mitigation Measures

Refer to MM GEO-1.

Level of Significance

The Project would result in less than significant impacts related to unstable geologic units or soils and expansive soils.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Discussion

Existing wastewater infrastructure serves the Project sites. New sewer lines installed to serve the Project would connect to the existing sewer mains within the UCLA LAL and beneath Willow Creek Road. Because no septic tanks or alternative wastewater systems are proposed, there would be no impact related to the presence of soils incapable of adequately supporting these systems.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

There would be no impact related to the presence of soils incapable of adequately supporting septic tanks or alternative wastewater disposal systems.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Discussion

Paleontological resources include fossil remains, fossil localities, and formations that have produced fossil material in other nearby areas. Paleontological resources are limited, nonrenewable, sensitive, scientific, and educational resources protected by State and federal environmental laws and regulations. Significant California fossils generally consist of fossils of late Quaternary and Tertiary age. It should be noted that the San Bernardino Mountains are relatively young, dating back to the Pleistocene era (San Bernardino County, 2018).

The most useful designation for determining if paleontological resources are likely to be present in a project area is "sensitivity" of the geologic units underlying the project area. Sensitivity refers to the likelihood of discovering significant fossils within a geologic unit. As discussed above, the Project site is underlain by fill materials to a maximum depth of 4 feet, colluvium, and granitic bedrock. The colluvial soils have a low sensitivity based on their relative youthful age and/or their high-energy depositional history and are unlikely to produce important fossil remains. The granitic bedrock has zero sensitivity; zero sensitivity is assigned to crystalline rock because these geologic units have no potential for producing fossil remains (San Bernardino County, 2018). As such, the implementation of the Project would not directly or indirectly destroy a unique paleontological resource/site or unique geologic feature. Impacts would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

There would be a less than significant impact related to the direct or indirect destruction of a unique paleontological resource or site or unique geologic feature.

8. GREENHOUSE GAS EMISSIONS

Relevant elements of the Project related to GHG emissions include the demolition of approximately 10,690 sf of existing buildings and associated parking; construction of the Willow Creek Staff Housing building to replace the existing Cedar Lodge to be demolished; construction of the Cedar Suites buildings to accommodate 12 guest rooms; and installation of infrastructure to serve these buildings. The Project also includes the installation of 10 glamping cabins and associated restrooms, and utility infrastructure. The primary contributors of operational GHG emissions would be mobile emissions, the direct use of electrical energy, and the indirect use of electrical energy to provide water and to treat wastewater. The Project is conservatively estimated to generate 176 daily vehicle trips.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs and MMs from the Final EIR have been incorporated into the Project. Therefore, the following PP is considered part of the Project and is assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the Project, which is off campus

PP 4.15-1 *~~The campus~~**UCLA** shall continue to implement provisions of the UC Policy on Sustainability Practices including, but not limited to: Green Building Design; Clean Energy Standards; Climate Protection Practices; Sustainable Transportation Practices; Sustainable Operations; Recycling and Waste Management; Environmentally Preferable Purchasing Practices; and provisions of the applicable UCLA Climate Action Plan.*

In addition, PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), 4.14-3, and 4.14-9 included in the Utilities and Service Systems section of this IS have been incorporated into the Project, as applicable, and require that UCLA facilities continue to implement energy and water conservation measures and reduce solid waste generation which would, in turn, reduce associated GHG emissions.

Greenhouse Gas Background

Description of Global Climate Change

Increasing GHG emissions have led to an anthropogenic[10] warming trend of the Earth's average temperature, which is causing changes in the Earth's climate. GHG emissions are primarily associated with (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activities; and (4) solid waste decomposition. This increasing temperature phenomenon is known as "global warming", and the climatic effect is known as "climate change" or "global climate change".

Climate change is a recorded change in the Earth's average weather measured by variables such as wind patterns, storms, precipitation, and temperature. Historical records show that global temperature changes have occurred naturally in the past, such as during previous ice ages.

The year 2020 ranks as Earth's hottest year on record, tying 2016.[11] Overall, Earth's average temperature has risen more than 2 degrees Fahrenheit since the 1880s. Continuing the planet's long-term warming trend, the year's globally averaged temperature was 1.84 degrees Fahrenheit (1.02 degrees Celsius) warmer than the baseline 1951-1980 mean. The last seven years have been the warmest seven years on record, typifying the ongoing and dramatic warming trend (NASA, 2021).

In 2013, the Working Group of the Intergovernmental Panel on Climate Change concluded the following (IPCC, 2013):

> Human influence on the climate system is clear. This is evident from the increasing greenhouse gas concentrations in the atmosphere, positive radiative forcing,

[10] Anthropogenic effects, processes, objects, or materials are those that are derived from human activities, as opposed to those occurring in natural environments without human influence.

[11] A separate, independent analysis by the National Oceanic and Atmospheric Administration (NOAA) concluded that 2020 was the second-warmest year in their record, behind 2016.

observed warming, and understanding of the climate system. Human influence has been detected in warming of the atmosphere and the ocean, in changes in the global water cycle, in reductions in snow and ice, in global mean sea level rise, and in changes in some climate extremes. It is *extremely likely*[12] that human influence has been the dominant cause of the observed warming since the mid-20th century.

Greenhouse Gases

GHGs are comprised of atmospheric gases and clouds in the atmosphere that influence the Earth's temperature by absorbing most of the infrared radiation that rises from the sun-warmed surface and that would otherwise escape into space. This process is commonly known as the "Greenhouse Effect". GHGs are emitted by natural processes and human activities. The Earth's surface temperature averages about 58°F because of the Greenhouse Effect. Without it, the Earth's average surface temperature would be somewhere around an uninhabitable 0°F. The resulting balance between incoming solar radiation and outgoing radiation from both the Earth's surface and the atmosphere maintains the planet's habitability.

GHGs, as defined under the California Global Warming Solutions Act of 2006 (AB 32), include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). General discussions on climate change often include water vapor, atmospheric ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not formed directly in the construction or operation of development projects, nor can they be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies (such as CARB) or climate change groups (such as the California Climate Action Registry [CCAR]) as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided.

GHGs are global pollutants and are unlike air pollutants such as ozone, particulate matter, and TACs, which are pollutants of regional and local concern. While air pollutants with localized air quality effects have relatively short atmospheric lifetimes (generally on the order of a few days), GHGs have relatively long atmospheric lifetimes that range from one year to several thousand years. Long atmospheric lifetimes allow for GHGs to disperse around the globe. In addition, the GHG impacts are global, as opposed to the localized air quality effects of criteria air pollutants and TACs.

Additional background data relative to GHGs; global, national, and State emissions; and the general environmental effects of global climate change are included in the LRDP Amendment Final SEIR, which is incorporated by reference.

Regulatory Framework

A discussion of the regulatory framework for assessing climate change impacts is discussed in Section 4.15, Greenhouse Gas Emissions, of the LRDP Amendment Final SEIR and is incorporated by reference. Regulations addressed in the Final SEIR include, but are not limited to, the following:

[12] "Extremely likely" is defined as the 95 to 100 percent confidence level (IPCC, 2013).

Federal

The United States Environmental Protection Agency (USEPA) and the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) have issued rules to reduce GHG emissions and to improve fuel economy for new cars and trucks sold in the United States. On April 2, 2018, the EPA signed the Mid-term Evaluation Final Determination, which declared that the model year (MY) 2022-2025 GHG standards are not appropriate and should be revised (Federal Register, 2018). This Final Determination serves to initiate a notice to further consider appropriate standards for MY 2022-2025 light-duty vehicles. On August 2, 2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend existing Corporate Average Fuel Economy (CAFE) and tailpipe CO_2 standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO_2 emissions standards by 1.5% each year through model year 2026 (NHTSA, 2020). Also, in April 2021, the U.S. EPA and NHTSA separately announced proposed rulemakings to repeal the previous administration's light-duty motor vehicle regulations that were part of the "The Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program" (SAFE 1). The comment period has closed, but no additional actions have been taken to date.

State

- **Executive Order (EO) S-3-05**, which establishes a goal of a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.
- **AB 32**, the California Global Warming Solutions Act of 2006, is the primary State regulation relative to GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020.
- **SB 375** provides for a new planning process to coordinate land use planning and regional transportation plans (RTPs) and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 requires Metropolitan Planning Organizations (MPOs), including SCAG, to incorporate a Sustainable Communities Strategy (SCS) in their RTPs that will achieve GHG emission reduction targets set by CARB. There are two mutually important facets to SB 375: reducing VMT and encouraging more compact, complete, and efficient communities for the future.
- **EO B-30-15** orders a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 be established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. EO B-30-15 also directs CARB to update the *Climate Change Scoping Plan* to express the 2030 target in terms of million metric tons of carbon dioxide equivalent ($MMTCO_2e$).
- **SB 350** is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of EO B-30-15. The text of SB 350 sets a December 31, 2030, target for 50 percent of electricity to be generated from renewable sources.
- **SB 32** implements a goal of EO B-30-15. Under SB 32, in "adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions," CARB must ensure that statewide greenhouse gas emissions are reduced to 40 percent below the 1990 level by 2030. SB 32's findings state that CARB will

"achieve the state's more stringent greenhouse gas emission reductions in a manner that benefits the state's most disadvantaged communities and is transparent and accountable to the public and the Legislature."

- **AB 197**, a companion to SB 32, adds two members to the CARB and requires measures to increase transparency about GHG emissions, climate policies, and GHG reduction actions.
- **The CARB Scoping Plan**, required by AB 32, which proposes a comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health. The CARB approved the final *First Update to the Climate Change Scoping Plan* on May 22, 2014. The first update describes California's progress toward AB 32 goals, stating that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32." In November 2017, CARB released the *Final 2017 Scoping Plan Update*, which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. The 2017 Scoping Plan establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030. The 2022 Scoping Plan Update will assess progress towards achieving the Senate Bill 32 2030 target and lay out a path to achieve carbon neutrality by mid-century. The first public workshops for the 2022 Scoping Plan Update were held in June 2021, with additional public hearings and workshops scheduled throughout 2021.
- **SB 100** requires renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045.
- **EO B-55-18** sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045, and achieve net negative emissions thereafter.

The following discussion focuses on current regulatory information related to GHG emissions, which is particularly relevant to the Project.

State California Environmental Quality Act Guidelines for Greenhouse Gas Emissions

At the direction of the State Legislature in SB 97, the California Natural Resources Agency (CNRA) adopted amendments to the State CEQA Guidelines that require evaluation of GHG emissions or the effects of GHG emissions. CEQA Guidelines Section 15064.4, Determining the Significance of Impacts from Greenhouse Gas Emissions, and effective March 18, 2010, provide that:

> (a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project.

(b) A lead agency should consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:

(1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project;

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions.

The amendments also add a new Section 15126.4(c), Mitigation Measures Related to Greenhouse Gas Emissions, which describes acceptable means to reduce the impacts of GHG emissions.

Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (*California Code of Regulations* [CCR], Title 24, Part 6) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The currently applicable standards are the 2019 Standards, effective January 1, 2020. The 2019 standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The ventilation measures improve indoor air quality, protecting homeowners from air pollution originating from outdoor and indoor sources (CEC 2021). The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Both natural gas and electricity use produce GHG emissions. The goal of the standards is to reduce energy use in new homes by more than 50 percent.

Title 24 Green Building Standards

The 2019 California Green Building Standards Code (CCR, Title 24, Part 11) is a code with mandatory requirements for new residential and nonresidential buildings (including buildings for retail, office, public schools, and hospitals) throughout California and became effective on January 1, 2020. The code is Part 11 of the California Building Standards Code in Title 24 of the *California Code of Regulations* and is also known as the CALGreen Code. The development of the CALGreen Code is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

The CALGreen Code contains requirements for construction site selection; storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. It provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the

verification that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

Buy Clean California Act

The Buy Clean California Act (BCCA), (California Public Contract Code Sections 3500-3505), states the Department of General Services (DGS) is required to establish and publish the maximum acceptable Global Warming Potential (GWP) limit for select construction materials. The BCCA targets carbon emissions associated with the production of structural steel (hot-rolled sections, hollow structural sections, and plate), concrete reinforcing steel, flat glass, and mineral wool board insulation. These materials must have a GWP that does not exceed the limit set by DGS (DGS, 2021b). Contractors for State public works projects, which includes UC facilities, must submit documentation verifying products to be used meet BCCA requirements.

University of California Policy on Sustainable Practices

In June 2004, the University of California developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the university as a leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, the policy has been revised several times, most recently in July 2020, and includes the areas of climate protection, sustainable transportation, sustainable building operations for campuses, zero waste, sustainable procurement, sustainable food services, sustainable water systems, and sustainability at UC Health (UC, 2020). The UC Policy on Sustainable Practices includes climate change goals for the ten UC campuses that, at a minimum, meet AB 32 requirements.

University of California Carbon Neutrality Initiative

In November 2013, UC President Janet Napolitano announced the Carbon Neutrality Initiative, establishing goals for UC to emit net zero greenhouse gases from its buildings and vehicle fleet by 2025, something no other major university system has done. The initiative builds on UC's pioneering work on climate research and furthers its leadership on sustainable business practices. UC is improving its energy efficiency, developing new sources of renewable energy and enacting a range of related strategies to cut carbon emissions (UC, 2014). UCLA is in the process of developing a Carbon Neutrality Plan; a draft plan was prepared in December 2016 (UCLA, 2016). Reaching neutrality in 2025 will require, among other actions, increased energy conservation at Housing and Hospitality Services facilities on- and off-campus, including the UCLA LAL.

University of California, Los Angeles Climate Action Plan

The UC Policy on Sustainable Practices also calls for each UC campus to draft a Climate Action Plan (CAP) that examines the feasibility of meeting the climate change goals identified in the UC Policy on Sustainable Practices. The UCLA CAP was completed in December 2008 (UCLA, 2008). The CAP was reviewed and endorsed by the UCLA Campus Sustainability Committee and presented to the UCLA Administration and Chancellor prior to submittal to the University of California Office of the President (UCOP).

Regional

SCAQMD is the agency responsible for air quality planning and regulation in the SoCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as

a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions. In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, that could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold.

At Tier 1, GHG emissions impacts would be less than significant if the project qualifies under a categorical or statutory CEQA exemption. At Tier 2, for projects that do not meet the Tier 1 criteria, the GHG emissions impact would be less than significant if the project is consistent with a previously adopted GHG reduction plan that meets specific requirements. At Tier 3, the following Tier 3 screening values are identified: either (1) a single 3,000 $MTCO_2e$/yr threshold for all residential and commercial uses; or (2) separate thresholds of 3,500 $MTCO_2e$/yr for residential projects, 1,400 $MTCO_2e$/yr for commercial projects, and 3,000 $MTCO_2e$/yr for mixed-use projects. The screening thresholds are based on estimates that projects with emissions greater than the thresholds would emit 90 percent of the region's GHGs. Therefore, a project with emissions less than the applicable screening value would be considered to have less than significant GHG emissions. Projects with emissions greater than the Tier 3 screening values would be analyzed at Tier 4 by one of the three methods. Projects with GHG emissions not meeting the Tier 4 targets would be required to provide mitigation in the form of real, quantifiable, and verifiable offsets to achieve the target thresholds. The offsets may be achieved through project design features, other on-site methods, or by off-site actions, such as energy efficiency upgrade of existing buildings. As identified in the analysis presented in this section, the Project would not have GHG emissions greater than the Tier 3 screening values; therefore, Tier 4 methods are not applicable.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate change.

Existing Emissions

Existing GHG emissions related to the Project site are from the vehicles used by the occupants of Cedar Lodge and the electricity and natural gas use associated with the operation of Cedar Lodge and the maintenance facility.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Discussion

Construction emissions of carbon dioxide equivalent (CO_2e) were calculated by using CalEEMod Version 2020.4.0, as described in the Air Quality section of this IS. The CalEEMod model computes GHG from construction and operations. The results are output in metric tons per year. Construction emissions would be associated with vehicle engine exhaust from construction equipment, soil haul truck trips, vendor trips, and worker commuting trips. The estimated construction emissions for the Project are shown in Table 7. For estimating annual GHG emissions, the SCAQMD has recommended amortizing construction emissions over the life of a project and a common value for project life is 30 years (SCAQMD, 2008b). As shown in Table 7, the 30-year amortized construction emissions would be approximately 40 $MTCO_2e$/year.

TABLE 7
ESTIMATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

Year	Emissions ($MTCO_2e$)
2022	188
2023	473
2024	439
2025	107
Total	**1,207**
Annual emissions for 30-year amortization	***40***
$MTCO_2e$: metric tons carbon dioxide equivalent.	
Note: CalEEMod model data sheets are included in Appendix A.	

Operational GHG emissions attributed to the Project include mobile sources, purchased electricity, the electricity embodied in water consumption, and the energy associated with solid waste disposal. CalEEMod incorporates mitigation measures based on the California Air Pollution Control Officers Association (CAPCOA) publication *Quantifying Greenhouse Gas Mitigation* Measures (CAPCOA, 2010). UCLA has committed to achieving a minimum LEED NC Silver rating for the Project, and would strive to achieve a LEED NC Gold rating. The Project would implement energy- and water-efficiency measures that would result in increased energy and water efficiency; these measures are described in PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), 4.14-3, and 4.14-9 included in the Utilities and Service Systems section of this IS. Estimated operational GHG emissions for the Project are shown in Table 8.

TABLE 8
ESTIMATED ANNUAL OPERATIONAL GREENHOUSE GAS EMISSIONS

Source	Emissions $MTCO_2e/yr$
Area sources	<0.5
Energy sources	113
Mobile sources	173
Solid waste	6
Water	3
Amortized construction emissions (Table 7)	40
Proposed Project Total	**335**

$MTCO_2e/yr$: metric tons of carbon dioxide per year.
Total does not add due to rounding.
Note: Detailed calculations in Appendix A.

As shown in Table 8, the estimated annual operational GHG emissions for the Project, including amortized construction emissions, are 335 $MTCO_2e/yr$. This estimate is conservative because it does not include "credit" for GHG emissions associated with existing operations at the Willow Creek and Cedar Suites sites. The Project GHG emissions would be substantially less than the SCAQMD-recommended Tier 3 thresholds of 3,500 $MTCO_2e/yr$ for residential projects or 3,000 $MTCO_2e/yr$ threshold for residential and commercial land use types. Thus, the direct and indirect GHG emissions of the Project would not be cumulatively considerable and would result in a less than significant impact.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project's estimated annual GHG emissions would be substantially below the SCAQMD screening threshold and would therefore result in a less than significant impact.

Threshold(s)	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

University of California Plans, Policies, and Regulations

The Project incorporates PP 4.15-1, which ensures implementation of applicable provisions of the UC Policy on Sustainable Practices and UCLA CAP. The majority of the sustainable practices policies and CAP initiatives are applicable at the UC-wide or campus-wide level and are not applicable to specific projects. Examples are green power purchasing, efficient vehicles and tires for campus fleets, transportation demand programs, and campus outreach programs. Additional

policies are applicable to certain types of projects, but not the Project, such as existing building renovation and consolidating server rooms. The UC Policy on Sustainable Practices and UCLA CAP policies applicable to the Project are discussed below.

UC Policy on Sustainable Practices and UCLA Climate Action Plan

The Policy for **Green Building Design** includes the following goals applicable to the Project:

- All new building projects, other than acute care facilities, shall be designed, constructed, and commissioned to outperform the CBC energy-efficiency standards by at least 20% or meet the whole-building energy performance targets listed in Table 1 of Section V.A.3. The University will strive to design, construct, and commission buildings that outperform CBC energy efficiency standards by 30% or more or meet the stretch whole-building energy performance targets listed in Table 1 of Section V.A.3, whenever possible within the constraints of program needs and standard budget parameters. Exceeding Title 24 by 20 percent is also in Climate Action Plan Initiative 11.3.
- No new building or major renovation that is approved after June 30, 2019 shall use onsite fossil fuel combustion (e.g., natural gas) for space and water heating (except those projects connected to an existing campus central thermal infrastructure). Projects unable to meet this requirement shall document the rationale for this decision.
- All new buildings will achieve a USGBC LEED "Silver" certification at a minimum. All new buildings will strive to achieve certification at a USGBC LEED "Gold" rating or higher, whenever possible within the constraints of program needs and standard budget parameters. Achieving a minimum LEED Silver rating is also in UCLA CAP Initiative 11.3.
- All new building projects will achieve at least two points within the available credits in the LEED-BD+C's Water Efficiency category.

As discussed above, the Project would be designed to achieve a minimum LEED NC Silver rating and to exceed Title 24 requirements by 20 percent. The Project would also comply with CALGreen 2019 mandatory requirements required for residential uses. The Project would include water conservation measures (PP 4.14-2[a] through PP 4.14-2[d]), solid waste conservation measures (PP 4.14-3), and energy conservation measures (PP 4.14-9). The Project would replace the existing Cedar Lodge staff housing building built in 1946, and the existing maintenance building built in the late 1980s with new, energy-efficient and water conserving buildings, thus reducing energy- and water-related GHG emissions. As required by the UC Policy on Sustainable Practices, as noted above, the Project would not utilize natural gas for space and water heating.

Additional sustainable actions implemented at the UCLA LAL, and that would also be applied to the Project and that would serve to reduce GHG emissions include:

- **Energy**. Energy efficiency is reached by LED lighting, ENERGY STAR appliances, and HVAC sensors.
- **Water.** In response to California's drought, Lake Arrowhead installed hydration stations throughout the center to refill reusable water bottles, as well as designed a native landscape with drought tolerant vegetation. Water saving efforts have been focused in bathrooms, automatic faucets, and toilets that are in all public areas. The guest rooms also have ultra-low-flow toilets.

Further, as required because the Project is proposed by a state entity, contractors would be required to verify that products to be used meet BCCA requirements.

Relevant to the Project, the Policy for **Sustainable Transportation** includes requirements related to vehicles used at UC facilities, and notably increasing the use of vehicles that use alternative fuel infrastructure (i.e., electric vehicles). The UCLA CAP and draft Carbon Neutrality Plan similarly address reduction in GHG emissions associated with the vehicle fleets. Operations at the UCLA LAL that would also be implemented at the new facilities, would be consistent with this policy. UCLA LAL sustainable transportation measures include the use of electric golf carts and electric vehicles for on-site transportation, as well as electric vehicle (EV) charging stations, including 4 EV charging stations for guests.

The Policy for **Zero Waste** indicates that the University will achieve zero waste through prioritizing waste reduction in the following order: reduce, reuse, and then recycle and compost (or other forms of organic recycling). Minimum compliance for zero waste at all locations, including the UCLA LAL, involves: reducing per capita total municipal solid waste generation by 25 percent per capita from fiscal year (FY) 2015/2016 levels by 2025, and 50 percent per capita from FY 2015/2016 levels by 2020; and diverting 90 percent of municipal solid waste from the landfill. At the UCLA LAL, in an effort to reach these goals, waste diversion programs that have been implemented, and that would also be applied to the Project include: use of recycling bins in each room and office, restricting use of styrofoam, and restricting use of single-use plastics.

The Project would not conflict with UC Policy on Sustainable Practices and UCLA CAP policies adopted for the purpose of reducing GHG emissions.

University of California Carbon Neutrality Initiative

The UC Carbon Neutrality Initiative establishes goals for the UC to emit net zero greenhouse gases from its buildings and vehicle fleet by 2025. UCLA has developed a draft Carbon Neutrality Plan. As required, the Project would be constructed and operated in compliance with applicable provisions of UCLA's Carbon Neutrality Plan.

State and Regional Plans, Policies and Regulations

Assembly Bill 32

The primary State policy document is AB 32. While many of the AB 32 policies are statewide actions and are not applicable to the Project (e.g., the low carbon fuel standard, goods movement, and high-speed rail), the Project supports the following AB 32 policies:

- **Energy Efficiency.** As discussed above, the proposed housing project would reduce building energy consumption by at least 20 percent below Title 24 requirements.
- **Green Buildings.** The Project has been designed to achieve the minimum standard LEED NC Silver rating, but UCLA would strive to achieve a LEED Gold rating. To achieve this rating, the design, construction, and operation of the Project would incorporate a series of green building strategies as previous described. The Project would also comply with CALGreen 2019 mandatory requirements.
- **Recycling and Waste.** This policy includes a measure for high recycling/zero waste. Although the AB 32 measure focuses primarily on commercial recycling, the UC Zero Waste policy contributes to achieving this policy.
- **Water.** The first measure of the AB 32 Water policy is Water Use Efficiency. The Project would provide efficient water use through LEED and CALGreen requirements and compliance with the UC Policy on Sustainable Practices.

Executive Orders S-3-05 and B-30-05 and SB32

Actions to implement EO B-30-15 and SB 32 are contained in the *Final 2017 Scoping Plan Update*. The elements of the Scoping Plan Update are primarily for action at the State level, such as an increased Low Carbon Fuel Standard and putting 4.2 million zero-emission vehicles on the roads; or by specific industries, such as improving freight system efficiency and reducing GHG emissions at refineries. Thus, the Project would not conflict with those elements. However, the Project would support a goal of the SB 350 element of the Scoping Plan Update, i.e., doubling of energy efficiency savings by 2030. The Project would exceed current Title 24 energy efficiency standards by 20 percent. The Project would not conflict with EO S-3-05, EO B-30-15, and SB 32.

Senate Bill 375

A primary goal of SB 375 is to reduce GHG emissions by reducing vehicle trips and associated VMT. Methods to reduce VMT include locating residents closer to where they work and play; designing walkable environments; and providing access to high-quality transit service. The Project would add VMT with the construction of new guest housing. However, as discussed in the Transportation section of this IS, the Project's increase in VMT impact would be less than significant impact due the size of the Project and associated limited increase in GHG emissions. UCLA LAL sustainable transportation measures include the use of electric golf carts and electric vehicles for on-site transportation, as well as electric vehicle (EV) charging stations, including four EV charging stations for guests. These sustainable transportation measures would also be used for operation of the proposed new uses. Therefore, it is concluded that implementation of the Project would not conflict with SB 375.

The above analysis demonstrates the Project's consistency with applicable plans, policies, and regulations relative to reducing GHG emissions. Therefore, the Project would result in a less than significant impact related to conflicts with plans, policies, or regulations pertaining to reducing GHG emissions.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions resulting in a less than significant impact.

9. HAZARDS AND HAZARDOUS MATERIALS

Relevant elements of the proposed Project related to hazards and hazardous materials include the demolition of the existing Cedar Lodge, which has the potential to contain asbestos-containing materials (ACMs), asbestos-containing construction materials (ACCMs), and lead-based paint (LBP) due to the age of the structure. Operation of the Project would not involve handling of hazardous materials not already used at the existing buildings or elsewhere at the UCLA LAL.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs are considered part of the Project and assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added.

Changes have been made so the stated requirement better applies to the Project, which is off campus.

PP 4.6-1 *~~The campus~~**UCLA** shall continue to implement the same (or equivalent) health and safety plans, programs, practices, and procedures related to the use, storage, disposal, or transportation of hazardous materials during the LRDP Amendment planning horizon, including, but not necessarily limited to, the Business Plan, Hazardous Materials Management Program, Hazard Communication Program, Injury and Illness Prevention Program, Chemical Exposure Monitoring Program, Asbestos Management Program, Respiratory Protection Program, EH&S procedures for decommissioning and demolishing buildings that may contain hazardous materials, and the Broadscope Radioactive Materials License. These programs may be subject to modification as more stringent standards are developed or if the programs become obsolete through replacement by other programs that incorporate similar health and safety protection measures.*

PP 4.6-4 *While not expected to occur ~~on-campus~~, if contaminated soil and/or groundwater is encountered during the removal of on-site debris or during excavation and/or grading activities, the construction contractor(s) shall stop work and immediately inform the EH&S. An on-site assessment shall be conducted to determine if the discovered materials pose a significant risk to the public or construction workers. If the materials are determined to pose such a risk, a remediation plan shall be prepared and submitted to the EH&S to comply with all federal and State regulations necessary to clean and/or remove the contaminated soil and/or groundwater. Soil remediation methods could include, but are not necessarily limited to, excavation and on-site treatment, excavation and off-site treatment or disposal, and/or treatment without excavation. Remediation alternatives for cleanup of contaminated groundwater could include, but are not necessarily limited to, on-site treatment, extraction and off-site treatment, and/or disposal. The construction schedule shall be modified or delayed to ensure that construction will not inhibit remediation activities and will not expose the public or construction workers to significant risks associated with hazardous conditions.*

In addition, PPs 4.13-6 and 4.13-8 presented in the Transportation section of this IS, which address pedestrian and emergency vehicle access, respectively, are also incorporated into the Project and assumed in the analysis of potential hazards.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

Discussion

Construction-Related Hazards

The transport, use, and handling of hazardous materials on the Project sites during construction is a standard risk on all construction sites, and there would be no greater risk than would occur on any other similar construction site. Construction equipment (e.g., excavators) that would operate on the Project sites during construction is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project sites during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA, California Department of Toxic Substances Control (DTSC), SCAQMD, Regional Water Quality Control Board (RWQCB), and UC. With mandatory adherence to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

The Willow Creek and Cedar Suites are currently developed with the UCLA LAL maintenance facility and Cedar Lodge, respectively. The Glamping site is currently undeveloped. Based on the age of the existing Cedar Lodge, which was constructed in 1946, it is anticipated that it contains ACMs, ACCMs, and LBP. Asbestos, a naturally occurring fibrous material, was used for years in many building materials for its fire-proofing and insulating properties. While the use of asbestos in the manufacture of most building materials has not been fully prohibited by law, the use of asbestos, for the most part, has voluntarily been discontinued since the late 1970s. Loose insulation, ceiling panels, and brittle plaster are potential sources of friable (easily crumbled) asbestos. Nonfriable asbestos is generally bound to other materials such that it does not become airborne under normal conditions. Any activity that involves cutting, grinding, or drilling during demolition can release friable asbestos fibers unless proper precautions are taken. Inhalation of airborne fibers is the primary mode of asbestos entry into the body, which makes friable materials the greatest potential health risk. Lead is a naturally occurring metallic element. Among its numerous uses and sources, lead can be found in paint; water pipes, solder in plumbing systems; and structures painted with LBP. In 1978, the Consumer Products Safety Commission banned paint and other surface coating materials containing lead. Because of its toxic properties, lead is regulated as a hazardous material. Inorganic lead is also regulated as a TAC.

Because exposure to such materials can result in adverse health effects in uncontrolled situations, several regulations pertaining to abatement, handling, and disposal of ACMs/ACCMs and LBP have been developed. Per PP 4.6-1, the UC Office of Environment, Health and Safety (EH&S) procedures require that all applicable federal, State, and local regulations as well as UCLA's Asbestos Management Program and Lead Compliance Program be implemented during construction activities. The Asbestos Management Program ensures safe work practices involving asbestos, including notification of applicable government agencies prior to beginning any renovation or demolition that could disturb asbestos and using safe work practices to eliminate or reduce the potential for release of asbestos fibers. This program also requires medical examinations and monitoring of employees engaged in activities that could disturb asbestos. Similarly, UCLA's Lead Compliance Program is directed at reducing lead exposure to a less than significant level through education, inspection, testing, and removal

There are no known instances of contaminated soils at the Project sites and the potential to encounter contaminated soil is considered low. Although not anticipated, if any contaminated soil is discovered during construction, all construction activities shall stop, and an assessment would be made of the nature and extent of contamination and the type (if any) of remediation that is required. The primary purpose of LRDP Amendment Final SEIR PP 4.6-4 is to ensure that the exposure of contaminated soil or the remediation activities, if necessary, would not expose the public or construction workers to hazardous conditions. Continued compliance with all applicable federal, State, and local laws and regulations, as well as incorporation of Final SEIR PPs 4.6-1 and 4.6-4, would ensure that impacts associated with the potential exposure of contaminated soil is less than significant.

Operational Hazards

The Project involves the development of replacement staff housing and new overnight guest accommodations at the UCLA LAL. The Project would not involve the development of new laboratories, research facilities, or other sources of new or increased handling of hazardous materials. There would also be no change in how hazardous materials are handled, stored, transported, or disposed of at the UCLA LAL, and the potential for accidents involving hazardous materials would not increase. Operations associated with the proposed overnight guest accommodations and replacement staff housing would be consistent with the existing uses at the UCLA LAL. The types of hazardous materials that could be used in association with the Project would not require disposal. Cleaning products would be disposed of either through the wastewater system (i.e., sinks, laundry) or evaporation. Neither chlorine nor standard cleaning products (i.e., degreasers, window-cleaning products) are used in quantities that would result in adverse health effects either through direct exposure to the skin or inhalation. Additionally, operation of the Project would comply with applicable federal, State, and local laws and regulations and with the existing (or equivalent) PPs that are required by LRDP Amendment Final SEIR PP 4.6-1 identified above. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material, or reasonably foreseeable upset and accident conditions involving the release of hazardous materials. There would be a less than significant impact during operation.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant impact related to the routine transport, use, and disposal of hazardous materials, and a less than significant impact related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

Discussion

The Lake Arrowhead Elementary School, located at 1300 Golden Rule Lane, is the nearest school (approximately 0.60-mile northeast of the UCLA LAL). As discussed under Threshold a, above, the Project includes the construction of overnight guest accommodations and one replacement staff housing building, which would not involve hazardous emissions, and would not involve the handling of hazardous or acutely hazardous materials in quantities significant enough to pose a risk to occupants of the school. No impacts would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have no impact related to handling hazardous materials within 0.25-mile of a school.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Discussion

The Project sites are part of the UCLA LAL and there are no known current or historical sources of hazardous materials at the Project sites. A current review of hazardous materials sites compiled by the California Environmental Protection Agency pursuant to Section 65962.5 of the California Government Code (the "Cortese List") and as required by Section 21092.6 of the California Public Resources Code was conducted for the Project sites. This included a review of the following databases: the California Department of Toxic Substances Control Hazardous Waste and Substances Sites database, Leaking Underground Storage Tanks (LUST) database, selected solid waste disposal sites, and hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the California Health and Safety Code. The Project sites are not located on an identified hazardous materials site (DTSC, 2021). Therefore, there would be no impact.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and the Project would not create a significant hazard to the public or the environment. Therefore, no impact would result.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒

Discussion

The Project sites are not located within two miles of a public airport or public use airport and has not been included in an airport land use plan. The nearest public airport is the Hesperia Airport, located approximately 10.5 miles (linear) to the northwest. Additionally, there are no helipads within two miles of the Project sites. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

There would be no impacts from the Project related to exposure of people residing or working in the Project area to safety hazards or excessive noise levels from airport uses.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Discussion

Although construction activity associated with implementation of the Project is anticipated to occur within the boundaries of the Project sites and most staging would also occur on or near the sites, some construction activities (e.g., short-term construction vehicle parking,) and utility infrastructure improvements (e.g., pipeline connections) for the Project could periodically occur for short periods on Willow Creek Road.

The San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan, approved by the Federal Emergency Management Agency (FEMA) in July 2017, includes risk assessments for many types of hazards, both natural and man-made; an assessment of community capabilities for hazard mitigation; and mitigation strategies (San Bernardino County, 2017). County-identified evacuation routes consist of major and secondary highways; the nearest roadway identified as an evacuation route to the Project sites is SR-173 (San Bernardino County, 2020a). SR-173 extends north, east

and south of Lake Arrowhead, and is approximately 0.25 mile to the north of UCLA LAL. There are no designated evacuation routes adjacent to the Project sites.

UCLA would be required to obtain all necessary encroachment permits from the County of San Bernardino Department of Public Works prior to any construction activity occurring in the Willow Creek right-of-way. Ongoing coordination between the San Bernardino County Fire Protection District (SBCFPD), San Bernardino County Sheriff's Department (SBCSD), and UCLA pursuant to LRDP Amendment Final SEIR PP 4.13-8 (refer to the Transportation section of this IS) ensures that roadway or travel lane closures would be coordinated with emergency response personnel to ensure that individual development projects would not impair implementation of, or physically interfere with, emergency response and evacuation efforts. The Project incorporates Final SEIR PP 4.13-8, which ensures that required emergency access to and surrounding the Project sites would be maintained during construction. The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and this impact would be a less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant impact related to implementation of or physical interference with an adopted emergency response plan or emergency evacuation plan.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Discussion

As further discussed in the Wildfire section of this IS, according to CalFire, the UCLA LAL, including the Project sites, is within a VHFHSZ within a State Responsibility Area (SRA) (CalFire, 2021). The Willow Creek Staff Housing and Cedar Suites and Cedar Suites components of the Project involve redevelopment of sites that are currently developed. The Glamping component of the Project would involve the construction of cabins along existing trails in the northern portion of the UCLA LAL, which is predominantly undeveloped. In accordance with CalFire, CBC, and CFC requirements, brush management activities directed by the Campus Fire Marshal would be conducted at each Project site. Notably, a defensible space of 100-feet from each side and from the front and rear of the proposed buildings would be maintained within the UCLA LAL property. Further, proposed buildings would be designed for compliance with the CBC Section 701A regulations on materials and construction methods for exterior wildfire exposure. All materials would comply with extended testing requirements and labelling where required for ignition-resistant construction as defined by chapter 7A. Exterior building elements would be designated to comply with protection requirements listed in sections 705A thru 710A to protect against ignition and intrusion of embers. The existing buildings, which were constructed in 1946 (Cedar Lodge) and the late 1980s (maintenance facility), do not meet these current building requirements. With

adherence to applicable regulations, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires and this impact would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would result in less than significant impacts related to wildland fires.

10. HYDROLOGY AND WATER QUALITY

Relevant elements of the Project related to hydrology and water quality include a decrease in impervious surfaces at the Willow Creek and Cedar Suites sites, which are currently undeveloped, and a minimal increase in impervious surfaces at the Glamping site. The Project would generate similar pollutants of concern as existing uses at UCLA LAL. BMPs would be used to capture and treat runoff, as feasible, as described in Section II.5, Project Components, and per MM 4.7-1, which would manage the post-development hydrology in compliance with all applicable regulations.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the Project and are assumed in the analysis presented in this section. A change in the text from the LRDP Amendment Final SEIR is signified by strikeout (~~strikeout~~) where text has been removed; this change has been made so the stated requirement better applies to the Project, which is off campus.

PP 4.7-1 *Construction and operation of projects ~~on campus~~ shall comply with requirements and water quality standards set forth within current NPDES Permit regulations (Phase I and Phase II) at the time of project approval. Pursuant to Phase I permit requirements, UCLA shall develop a Storm Water Pollution Prevention Plan (SWPPP) that incorporates Best Management Practices (BMPs) for reducing or eliminating construction-related and post-construction pollutants in site runoff, including but not limited to the BMPs listed in MM 4.7-1.*

PP 4.7-5 *Site-specific hydrologic evaluation shall be conducted for each proposed development project based on the project-specific grading plan and site design of each individual project. This evaluation shall include, but not be limited to: (1) an assessment of runoff quality, volume and flow rate from the Project site; (2) identification of project-specific BMPs (structural and non-structural) to reduce the runoff rate and volume to appropriate levels, including but not limited to the BMPs listed in MM 4.7-1; and (3) identification of the need for new or upgraded storm drain infrastructure ~~(on and off campus)~~ to serve the project. Project design shall include measures to upgrade and expand campus storm drain capacity where necessary, as identified through the project-specific hydrologic evaluation. Design of future projects shall include measures to reduce runoff, including, but not limited to, the provision of permeable landscaped areas adjacent to structures to absorb runoff and the use of pervious or semi-pervious paving materials.*

MM 4.7-1 *Best Management Practices (BMPs) shall be implemented for individual development projects, to the extent required by State law, to ensure compliance is maintained with all applicable NPDES requirements at the time of project construction. UCLA shall utilize BMPs as appropriate and feasible to comply with and/or exceed the current requirements under the NPDES program. BMPs that may be implemented include, but are not limited to, the following:*

Non-Structural/Structural

- *Landscape Maintenance*
- *Catch Basin Stenciling and Clean-out*
- *Efficient Irrigation Practices*
- *Litter Control*
- *Fertilizer Management*
- *Public Education*
- *Efficient Irrigation*
- *Permanent Vegetative Controls*
- *Runoff – Minimizing Landscape Design*

Treatment Control BMPs ~~(to minimize storm water pollutants of concern for Ballona Creek – Sediment, Bacteria/Viruses, Toxicity, Trash, and Metals)~~:

- *Vegetated Swale(s) – An open, shallow channel with vegetation covering side slopes and the bottom.*
- *Bioretention – A basin that functions as a soil and plant-based filtration device that removes pollutants through a variety of physical, biological, and chemical treatment processes.*
- *~~Turf Block – A grass area that has a structural component which allows it to be used in drive aisles and parking lots~~.*
- *Drain Inserts – A manufactured filter placed in a drop inlet to remove sediment and debris.*

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

Discussion

Surface Water

Information regarding drainage and water quality conditions at the Project sites is provided in the *Cedar Suites & Willow Creek Staff Housing Infrastructure Assessment* prepared by Fuscoe Engineering (November 2021) (Fuscoe, 2021) and included in Appendix E1 of the IS, and the *Site Infrastructure Assessment for Lake Arrowhead Lodge Glamping Program* prepared by VCA Engineers, Inc. (VCA, 2021) and included in Appendix E, and summarized in this section.

The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) are responsible for the protection of water quality in California. The UCLA LAL, including the Project sites, is within the Lahontan RWQCB (LRWQCB). The SWRCB establishes statewide policies and regulations for implementing water quality control programs mandated by federal and State water quality statutes and regulations. The RWQCBs develop and implement Water Quality Control Plans (Basin Plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. The Lahontan Basin Plan, which is further discussed under Threshold e, below, implements a number of federal and State laws for the Project area, the most important of which are the State Porter-Cologne Water Quality Control Act and the Federal Clean Water Act (CWA).

Pursuant to CWA Section 402(p), which requires regulations for permitting of certain storm water discharges, the SWRCB issued a statewide general NPDES Permit for storm water discharges from construction sites,[13] herein referred to as the "Construction General Permit." Under this Construction General Permit, discharges of storm water from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit.

The 2013 Phase 2 Small Municipal Separate Storm Sewer System Permit (MS4 Permit), adopted by the SWRCB and overseen by the LRWQCB, requires all new development and significant redevelopment projects to incorporate Low Impact Development (LID) Best Management Practices (BMPs) to the maximum extent practicable (MEP). In addition, the Phase 2 MS4 Permit also requires development of a standard design and post-development BMP guidance for incorporation of site design/LID, source control, and treatment control BMP (where feasible and applicable) to reduce the discharge of pollutants to receiving waters.

Regarding LID practices specifically, the 2013 Phase 2 MS4 permit requires project proponents to first consider preventative and conservation techniques (e.g., preserve and protect natural features to the maximum extent practicable) prior to considering mitigative techniques (structural treatment, such as infiltration systems). The mitigative measures should be prioritized with the highest priority for BMPs that remove storm water pollutants and reduce runoff volume, such as hydrologic source control and infiltration, then other BMPs, such as harvesting and use, evapotranspiration and biotreatment should be considered. To the maximum extent practicable, these LID BMPs must be implemented at project sites. The LRWQCB recognizes that site conditions, including site soils, contaminant plumes, high groundwater levels, etc., could limit the applicability of infiltration and other LID BMPs at certain project sites. Where LID BMPs are not feasible at a project site, more traditional, but equally effective control measures should be implemented. Where preferred LID BMPs are infeasible, the MS4 Permit provides for alternatives (SWRCB Order 2013-0001-DWQ NPDES No. CAS000004, Section F.5.g.3).

[13] NPDES No. CAS000002, Water Quality Order 2009-0009-DWQ, SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction Activity (adopted by the SWRCB on September 2, 2009, and effective on July 1, 2010). This order was amended by 2010-0014-DWQ, which became effective on February 14, 2011, and 2012-0006-DWQ, which became effective on July 17, 2012. The existing permit expired in 2014 and has been administratively extended until the SWRCB reissues the General Permit and the new permit is effective.

As shown on Figure 30, Willow Creek, which receives stormwater runoff from the Willow Creek and Cedar Suites sites, and the eastern portion of Glamping site, joins Deep Creek and eventually discharges into the Mojave River Basin at the north side of the San Bernardino Mountains. Stormwater from the western portion of the Glamping site ultimately flows into Lake Arrowhead.

Construction-related Water Quality Impacts

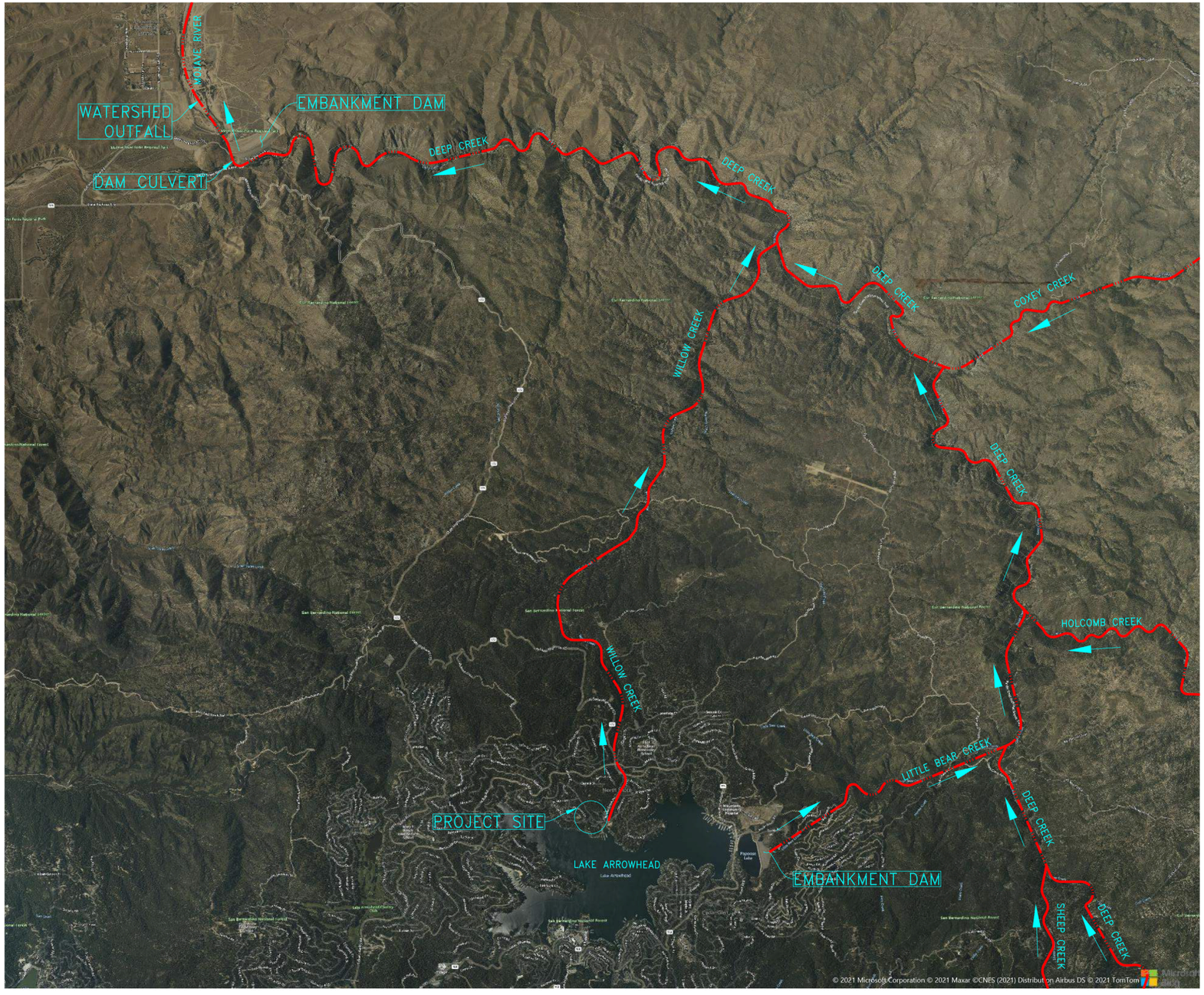
If not properly managed, implementation of the Project would result in runoff exiting the Project sites during construction. Clearing, grading, excavation and construction activities associated with the Project have the potential to impact water quality due to sheet erosion of exposed soils and subsequent deposition of particulates in local drainages. Particularly, grading activities lead to exposed areas of loose soil, as well as sediment stockpiles, that are susceptible to uncontrolled sheet flow. Although erosion occurs naturally in the environment, primarily from weathering by water and wind action, improperly managed construction activities can lead to substantially accelerated rates of erosion that are considered detrimental to the environment. Further, storm water runoff during construction could contain petroleum-related pollutants due to spills or leaks from construction equipment and machinery. Other common pollutants that may result from construction activities include solid or liquid chemical spills; concrete and related cutting or curing residues; wastes from paints, stains, sealants, solvents, detergents, glues, acids, lime, plaster, and cleaning agents; and heavy metals from equipment.

The individual Project components (Willow Creek Staff Housing, Cedar Suites and Glamping) would be separate construction projects and each Project would not involve construction activities on more than 1.0 acre. The Willow Creek and Cedar Suites sites, which would not be under construction at the same time since the Cedar Suites construction would not be initiated until the Willow Creek Staff Housing construction is complete, collectively encompass 0.8 acre. The Glamping site, which is not located adjacent to the Cedar Suites and Willow Creek sites encompasses approximately 0.4 acre) and therefore would not be required to comply with requirements and water quality standards set forth in the current NPDES permit regulations (i.e., processing through the SWRCB is not required). However, Project construction activities would comply with UCLA standard requirements, which include preparation of a Storm Water Pollution Prevention Plan (SWPPP) by contractors (refer to LRDP Amendment Final SEIR PP 4.7-1). The SWPPP incorporates BMPs for reducing or eliminating construction-related pollutants in runoff from construction sites. As identified above, the MS4 permit also requires incorporation of LID standards for post-construction design, as further discussed under Operational Water Quality Impacts, below. The SWPPP would include both source control and treatment control BMPs to reduce water quality impacts. The BMPs that are most often used during construction and would be implemented for the Project include installing sandbags and silt fences to minimize off-site runoff, and providing stabilized driveways at construction entrances and exits. Compliance with these requirements would reduce short-term construction related water quality impacts would be less than significant and no additional mitigation is required.

Operational Water Quality Impacts

The Project sites are not considered a point source for regulatory purposes and is not subject to waste discharge requirements (WDRs). Therefore, the Project would not violate WDRs.

As further discussed under Threshold “c” below, the Willow Creek Staff Housing and Cedar Suite components of the Project would involve redevelopment of the Willow Creek and Cedar Suites sites, and would result in an overall reduction in impervious area compared to existing conditions. The Project would generate urban pollutants similar to the existing Cedar Lodge to be removed, and similar housing-related uses at the UCLA LAL. Further, the urban pollutants generated at the



Source(s): FUSCOE Engineering (11-24-2021)

Figure 30

Not to Scale

Watershed Map

Willow Creek site would be reduced compared to the existing maintenance facility, which does not include structural water quality BMPs. These sites, including the maintenance facility at the Willow Creek site, were developed prior to establishment of current water quality management regulations and water quality treatment does not meet current standards. The Glamping component of the Project, which would involve development of 10 cabins on platform structures and two restrooms at the Glamping site, which is currently undeveloped, would involve a slight increase in impervious area. The Project would comply with applicable water quality management requirements at the time of construction, as per LRDP Amendment Final SEIR PP 4.7-1 and MM 4.7-1, to ensure that discharges of post-construction pollutants remain less than significant. This includes the implementation of structural and non-structural BMPs, as feasible. Per the Mojave River Watershed WQMP Template, LID BMPs will be required since the proposed development at each site would exceed the addition and/or replacement of 5,000 square feet of impervious area.

As discussed under Threshold "c" below, there are three impacted drainage subareas corresponding with the Cedar Suites and Willow Creek Staff Housing components of the Project. Using the San Bernardino County Mojave River Watershed Technical Guidance Document (TGD) for WQMPs methodology for determining the 85th percentile storm event volume, Subarea A-1 would need to treat approximately 1,400 cubic feet of stormwater while Subarea A-2 would need to treat approximately 1,700 cubic feet of stormwater, based on the calculated changes in impervious area. The Project would involve the removal of approximately 1,411 square feet of pavement from Subarea A-3, therefore, no BMPs are proposed for subarea A-3.

LID BMPs would also be required for the Glamping component of the Project since the proposed development would disturb more than 5,000 square feet in a hillside area with a natural grade of 25 percent or greater. There are ten disturbed areas independent of each other for this component of the Project. Using the TGD methodology for determining the 85th percentile storm event volume, the Design Capture Volume (DCV) that would need to be treated is 1,617 cubic feet of storm water for the combined disturbed area.

Per the Project-specific geotechnical investigation prepared by Geotechnologies, Inc. and included in Appendix D of this IS, the Project sites are mantled with a thin cover of fill soil and natural colluvium over granite bedrock varying in depth from 1.5 to 4 feet. Consequently, storm water infiltration is not a suitable BMP strategy given the shallow depth of impervious bedrock. Likewise, given the small area of each subarea, harvest and use strategies would be infeasible. Therefore, a volume-based planter biofiltration BMP system or proprietary flow through biofiltration BMP would be pursued. Additional details would be provided in the required Project-specific WQMP. Per the Phase 2 MS4 Permit, if on-site BMPs are infeasible, alternative post-construction measures in-lieu of some or all the requirements to support multiple benefit projects may be considered. Concerning BMP maintenance, BMPs would be maintained per the San Bernardino TGD for WQMPs.

Pursuant to Final SEIR PP 4.7-5, a site-specific hydrologic evaluation would be conducted for each Project component and would include identification of Project-specific BMPs (structural and non-structural), including the BMPs listed in Final SEIR MM 4.7-1. With incorporation of Final SEIR PP 4.7-1, PP 4.7-5 and MM 4.7-1, and adherence to applicable water quality regulations, there would be less than significant impacts related to water quality impacts during operation. No additional mitigation would be required.

Groundwater

Groundwater was not encountered during exploration and water is not anticipated to be within excavation depth (Geotechnologies, 2021). Therefore, the Project would not degrade groundwater quality.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have no impact related to the potential to violate waste discharge requirements and the potential to substantially degrade groundwater quality, and a less than significant impact related to the potential to violate water quality standards or otherwise substantially degrade surface water quality.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒

Discussion

Potable water for the Project would be obtained from the LACAD. According to the LACSD 2020 Urban Water Management Plan (UWMP), groundwater resources are limited in the Lake Arrowhead area. Groundwater in granitic mountain areas occurs where there are open fractures in the rock which make it difficult to estimate the production of water from this type of geology. There are no true aquifers, but there are subsurface water sources from snow pack and rain, which percolate into the crystalline rocks. Groundwater in this area is found primarily in the unconsolidated alluvial deposits found in localized canyons and slopes. Thus, for the Lake Arrowhead region, groundwater recharge into the fractured granitic rock and alluvium in the area occurs through infiltration and percolation of precipitation and surface runoff in stream channels that flow through the local mountains. (LACSD, 2021)

Due to the limited potential for groundwater recharge in the Lake Arrowhead area, and overall limited increase in impervious area associated with the Project (refer to the discussion for Threshold c below), the Project would not interfere substantially with groundwater recharge. Further, as discussed under Threshold e below, there is not a groundwater management plan applicable to the Project site.

Water sources for the LACSD include groundwater supplies. LACSD owns two wells southeast of the UCLA LAL along Willow Creek; however, only one well is operational and only produced 73 acre-feet (AF) of water over the last five years (LACSD, 2021). The Project would not involve direct withdrawal of groundwater. Further, LACSD currently has adequate water supplies to serve the Project (refer to analysis of Threshold b in the Utilities and Service Systems section of this

IS). Therefore, the Project would not substantially decrease groundwater supplies, and potential impacts would be less than significant.

Therefore, Project impacts related to decreasing groundwater supplies and groundwater recharge would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant impact related to a substantial decrease of groundwater supplies or interference with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on or off site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒

Discussion

Erosion and Siltation

As previously discussed, construction of the Project would result in grading and ground disturbance. Erosion during construction would be related primarily to disturbed soils and sediments that may enter the storm water during rainfall events or winds, but the implementation of erosion control and sediment control BMPs as part of the required SWPPP would reduce erosion on and off site. Thus, compliance with existing water quality regulations would prevent erosion hazards during construction and impacts would be less than significant.

In the long term, there would not be a substantial change in the amount of surface area exposed to potential erosion. Soil flowing off site (by wind or water erosion) would be managed by the

proposed development, landscaped areas, and post-construction BMPs. Potential erosion impacts would be less than significant during operation.

Site Drainage and Storm Water Runoff

Willow Creek and Cedar Suites Sites

Under existing conditions, the Willow Creek and Cedar Suites sites sit inscribed in one larger 57,935 square foot drainage area that sheet flows to Willow Creek Road—there is no subterranean storm drain infrastructure in the subarea. The existing sites are split up into three drainage areas (A-1, A-2, and A-3), shown on Figure 31. The Subarea A-1 drainage area (where the current Cedar Lodge sits) drains to an 8-inch corrugated metal pipe (CMP) culvert outlet that daylights in the parking lot below. It then sheet flows into the public right-of-way (Willow Creek Road) and north into the existing catch basin at the northerly corner of the Willow Creek site. The existing parking lot and maintenance building in Subarea A-2 as well as the vegetated hillside in Subarea A-3 also sheet flow into the right-of-way and into the existing northerly catch basin.

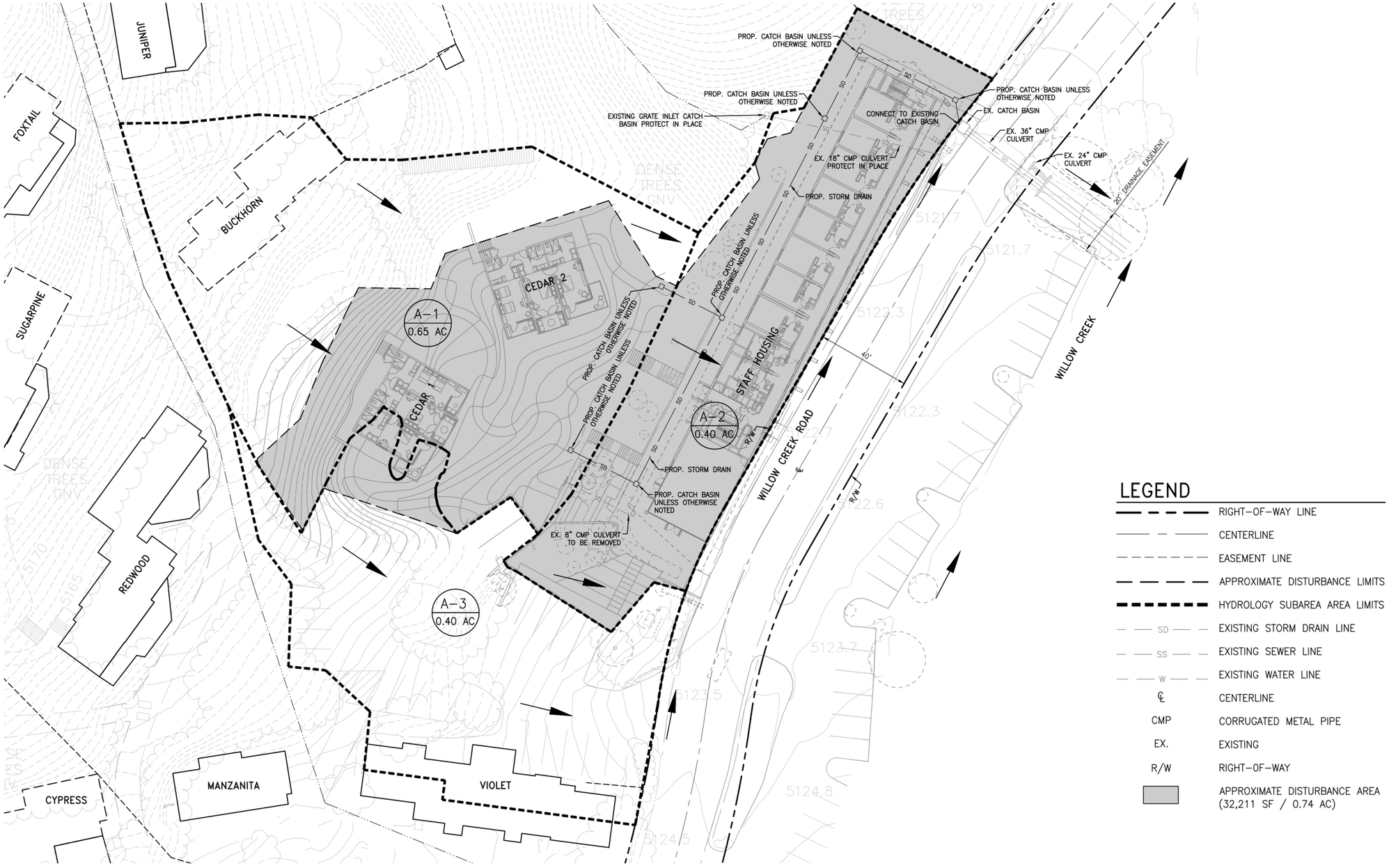
The existing catch basin in Willow Creek Road routes all surface runoff via a 36-inch culvert under Willow Creek Road ultimately discharging into Willow Creek to the east. The Willow Creek Staff Housing and Cedar Suites components of the Project would maintain the same drainage pattern and subareas as existing conditions to convey excess stormwater to Willow Creek Road. New drainage would be installed onsite to convey stormwater flows as shown in Figure 31. The difference in imperviousness between existing and proposed condition is shown in Table 9 below. As shown, the decrease in imperviousness would result in a decrease in peak flow runoff; therefore, no impacts to storm drain infrastructure are anticipated.

TABLE 9
WILLOW CREEK AND CEDAR SUITES SITES
EXISTING VERSUS PROPOSED SITE IMPERVIOUSNESS

Condition	Total Area	Impervious Area	Impervious Area Percentage
Existing Condition	1.45 ac (63,050 sf)	33,395 sf [1]	53%
Proposed Condition	1.45 ac (63,050 sf)	31,664 sf[2]	50%
Difference	**0**	**- 1,731 sf**	**- 3%**

[1] Existing 33,395 sf of impervious area includes Buckhorn Building roof area (2,009 sf), Cedar Lodge roof area (4,010 sf), maintenance building roof area (2,220 sf), and existing pavement area (25,156 sf).
[2] Proposed impervious area includes both Cedar Suites "condolets" roof areas and balconies (total of 3,748 sf), Willow Creek Staff Housing roof area (5,930 sf), proposed pavement and walkway areas (3,968 sf), existing Buckhorn building roof area (2,009 sf), and existing parking lot area (16,019 sf).
Source: (Fuscoe, 2021)

It should be noted that there is a small ephemeral drainage feature bordering the northwest corner of the Willow Creek site (refer to Figure 31). This drainage feature follows a topographic low spot at the bottom of a small slope north of the Cedar Suites site and enters a concrete inlet catch basin on the northwest corner of the Willow Creek site before being conveyed through the storm drain under the existing maintenance building where it outlets east of the site and paved street into Willow Creek. The Project does not include any features that would alter this drainage during construction or operation, and the existing catch basin would be protected in place. However, a drainage channel may be installed north and northwest of the proposed Willow Creek Staff Housing building to capture overflow runoff in the event that the catch basin becomes clogged, which occurs under existing conditions.



Source(s): FUSCOE Engineering (11-24-2021)

Figure 31

Not to Scale

Willow Creek and Cedar Suites Hydrology Map and Schematic Storm Drain Layout

In addition to the water quality protection measures discussed above, as identified in MM BIO-2 it the Biological Resources section of this IS, temporary fencing (e.g., silt fencing or snow fencing) would be placed around the adjacent drainage feature to mark the limits of the drainage to ensure no encroachment occurs during construction and that erosion impact are less than significant.

Glamping Site

Under existing conditions, the Glamping site sits along the rim of a hill located at the apex of two major drainage areas. These drainage areas are identified by their discharge points which are into Lake Arrowhead to the south of the property and into Willow Creek to the east as shown on Figure 32. While some subterranean storm drain system is located along the main lodging area, the Glamping site location conveys storm water runoff through sheet flow into conveyance channels or culverts. The Glamping site is north of the main lodging area. The proposed cabins and restrooms would be isolated from one another but they would remain in a general vicinity and would be accessed by the existing service road that extends around the hill. The Glamping site is currently undeveloped and follows the existing drainage pattern flowing from the top of the hill to the base towards West Shore Road and Willow Creek Road.

The flow generated from the eastern portion of the Glamping site drains towards the public right-of-way (Willow Creek Road), which then flows north into existing catch basins located along the road. The two existing catch basins route the runoff via a 24-inch CMP culvert located by the existing tennis courts and a 36-inch CMP culvert located northeast of the site under Willow Creek Road ultimately discharging into Willow Creek to the east. As shown on Figure 30, Willow Creek routes north joining with Deep Creek eventually discharging into the Mojave River Basin north of the San Bernardino Mountain range.

The western portion of the Glamping site flows towards West Shore Road into an asphalt gutter located along the road which connects to several CMPs that route the surface runoff through the existing site and vegetative swales and ultimately south towards a culvert located at the intersection of North Shore Road and Willow Creek Road. The existing culvert drains the surface runoff towards the southern portion of Willow Creek which is divided by a dam structure that separates runoff between flowing south and north. The culvert routes the flow south into Lake Arrowhead.

The Glamping component of the Project would maintain the same drainage pattern and subareas to convey excess storm water runoff generated by the eastern portion of the site to Willow Creek Road and storm water runoff generated west of the site into the existing culverts. This component of the Project effectively consists of 10 sub-tributary areas isolated from one another. Since the cabins would sit on piles/platforms, the runoff from adjacent areas would not be interrupted; however, the cabins would introduce new impervious areas along with the expansion of the service/access road that would affect the amount of peak flow generated at the Glamping site. Table 10 identifies the difference in imperviousness and peak flow rates for the western portion of the Glamping site, which drains to Lake Arrowhead. Table 11 identifies the difference in imperviousness and peak flow rates for the eastern portion of the Glamping site which drains to Willow Creek.

Source(s): VCA Engineers, INC. (11-30-2021)

Figure 32

Not to Scale

Glamping Site Drainage Area Map

TABLE 10
LAKE ARROWHEAD DRAINAGE
EXISTING VERSUS PROPOSED SITE IMPERVIOUSNESS
WESTERN PORTION OF THE GLAMPING SITE

Condition	Total Drainage Area	Impervious Area	Impervious Area Percentage	Peak Flow Rate[1]
Existing	2.98 (130,020 sf)	12,584 sf	9.68%	15.12 cfs
Proposed	2.98 (130,020 sf)	16,475 sf	12.67%	15.42 cfs

cfs: cubic feet per second
[1] Peak Flow Rate calculations are per values and methodology as is presented in the San Bernardino Hydrology Manual.
Source: (VCA, 2021)

TABLE 11
WILLOW CREEK DRAINAGE
EXISTING VERSUS PROPOSED SITE IMPERVIOUSNESS
EASTERN PORTION OF THE GLAMPING SITE

Condition	Total Drainage Area	Impervious Area	Impervious Area Percentage	Peak Flow Rate[1]
Existing	9.67 (421,025 sf)	175,615 sf	41.71%	65.24 cfs
Proposed	9.67 (421,025 sf)	178,053 sf	42.29%	65.68 cfs

cfs: cubic feet per second
[1] Peak Flow Rate calculations are per values and methodology as is presented in the San Bernardino Hydrology Manual.
Source: (VCA, 2021)

As shown, the post condition imperviousness is more than the existing area since the Glamping site is current undeveloped and does not contain impervious area. However, when taking into account the two major drainage areas, the overall change in impervious surface is less significant. The change in flow being generated for the drainage areas would not exceed the capacity of the existing storm drain conveyance system (3 percent increase to the west and less than 1 percent to the east). It is also important to note that the proposed cabins would sit above ground level so flow from upstream the hill would not be impeded by the cabin structures. In addition, the shallow bedrock underlying the site (refer to the Geology and Soils section of this IS) also affects the runoff being generated; the shallow bedrock would limit the infiltration of the soil which would generate more flow as storm water sheet flows downstream. The proposed roadway improvements and restroom structure would be located at grade; however, as discussed above, the increase in impervious surface would be less than significant. In summary, the storm water runoff associated with the Glamping component of the Project would not have a less than significant impact on existing storm drain structures or conveyance.

Further, pursuant to LRDP Amendment Final SEIR PP 4.7-5, a site-specific hydrologic evaluation would be conducted during design of the Project components (Willow Creek Staff Housing, Cedar Suites and Glamping) to confirm the volume and flow rate from the Project site and Project-specific BMPs to reduce the runoff rate and volume to appropriate levels. As discussed under Threshold d below, the Project sites are not located within a 100-year flood zone. Therefore, the Project would not impede or redirect flood flows.

Additionally, the Project would generate urban pollutants similar to existing uses at the UCLA LAL and in surrounding residential areas. As discussed under Threshold a, above, with incorporation

of required structural and non-structural BMPs, the Project would not generate substantial additional sources of polluted runoff.

Potential impacts related to site drainage and storm water runoff would be less than significant and no mitigation is required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have less than significant impacts related to (1) substantial erosion or siltation on or off the site, (2) substantial increase in the rate or amount of surface runoff in a manner that would result in flooding on or off the site; (3) create or contribute to runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; and (4) impede or redirect flood flows.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In a flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	☐	☐	☒	☐

Discussion

Based on review of the Federal Emergency Management Agency (FEMA), the Project sites are within Zone D (Area of Undetermined Flood Hazard) hazard zone (FEMA, 2008). The Project sites are not located within a 100-year flood zone. Lake Arrowhead is located approximately 0.2-mile south of the UCLA LAL. As identified in the San Bernardino Countywide Plan PEIR Hydrology and Water Quality section, "[a] seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. Most of the largest inland water bodies in the county that could generate local flooding due to a seiche are reservoirs and flood control basins impounded by dams…There are numerous water bodies in the Mountain Region—lakes and reservoirs—that could cause localized flooding next to their shores due to a seiche. The largest seiche ever recorded in San Francisco Bay—a much larger water body than any in the Mountain Region—was four inches high, after the 1906 San Francisco Earthquake. Thus, the likelihood of a seiche that would pose substantial risk of injuries or major property damage to residents next to lakes and reservoirs in the Mountain Region is considered low". (San Bernardino County, 2020a) Additionally, the Pacific Ocean is located more than 60 miles south of the UCLA LAL; therefore, the Project is not subject to inundation due to a tsunami. Therefore, the Project would have a less than significant impact related to the risk of the release of pollutants due to Project inundation.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have less than significant impacts related to the release of pollutants due to Project inundation.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

The Project site is located within the jurisdiction of the Lahontan Regional Water Quality Control Board (RWQCB). The RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface water. The RWQCB has developed a Water Quality Control Plan for Lahontan Region (Basin Plan), which was most recently updated in October 2019 (RWQCB, 2019). The Basin Plan establishes water quality standards for the ground and surface waters of the region, and describes the actions by the RWQCB and others that are necessary to achieve and maintain the water quality standards. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. The RWQCB ensures compliance with the Basin Plan through its issuance of NPDES Permits, issuance of WDRs, and Water Quality Certifications pursuant to Section 401 of the CWA. As required by LRDP Amendment Final SEIR PP 4.7-1 and MM 4.7-1, the Project would comply with the latest NPDES General Permit, and a SWPPP that incorporates BMPs for reducing or eliminating construction-related pollutants generated at the Project site would be prepared and implemented. As such, the Project would not conflict with the Basin Plan, and no impact would occur.

The 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in "high"- and "medium"-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability. DWR has not identified the Lake Arrowhead groundwater basins in its Bulletin No. 118, and it has not been identified with any priority under the SGMA. Further, this basin is not adjudicated and currently does not have a groundwater management plan associated with it. As such, LACSD is not part of a GSA. Therefore, implementation of the project would not result in a conflict with or the obstruction of a groundwater management plan.

The Project would have no impact related to conflicts or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have no impact related to conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan.

11. LAND USE AND PLANNING

Relevant elements of the Project related to land use and planning include redevelopment of the Willow Creek and Cedar suites sites with replacement staff housing and two new guest condolets (12 rooms total), respectively; and, development of the Glamping site with 10 new guest cabins and 2 restrooms. The Project is located in the County of San Bernardino Lake Arrowhead Community.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. Therefore, the following PP is considered part of the Project and is assumed in the analysis presented in this section.

PP 4.8-1(d) *New building projects shall be sited to ensure compatibility with existing uses and the height and massing of adjacent facilities.*

In addition, PP 4.1-1(a) previously identified in the Aesthetics section of this IS is also incorporated into the Project and is applicable to the land use analysis.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project physically divide an established community?	☐	☐	☐	☒

Discussion

The Project sites are within the existing UCLA LAL. The Willow Creek and Cedar Suites sites are currently developed, and the Glamping site is undeveloped but internal to the UCLA LAL. There are existing residences surrounding UCLA LAL. The Project would involve redevelopment of the Cedar Suites and Willow Creek sites and the construction of ten new guest cabins and restrooms along the existing trail at the Glamping site. Proposed roadway/access improvements would occur along existing roadways. The Project would not divide an established community and no impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not physically divide an established community and no impact would result.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

San Bernardino National Forest Land Management Plan

The San Bernardino National Forest Land Management Plan as adopted in 2006 and includes three parts: South California National Forests Vision, San Bernardino National Forest Strategy, and Design Criteria for the Southern California National Forests. The UCLA LAL, including the Project sites, is within the San Bernardino National Forest. However, according to the USDA, the UCLA LAL and surrounding areas area within an area identified as Non-Forest Service Land (USDA, 2021). Non-Forest Service Land is land that is not identified as a part of the National Forest National Grasslands, Land Utilization Projects, or other Federal land for which the Forest Service has administrative jurisdiction. Located on or in proximity to Non-Forest Service Land, the Project is not subject to requirements of the San Bernardino National Forest Land Management Plan and not further discussion is required.

Regional Planning Programs

With respect to regional planning, SCAG is the MPO for Los Angeles, Riverside, Orange, San Bernardino, Ventura, and Imperial Counties. The federal government mandates SCAG, as the designated MPO, to prepare plans for growth management, transportation, air quality, and hazardous waste management. In addition, SCAG reviews EIRs for projects of regional significance for consistency with its regional plans. The policies and strategies of SCAG's regional planning programs, including the Connect SoCal (2020-2045 RTP/SCS) is not applicable to the Project because the Project is not of Statewide, Regional, or Areawide Significance based on the established criteria in Section 15206 of the State CEQA Guidelines, which is applied by SCAG to determine regional significance.

The Project's consistency with regional plans and programs that address specific topical issues are discussed in the respective sections of this IS. This includes, but is not limited to, the SCAQMD AQMP (Air Quality section) and the Basin Plan for Lahontan Regional Water Quality Control Board (Hydrology and Water Quality section). As indicated in the analysis presented in this IS, the Project would be consistent with the requirements outlined in these regional plans, including requirements in place to avoid or mitigate environmental effects.

University of California, Los Angeles

The UCLA 2002 LRDP, as amended through 2017, guides the physical development of the UCLA campus to serve its teaching, research, and public service mission. The Project site is not located on campus and therefore is not considered in relation to the remaining building square footage allocation for campus uses or parking and trip generation limits identified in the LRDP. The Project would not conflict with the provisions of the LRDP.

San Bernardino County

UCLA is part of the University of California, a constitutionally created entity of the State of California. As a constitutional entity, the University of California is not subject to municipal regulations, including general plans, specific plans, and zoning regulations. The Lake Arrowhead Community is part of unincorporated San Bernardino County, and although this jurisdictional separation provides no formal mechanism for joint planning or the exchange of ideas, UCLA may consider (for coordination purposes) aspects of local plans and policies for the community surrounding its properties but is not bound by those plans and policies in its planning efforts. Following is a discussion of the Project's relationship to local plans and regulations, for informational purposes.

Countywide Plan and Lake Arrowhead Community Plan

The San Bernardino Countywide Plan was adopted in October 2020. The Countywide Plan consists of a Policy Plan (an update and expansion of the County's General Plan for unincorporated areas), Business Plan, Community Action Guides, and Environmental Documents. The Policy Plan Land Use Element serves as a guide for the County's future development and designates the distribution and general location of land uses. Based on review of the Policy Map LU-1B Land Use Map – Mountain Region, the UCLA LAL is located in an area designated LDR: Low Density Residential 2-5 dwelling units per acre maximum (San Bernardino County, 2020b).

For purposes of developing, maintaining, and implementing the land use portion of the General Plan, the County encourages the adoption of community plans for unincorporated communities. The unincorporated Lake Arrowhead Community adopted the Lake Arrowhead Community Plan (LACP) on March 13, 2007 (San Bernardino County, 2007). The LACP includes goals and polices that are refinements to the goals and polices provided in the County General Plan. Although the provisions of the LACP are not applicable to the Project, the Project site is within the LACP area. Based on review of Figure 2, Policy Land Use, of the LACP, the UCLA LAL is within an area designated RS, Single Residential (RS-14M). Single Residential land use designations make up approximately 67 percent of the Lake Arrowhead Community, with the RS-14M land use representing 61 percent of the community. As discussed in Section II.3, Background and Need for the Project, UCLA LAL has operated as a conference center since 1957. Additionally, the UCLA LAL hosts the Bruin Woods program, which is an all-inclusive summer camp that offers outdoor recreation, arts and crafts, and activities for guests. The Project would involve the development of replacement staff housing, new guest accommodations (a total of 22 rooms/units) and support uses at the UCLA LAL, which is an all-inclusive resort, and would not change current operations. As such, the Project would be consistent with Goal LA/LU 1 and associated policies of the LACP Land Use Element to "[r]etain the existing resort-oriented mountain character of the community." Policy LA/LU 1.1 is to "[r]equire strict adherence to the land use policy map unless proposed changes are clearly demonstrated to be consistent with the community character." Consistent with this policy, the Project does not propose changes to the land use policy map, would continue the existing resort use, and has been designed to maintain the character of the area. Further, as required by PP 4.8-1(d), the proposed Willow Creek Staff Housing and Cedar Suites buildings along Willow Creek Road have been located on existing developed sites and have been designed to be ensure compatibility with existing uses and the height and massing of existing uses. Consistent with Policy LA/LU 1.5, and as discussed in the Aesthetics section of this IS, the proposed structures would be designed, in accordance with PP 4.4-1(a), with an architectural style that compliments the architecture of existing buildings featured throughout the UCLA LAL. Notably, the new buildings would complement the existing aesthetic of the UCLA LAL

property, with steep shingle roofs, fieldstone bases and accents, exposed timber trim, and cement plaster exterior finishes.

With respect to the LACP Circulation and Infrastructure Element, the Project's consistency with goals/policies related to circulation is addressed in the Transportation section of this IS. With respect to infrastructure goals and policies, as discussed in the Hydrology and Water Quality section and Utilities and Service System section of this IS, the Project would not exceed the capacity of existing utility infrastructure. Further, as discussed in the Greenhouse Gas Emission section of this IS, the Project would be implemented in adhere to UC requirements for sustainability, including water conservation.

Goal LA/CO 1 and associated policies of the LACP Conservation Element address preservation of unique environmental features of Lake Arrowhead including native wildlife, vegetation and scenic vistas. Goal LA/CO 2 and its associated policies address maintenance of the health and vigor of the forest environment. As addressed in the Aesthetics and Biological Resources sections of this IS, the Project would result in less than significant impacts to biological resources and scenic vistas. Further, required brush management would be implemented for fire protection purposes. The Project would not involve ridgeline development that would detract from the scenic quality of major ridgeline viewsheds, rather, the Cedar Suites and Willow Creek Staff Housing components of the Project would occur on sites that are currently developed, and the Glamping cabins would be developed internal to the UCLA LAL and would be visible from public vantage points. Goal LA/CO 3 and its associated policies address protection of streambeds and creeks from encroachment, and Goal LA/CO 4 and its associated policies address water quality protection. As discussed in the Biological Resources and Hydrology and Water Quality section of this IS, the Project does not encroach into an existing ephemeral drainage that extends north-northwest of the Cedar Suites and Willow Creek sites, and the Project would adhere to existing water quality regulations, which are more stringent than water quality regulations in place with existing uses were constructed. Goal LA/CO 5 and its associated polices address preservation of historic resources. As discussed in the Cultural Resources section of this IS, there are no existing historic resources that would be impacted by the Project. Cedar Lodge has been evaluated and determined not to meet any significance criteria for listing in the NRHP or California Register, and is not a historic resource for purposes of CEQA.

The goals and associated policies of the LACP Open Space Element address preservation and management of National Forest Lands, development of park and recreational facilities to meet the recreational needs of the community and visitors, establishing a community-wide trail system, and improving open space corridors. The Project involves redevelopment and new development within the UCLA LAL. The UCLA LAL is not within an area managed by the National Forest. Further, as discussed in the Recreation section of this IS, there would be no increase in the demand for public recreational facilities. There is an existing trail system within UCLA LAL that would be maintained, and enhanced with the Glamping component of the Project. The Project is not within or near any designated open space areas.

The LACP Safety Element goal and policies address the provision of adequate fire safety measures and emergency evacuation routes, and disaster planning. As discussed in the Public Services and Wildfire sections of this IS, the Project would be implemented in adherence to applicable building and fire codes, including requirements for brush management. Further the Project does not involve any uses or activities that would impede emergency evacuation. Rather, access within the UCLA LAL would be improved.

The LACP defers to the Noise Element and Housing Element. San Bernardino County noise regulations are addressed in the Noise section of this IS. The UCLA LAL is an all-inclusive resort

and does not provide housing. The Project involves the provision of additional guest accommodations at the UCLA LAL; therefore, the provisions of the Housing Element are not relative to the Project.

Zoning

The UCLA LAL, including the Project sites, and adjacent parcels are zoned LA/RS-14M, which requires a minimum of 14,000-sf lots. In addition to residential uses, various types of use are allowed, subject to certain permits requirements in the various RS zones. This includes, but is not limited to agricultural, resource, and open space uses; recreation, education, and public assembly uses; retail uses; general services; transportation, communications, and infrastructure; and other (e.g., accessory structures). The Project would involve the development of replacement staff housing, new guest accommodations (a total of 22 rooms/units), and support uses at the UCLA LAL, which has been in operation since 1957. The proposed development is not subject to the development standards outlined in the County's Development Code and given the type of uses involved, the residential development standards are not particularly relevant to the proposed development (which does not involve single-family residential uses). Notwithstanding, the Project would not change current operations or types of uses provided at the UCLA LAL, would be compatible with existing development within the Project area, and would be developed in accordance with applicable state building codes.

As addressed through the analysis presented in this IS, the Project would not result in a significant environmental impact due to a conflict with County of San Bernardino plans, policies, or regulations.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would result in no impact related to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project.

12. MINERAL RESOURCES

There are no relevant elements of the Project related to mineral resources. Additionally, there are no relevant PPs or MMs adopted as part of the Final SEIR.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion

Based on review of Figure 5.11-1, Mineral Resource Zones 2 & 3 in the Southwest Quadrant of the County, of the San Bernardino Countywide Plan PEIR Mineral Resources section, there are no mineral resources of value to the State or region in the vicinity of the Lake Arrowhead Community, including the Project Sites (County of San Bernardino, 2020a). Further, there are no locally-important mineral resource recovery sites located near the Project. Thus, there would be no impact to mineral resources from implementation of the Project.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have no impact related to (1) the availability of a known mineral resource that would be of value to the residents of the State and region and (2) the availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

13. NOISE

Relevant elements of the Project related to noise and vibration include the use of diesel-powered equipment during construction and the operational noise that may be generated by mechanical equipment, by outdoor social or recreational activities, and by associated vehicle traffic.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs are considered part of the Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes

have been made so the stated requirement better applies to the Project, which is off campus and in San Bernardino County.

PP 4.9-1 *~~The campus~~**UCLA** shall continue to evaluate ambient noise conditions when placing new ~~student~~ housing near regular sources of noise such as roadways~~, the on-campus helistop~~ and stationary equipment, and design the new buildings to ensure that interior noise levels would be less than 45 dBA CNEL.*

PP 4.9-6(a) *~~The campus~~**UCLA** shall continue to shield all new stationary sources of noise that would be located in close proximity to noise-sensitive buildings and uses.*

PP 4.9-7(a) *To the extent feasible, construction activities shall be limited to 7:00 AM to ~~9:00~~ **7:00** PM Monday through Friday, 8:00 AM to 6:00 PM on Saturday, and no construction on Sunday and national holidays, as appropriate, in order to minimize disruption to area residences surrounding the ~~campus and to on-campus uses~~ **Project sites** that are sensitive to noise.*

PP 4.9-7(b) *~~The campus~~**UCLA** shall continue to require by contract specifications that construction equipment be required to be muffled or otherwise shielded. Contracts shall specify that engine-driven equipment be fitted with appropriate noise mufflers.*

PP 4.9-7(c) *~~The campus~~**UCLA** shall continue to require that stationary construction equipment material and vehicle staging be placed to direct noise away from sensitive receptors.*

PP 4.9-8 *~~The campus~~**UCLA** shall continue to conduct meetings, as needed, with off-campus constituents that are affected by campus construction to provide advance notice of construction activities and ensure that the mutual needs of the particular construction project and of those impacted by construction noise are met, to the extent feasible.*

MM 4.9-2 *~~The campus~~**UCLA** shall require by contract specifications that~~, to the extent feasible,~~ large bulldozers, large heavy trucks, and other similar equipment not be used ~~within 43 feet of occupied residence halls, within 34 feet of non-residential/non-sensitive buildings, and within 135 feet of buildings that house sensitive instrumentation or similar vibration-sensitive equipment or activities~~. The work shall be done with medium-sized equipment or smaller within these prescribed distances to the extent practicable.*

Fundamentals of Sound and Environmental Noise

Sound is a vibratory disturbance that is created by a moving or vibrating source and is capable of being detected by the ear. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. In its most basic form, a continuous sound can be described by its frequency or wavelength (pitch) and its amplitude (loudness). Frequency is expressed in cycles per second, or hertz. Frequencies are heard as the pitch or tone of sound. High-pitched sounds produce high frequencies; low-pitched sounds produce low frequencies. Sound pressure levels are described in units called the decibel (dB).

The decibel scale (or dB scale) is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of

the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or in terms of acoustical energy. Two noise sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive changes of a 3 dBA increase or decrease; that a change of 5 dBA is readily perceptible; and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (Caltrans, 1998). Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider the fact that the effect noise has upon people is largely dependent upon the total acoustical energy content of the noise and the time of day when the noise occurs. The rating scales that are applicable to this analysis are as follows:

- ***L_{eq},*** the equivalent energy noise level, is the average acoustic energy content of noise for a stated time period. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. This rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- ***CNEL,*** the Community Noise Equivalent Level, is a 24-hour average L_{eq} with a 10 dBA "weighting" added to the hours between 10:00 PM and 7:00 AM and an additional 5 dBA weighting added to hours between 7:00 PM and 10:00 PM to account for noise sensitivity in the nighttime and evening, respectively. The logarithmic effect of these additions is that a steady noise source over a 24-hour period would result in a CNEL measurement approximately 7 dBA higher than the L_{eq} over the same period. This is generally not the case with traffic noise, as traffic volumes may vary considerably depending on the hour. For typical urban and suburban traffic, it has been found that the average noise level for the peak hour is numerically equal to the CNEL; therefore, for purposes of this analysis, the CNEL and peak hour traffic L_{eq} are assumed to be equal. CNEL is also used to describe aircraft noise.
- ***L_{min}*** is the minimum instantaneous noise level experienced during a given period of time.
- ***L_{max}*** is the maximum instantaneous noise level experienced during a given period of time.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 45 dBA, moderate in the 45- to 60-dBA range, and high above 60 dBA. Prolonged noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated natural settings that can provide noise levels as low as 20 dBA and quiet suburban residential streets that can provide noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA CNEL) and commercial locations (typically 60 dBA CNEL). People may consider louder

environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA CNEL) or dense urban or industrial areas (65 to 80 dBA CNEL).

Noise levels from a particular source decline as distance to the receptor increases. Other factors, such as the weather and reflecting or shielding, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about (1) 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and (2) 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures—generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more.

Fundamentals of Environmental Vibration

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as peak particle velocity in inches per second (ppv in/sec) and, in some studies, as vibration decibels (VdB).

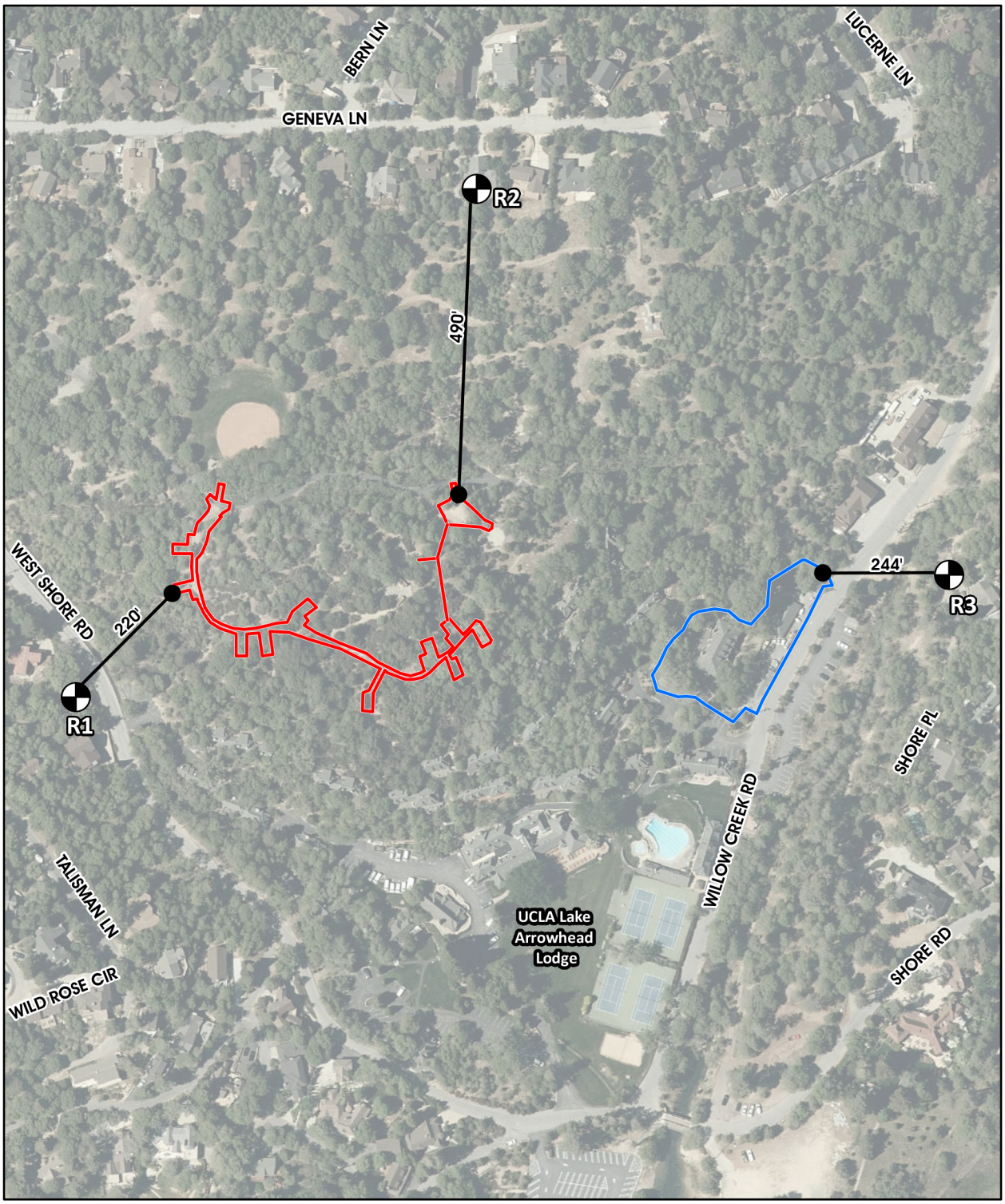
Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible.

Noise-Sensitive Receptors

Noise-sensitive receptors are generally considered to be those people engaged in activities or utilizing land uses that may be subject to the stress of significant interference from noise. Activities usually associated with sensitive receptors include, but are not limited to, talking, reading, and sleeping. As shown on Figure 33, the non-UCLA LAL off-site sensitive receptors nearest to the Willow Creek and Cedar Suites site are the residences east of Willow Creek Road (approximately 245 east of the Willow Creek site). The off-site sensitive receptors nearest to the Glamping site are the residences approximately 220 feet to the southwest, across West Shore Road.

Existing Noise Environment

The noise environment at and near the Project site is relatively quiet. Noise sources are occasional vehicle traffic on Willow Creek Road, construction sounds from maintenance and improvement work at nearby residences and Tavern Bay Beach Club, and nature sounds, such as wind and bird call.



LEGEND:

- Glamping Area
- Willow Creek Staff Housing and Cedar Suites Area
- Receiver Locations
- Distance from receiver to Project site boundary (in feet)

Source(s): ESRI, LA County Portal (2017), Nearmap Imagery (2017)

0 62.5 125 250 Feet

Figure 33

Noise-Sensitive Receptor Locations

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

Discussion

Construction

During construction, nearby noise-sensitive receptors would be exposed to occasional increased noise levels associated with the operation of construction equipment, such as loaders, excavators, and truck trips. Section 24.0706 (d) of the San Bernardino County Code of Ordinances prohibits the operation of construction equipment noise between the hours of 7:00 PM and 7:00 AM (during the hours when people normally sleep and during the early morning and evening when people are typically within their home and more sensitive to noise effects). LRDP Amendment Final SEIR PP 4.9-7(a), as modified for this Project, reflects these hourly restrictions. Section 83.01.080 (g) (3) of the San Bernardino County Code of Ordinances exempts temporary construction, maintenance, repair, or demolition activities between 7:00 AM and 7:00 PM, except Sundays and Federal holidays from the noise standards of Section 83.01.080.

However, neither the San Bernardino Countywide Plan or County Code of Ordinances establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a substantial temporary or periodic noise increase. Therefore, a numerical construction threshold based on Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual is used for analysis of daytime construction impacts, as discussed below.

According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise sensitive residential land use.

Construction equipment noise would not be constant because of the variations of power, cycles, and equipment location. As shown on Table 12, noise levels generated by construction equipment can range from approximately 68 dBA to in excess of 80 dBA when measured at 50 feet. Hard site conditions are used in the construction noise analysis, which result in noise levels that attenuate (or decrease) at a rate of 6 dBA for each doubling of distance from a point source (i.e., construction equipment). For example, a noise level of 80 dBA measured at 50 feet from the noise

source to the receiver would be reduced to 74 dBA at 100 feet from the source to the receiver and would be further reduced to 68 dBA at 200 feet from the source to the receiver.

TABLE 12
CONSTRUCTION REFERENCE NOISE LEVELS

Construction Equipment	Acoustical Use Factor	Reference Noise Level @ 50 Feet (dBA L_{max})	Reference Noise Level @ 50 Feet (dBA L_{eq})[2]	Combined Noise Level (dBA L_{eq})
Dozer	40%	82	78	80
Front End Loader	40%	79	75	
Source: (FHWA, 2006)				

For the purposes of this analysis, operation of a dozer and a loader operating simultaneously near the edge of the building construction area at distances ranging from 220 to 490 feet from the nearest noise sensitive receptor locations is anticipated. The combined typical average noise levels at the nearest noise-sensitive uses would range from 60.2 to 67.1 dBA L_{eq} during construction, as shown on Table 13. The data in Table 13 assume a hard site for noise absorption. Noise levels would be further reduced by natural barriers where the terrain blocks the line of sight between the noise source and the receiver, and by intervening buildings or other structures.

TABLE 13
ESTIMATED CONSTRUCTION NOISE LEVELS

Receiver Location[1]	Reference Construction Noise Level (dBA L_{eq})	Distance to Construction Activity (Feet)[2]	Distance Attenuation (dBA L_{eq})[3]	Construction Noise Level (dBA L_{eq})
R1	80	220'	-12.9	67.1
R2	80	490'	-19.8	60.2
R3	80	244'	-13.8	66.2

[1] Receiver locations are shown on Figure 33.
[2] Distance from the nearest point of construction activity to the nearest receiver.
[3] Point (stationary) source drop off rate of 6.0 dBA per doubling of distance.
[4] Estimated construction noise level at receiver location.

Construction noise would be audible above the relatively quiet ambient noise, but would not be unlike the noise from typical construction activities occurring in the area. Construction would not occur before 7:00 AM or after 7:00 PM or on Sundays or holidays, as required by County ordnance. Noise attenuation would be provided with the Project's incorporation of LRDP Amendment Final SEIR PP 4.9-7(b), which requires the muffling or shielding of equipment; Final SEIR PP 4.9-7(c), which requires that stationary construction equipment material and vehicle staging be placed to direct noise away from sensitive receptors; and Final SEIR MM 4.9-7, which requires the installation of noise barriers.

With adherence to established construction hours, and incorporation of technically feasible mitigation, the construction activities associated with the Project would not conflict with established construction related standards and would be less than significant.

With respect to construction phase vehicle noise impacts, it is anticipated that one to four truck trips per day would occur to remove demolition spoils. Similarly, one to four truck trips per day could occur occasionally during the building phases to bring materials to the Project site. While any single truck passing may be audible, it is expected that the noise from Project-related construction truck traffic would not be frequent enough to be an annoyance. Traffic noise may also increase briefly at the start and end of the workday due to the arrival and departure of construction workers. The brief noise increases caused by occasional truck traffic and worker commutes would be a less than significant impact. No mitigation measures would be required for vehicle noise during construction.

Operations

The primary potential operational project-generated noise source that could impact nearby sensitive receptors include outdoor gathering areas, and vehicle operations. The Willow Creek Staff Housing would not generate new traffic because it is a replacement for Cedar Lodge and does not increase the number of resident staff.

Operational trip generation for the new Cedar Suites and the Glamping facilities (22 new guest rooms) was calculated using the standard ITE trip generation rate for a hotel (7.99 trips per day per room), which provides a very conservative analysis of 176 new daily trips (Urban Crossroads, 2021). However, many years' experience with UCLA LAL events and the Bruin Woods summer program has shown that guests generally generate zero trips per day because meals and most activities are provided on or adjacent to the UCLA LAL property, and no vehicle travel is required for most activities. Guests typically arrive and leave on Saturdays. The trip generation rate for the new Cedar Suites and Glamping units when used for conferences and the Bruin Woods programs would be the same as for the existing operations. With the recent change in operations at the UCLA LAL to allow for non-University affiliate during certain times of the year (when the facility is not being used for the Bruin Woods program), it is reasonable to anticipate additional trip generation; however, these guests would also use onsite amenities, including food service so the trip generation is not expected to reflect a typical hotel room (8.36 trips per day). Additionally, there would be no time when all of the new guest accommodations would be used solely by non-University affiliates.

The UCLA LAL currently has 81 units with a capacity to accommodate 225 guests, and the Project would add capacity for 44 guests (22 rooms/units with potential double occupancy), which represents an increase of approximately 20 percent. It is reasonable to assume that the trip generation rate for the 22 new rooms/units would be the same as for the existing 81 guest units and the trip generation increase on Willow Creek Road would not exceed 30 percent. This is a conservative estimate because the Project-related increase in traffic volume on Willow Creek Road would be less when the existing non-Conference Center traffic is included. A traffic volume increase of 30 percent would increase the traffic noise by less than 1.0 dBA, which is generally considered as imperceptible to the human ear. As noted above, doubling of traffic volume is required to increase average traffic noise levels by 3 dBA, a change which is considered barely perceptible to human hearing. The impact would be less than significant, and no mitigation is required.

Level of Significance

With implementation of the LRDP Amendment Final SEIR MMs and PPs the Project would have a less than significant impact related to generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in any applicable plan or noise ordinance, or applicable standards of other agencies.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒

Discussion

Construction activities associated with pile driving, blasting, large grading equipment, and heavy, loaded trucks and similar equipment has the potential to cause significant vibration impacts to adjacent and nearby receptors. No pile driving, blasting, or the use of large grading equipment would occur with the Project.

The San Bernardino County Development Code Section 83.01.090(a) states that vibration shall be no *greater than or equal to two-tenths inches per second measured at or beyond the lot line*. Therefore, to determine if the vibration levels due to the operation and construction of the Project, the peak particle velocity (PPV) vibration level standard of 0.2 inches per second is used.

Section 83.01.090(c)(2) exempts "Temporary construction, maintenance, repair, or demolition activities between 7:00 a.m. and 7:00 p.m., except Sundays and Federal holidays" form the above standard. Although construction activities are exempt from the quantitative vibration standard, it is noted that vibration from equipment planned for the Project, which would not include heavy construction equipment per LRDP Amendment Final SEIR MM 4.9-2, would not exceed the 0.2 PPV in/sec County standard beyond 15 feet from the work site.

There would be no impact, and no mitigation measures are required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

There would be no impact, and no mitigation measures are required.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

Discussion

The Project site is neither within an airport land use plan nor within two miles of a public airport or public use airport; therefore, no impact related to noise from public airport operations would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

There would be no impact related to public use airports.

14. POPULATION AND HOUSING

There are no relevant elements of the Project related to population and housing. Additionally, there are no relevant PPs or MMs adopted as part of the LRDP Amendment Final SEIR.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

Discussion

The Project is located at the UCLA LAL, which is an all-inclusive resort used for summer programs and summer programs. There are no full-time residents at the UCLA LAL, and the proposed new guest accommodations at the Cedar Suites and Glamping components of the Project would not result in the generation of full-time residents. Further the Willow Creek Staff Housing component of the Project would replace staff housing currently accommodated at the current Cedar Lodge (54 beds). There would be no increase in employment opportunities at the UCLA LAL as a result of the Project. Further, the Project would involve connections to existing utility infrastructure on or near the Project site; there would be no extension of roads or utilities. Therefore, the Project would not directly or indirectly induce unplanned population growth at UCLA LAL or the Lake Arrowhead Community. No impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have no impacts related to inducing substantial unplanned population growth in an area, either directly or indirectly.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

The Cedar Suites site is developed with the existing Cedar Lodge, which provides 54 beds for staff housing. Cedar Lodge is seismically deficient and is being replaced by the Willow Creek Staff Housing component of the Project, which would also accommodate 54 beds for staff. The environmental impacts associated with construction of the Willow Creek Staff Housing component of the Project are addressed throughout this IS. Cedar Lodge would not be demolished until the new Willow Creek Staff Housing building is operational; therefore, the construction of replacement housing elsewhere, even on a temporary basis, would not be required. The Glamping site does include any existing housing. Therefore, the Project would not displace any existing people or housing. No impacts would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have no impacts related to displacement of substantial numbers of existing people or housing that would necessitate the construction of replacement housing.

15. PUBLIC SERVICES

Relevant elements of the Project related to public services include the redevelopment of the Willow Creek and Cedar Suites sites with replacement UCLA LAL staff housing, and the new Cedar Suites (two buildings with a total of 12 new guest rooms accommodating 24 guests), respectively; and 10 new cabins associated with the Glamping component of the Project, which would accommodate 20 guests. The Project would not generate new employment opportunities in the Project area and would not result in a permanent increase in population.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. PP 4.12-1(a), discussed under the Recreation section of this IS, has been incorporated into the Project and require UCLA to continue to provide recreational facilities for students, faculty, and staff.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☐	☒

Discussion

The UCLA LAL, which includes the Project sites, is within the Lake Arrowhead Community. The Lake Arrowhead Community is within a State Responsibility Area (SRA) and is under the jurisdiction of Cal Fire for fire protection services. However, the Lake Arrowhead Community is within a mutual threat zone for the U.S. Forest Service, Cal Fire, and San Bernardino County Fire Protection District (SBCFPD). As such, all three entities would be dispatched to fires calls within the Lake Arrowhead Community through mutual aid agreements. The nearest U.S. Forest Service fire station to the UCLA LAL is located at 28104 CA-18, Skyforest at the Skyforest Work Center approximately 7.0 roadway miles to the south. The nearest Cal Fire is located at 31250 Hilltop Boulevard, Running Springs at the Running Springs Fire Station No. 51 approximately 12.2 roadway miles to the southeast. With respect to SBCFPD, UCLA LAL is specifically located in the SBCFPD Mountain Division (Division 3). There are three SBCFPD fire stations in the Lake Arrowhead Community: Station 91, Station 92, and Station 94. Station 91 is located approximately 4.7 roadway miles to the south of the UCLA LAL on the south side of Lake Arrowhead (301 S State Highway 173); Station No. 92 is located approximately 1.6 roadway miles to the east, northeast of Lake Arrowhead (981 N State Highway 173); and Station 94 is located approximately 2.0 roadway miles to the west on the west side of Lake Arrowhead (981 N State Highway 173). It should be noted that SBCFPD stations would be dispatched first to any structural fires within the Lake Arrowhead Community and Cal Fire stations would be dispatched first to any vegetation fires within the Lake Arrowhead Community; the U.S. Forest Service fire station would be dispatched if fires within the Lake Arrowhead Community spread to federally owned land (Biers, 2021).

The Project would result in an overall net increase of 22 guest accommodations on-site accommodating 44 guests. The Project would not result in an increase in employment opportunities, nor result in a permanent increase in population. As such, the implementation of the Project is not anticipated to substantially increase the intensity of the use at the Project site and is not anticipated to result in an increase the demand for fire protection services compared to existing conditions at the UCLA LAL, including the Project sites. The Project would be designed in compliance with the California Fire Code and California Building Code, specifically Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California. In addition, the Project would comply with all regulations of the California Health and Safety Code (Sections 13000 et seq.) pertaining to fire protection systems, including provision of State-mandated smoke alarms, fire extinguishers, appropriate building access, and emergency response notification systems.

Due to the limited scale of the Project, the Project would not substantially increase the demand for fire protection services and would not require the need for new or physically altered fire protection facilities to accommodate the Project and to maintain acceptable response times and fire flows. No physical environmental impacts related to the provision of fire protection services would result. No impacts would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not require new or altered fire protection services and no physical impacts would occur. No impact would occur.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Police protection?	☐	☐	☐	☒

Discussion

The UCLA LAL, which includes the Project sites, is within the jurisdiction of the San Bernardino County Sheriff's Department. Specifically, the Project sites are within the service area of the Twin Peaks Station located at 26010 Highway 189, which covers a territory of over 135 square miles. The patrol area stretches from Lake Silverwood to Lake View Point and includes the towns/communities of Crestline, Lake Arrowhead, Running Springs and numerous smaller communities and neighborhoods. As well as being home to nearly 35,000 regular residents, the resort and recreation destination can sometimes have a daily population of over 85,000 persons on weekends and holidays. Marine Enforcement team patrol Lake Arrowhead and Lake Silverwood, and Off Highway Vehicle teams patrol the SBNF within the Twin Peaks Station jurisdiction. The Twin Peaks Station has 17 deputies, 2 detectives, 5 sergeants, 1 Captain, and 7 professional staff employees. Additionally, the Twin Peak Station has a group of volunteers that include Citizens on Patrol, Search and Rescue, Sheriff's Reserve, and the Explorer program. (SBCSD, 2021). The Twin Peaks Station located approximately 6.4 roadway miles from the UCLA LAL.

The Project would result in an overall net increase of 22 guest rooms on-site accommodating 44 guests, a negligible increase compared to the current visitor population served by the Twin Peak Station. The Project would not result in an increase in employment opportunities, nor result in a permanent increase in population. Additionally, there would be no change in the types of operations and uses provided on-site. As such, the implementation of the Project would not increase the demand for police protection services as compared to existing conditions, and new or physically altered police protection facilities would not be required to serve the Project and to maintain acceptable response times. No physical environmental impacts related to the provision of police protection services would result. No impacts would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not require new or altered police protection facilities and no physical impact would occur; therefore, impacts related to police protection services would be less than significant.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Schools?	☐	☐	☐	☒

Discussion

The Project sites are within the service area of the Rim of the World School District. As discussed above, the Project does not propose residential uses that would generate new residents or a school-aged population, rather there would be a limited increase in guest accommodations. The Project would not generate new employment opportunities. The Project would not result in a need for the construction of new or altered school facilities. Therefore, no physical environmental impacts would result.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not require new or altered school facilities and no physical impact would occur.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Parks?	☐	☐	☐	☒

Discussion

The analysis of the Project's impacts related to park facilities is provided in the Recreation section of this IS. As identified, the Project's future visitors and occupants would utilize the existing recreational facilities within the UCLA LAL, which the Project sites are a part of, and new or expanded recreational facilities are not required to maintain acceptable service levels. No impacts related to construction of new or expanded park facilities would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not require new or altered park facilities and no physical impact would occur. No impacts would occur.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Other public facilities?	☐	☐	☐	☒

Discussion

The UCLA LAL, including the Project sites, is within the library service area for San Bernardino County Library System, and specifically within the service area of the Lake Arrowhead Branch located at 27235 Highway 198 in the Bluejay Community approximately 4.0 miles to the south. As discussed above, the Project does not propose residential uses that would generate new residents, rather there would be a limited increase in guest accommodations. The Project would not generate new employment opportunities. The Project would not result in a need for the construction of new or altered library facilities. Therefore, no physical environmental impacts would result. No impacts would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would not require new or altered libraries or other public services and no physical impacts would result. No impacts would occur.

16. RECREATION

Relevant elements of the Project related to recreation include the redevelopment of the Willow Creek and Cedar Suites sites with replacement UCLA LAL staff housing, and the new Cedar Suites (two buildings with a total of 12 new guest rooms accommodating 24 guests), respectively; and 10 new cabins associated with the Glamping component of the Project, which would accommodate 20 guests. The Project would not generate new employment opportunities at the UCLA LAL and would not result in a permanent increase in population. The additional guests would have access to the existing recreational facilities within the UCLA LAL.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. Therefore, the following PP is considered part of the Project and is assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the Project, which is off campus

PP 4.12-1(a) *~~The campus~~**UCLA** shall continue to provide, operate, and maintain recreational facilities for students, faculty, and staff ~~on campus~~.*

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Discussion

The Project sites are within the existing UCLA LAL, which is an all-inclusive resort that has existing recreational facilities, including but not limited to a pool, a ball field, trails, volleyball court, tennis courts, basketball courts, archery, frontier village, rock wall, ropes course, and an amphitheater. UCLA LAL guests also have access to boat docks and equipment for water activities. The 44 additional guests that would be accommodated by the proposed new guest accommodations would use existing recreational facilities. As with existing conditions, the guests would not use existing public neighborhood or regional parks. Additionally, the Project would not generate new employment opportunities at the UCLA LAL and would not result in a permanent increase in population. Therefore, there would not be a physical deterioration of public recreation facilities due to increased use.

With the exception of improvements to pedestrian trails/pathways for accessibility, the project does not include the construction or expansion of existing recreational facilities at the UCLA LAL. Further, the construction activities associated with the Project, which include replacement staff housing and new guest accommodations to facilitate continued operations at the UCLA LAL have been evaluated in this IS and construction-related impacts would be less than significant. No additional physical impacts would occur with implementation of the Project.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant impact related to an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the Project does not include the construction of any new or expanded park or recreational facilities. The Project-related construction activities have been addressed throughout this IS and impacts would be less than significant.

17. TRANSPORTATION

Relevant elements of the Project related to transportation include redevelopment of the Willow Creek site with replacement staff housing (54 beds), redevelopment of the Cedar Suites site with two new guest condolets (12 rooms accommodating 24 guests), 10 new Glamping cabins accommodating 20 guests.

Primary vehicular access to the Willow Creek and Cedar Suites site would be provided via an existing driveway south of the Willow Creek site along Willow Creek Road, which enters into an existing surface parking area. No new driveways or parking would be provided. The two existing driveways into the maintenance facility and surface parking area would be removed, and curb and sidewalk would be installed. Accessible pathways would be constructed to accommodate access to and around the proposed buildings.

Primary access to the Glamping facilities would be provided via an existing asphalt paved service road north of the Glamping site, with accessible drop-off areas at each of the restroom buildings. A portion of the existing trail near the western restroom building would be paved and the two adjacent cabins would be accessible.

Construction activities would involve truck travel along the local roadways used to access UCLA LAL, including Willow Creek Road and West Shore Road; use of West Shore Road would be limited to construction activities for the Glamping component of the Project.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs are considered part of the Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the Project, which is off campus.

PP 4.13-5 *~~To the extent feasible, The campus~~ **UCLA** shall maintain at least one unobstructed lane in both directions ~~on campus roadways~~. At any time only a single lane is available, ~~the campus~~ **UCLA** shall provide a temporary traffic signal, signal carriers (i.e., flagpersons), or other appropriate traffic controls to allow travel in both directions. If construction activities require the complete closure of a roadway segment, ~~the campus~~ **UCLA** shall provide appropriate signage indicating alternative routes.*

PP 4.13-6 *For any construction-related closure of pedestrian routes, ~~the campus~~ **UCLA** shall provide appropriate signage ~~indicating alternative route and provide curb cuts and street crossings to~~ **and** assure alternate routes are accessible.*

PP 4.13-8 *To ensure adequate access for emergency vehicles when construction projects would result in temporary lane or roadway closures, UCLA shall consult with the ~~UCPD, EH&S, and the LAFD~~ **emergency service providers** to disclose temporary lane or roadway closures and alternative travel routes.*

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒

Discussion

As previously discussed in the Land Use Planning Section of this IS, UCLA is part of the University of California, a constitutionally created entity of the State of California, and is not subject to municipal regulations. Although there is no formal mechanism for joint planning or the exchange of ideas, UCLA may consider, for coordination purposes, aspects of local plans, ordinances, and policies for the communities surrounding its properties but is not bound by those plans and policies in its planning efforts. The following discussion addresses the Project's consistency with transportation-related programs, plans, and policies for informational purposes.

County of San Bernardino

The County of San Bernardino's Policy Plan/General Plan Transportation & Mobility Element was adopted in October 2020 and is intended to accomplish the following:

- Establishes the location and operational conditions of the roadway network.
- Coordinates the transportation and mobility system with future land use patterns and projected growth.
- Provides guidance for the County's responsibility to satisfy the local and subregional mobility needs of residents, visitors and businesses in unincorporated areas.
- Addresses access and connectivity among the various communities, cities, towns, and regions, as well as the range and suitability of mobility options: vehicular, trucking, freight and passenger rail, air, pedestrian, bicycle, and transit.

Based on review of Policy Map TM-1, Roadway Network, of the Policy Plan Transportation & Mobility Element, the roadways adjacent to the UCLA LAL, including Willow Creek Road are not specifically designated. Similarly, the LACP Circulation and Infrastructure Element (Figure 3-1, Circulation Map) does not include roadway designations for the roadways adjacent to UCLA LAL. The nearest designated roadway is SR-173, which is identified as a Mountain Major Highway; SR-173 which extends north, east and south of Lake Arrowhead, and is approximately 0.25 mile to the north of the Project sites, at its closest point. Adjacent to the Willow Creek site, Willow Creek Road is upaved and is not striped. In the vicinity of UCLA LAL, this road accommodates vehicular travel in both directions and primarily serves local residents and UCLA LAL and access to Lake Arrowhead. There are no sidewalks or bicycle paths; however, pedestrians and bicyclists travel along the road.

Goal LA/CI 1 of the LACP Circulation and Infrastructure Element is to "[e]nsure a safe and effective transportation system that provides adequate traffic movement while preserving the

mountain character of the community." As identified above, primary vehicular access to the Willow Creek and Cedar Suites site would be provided via an existing driveway south of the Willow Creek site along existing Willow Creek Road, which enters into an existing surface parking area. No new driveways or parking would be provided. The two existing driveways into the maintenance facility and surface parking area would be removed, and curb and sidewalk would be installed. Consistent with Goal LA/CI 1, the removal of existing driveways would reduce potential conflicts between vehicles, pedestrians and bicyclists traveling along Willow Creek Road and the vehicles entering/exiting the maintenance facility. There are no proposed modifications to Willow Creek Road that would affect the mountain character of the community.

Primary access to the Glamping facilities would be provided via an existing asphalt paved service road north of the Glamping site, with accessible drop-off areas at each of the restroom buildings. Guest accessing the Glamping site would parking in existing parking facilities at the UCLA LAL and would either walk to the cabins, or be transported by UCLA LAL staff.

Goal LA/CI 2 of the LACP Circulation and Infrastructure Element is to "[e]nsure safe and efficient non-motorized traffic circulation with the community." The associated policies address pedestrian and bicycle facilities. There are no existing public sidewalk or bike paths along the roadways surrounding the UCLA LAL; however, there is a system of pedestrian paths throughout the resort. Accessible pedestrian pathways would be provided within the Project sites to provide safe and efficient connections to existing pathways within the UCLA LAL and around the buildings. The

Other goals and policies in the LACP Circulation and Infrastructure Element address provision of alternative modes of transportation (transit) and maintaining vehicular capacity of the roads. There are no existing or proposed transit facilities serving the Project sites; however, UCLA provides shuttle services for guests at the UCLA LAL to minimize the need for guest to use their vehicles while staying at the resort. Notably, the UCLA LAL provides shuttle services to local ski areas during the Christmas/New Year Bruin Woods Family and Holiday, and provides shuttles to the Lake Arrowhead Village shopping center during the Bruin Woods summer program. With the exception of periodic lane closures that may occur during construction (discussed under Threshold "c" below), the Project does not involve any uses or activities that would limit roadway capacity. No on-street parking is proposed as all guests and employees would park in designation parking areas within the UCLA LAL.

The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have no impact related to project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒

Discussion

Following the passage of SB 743, the State of California's Governor's Office of Planning and Research (OPR) was tasked with developing new guidelines for evaluating transportation impacts under CEQA. These guidelines were intended to shift the transportation performance metric from automobile delay and LOS to one that would promote the reduction of GHG emissions and the development of multimodal and diverse transportation networks. As a result, Section 15064.3, Determining the Significance of Transportation Impacts, was added to the State CEQA Guidelines in December 2018. OPR determined that, under the update to the CEQA guidelines, VMT would be established as the primary metric for evaluating environmental and transportation impacts. To aid in this transition, OPR released a *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory).

The *Cedar Suites and Willow Creek Housing and Glamping Facility Vehicle Miles Traveled (VMT) Screening Analysis* (VMT Analysis) was prepared for the Project by Urban Crossroads (November 2021) (Urban Crossroads, 2021) and is included in Appendix F of this IS.

As outlined in the VMT Analysis, the Technical Advisory provides details on appropriate screening criteria that can be used to identify when a proposed land use project is anticipated to result in a less than significant VMT impact without conducting a more detailed analysis. For projects located within County of San Bernardino, the San Bernardino County Transportation Authority (SBCTA) developed a VMT Screening Tool (Screening Tool). The Screening Tool allows users to input an assessor's parcel number (APN) to determine if a project's location meets one or more of the screening thresholds for land use projects. Additionally, as further described below, a "small project" threshold based on the SCAQMD screening threshold for GHG emissions is used by lead agencies within the South Coast Air Basin. A land use project need only to meet one of the screening thresholds below to result in a less than significant VMT impact.

Project Type Screening

The Technical Advisory identifies that local serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition to local serving retail, other types of local serving uses such as day care centers, non-destination hotels, affordable housing, local parks, municipal services and other local serving uses may also be presumed to have a less than significant impact as local serving in nature and would tend to shorten vehicle trips. The Project's lodging uses serves a regional area to local points of interest. The Project Type screening criteria is not met.

Projects Generating Less than 110 Daily Vehicle Trips

The Technical Advisory identifies that projects generating fewer than 110 daily vehicle trip-ends per day would not cause a substantial increase in the total regional VMT and are therefore presumed to have less than significant impact on VMT. Trips generated by the Project's proposed land use have been estimated based on trip generation rates collected by the ITE Trip Generation

Manual, 11th Edition, 2021. Using the ITE trip generation rate for a traditional hotel room (7.99 daily trips per room), the Project is anticipated to generate a total of 176 vehicle trip-ends per day (Urban Crossroads, 2021), above the 110 average daily trips criteria. However, as discussed in Section II.5, Project Components, this is a conservative estimate since the operational characteristics of the Bruin Woods program and conference program are such that guests seldom, if ever, leave the UCLA Lake Arrowhead Lodge after arrival and on most days zero daily trips are generated. This screening criteria is not met.

Transit Priority Area (TPA) Screening

Consistent with guidance identified in the Technical Advisory, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing "major transit stop"[14] or an existing stop along a "high-quality transit corridor"[15]) may be presumed to have a less than significant impact absent substantial evidence to the contrary. Based on the SBCTA Screening Tool results presented in the VMT Assessment included in Appendix E of this IS, the Project site is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor and this screening criteria is not met.

Low VMT Area Screening

As noted in the Technical Advisory, "residential and office projects that locate in areas with low VMT and that incorporate similar features (density, mix of uses, and transit accessibility) will tend to exhibit similarly low VMT." The SBCTA Screening Tool uses the sub-regional San Bernardino Transportation Analysis Model (SBTAM) to measure VMT performance within individual traffic analysis zones (TAZ's) within the region. The Project's physical location is input into the Screening Tool to determine project generated VMT. The parcels containing the Project were selected and the Screening Tool was run for Production/Attraction (PA) Home-Based Work VMT per Worker measure of VMT. The Technical Advisory indicate that projects with VMT per employee below the existing VMT per person/employee for the regional area (i.e., the County) are considered to have a less than significant impact. Based on the Screening Tool results presented in the VMT Assessment included in Appendix E of this IS, the existing County baseline VMT per Worker is 17. The existing baseline Project TAZ estimated VMT per employee is 21.9. The Project is determined to not be in a low VMT generating area and this screening criteria is not met.

Small Projects Less than 3,000 $MTCO_2e$

As identified above, the shift in the transportation performance metric from automobile delay and LOS to VMT is largely intended to promote the reduction of GHG emissions consistent with state requirements. Therefore, as previously discussed, several lead agencies within the South Coast Air Basin will accept additional screening criteria of small projects that generate less than 3,000 $MTCO_2e$ per year, consistent with the SCAQMD interim thresholds (Interim Thresholds) for GHG emissions, discussed previously in the GHG Emissions section of this IS. This GHG emissions threshold is accepted by most lead agencies because it has been recommended by SCAQMD and SCAQMD is the expert agency and regional authority for air quality in the South Coast Air Basin, which the Project is located in. The Interim Thresholds document provides substantial evidence that the thresholds are consistent with the policy goals and GHG reduction targets set by the State. Specifically, the thresholds were set at levels that capture 90 percent of the GHG

[14] Pub. Resources Code, § 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").

[15] Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").

emissions from the above described uses, consistent with the Executive Order S-3-05 target of reducing GHGs to 80 percent below 1990 levels by 2050. Further, the threshold is reasonable because it will require medium and large size projects to reduce project GHGs, while allowing smaller projects, which are not the focus of future GHG reductions, to proceed. It should be noted that due to the global scale of the effects of GHG emissions, the GHG emissions threshold functions as both the Project-level threshold and the cumulative impact threshold of significance for GHG analysis. If a project generates GHG emissions below the threshold, it is acceptable to conclude that the project's GHG contribution is not "cumulatively considerable" and is therefore "less than significant" under CEQA. If a project generates GHG emissions above the threshold, the analysis must identify mitigation measures to reduce GHG emissions.

Consistent with other lead agencies within the South Coast Air Basin, and because the Project is located in the South Coast Air Basin, for this Project, UCLA, as the lead agency, will rely on the results of the Project-specific GHG analyses that use the "Tier 3" quantitative thresholds recommended in the SCAQMD's Interim Thresholds document for commercial, residential, mixed use, and industrial development projects, as follows:

- Residential, Commercial, and Mixed-Use Projects (including industrial parks, warehouses, etc.) - 3,000 $MTCO_2e$ per year.

Based on GHG emissions calculations for the Project (refer to the Greenhouse Gas Emissions section of this IS), the Project is estimated to generate approximately 295 $MTCO_2e$ annually during operation (335 $MTCO_2e$ annually when also taking into account amortized construction emissions), which is substantially less than the 3,000 $MTCO_2e$ annual threshold. Therefore, this screening criteria is met and the Project would therefore be assumed to result in a less than significant VMT impact. No additional VMT analysis is required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant VMT impact, and therefore, would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). No impact would occur.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

Discussion

Vehicular Hazards during Construction

The Project does not involve any long-term changes to public roadways, service roads, or other vehicular circulation routes. As described in Section II.5, Project Components, of this IS, access to the site would be provided from Willow Creek Road and existing service/access roads within

the UCLA LAL. Construction activities associated with the Project could result in the temporary closure of a portion of Willow Creek Road and service roads within the UCLA LAL during various construction activities, including, but not limited to, accommodating the delivery of construction equipment/materials; driveway removal and sidewalk/curb construction; and utility connections.

Although there is minimal daily traffic along Willow Creek Road, which is a public roadway, the reduction of roadway capacity, the narrowing of traffic lanes, and the occasional interruption of traffic flow on streets associated with Project-related construction activities could pose hazards to vehicular traffic. However, implementation of PP 4.13-5, which requires maintenance of one travel lane in each direction and/or the provision of signal carriers (i.e., flagpersons) when only a single lane can be maintained, ensures that impacts associated with a construction-related traffic lane or roadway closures along Willow Creek Road would remain less than significant.

The proposed improvements to the service/access road north of the Glamping site within the UCLA LAL would occur during the off-peak period for UCLA LAL activities. This road is only accessible to UCLA LAL staff, and alternate access roads would be used during construction.

Pedestrian/Bicyclist Hazards during Construction

There are no existing sidewalks along Willow Creek Road adjacent to the UCLA LAL, including the Willow Creek site. It is common for pedestrians and bicyclists to travel along Willow Creek Road, which has minimal vehicular traffic. To avoid conflicts/potential hazards during construction, pedestrians and bicyclists would be directed to the east side of the road. Safe pedestrian and bicyclist movement within and around the Project area and access to the nearby uses would be maintained as efficiently as possible. With incorporation of PP 4.13-6, which requires appropriate signage of alternate routes, there would be less than significant impacts related to pedestrian and bicyclist hazards along Willow Creek Road during construction.

To avoid potential hazards to pedestrians and bicyclist on the UCLA LAL service/access road and trails during construction of the Glamping facility, pedestrian and bicyclist access would be restricted. There sufficient alternate trails within the UCLA LAL to accommodate access to existing uses during construction.

Vehicular Hazards during Operation

The Project does not include permanent modifications to Willow Creek Road or any other San Bernardino County roadways. As previously discussed, vehicular access to the Willow Creek and Cedar Suites sites would be provided from an existing driveway south of the Willow Creek site. Additionally, two existing driveways for the maintenance facility would be removed. Access to the Glamping facility would be provided from existing driveways and access roads. Further, the Project, which involves replacement staff housing and new guest accommodations at the existing UCLA LAL would not introduce new types of uses or activities at the resort. Therefore, implementation of the Project would not increase hazards due to design features or incompatible uses. Operation of the Project would result in a less than significant impact related to vehicular hazards.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant impact related to a substantial increase in hazards due to a design feature or incompatible uses.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project result in inadequate emergency access?	☐	☐	☒	☐

Discussion

Emergency Access during Construction

Construction activities along Willow Creek Road may result in temporary closure of portions of this roadway to permit the delivery of construction materials; to transport soil; to accommodate the installation of utility infrastructure; or to provide adequate site access. The reduction of roadway capacity, the narrowing of travel lanes, and the occasional interruption of traffic flow could impair emergency access. Construction activities would be planned so that access for emergency vehicles is maintained at all times. Additionally, implementation of PP 4.13-8 as part of the Project would require consultation with emergency service providers in the event of lane or street closures. Therefore, there would be less than significant impacts related to emergency access during construction of the Project.

Emergency Access during Operation

Emergency access to the proposed uses would be provided from various locations surrounding the UCLA LAL (Willow Creek Road and West Shore Road), consistent with existing conditions. Consistent with UCLA standard procedures, the Campus Fire Marshal would review and approve the Project to ensure that circulation and design features allow adequate emergency vehicle access in compliance with the CBC. Therefore, there would be less than significant impacts related to emergency access during operation of the Project.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant impact related to emergency access.

18. TRIBAL CULTURAL RESOURCES

Relevant elements of the Project related to cultural resources include excavation to a depth of up to 10 feet for the Cedar Suite component of the Project that could extend into native sediments, and limited excavation for the Willow Creek Staff Housing and Glamping components of the Project.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	☐	☒	☐	☐

Discussion

A detailed description of the cultural setting for the Project is provided in the Cultural Resources studies for the Project components included in Appendix C2 and Appendix C3 of this IS. This includes a description of the prehistoric period, and tribes located in the San Bernardino area including the Cahuilla, Serrano and Vanyume tribes.

In September 2014, Governor Brown signed AB 52 (Chapter 532, Statutes of 2014), which creates a new category of environmental resources that must be considered under CEQA: “tribal cultural resources.” The legislation imposes new requirements for offering to consult with California Native American tribes regarding projects that may affect a tribal cultural resource, emphasizes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures. Recognizing that tribes may have expertise regarding their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Project if they have requested notice of projects proposed within that area. Written project notification is required prior to a lead agency’s release of a Notice of Preparation (NOP) for an EIR, an MND, or Negative Declaration (ND). Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document.

To date, UCLA has received one request (from the Torres Martinez Desert Cahuilla Indians) to be notified of UCLA projects; this request was received on May 2, 2016. However, because the currently proposed Project is not located near the main UCLA campus, UCLA Capital Programs sent written Project notification to Native American Representatives from five tribes included on the list provided by the Native American Heritage Commission (included in the Cultural Resources Studies provided in Appendix C2 and Appendix C3 of this IS). The initial Project notification (for the Willow Creek and Cedar Suites components of the Project) was sent on June 16, 2021. Following is a summary of the consultation results:

- **San Manuel Band of Mission Indians.** UCLA received a response on June 22, 2021, indicating that the Project area exists within Serrano ancestral territory (near the Serrano

village of *Pananaviat*) and is of interest to the Tribe. Consultation was requested. A copy of the Cedar Suites and Willow Creek Staff Housing Cultural Resources Study was provided. The tribe concurred with the findings of the study and the recommendation for implementation of a monitoring program, and provided preferred language to be added to the mitigation regarding monitoring and inadvertent discover. The mitigation recommendations have been incorporated into this Cultural Resources Study and this IS (refer to MM CULT-2 through MM CULT-6 in the Cultural Resources section of this IS). Subsequently, on October 28, 2021, UCLA notified the tribe that the building footprints for the Cedar Suites and Willow Creek Staff Housing buildings had been refined, and that the Glamping facilities have been added to the Project. Cultural Resources Studies for the Project, which included the requested mitigation, were provided. No further input from the tribe has been received as of the date of preparation of this IS and the consultation is considered complete.

- **Agua Caliente Band of Cahuilla Indians.** UCLA received a response on June 17, 2021, indicating that the Project is no located within the Tribe's Traditional Use Area and they defer to other tribes in the area.
- **Quechan Tribe of the Fort Yuma Reservation.** UCLA received a response on June 17, 2021, indicating that the tribe has no comments and that they defer to local tribes.

The Serrano Nation of Mission Indians and Morongo Band of Mission Indians did not respond to the Project notification.

As previously addressed in the Cultural Resources section of this IS, a prehistoric bedrock milling feature site (P-36-020265) is located near the Glamping component of the Project. To determine the significance of this site, which encompasses approximately 17.0-square-meters, an archaeological testing program was conducted by BFSA on May 12, 2021, as detailed in the Cultural Resources Study included in Appendix C3. In summary, the testing program included recording the bedrock milling features and excavating four shovel test pits (STP). Two bedrock milling features were identified, containing two mortars and one mortar start. No artifacts were observed in the area surrounding the milling features, and no artifacts were recovered from the STPs. The investigation of site P-36-020265 revealed that the site was an occasionally used bedrock milling site. The identified features indicate that site activities primarily focused upon floral and/or faunal food processing during seasonal food procurement activities. No evidence of temporary camping or cooking by Native American people was noted during the site investigations. No surface artifacts were identified and shovel test investigations did not identify any subsurface deposits. Although bedrock milling is typically associated with the Late Prehistoric occupation of the area, since no diagnostic artifacts were recovered, no definite cultural affiliation could be assigned to the resource. The bedrock milling features have been drawn, photographed, and measured. The site exhibits no artifacts, artifact assemblages, or subsurface features, and the documentation of these surfaces has exhausted its research potential. A significance assessment of the site according to the criteria listed in CEQA, Section 15064.5, clarifies that the site does not qualify as a significant archaeological resource under any of the stated criteria and is ineligible for listing on the CRHR. No further archaeological investigations are required for the evaluation of Site P-36-020265.

Notwithstanding this determination, the site would not be directly impacted by construction of the Glamping facilities; however, MM CULT-1 requires that temporary fencing be installed around the milling features during construction to ensure the milling features are avoided by construction crews and equipment. No tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources have ever been recovered or recorded on or near the Project site.

Due to the Project's proximity to recorded pre-historic sites, there is a potential for the Project to impact previously unidentified tribal cultural resources. The potential to encounter unknown tribal cultural resources during Project construction activities is considered a potentially significant impact. Therefore, it is recommended that all earth disturbances associated with the development of the Project (Willow Creek Staff Housing, Cedar Suites, and Glamping) be monitored by an archaeologist and Tribal monitor, as identified in MM CULT-2 and MM CULT-3. Further, MM CULT-4 identifies actions to take in the event that archaeological or tribal cultural resources are discovered during construction, MM CULT-5 identifies the required treatment of cultural resources, and MM CULT-6 identifies actions to take if human remains are discovered. Implementation of MM CULT-2 through MM-CULT 6 would reduce potential impacts to unknown tribal cultural resources to a level considered less than significant.

Additional Project-Level Mitigation Measures

Refer to MM CULT-1 through MM CULT-6 in the Cultural Resources section of this IS.

Level of Significance

The Project would have a less than significant impact related to the potential to cause a substantial adverse change in the significance of a tribal cultural resource as defined in Section 21074 of the *California Public Resources Code*.

19. UTILITIES AND SERVICE SYSTEMS

Relevant elements of the Project related to utilities and service systems include: redevelopment of the Willow Creek site with a new approximately 10,000 sf building for replacement staff housing with 54 beds and meeting space; redevelopment of the Cedar Suites site with two new, approximately 2,375 sf guest condolets (totaling 4,750 sf) with 6 rooms each (12 rooms total) that would accommodate 24 guests; and development of the Glamping site with 10 guest cabins that would accommodate 20 guests, and 2 restroom buildings. To accommodate the Willow Creek Staff Housing and Cedar Suites components of the Project, the existing Cedar Lodge and maintenance facility would be demolished. The Project would be implemented in compliance with the UC Policy on Sustainable Practices, as identified in Section II.5, Project Components, of this IS. Specifically, the Project would be designed to achieve a minimum LEED NC Silver rating, but UCLA would strive to achieve a LEED NC Gold rating. The Project would also comply with all 2019 CALGreen mandatory requirements. CALGreen overlaps with many of the Project's LEED strategies. The design, construction, and operation of the Project would include a series of green building strategies, including exceedance of Title 24 energy efficiency requirements by 20 percent, as required by the UC Policy on Sustainable Practices. Pursuant to the UC Policy on Sustainable Practice there would be no use of natural gas for operations.

While this IS is not tiered from the LRDP Amendment Final SEIR, adopted PPs and MMs from the Final SEIR have been incorporated into the Project. Therefore, the following PPs and MMs are considered part of the Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Amendment Final SEIR are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the Project, which is off campus.

PP 4.14-2(a) *New facilities and renovations ~~(except for patient care facilities in the Medical Center)~~ shall be equipped with low-flow showers, toilets, and urinals.*

PP 4.14-2(b) *Measures to reduce landscaping irrigation needs shall be used, such as automatic timing systems to apply irrigation water during times of the day when evaporation rates are low, installing drip irrigation systems, using mulch for landscaping, subscribing to the California Irrigation Management Information System Network for current information on weather and evaporation rates, and incorporating drought-resistant plants as appropriate.*

PP 4.14-2(c) ***UCLA****~~The campus~~ shall promptly detect and repair leaks in water and irrigation pipes.*

PP 4.14-3 ***UCLA****~~The campus~~ shall continue to implement a solid waste reduction and recycling program designed to limit the total quantity of ~~campus~~ solid waste that is disposed of in landfills ~~during the LRDP horizon~~.*

PP 4.14-9 ***UCLA****~~The campus~~ shall continue to implement energy conservation measures (such as energy-efficient lighting and microprocessor-controlled HVAC equipment) to reduce the demand for electricity ~~and natural gas~~. The energy conservation measures may be subject to modification as new technologies are developed or if current technologies become obsolete through replacement.*

In addition, PP 4.15-1, discussed under the GHG Emissions section of this IS), requires implementation of the provisions of the UC Policy on Sustainability Practices; and PP 4.7-1, PP 4.7-5, and MM 4.7-1, discussed in the Hydrology and Water Quality section of this IS), require development and implementation of Best Management Practices (BMPs) to manage runoff.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Discussion

As previously described in Section II.5, Project Components, of this IS, under the discussions of Utility Infrastructure, and as shown on Figure 13 and Figure 18, municipal and private utility infrastructure necessary to serve the Project is currently existing on-site or adjacent to the sites, as summarized below. The final sizing of the onsite private utility lines would be determined during final design; however, all utility infrastructure improvements would occur within the construction impact area for the Project evaluated throughout this IS.

Cedar Suites and Willow Creek Staff Housing

- **Water.** There is a 6-inch water main south of the Willow Creek and Cedar Suites sites, which connects to an existing LACSD 8-inch water main under Willow Creek Road. Two-inch water laterals connect existing uses to the existing 6-inch water main. Existing laterals

would be removed and a new 2-inch lateral water line would be installed to serve the proposed Willow Creek Staff Housing building. The proposed Cedar Suites would connect via a new 2-inch branch service lateral off the existing 6-inch water main with new 1-inch individual connections to each of the 2 new buildings. The water line connection would be within the construction impact footprint for the Project evaluated in this IS. According to the Infrastructure Assessment included in Appendix E1 of this IS, using the City of San Bernardino Water Master Plan water duty factors, these Project components would result in a total net increase of 145 gallons per day (gpd) in water demand[16]. The Project's increase in water demand is not anticipated to impact the existing 6-inch on-site private water main or the exiting 8-inch public water main (Fuscoe, 2021). No construction of new or expanded water lines offsite would be needed to serve the Project.

- **Sewer.** The LACSD also provides wastewater services to the UCLA LAL. There is an existing LACSD 8-inch sewer main under Willow Creek Road. The proposed Willow Creek Staff Housing building would tie into an existing manhole in Willow Creek Road via a single 8-inch house connection into the existing manhole. The proposed Cedar Suites would include removal of the existing 6-inch sewer lateral that serves Cedar Lodge and connects to the existing sewer manhole in Willow Creek Road, and replacement of this sewer line with a new 6-inch sewer lateral. The proposed 6-inch lateral would serve both buildings with a second 6-inch sewer lateral from the northern building that would connect to the proposed lateral extension. The sewer line connection would be within the construction impact footprint for the Project evaluated in this IS. According to the Infrastructure Assessment included in Appendix E1 of this IS, sewer flows and water demands are similar; therefore, the same methodology to estimate water demands was employed to estimate sewer flows (145 gpd). The Project's increase in wastewater generation is not anticipated to impact the existing 8-inch public wastewater main (Fuscoe, 2021). No construction of additional new or expanded wastewater infrastructure offsite would be needed to serve the Project.
- **Drainage and Water Quality.** As discussed in the Hydrology and Water Quality section of this IS, the Cedar Suites and Willow Creek Staff Housing components of the Project would maintain the same drainage pattern and subareas to convey excess stormwater to Willow Creek Road. New onsite storm drains and catch basins would be installed and would route stormwater to the existing catch basin. The post condition imperviousness is less than the existing project impervious area, so the existing offsite catch basin and culvert infrastructure capacity would not be impacted. However, a drainage channel may be installed north and northwest of the proposed Willow Creek Staff Housing building to capture overflow runoff in the event that the catch basin becomes clogged, which occurs under existing conditions. (Fuscoe, 2021)

  The Project is also required to meet LID requirements. Storm water BMPs would be designed and constructed within the Project site to treat storm water, remove pollutants, and control the discharge flow rate. Due to site conditions that preclude infiltration, harvest,

[16] Existing total water demands are estimated to be 622 gpd. Proposed water demands following the same methodology are estimated to be 959 gpd suggesting an increase of 337 gpd. However, per the LACSD's 2015 and 2020 UWMP, the District is required to reduce water demands by 20% by 2020. The water duty factors implemented in the analysis are from the City of San Bernardino Water Master Plan which was published in 2015 and utilized data from 2007. Therefore, proposed water demands should include a 20 percent reduction to meet this goal. In addition, the CalGreen Code and UCLA require low flow fixtures that would reduce water demands as compared to the outdated fixtures currently at the project site. Therefore, it is anticipated that the project would increase water demand by approximately 145 gpd.

and use LID BMP strategies, it is anticipated that a volume-based planter biofiltration BMP system or proprietary flow through biofiltration BMP would be installed, if feasible.

Storm water management and water treatment facilities required for the Willow Creek Staff Housing and Cedar Suites components of the Project would be within the construction impact footprint for the Project evaluated in this IS. No construction of new or expanded storm water infrastructure offsite would be needed with Project implementation.

- **Electricity, Natural Gas, and Telecommunications.** SCE provides electric service to the Willow Creek and Cedar Suites sites via overhead cables and an existing pole at the northeast corner of the Willow Creek site. Electrical service provided by SCE would be increased to accommodate the new construction, and would be sourced from the same SCE pole, and would extend underground from the pole to the new building service connections. Telecommunication Services are provided by Spectrum/Charter via a hard-line connection to the main server in the Main Lodge. Because the UC does not allow the use of natural gas for water heating, an electric heat pump water heater and storage tank would be provided as part of the Project. Further PP 4.14-9 from the LRDP Amendment Final SEIR is incorporated into the Project which requires the implementation of energy conservation measures to reduce the demand for electricity. New utility infrastructure and facilities to be constructed would occur within the construction impact area identified for the Project and evaluated in this IS. No construction of new or expanded dry utility infrastructure off-site would be needed to serve the Project.

Glamping Project Component

- **Water.** There is an existing 3-inch private water lateral that serves the existing restroom adjacent to the ball field. This line branches off the existing 2-inch onsite private water lateral, which connects to the existing public LACSD 8-inch water main in Willow Creek Road at a vault southeast of the Glamping site. Two new 3-inch branch service laterals would be installed off the existing onsite private 3-inch lateral to service the two restrooms. Water service would not be provided to the proposed cabins. According to the Infrastructure Assessment prepared for the Glamping component of the Project, this Project component would generate a water demand of 103 gpd (VCA, 2021).The Project's increase in water demand is not anticipated to impact the existing 6-inch on-site private water main or the exiting 8-inch public water main. New utility infrastructure and facilities to be constructed would occur within the construction impact area identified for the Project and evaluated in this IS. No construction of new or expanded water lines off-site would be needed with Project implementation.
- **Sewer.** There is an existing sewer lateral servicing the existing restroom adjacent to the ball field, which is served by a 4-inch sewer lateral that connects to an existing 4-inch sewer lateral eventually connecting to a public sewer manhole and 8-inch public sewer line in Willow Creek Road. Two additional 4-inch sewer laterals would be installed to serve the two new restroom buildings and would connect to the existing private 4-inch sewer lateral within the UCLA LAL. Sewer service would not be provided to the proposed cabins. According to the Infrastructure Assessment for the Glamping component of the Project, this Project component would result in a 103 gpd increase in wastewater generation (VCA, 2021). The final sizing of the onsite private sewer lines would be determined during final design. New sewer lines to be installed onsite as part of the Project would occur within the construction impact area identified for the Project and evaluated in this IS. The public 8-inch sewer line has sufficient capacity to accommodate the increase sewer flows that would be generated by the Glamping component of the Project.

- **Drainage and Water Quality.** Stormwater from the eastern portion of the Glamping site sheet flows to Willow Creek Road (refer to the discussion above regarding the storm drain infrastructure along Willow Creek Road). The western portion of the Glamping site flows towards West Shore Road into an asphalt gutter located along the road which connect to several CMP that routes the surface runoff through the existing site and vegetative swales and ultimately south towards a culvert located at the intersection of North Shore Road and Willow Creek Road. The existing culvert drains the surface runoff towards the southern portion of Willow Creek which is divided by a dam structure that separates runoff between flowing south and north. The culvert routes the flow south into Lake Arrowhead. The Glamping component of the Project would maintain the same drainage pattern and subareas to convey excess storm water runoff generated by the eastern portion of the site to Willow Creek Road and storm water runoff generated west of the site into the existing culverts. The existing storm drain facilities have sufficient capacity to accommodate the increase in stormwater runoff from the Project.

  As with the Willow Creek Staff Housing and Cedar Suites components of the Project, the Glamping component of the Project is also required to meet LID requirements. Storm water BMPs would be designed and constructed within the Glamping site to treat storm water, remove pollutants, and control the discharge flow rate. Due to site conditions that preclude infiltration, harvest, and use LID BMP strategies, it is anticipated that a volume-based planter biofiltration BMP system or proprietary flow through biofiltration BMP would be installed, if feasible.

  Storm water management and water treatment facilities required for the Glamping component of the Project would be within the construction impact footprint for the Project evaluated in this IS. No construction of new or expanded storm water infrastructure offsite would be needed with Project implementation.

- **Electricity, Natural Gas, and Telecommunications.** There is existing electric and telecommunications infrastructure under the existing trail north of the site, and extending to the existing yurt in the eastern portion of the Glamping site. Electric and telecommunication service to the proposed cabins would be provided through installation of infrastructure under the trail that extends through the site, and a connection to the existing lines. Consistent with UC requirements, no natural gas would be used. Further PP 4.14-9 from the LRDP Amendment Final SEIR is incorporated into the Project which requires the implementation of energy conservation measures to reduce the demand for electricity. New utility infrastructure and facilities to be constructed would occur within the construction impact area identified for the Project and evaluated in this IS. No construction of new or expanded dry utility infrastructure off-site would be needed with Project implementation.

In summary, the on-site utility infrastructure and facilities necessary to serve the Project—including water, sewer, drainage, water quality treatment, and dry utilities (e.g., electricity and telecommunications)—would be installed within or adjacent to the Project sites and would connect to the existing utility lines within the sites or within the adjacent roadway. No new or expanded utility lines or facilities are required off site, except as needed for the utility connections. The physical impacts that would result from the installation of utility infrastructure have been addressed in the analysis presented throughout this IS and would be less than significant. No additional impacts would occur and no additional mitigation is required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

Less than significant impact related to construction of wastewater conveyance, storm drainage, and dry utility (i.e., electricity, natural gas, telecommunications) infrastructure; and no impact related to capacity of existing wastewater treatment facilities.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

Discussion

The LACSD supplies domestic water to UCLA LAL, including the Project sites, and ensures that the water meets all applicable State and federal potable water quality standards. LACSD utilizes multiple sources of water including surface water, groundwater, imported water, and recycled water. Potable water comes mostly from local sources and is supplemented by imported water. Local water consists of treated surface water from Lake Arrowhead and groundwater from groundwater wells from the Grass Valley Basin and imported water consists of water supplied by the State Water Project (SWP).

According to the 2020 Urban Water Management Plan (UWMP), from 2016-2020 LACSD provided an average of 1,387 acre-feet per year (afy) of potable water while it had at least 2,326 afy of supply. Approximately 89 percent of LACSD's supplies were from local sources. It should be noted that additional groundwater supplies are under development and as more groundwater supplies become available, less surface water and imported water will be used. LACSD developed a water demand forecast through the year 2045 with passive conservation including codes, ordinances, and conservation phases for each of the major categories of demand. LACSD is projected to have sufficient water supply to meet (and exceed) all demands for normal year, single-dry year, and multiple-dry year conditions through the planning period (2020 to 2045). (LACSD, 2021)

As outlined in the Infrastructure Assessments prepared for the Project components and included in Appendix E1 and Appendix E2 of this IS, the Project would generate a net increase in water demand of approximately 248 gallons per day (145 gpd for the Cedar Suites and Willow Creek Staff Housing buildings, and 103 gpd for the Glamping cabins). This represents approximately 0.28 afy, or approximately 0.01 to 0.02 percent of the anticipated LACSD demand by 2045 for normal year, single-dry year, and multiple-dry year conditions. Under each of these conditions. Further PPs 4.14-2(a) through 4.14-(c) from the LRDP Amendment Final SEIR are incorporated into the Project which require use of low flow plumbing fixtures, reducing irrigation needs, and promptly detecting and repairing water and irrigation pipe leaks respectively. There would be sufficient water supplies for the implementation of the Project and a less than significant impact related to water supply would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have a less than significant impact related to the availability of sufficient water supplies to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Discussion

LACSD provides wastewater services to the UCLA LAL, which includes the Project sites. Wastewater within the LACSD wastewater service area is treated at the Grass Valley Wastewater Treatment Plant (WWTP). The Grass Valley WWTP has a treatment capacity of 3.75 million gallons per day (mgd) and between 2011 and 2015 treated an average of 1,229 afy (LACSD, 2021). As identified under Threshold "a", it is estimated the Project would generate a net increase of 248 gpd of wastewater (approximately 0.0002 mgd). This represents a negligible amount of the Green Valley WWRP's permitted daily treatment capacity. There would be sufficient wastewater treatment capacity at the existing wastewater treatment facility to serve the Project and existing commitments. The implementation of the Project would result in less than significant impacts.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have less than significant impacts related to the adequate wastewater treatment capacity to serve the project's projected demand in addition to the provider's existing commitments.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Would the project comply with applicable federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

Section 4.14, Utilities and Service Systems, of the LRDP Amendment Final SEIR, which is incorporated by reference, provides a complete discussion of the regulatory framework for solid waste management relevant to UCLA projects. As discussed, AB 939 set diversion requirements of 25 percent in 1995 and 50 percent in 2000; jurisdictions select and implement the combination of waste prevention, reuse, recycling, and composting programs that best meet the needs of their community while achieving the diversion requirements. On October 6, 2011, Governor Brown signed AB 341, establishing a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020 and requiring the California Department of Resources Recycling and Recovery (CalRecycle) to provide a report to the legislature that recommends strategies to achieve the policy goal by January 1, 2014. The Solid Waste Disposal Measurement Act of 2008 (SB 1016) was established to make the process of goal measurement (as established by AB 939) simpler, more timely, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. Further, the CalGreen Code requires all new developments to divert 65 percent of non-hazardous construction and demolition (C&D) debris for all projects.

Notwithstanding the State's requirements, the UC Policy on Sustainable Practices, previously discussed in the GHG Emission section of this IS, establishes goals addressing waste reduction and recycling, which exceeds the established State requirements. Notably, the Policy for Zero Waste indicates that the University will achieve zero waste by 2020, at all locations including the UCAL LAL (but not including health locations). Minimum compliance for zero waste is 90 percent diversion of municipal solid waste from landfill. This requirement exceeds those established by AB 341 and the CalGreen Code.

UCLA accomplishes operational diversion through various recycling and waste management programs, including but not limited to programs for food and beverage containers, plastics, paper, metals, green waste, food waste, construction waste, and electronics.

Solid waste generated due to the Project would be hauled by Mountain Disposal Service, Inc. (a Burrtec Company [Burrtec]) and is anticipated to be hauled to the Heaps Peak Transfer Station located at 29898 State Highway 18 in the Running Springs Community. The Heaps Peak Transfer Station is permitted to receive 600 tons per day. Solid waste would be transferred to either the Barstow Landfill or San Timoteo Landfill. The Barstow Landfill is located at 32553 Barstow Road, Barstow, is permitted to accept 1,500 tons per day, and as of December 2014 has a cease

operation date of May 2071. The San Timoteo Landfill is located at San Timoteo Canyon Road, Redlands, is permitted to accept 2,000 tons per day, and as of April 2019 has a cease operation date of December 2039.

As further discussed below, the Project would generate solid waste during construction activities and during operation.

- **Construction.** The implementation of the Project would require the demolition of the Cedar Lodge on the Cedar Suites site and the removal of the surface parking lot and demolition of the maintenance building on the Willow Creek site. Based on the United States Environmental Protection Agency (USEPA) (USEPA, 2003) demolition rate of 158 pounds (lbs) per sf, the demolition of the existing structures is estimated to generate 845 tons[17] of solid waste. Based on the USEPA new construction solid waste generation rate for nonresidential structures, the Project's proposed buildings are estimated to generate 33 tons of solid waste. As such, the Project's construction and demolition activities are estimated to generate a total of 878 tons of solid waste.

  A minimum LEED NC Silver rating for the Project has been established, consistent with the UC Sustainable Practices Policy. The UCLA campus is currently committed to achieving at least 75 percent waste diversion, which includes demolition and other construction waste. This would reduce the total amount of construction waste for the Project to approximately 211 tons, with a 75 percent waste diversion.

  The total anticipated construction waste stream (211 tons) would be spread out over the construction period for the Project components (estimated to be 23 months) and not a daily amount. Based on an average daily disposal rate of 2.2 tons per day, the construction debris transported to landfill would far less than the permitted daily capacity of the landfills that serve the UCLA LAL. Specifically, the Project's construction waste would represent approximately 0.4 percent of the daily capacity at the Heaps Peak Transfer Station, and 0.1 percent of the daily capacity of the Barstow Landfill and San Timoteo Landfill. Therefore, construction of the Project would result in a less than significant impact to landfill space.

- **Operation.** To estimate the solid waste generation of the Project's proposed staff and guest lodging uses, CalRecycle's service sector "hotel" solid waste generation rate of 4 pounds (lbs) per room per day (lbs/room/day) was used for the Cedar Suites and Glamping components of the Project. The Willow Creek Staff Housing component of the Project would replace the existing staff housing building (Cedar Lodge), which would be demolished and it is assumed there would be no net increase in solid waste generation for this use. As such, the two proposed Cedar Suites buildings with 12 rooms and 10 new Glamping cabins are calculated to generate approximately 88 lbs/day (0.04 tons per day).

  Continued waste diversion exceeding AB 939 requirements would be accomplished through UCLA's waste reduction and minimization efforts, as required by LRDP Amendment Final SEIR PP 4.14-3. Further, compliance with the UC Policy on Sustainable Practices is required (refer to Final SEIR PP 4.15-1), including provisions related to waste management practices. Specifically, consistent with the UC Sustainability Policy, UCLA is committed to achieving zero waste, which is defined as 90 percent diversion of municipal solid waste from landfills. As such, it is estimated that only 10 percent of the increased solid waste generated by the Project (approximately 0.004 tons per day) would be disposed of at the local landfills. This represents a negligible amount of the daily capacity

[17] (8,470 sf + 2,220 sf) x 158 lb/sf = 1,689,020 lbs / 2,000 lbs/ton = 845 tons

of the landfills serving the Project. The existing landfill facilities have sufficient permitted capacity.

Therefore, with incorporation of PPs 4.14-3 and PPs 4.15-1 into the Project, there would be a less than significant impact related to solid waste disposal and landfill capacity. Further, with adherence to the UC Policy on Sustainable Practices related to solid waste management, existing state solid waste diversion requirements would be exceeded. Project impacts related to solid waste would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would have less than significant impacts related to (1) solid waste generation in excess of landfill capacity, and (2) compliance with applicable federal, State, and local management and reduction statutes and regulations related to solid waste.

20. WILDFIRE

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:				
a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Discussion

The State Responsibility Areas (SRAs) dataset on the CalFire website identifies areas of legal responsibility for fire protection, Including SRA, Federal Responsibility Areas (FRAs), and Local Responsibility Areas (LRAs). CalFire has legal responsibility to provide fire protection on all SRA lands, which are defined based on land ownership, population density, and land use. According to CalFire, the UCLA LAL, which includes the Project sites, is within an SRA. Additionally, CalFire identifies the UCLA LAL as being within a VHFHSZ (CalFire, 2021).

As discussed in the Hazards and Hazardous Materials section of this IS, UCLA LAL is approximately 0.25 mile south of SR-173, which is an existing two-lane roadway and a designated evacuation route (San Bernardino County, 2017). Direct access to SR-173 would be provided via Willow Creek Road, which is adjacent to and provides access to the Willow Creek and Cedar Suites sites. The Project does not propose modifications to the existing circulation system and would not impair an adopted emergency response plan or evacuation plan. This impact would be less than significant.

Elevations within the Project area range from approximately 5,123 feet AMSL to 5,270 feet AMSL (Geotechnologies, 2021). The Project involves redevelopment of the Willow Creek and Cedar Suites sites and introduction of Glamping cabins in the northern portion of the UCLA LAL near existing amenities and trails. The Project would not introduce new uses or activities to the UCLA LAL. Additionally, as described in Section II.5, brush management activities directed by the Campus Fire Marshal would be conducted at the Project sites, including the Glamping cabins, in accordance with CalFire requirements, and structures built in compliance with the CBC and CFC. Notably, a defensible space of 100-feet from each side and from the front and rear of the proposed buildings would be maintained within the UCLA LAL property. The defensible space clearance would be maintained in two distinct zones: Zone 1 and Zone 2. Zone 1 extends 30 feet out from each building/structure or to the property line, whichever comes first, and generally requires the removal of dead and dying vegetation and trees, and removal of flammable vegetation that could catch fire, which are adjacent to or under combustible features. Zone 2 extends from 30 feet to 100 feet from the building (but not beyond the property line), and involves the creation of horizontal and vertical spacing among shrubs and trees using the "Fuel Separation" method, the "Continuous Tree Canopy" method or a combination of both. With both of these methods, the following standards apply:

- Dead and dying woody surface fuels and aerial fuels shall be removed. Loose surface litter (e.g., fallen leaves/needles, twigs, bark, cones, small branches) shall be permitted to a maximum depth of 3 inches.
- Cut annual grasses and forbs down to a maximum height for 4 inches.
- All exposed wood piles must have a minimum of 10 feet of clearance, down to bare mineral soil in all directions.
- "Ladder fuels" up to 6-feet in height at existing trees inside the defensible area would be removed.

Further, during the design process, the proposed buildings would be reviewed by the Campus Fire Marshal for compliance with CFC requirements, including provision of fire flow requirements, street/aerial access for emergency vehicles, and sprinkler systems for the Willow Creek Staff Housing and Cedar Suites buildings. Alternate fire suppression systems would be used for the Glamping cabins, which would not have water service. The proposed fire protection and brush management activities that would be implemented as part of the Project are more stringent than what currently exists at the Project sites. Therefore, the Project would not exacerbate wildfire risks, and would not expose project occupants to pollutant concentrations from a wildlife or the uncontrolled spread of wildfire. This impact would be less than significant.

Beyond clearing for required brush management activities, the Project does not require the implementation of fuel breaks or emergency water sources. The Project would involve the installation of onsite utility infrastructure as necessary to serve the Project and to meet required fire flow requirements. As previously described, the onsite (underground) infrastructure would connect to existing facilities on-site and along Willow Creek Road. Existing on-site private utility

infrastructure would be removed and/or modified, as necessary. Existing stormwater discharge points would be retained. As further discussed in the Biological Resources section of this IS, the physical impact area for the Project, including for the construction of roadway/access improvements and utility infrastructure installation, is primarily limited to previously developed and disturbed areas onsite. These improvements would not exacerbate fire risk. Rather. the proposed roadway and access improvements, and brush management described previously, would improve safety against wildfires. Temporary construction impacts are addressed throughout this IS. Mitigation measures, where needed, are incorporated to reduce the Project's construction impacts. Construction impacts would be less than significant. There would not be any significant environmental impacts associated with the operation of onsite roadways and utility infrastructure required for fire protection services.

As discussed in the Hydrology and Water Quality section of this IS, the Project's proposed drainage system is designed to maintain existing drainage patterns and the storm drain infrastructure and water quality BMPs would adhere to applicable regulations. As discussed in the Geology and Soils section of this IS, the Project site is not susceptible to landslides. Compliance with the building code requirements and recommendations outlined in the Project-specific geotechnical investigation(s) related to slope conditions would minimize potential slope instability. The Project would not expose people or structures to a significant risk of downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The Project would less than significant impacts related to wildfires.

21. MANDATORY FINDING OF SIGNIFICANCE

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE – The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the State CEQA Guidelines):				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Discussion

As discussed in the Biological Resources section this IS, the Project, the Willow Creek and Cedar Suites are developed and support ornamental vegetation. There is a mixed conifer forest plant community surrounding the existing buildings and adjacent to these sites. The Glamping site and surrounding areas consists disturbed areas and mixed conifer forest. The Project sites do not provide suitable habitat for any of the special-status plant species known to occur in the area. The vegetation that could be impacted does not comprise a special-status plant community. As such, the implementation of the Project would not result in substantial adverse effects to special-status plant communities. Additionally, the Project would have a less than significant impact to special status wildlife species and wildlife corridors. There is a potential for impacts to nesting birds and raptors; however, implementation of MM BIO-1, which expands the requirements of MM 4.3-1(a) and MM 4.3-1(b) from the LRDP Amendment Final SEIR, has been developed to comply with the MBTA and state requirements for protection of migratory birds, and to address the biological resource conditions at the Project site. With implementation of MM BIO-1, impacts to nesting birds and raptors would be less than significant. Additionally, the Project incorporates Final SEIR MMs 4.3-1(a) through 4.3-1(d) to address protection of trees to remain onsite, and MM 4.3-1(c) for replacement of mature trees to be removed. Therefore, the potential for the Project to degrade the quality of the environment related to biological resources would be less than significant with mitigation.

As discussed under the Cultural Resources section of this IS, the Project would have no impact to historic resources; Cedar Lodge and the bedrock milling features located within the Project sites are not eligible for listing in the NRHP or California Register. The Project would involve excavation in native sediments and, although unlikely, there is a potential for previously unknown archaeological resources to be encountered. Implementation of MM CULT-1 through MM CULT 5 would reduce potential impacts to the milling features and any unknown resources encountered during construction to a level considered less than significant.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?	☐	☒	☐	☐

Discussion

As identified through the analysis presented in this IS, with incorporation of applicable mitigation measures from the LRDP Amendment Final SEIR, the Project would have no impact or less than significant impacts related for each topical issue with the exception of archaeological resources, biological resources, geology and soils, and tribal cultural resources, for which the Project's impacts would be potentially significant prior to incorporation of Project-specific mitigation measures. Because Project impacts would be less than significant after mitigation, impacts associated with each component of the Project would not result in cumulatively-considerable impacts. Cumulative impacts would be less than significant.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

As described in the analysis presented in Section V.1 through V.20, of this IS, potential impacts of the Project are less than significant because the Project incorporates identified LRDP Amendment Final SEIR PPs and MMs, and new Project-specific MMs for potential construction-related impacts related to biological resources, cultural resources, geology and soils, and tribal cultural resources. No significant and unavoidable adverse environmental effects to human beings would occur as a result of the Project.

Fish and Wildlife Determination

Based on consultation with the California Department of Fish and Wildlife, there is no evidence that the Project has a potential for a change that would adversely affect wildlife resources or the habitat upon which the wildlife depends.

___ Yes (No Effect)

_x_ No (Pay fee)

VI. SUPPORTING INFORMATION SOURCES

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