Appendix A

Sunset Canyon Recreation Replacement Building Project

Notice of Preparation of a Draft SEIR
Initial Study
Notice of Preparation Comments

UNIVERSITY OF CALIFORNIA, LOS ANGELES UCLA

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July 17, 2023

NOTICE OF PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING

Project Title: Sunset Canyon Recreation Replacement Building Project
Project Location: University of California, Los Angeles Campus
111 Easton Drive, Los Angeles, California
Lead Agency: University of California
County: Los Angeles

Acting as the Lead Agency, the University of California plans to prepare a Supplemental Environmental Impact Report (EIR) for the proposed Sunset Canyon Recreation Replacement Building Project (proposed Project). This Notice of Preparation (NOP) has been prepared in accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines to provide the general public, responsible agencies and other interested parties with information regarding the proposed Project and its potential environmental effects. Additionally, as detailed below, a public Scoping Meeting will be held to receive input regarding the proposed Project and the environmental topics to be addressed in the Supplemental EIR.

The Supplemental EIR will be tiered from the University of California, Los Angeles (UCLA) Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (LRDP Final SEIR) (State Clearinghouse [SCH] No. 2017051024), which was certified by the University of California Board of Regents (The Regents) in January 2018. The LRDP Final SEIR analyzed the impacts of several student housing projects and was tiered from the UCLA 2008 Northwest Housing Infill Project and Long Range Development Plan Amendment Final Environmental Impact Report (2009 LRDP EIR) (SCH No. 2008051121), which was certified by The Regents in March 2009 and evaluated construction and operation of the Northwest Housing Infill Project, as well as the remaining buildout of the LRDP. As the LRDP Final SEIR incorporates the 2009 LRDP EIR by reference, they collectively serve as the CEQA documentation for construction and operation of development on campus, including any development proposed at the Sunset Canyon Recreation Center, and are referred to herein as the "LRDP EIRs."

Project Location: The Project site encompasses approximately 37,460 square feet (sf) (0.86 acre) and is located at the UCLA Sunset Canyon Recreation Center (Sunset Rec) at 111 Easton Drive, within the Northwest zone of the UCLA main campus, which is located in the community of Westwood in the City of Los Angeles, approximately 10.6 miles west of downtown Los Angeles and 4.8 miles northeast of the Pacific Ocean (refer to Figure 1, which depicts the regional location and local vicinity).

Project Description: The proposed Project involves the development of a new two-story (plus rooftop deck), student-oriented, multi-purpose building at Sunset Rec, which would provide approximately 11,500 gross square feet (gsf) of recreational floor area plus approximately 6,500 gsf of exterior space that is covered but unenclosed. The proposed building would include three multi-purpose rooms plus a teaching kitchen and a rooftop deck with a solar canopy. Also included are staff offices with a small conference room, gender inclusive restrooms and a family restroom, a lactation room, storage areas, custodial/mechanical space, a telecommunications/IT room, an accessible elevator meeting Americans with Disabilities Act (ADA) requirements, and circulation areas.

Additionally, associated utility, landscape, and hardscape improvements would be installed. A conceptual site plan for the proposed Project is provided on Figure 2.

The new building would replace a series of seven existing buildings/facilities at Sunset Rec, which comprise approximately 6,982 gsf of floor area plus 5,807 gsf of covered but unenclosed space. Collectively the buildings to be demolished are seismically deficient, substantially damaged/deteriorated (and therefore some of which are no longer habitable), non-compliant with current ADA requirements, otherwise constrained from a programming perspective, or, in some cases, inextricably physically, structurally, or programmatically dependent upon the deficient structures. Despite deteriorated conditions, the existing Sunset Rec buildings to be demolished appear eligible for listing in the California Register of Historic Resources (California Register) and are therefore considered historic resources under CEQA.

The proposed building would result in a net increase of 4,518 gsf of floor area within Sunset Rec in the Northwest zone of campus. This amount of development is within the total remaining development allocation consistent with the adopted LRDP. Currently, the Northwest zone has 130,682 gsf remaining in the allocation identified in the LRDP. The proposed Project would not change the overall recreational programming at Sunset Rec, nor would it result in any increase in the campus population.

Environmental Review and Comment: In compliance with the CEQA Guidelines and the University of California Procedures for Implementation of CEQA, this NOP hereby informs you that the University of California is preparing a tiered Supplemental EIR for the proposed Sunset Canyon Recreation Replacement Building Project. In accordance with Section 15063 of the CEQA Guidelines, the University of California has determined that a Supplemental EIR is required.

The Project-level analysis for the proposed Project will be tiered from the program-level analysis previously provided in the LRDP EIRs. The Initial Study checklist included in Appendix G of the CEQA Guidelines lists 20 broad environmental topics that are to be considered when evaluating the potential effects of a proposed project or action. The tiered Initial Study prepared for the proposed Project evaluates the potential environmental impacts for all of these environmental topics. Based on that Project-level analysis and incorporation of all applicable previously adopted LRDP campus programs, practices, and procedures (PPs) and mitigation measures (MMs), the tiered Initial Study adequately addresses the following topics in their entirety: aesthetics, agriculture and forestry resources, air quality, biological resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population/housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. Further, with respect to cultural resources, the tiered Initial Study adequately addresses potential impacts to archaeological resources and human remains. As concluded therein, all Project impacts related to these topics would be consistent with the findings of the LRDP EIRs, and further analysis of these topics in the forthcoming Supplemental EIR is not required.

However, the analysis in the tiered Initial Study also concludes that the program-level analysis in the LRDP EIRs does not adequately address all of the impacts of the proposed Project. As discussed therein, the proposed Project could have a potentially significant impact related to cultural resources, specifically historic resources, due the removal of several existing buildings at Sunset Rec which appear eligible for listing in the California Register. Therefore, this issue will be addressed in the Supplemental EIR. As required by CEQA, the Supplemental EIR will also include an evaluation of alternatives to the proposed Project that could avoid or reduce any significant impacts resulting from the proposed Project.

As the Lead Agency, we request your comments regarding the scope and contents of the Supplemental EIR, including mitigation measures or alternatives to reduce the Project's potential environmental impacts. If you represent a public agency, we request input from your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed Project. Your agency may need to use the Supplemental EIR prepared by the University of California when considering a permit or other approval for the proposed Project.

This NOP has been transmitted to relevant public agencies, organizations, other interested groups and individuals, and the NOP along with the supporting tiered Initial Study are available online at: http://www.capitalprograms.ucla.edu/EnvironmentalReview/ProjectsUnderEnvironmentalReview.

This NOP is being circulated for a 30-day public comment period from **Monday, July 17, 2023 to Wednesday, August 16, 2023**. Due to the time limits mandated by state law, responses to this NOP must be sent at the earliest possible date, but not later than 30 days after receipt of this notice. Accordingly, comments regarding the scope of the Sunset Canyon Recreation Replacement Building Project Supplemental EIR must be received by **5:00 p.m. on August 16, 2023** and may be mailed or emailed to the following address:

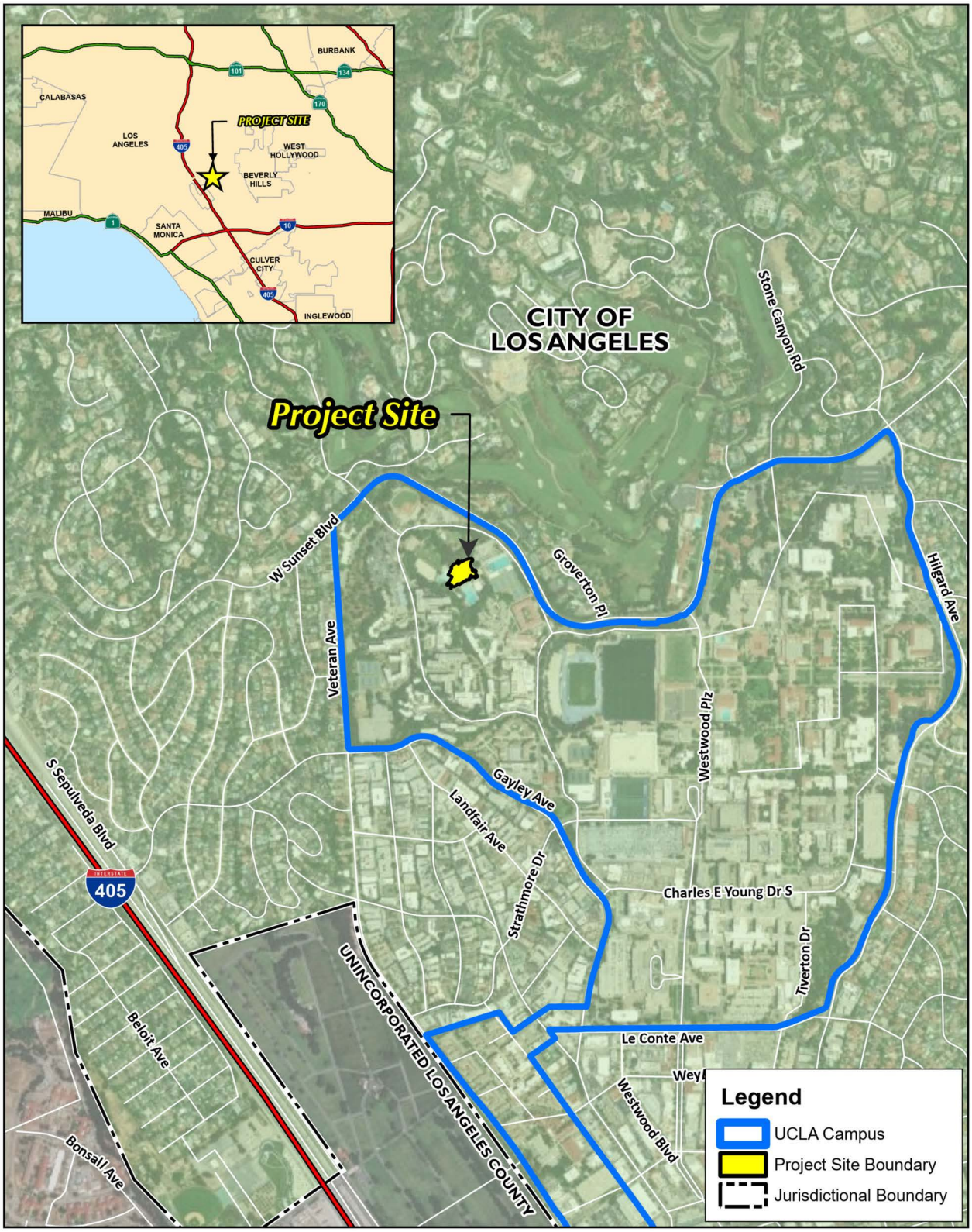
Ashley Rogers
Assistant Director, Environmental Planning
UCLA Capital Programs
1060 Veteran Avenue, Box 951365
Los Angeles, California 90095-1365
ARogers@capnet.ucla.edu

Please designate a contact person in your agency or organization for future correspondence.

A virtual **Public Information and Supplemental EIR Scoping Meeting will be conducted on August 1, 2023 at 6:30 p.m.** No decisions about the proposed Project will be made at the Scoping Meeting. Interested individuals may offer written or oral comments on the proposed scope of the environmental analysis at the public Scoping Meeting. You must register in advance to receive the Zoom link.

- **Zoom registration link:** https://ucla.zoom.us/meeting/register/tJIrfuCprj8uGNMzVqca89aKVpCBXMgxDK7n

If you have any questions about the environmental review for the proposed Project, please contact Ms. Rogers via the email address provided above or call (310) 923-6747.



Source(s): Esri, LA County (2023)

Figure 1

0 325 650 1,300 Feet

Regional and Local Vicinity Map



Source(s): Latitude 33 Planning & Engineering (07-11-2023)

Figure 2

Not to Scale

Conceptual Site Plan

Sunset Canyon Recreation Replacement Building Project

Initial Study

Lead Agency | University of California
1111 Franklin Street
Oakland, California 94607

July 2023

Sunset Canyon Recreation Replacement Building Project

Initial Study

Lead Agency:

University of California
1111 Franklin Street
Oakland, California 94607

July 2023

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SUNSET CANYON RECREATION REPLACEMENT BUILDING PROJECT
UNIVERSITY OF CALIFORNIA, LOS ANGELES

Project No. 940679.01

Initial Study and Environmental Checklist Form

I. PROJECT INFORMATION

I.1. Project Title

Sunset Canyon Recreation Replacement Building Project

I.2. Lead Agency Name and Address

University of California
1111 Franklin Street
Oakland, California 94607

I.3. Contact Person and Phone Number

Ashley Rogers, Assistant Director, Environmental Planning
University of California, Los Angeles
UCLA Capital Programs, Capital Planning and Finance
1060 Veteran Avenue
Los Angeles, California 90095-1365
arogers@capnet.ucla.edu
(310) 923-6747

I.4. Project Location

University of California, Los Angeles
111 Easton Drive
Los Angeles, California 90095
(Refer to Figures 1 and 2)

I.5. Project Sponsor's Name and Address

UCLA Capital Programs, Capital Planning and Finance
1060 Veteran Avenue
Los Angeles, California 90095-1365

I.6. Custodian of the Administrative Record For This Project

Same as listed under No. 3 above.

I.7. Identification and Location of Environmental Impact Report(s) Being Relied on for Tiering

The UCLA Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (referred to herein as the "LRDP Final SEIR")

(State Clearinghouse [SCH] No. 2017051024) was certified by the University of California Board of Regents (The Regents) in January 2018.[1] The LRDP Final SEIR analyzed the impacts of several student housing projects and was tiered from the UCLA 2008 Northwest Housing Infill Project and Long Range Development Plan Amendment Final Environmental Impact Report (referred to herein as the "2009 LRDP EIR") [SCH No. 2008051121]), which was certified by The Regents in March 2009 and evaluated construction and operation of the Northwest Housing Infill Project, as well as the remaining buildout of the LRDP. As the LRDP Final SEIR incorporates the 2009 Final EIR by reference, they collectively serve as the California Environmental Quality Act (CEQA) documentation for construction and operation of development on campus and are referred to herein as the "LRDP EIRs." The LRDP EIRs are available for inspection at the address listed under No. 3 above and available online at:

http://www.capitalprograms.ucla.edu/Planning/LongRangeDevelopmentPlan

It is noted that the current LRDP was originally approved in 2002 and has been amended several times, most recently for the aforementioned student housing and housing infill projects. Collectively, the 2002 LRDP and subsequent amendments comprise the documentation guiding growth and development on campus. These documents are also available at the web address listed above.

Introduction

The LRDP EIRs are Program EIRs prepared in accordance with CEQA (Public Resources Code, [PRC] Sections 21000, et seq., specifically, Section 21094), the CEQA Guidelines (14, California Code of Regulations [CCR], Sections 15000 et seq.), and the University of California Procedures for the Implementation of CEQA. It has been determined that a Supplemental EIR tiered from the LRDP EIRs is the appropriate environmental document for the proposed Sunset Canyon Recreation Replacement Building Project (proposed Project). This IS has been prepared to determine whether topics analyzed in the LRDP EIRs adequately address the potential environmental effects of the proposed Project or whether further analysis is required. In summary, Section 15162 of the CEQA Guidelines provides that a Subsequent EIR is required if:

1. Substantial changes are proposed in the project requiring major revisions to the previous EIR because of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes have occurred with respect to the circumstances under which the project is undertaken, which will require major revisions to the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following: (a) the project will have one or more significant effects not discussed in the previous EIR; (b) significant effects previously examined will

[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. It should be noted that the LRDP was subsequently amended (LRDP Amendment #7) following approval by the Executive Vice President and Chief Financial Officer in October 2018 to transfer 12,000 gross square feet (gsf) of remaining development allocation from the Core zone to the Health Sciences zone.

be substantially more severe than shown in the previous EIR; (c) mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (d) mitigation measures or alternatives which are considerably different from those analyzed in the Final EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the CEQA Guidelines indicates that the Lead Agency may choose to prepare a Supplement to an EIR rather than a Subsequent EIR if: (1) any of the conditions described in Section 15162 would require the preparation of a Subsequent EIR; and (2) only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

With respect to tiering, Section 15152 of the CEQA Guidelines states: "Tiering refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on issues specific to the later project." CEQA and the CEQA Guidelines encourage the use of tiered environmental documents to eliminate repetitive discussions of the same issues. Therefore, this IS is hereby tiered from the LRDP EIRs.

Section 15152(f) of the CEQA Guidelines instructs that when tiering, a later EIR or Negative Declaration shall be prepared only when, in the basis of an Initial Study, the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR or Negative Declaration. Significant environmental effects are considered to have been "adequately addressed" if the lead agency determines that:

(A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or

(B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

In conjunction with certification of the LRDP EIRs, The Regents adopted a Mitigation Monitoring and Reporting Program (LRDP MMRP). The LRDP MMRP ensures that campus programs, practices, and procedures (PPs) and mitigation measures (MMs) that are the responsibility of the University of California are implemented in a timely manner. As individual projects, such as the proposed Project, are designed and implemented, the projects include features necessary to implement relevant PPs and MMs from the LRDP MMRP (LRDP PPs and MMs). All relevant LRDP PPs and MMs are incorporated into and would be implemented as a part of the proposed Project and monitored through a Project-specific MMRP. The LRDP PPs and MMs that are relevant to the analysis presented in this IS are listed in the introduction to the analysis for each topical issue in Section V, Evaluation of Environmental Impacts.

Following review of the current LRDP and the analysis presented in the LRDP EIRs, it has been determined that the proposed Sunset Canyon Recreation Center Replacement Building Project is a "project" under CEQA that was not fully addressed in the LRDP EIRs. As such, this IS has

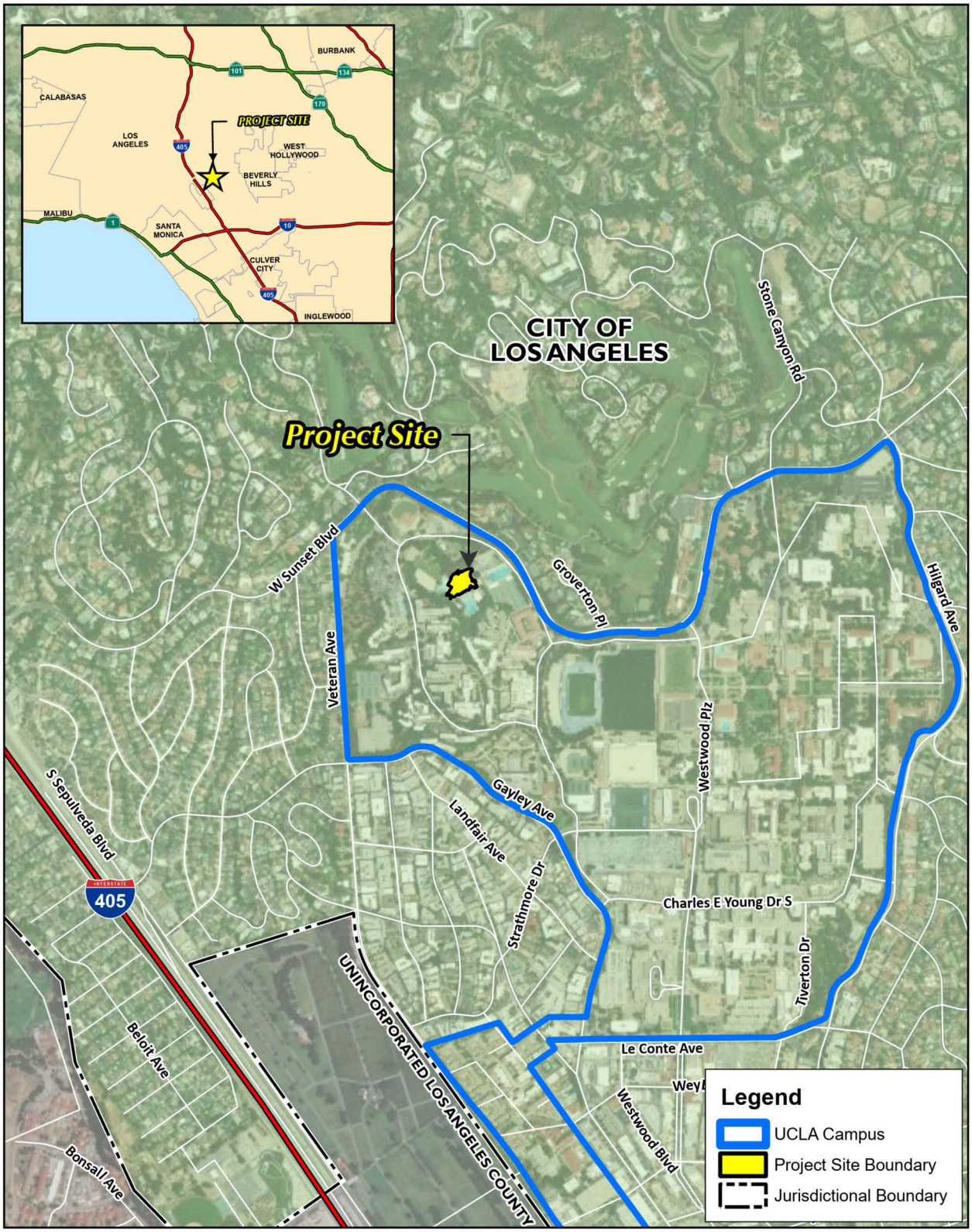
been prepared to: (1) identify the environmental topics that were adequately addressed for the proposed Project within the LRDP EIRs based on the incorporation of applicable LRDP PPs and MMs; (2) identify those topics for which the proposed Project would have no impact or a less than significant impact based on Project-specific analysis provided herein, for which no further evaluation is required; and (3) identify those topics, if any, for which the proposed Project would have a new or more severe impact that was not previously identified in the LRDP EIRs, thus requiring further analysis in an EIR. Additionally, this IS provides information regarding the regulatory framework for topics where new regulations have been adopted or regulations have been updated since preparation of the LRDP EIRs, and/or when the regulatory framework discussion provides important context for the environmental analysis that follows. As demonstrated throughout the analysis presented herein, with the exception of a potentially significant impact to historic resources (Cultural Resources Threshold [a]), the proposed Project would not result in any significant impacts with the incorporation of applicable, previously adopted LRDP PPs and MMs and no further evaluation in the Draft Supplemental EIR is required. However, as the buildings proposed for demolition as part of the proposed Project are considered eligible historic resources pursuant to CEQA, and the LRDP EIRs did not identify a significant impact to historic resources, additional environmental Project-level analysis of impacts to historic resources in a Supplemental EIR is required.

II. PROJECT DESCRIPTION

The proposed Project involves the development of a new two-story (plus rooftop deck), student-oriented, multi-purpose building at Sunset Canyon Recreation Center (referred to herein as "Sunset Rec") within the UCLA campus, which would provide approximately 11,500 gross square feet (gsf) of recreational floor area plus approximately 6,500 gsf of exterior space that is covered but unenclosed. Additionally, associated utility, landscape, and hardscape improvements would be installed. The new building would replace a series of seven existing buildings/facilities at Sunset Rec, which comprise approximately 6,982 gsf of floor area plus 5,807 gsf of covered, unenclosed space. These existing buildings at Sunset Rec are eligible for listing in the California Register of Historic Resources (California Register) and are therefore considered historic resources under CEQA. As further discussed below, collectively the buildings to be demolished are seismically deficient, substantially damaged/deteriorated (and therefore some of which are no longer habitable), non-compliant with current Americans with Disabilities Act (ADA) requirements, otherwise constrained from a programming perspective, or, in some cases, inextricably physically, structurally, or programmatically dependent upon the deficient structures. More detailed information regarding the proposed Project Description is provided in Section II.5, Proposed Project Components, below.

II.1. Project Location

The proposed Project is located at 111 Easton Drive, within the Northwest zone of the UCLA main campus, located in the community of Westwood in the City of Los Angeles, approximately 10.6 miles west of downtown Los Angeles and 4.8 miles northeast of the Pacific Ocean (refer to Figure 1, which depicts the regional location and local vicinity). The main campus is generally bound by Le Conte Avenue to the south, Gayley Avenue and Veteran Avenue to the west, Sunset Boulevard to the north, and Hilgard Avenue to the east. Figure 2 provides a map of the UCLA campus and specifically shows the location of the proposed Project.

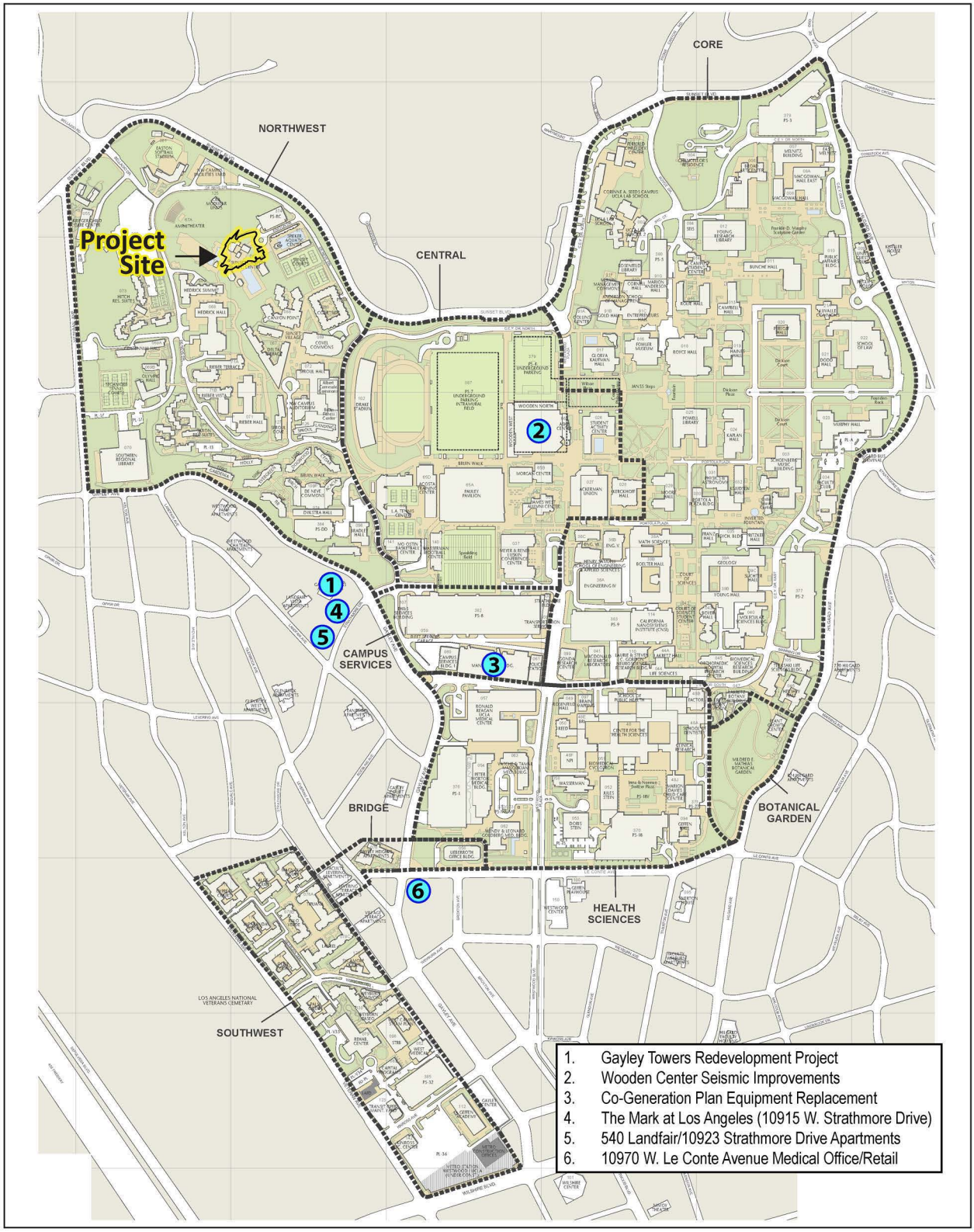


Source(s): Esri, LA County (2023)

Figure 1

0 325 650 1,300 Feet

Regional and Local Vicinity Map



Source(s): UCLA (April 2023)

Figure 2

Not to Scale

Campus Map and Related Projects

For purposes of description in this IS, the "Project site" includes the proposed new building site, the associated area that would be improved with new landscape and hardscape, and the immediately surrounding area that would be disturbed during demolition and construction. The Project site encompasses approximately 37,460 square feet (0.86 acre).

II.2. Environmental Setting

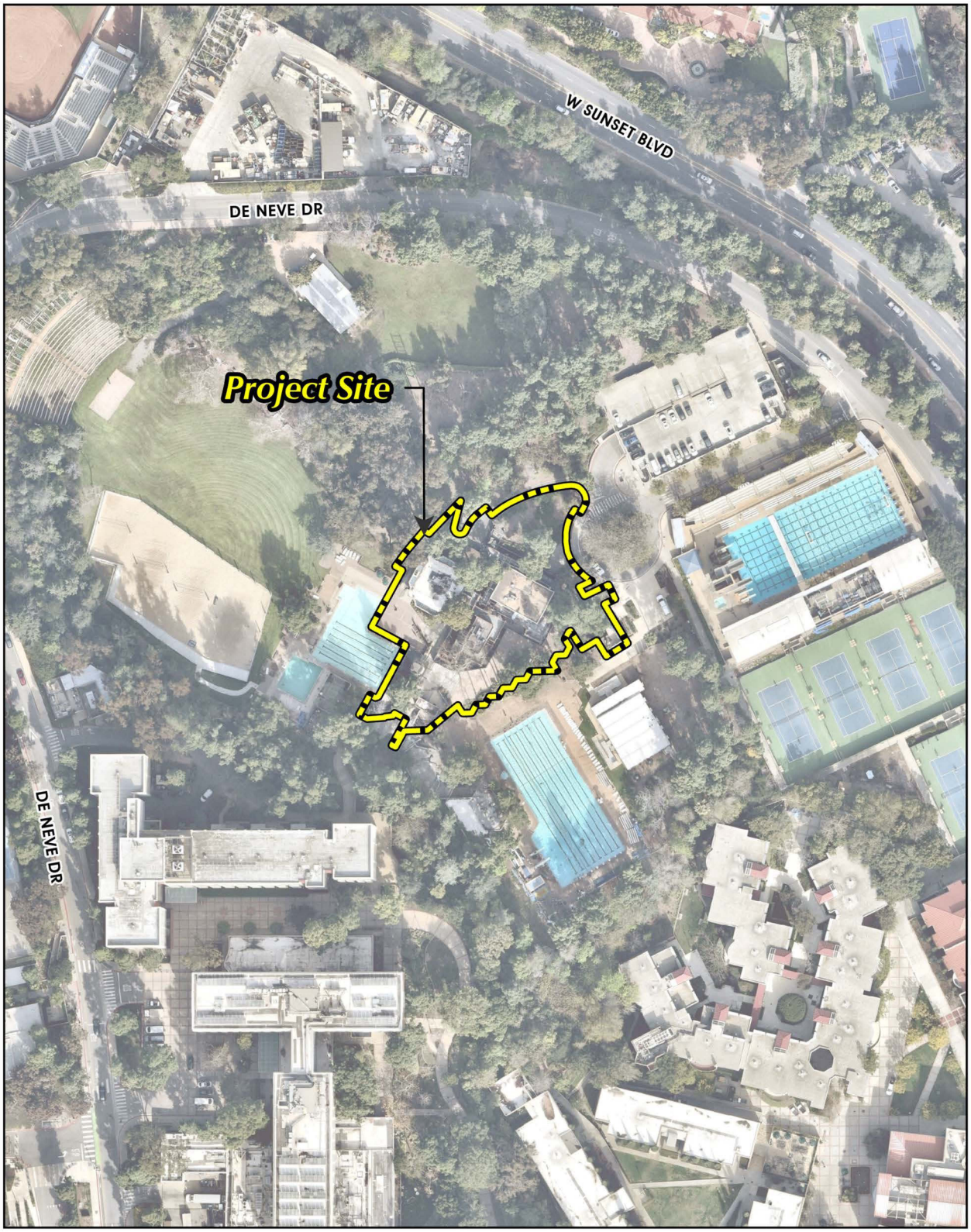
As shown on Figure 2, the proposed Project is located at Sunset Rec in the Northwest zone, which encompasses approximately 90.5 acres of the approximately 419-acre UCLA campus. The Northwest zone primarily includes residential and recreational uses and other functions that support housing and the greater academic community, such as the Southern Regional Library and the Krieger Child Care Center. The elevations in the Northwest zone range from 320 feet above mean sea level (amsl) to approximately 560 feet amsl, with a general downward slope from northwest to southeast.

There is a dense mix of urban development in this zone, and the adjacent areas of the City of Los Angeles, with varied architectural styles, building massing, and building heights. Due to the density of urban development, height of surrounding buildings, variations in topography, and mature vegetation, views of Sunset Rec are limited to vantage points either within Sunset Rec or in immediately adjacent areas. The visual character of the Project site and surrounding areas is shown in the photographs presented in Section V.I, Aesthetics, of this IS.

As shown on the aerial photograph provided on Figure 3, Sunset Rec is bordered by De Neve Drive to the north and west; the Sunset Recreation (SR) parking structure, Spieker Aquatic Center and Sunset Tennis Courts to the east; and student dormitories to the south. The Easton Softball Stadium and a campus maintenance facility are located north of Sunset Rec and north of De Neve Drive. The nearest off-campus uses include the residential neighborhood of Bel-Air to the north, north of Sunset Boulevard.

Sunset Rec encompasses approximately 9.0 acres and opened in 1966. Sunset Rec is operated by UCLA Recreation and provides various indoor/outdoor activity spaces for use by students, staff, and UCLA camps, including several multi-purpose rooms, offices, a small kitchen, and storage areas; two swimming pools and associated locker rooms; an expansive lawn, garden, outdoor amphitheater, picnic areas, sand volleyball courts, a Challenge Course, and other amenities; as well as an entry kiosk and a modular building with office space and a multi-purpose room (refer to Figure 4). The main entrance to Sunset Rec is located on Easton Drive at De Neve Drive. Sunset Rec has a unique rustic setting, due in part to the hillside topography, undeveloped open space areas, the numerous mature trees within and surrounding the area, and the older wood-framed buildings. Sunset Rec shares the three-story SR Parking Structure with the adjacent Spieker Aquatics Center. A summary of the various areas that span Sunset Rec's variable topography is provided for geographic context in Table 1 below.

With the exception of two modular buildings, construction of the existing buildings within Sunset Rec was completed in 1966, and the buildings were likely designed to the 1964 edition of the Uniform Building Code (UBC). The existing buildings along with their respective floor areas, uses, and seismic ratings are summarized in Table 2 below.

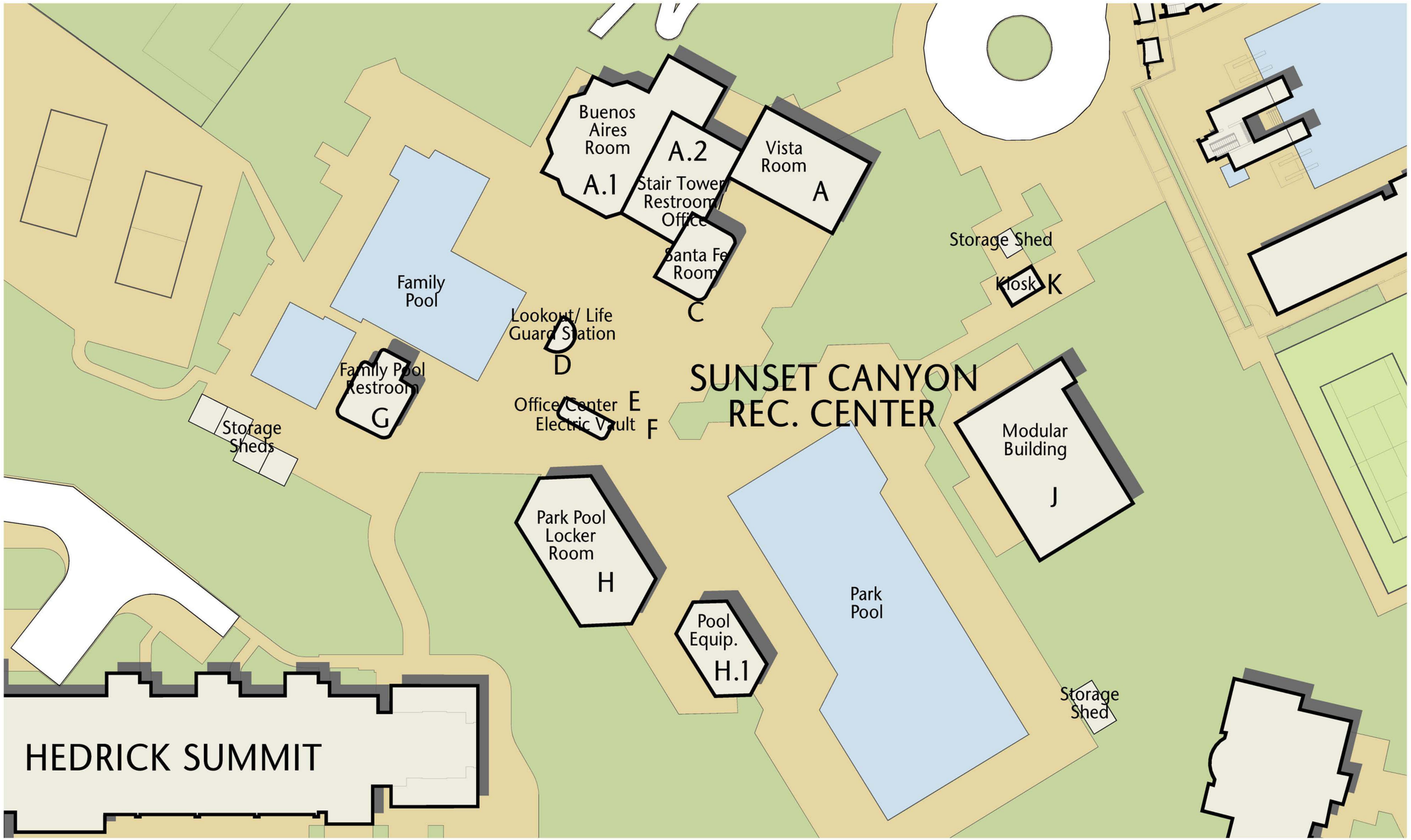


Source(s): ESRI, NearMap Imagery (2023)

Figure 3

0 37.5 75 150 Feet

Aerial Photograph



Source(s): UCLA (07-05-2023)

Figure 4

Not to Scale

Sunset Rec Existing Site Plan

Table 1
Summary of Sunset Rec Site Levels

Sunset Rec Area or Level	Location and Facilities
Lower (Pool) Level	A flat terrace at the southeast where primary access to the site is located, along with the Park Pool, associated locker room and pool equipment building, and a recreation lawn where a portable building was added in 2020-2021.
Middle Level	A narrow continuous slope that bridges the elevation change between the Lower and Upper Levels via a series of concrete stairways, perimeter circulation paths, and Sunset Rec's core recreation buildings.
Upper (Pool) Level	A large sloping bowl to the northwest with a smaller pool (called Unit L originally, and now known as the Family Pool), a large lawn, an amphitheater area with a tiered seating area, a wooded sloped picnic area on the northeast side of the large lawn, and beach volleyball courts installed in 2020 at the southwest side of the large lawn.
Upper Plateau	A flat terraced area with an open lawn at the north edge of the Upper Level above the wooded picnic zone, developed after the center first opened. The plateau now contains the modular Mesa Building, a student garden, a small lawn area, and an obstacle course known as the Challenge Course.

Table 2
Summary of Existing Buildings at Sunset Canyon Recreation Center

Building ID	Building Name	Floor Area (gsf)	Covered Unenclosed Area (gsf)	Use(s)	2021 Seismic Rating [1]
Buildings to be Demolished					
A	Vista Room[2]	2,984	5,273	Level 1 – Office Level 2 – Multi-purpose room and catering kitchen	VII
A1	Buenos Aires Room	2,445		Multi-purpose room and storage	IV
A2	Stair Tower/ Restroom/Office[2]	307		Level 1 and Level 2 – Restrooms Level 3 – Office Stairs surrounding the building core	VI
C	Santa Fe Room[2]	684	534	Multi-purpose room	VII
D	Lookout/ Lifeguard Station	112	0	Lifeguard/first aid station	VI
E	Office Center[3]	213	0	Office uses	VI
F	Electric Vault	237	0	Medium voltage primary switch, transformer, and secondary switchboard	NA
	Subtotal Buildings to be Demolished	***6,982***	***5,807***		
Buildings to be Relocated					
K	Entry Kiosk (Modular)	143	0	Office	NA[4]
Subtotal Buildings to be Relocated		**143**	**0**		
Buildings to be Retained					
G	Family Pool Restrooms	1,044	0	Family Pool locker rooms	III
H/H.1	Park Pool Locker Rooms & Mechanical Room	4,980	0	Park Pool locker rooms and mechanical equipment room	V
J	Modular Building[5]	3,679	0	Classroom, office, storage	NA[4]
4480	Mesa Building (Modular)	2,248	0	Classroom, office, storage	NA[4]
	Subtotal Buildings to be Retained	**11,951**	***0***		
	TOTAL	**19,076**	**5,807**		

1. Seismic evaluations of the buildings at Sunset Canyon Recreation Center were conducted by Nabih Youssef Associates Structural Engineers in 2021 based on the UC Seismic Program Guidelines. The buildings were assigned seismic performance ratings in accordance with UC-defined performance levels. It is noted that Level VII is defined as "posing an immediate life-safety hazard to [the building's] occupants under gravity loads. The building should be evacuated and posted as dangerous until remedial actions are taken to assure the building can support [California Building Code] prescribed dead and live loads."
2. These buildings were red-tagged by the Campus Building Official and vacated in 2020.
3. This building was vacated in 2021 due to water intrusion and mold, and the uses were relocated to the Modular Building (Building J).
4. Per Section 3.2.4.B of the UC Seismic Program Guidelines, a campus may elect not to rate modular units provided certain criteria are met.
5. This modular building was installed and occupied in 2019/2020 to house uses and operations previously accommodated in the Vista Room, Santa Fe Room, Stair Tower Office, and later the Office Center.

The topography within Sunset Rec is configured in a bowl shape, sloping from north to south with an approximately 70-foot change in topography. The topography, along with the various program elements, create specialized program areas within Sunset Rec. Quieter areas are located at the northeastern end (e.g., picnic areas and a garden) along with the Challenge Course. The amphitheater at the most northern end steps down to a large recreational lawn/plateau, which is heavily utilized. This level area also includes sand volleyball courts used by the UCLA Women's Volleyball Team, the Family Pool and associated locker room and pool storage structures, along with picnic areas on the east side of the lawn. The Family Pool and locker room are sited at the southern end of the lawn. From the upper pool level, the site steps down to a mid-level, and the transition between levels is structured with a series concrete steps, retaining walls, and various buildings that serve multiple functions. The Project site is located at this middle level, and the buildings are designed to bridge the upper level and the lower level where the Park Pool, associated locker rooms, and modular building are located.

Given the sloping topography of Sunset Rec, the existing buildings in the proposed Project area are sited at various elevations ranging from 495 feet amsl to 515 feet amsl. Buildings A, A1, A2, and C are interconnected by a series of stairways and wraparound decks, which collectively create a terraced arrangement of spaces that result in a treehouse effect. Building E sits at a middle elevation between the upper and lower pool levels that can only be accessed via stairs. The maximum elevation of the existing rooflines is approximately 536 feet amsl. ADA access to several of the spaces within the buildings is not available given the multiple levels, stairways, and lack of an elevator. Additionally, modifications such as the installation of latticework across railings have been installed for safety purposes, as the buildings do not meet many current Code requirements.

Most of the existing buildings include exposed wood framing and large wood canopies. While the buildings have undergone various structural repairs over the years, the exposed wood shows visible signs of deterioration, including dry rot and lightning strike damage, throughout the site. The condition of the wood in a structure has a direct relationship to its performance in a seismic event. Wood that is damaged, cracked, and has dry rot or insect damage can have a substantially lower capacity to resist the loads imposed by earthquakes. Due to their structurally unsound and deteriorated conditions, the Vista Room (Building A), Stair Tower/Restroom/Office (Building A1), and Santa Fe Room (Building C) were "red-tagged" (meaning that the buildings are considered unsafe and should not be entered) and were subsequently vacated and fenced-off in 2020. The Office Center (Building E) was also vacated in 2021 due to water intrusion and mold. Some of the multi-purpose space, administrative offices, youth camp offices, and front desk operations that were housed in the Vista Room, Santa Fe Room, and Office Center were relocated to a nearby modular building beginning in 2019/2020.

A formal historic resources evaluation is being prepared for the Sunset Rec complex. The complex will be evaluated under applicable criteria, including those for the National Register of Historic Places (National Register) and the California Register. The historic resources evaluation will include an assessment of Sunset Rec and its significance as well as the impact of changes that have been performed throughout the years for maintenance, safety, and usability purposes. The preliminary results of the evaluation indicate that Sunset Rec appears to be eligible for listing in the California Register under Criterion 3 as a significant work of Smith and Williams Architects, who are widely acknowledged as local masters of post war modernism. It may also qualify for listing in the National Register under Criterion C as a representation of the work of a master[s] if returned to an earlier appearance. The completed historic resources evaluation will be included in the Draft Supplemental EIR.

As further discussed in Section VI.4, Biological Resources, of this IS, there are approximately 20 mature trees within the Project site; only one tree is a protected species as defined in the LRDP, specifically western sycamore (*Platanus racemose*).[2] There are also approximately 21 mature trees immediately surrounding the Project site, none of which are protected species. There are no naturalized areas, stream channels, or otherwise sensitive hydrologic or biological resources within the Project site.

As further discussed in Section VI.7, Geology and Soils, of this IS, based on the Geotechnical Investigation conducted for the proposed Project, the Project site is underlain by artificial fill placed over Pleistocene age alluvial fan deposits that generally consist of interbedded silt, sand, and gravel, with lesser amounts of clay. The alluvial deposits are underlain by sedimentary bedrock of the Miocene age Monterey Formation (Geocon, 2023). Regionally, the UCLA campus lies in a seismically active area bound by two important faults in the Santa Monica Fault Zone: the active Malibu Coast/Santa Monica/Raymond/Sierra Madre/Cucamonga Fault and the active Newport-Inglewood Fault. However, there are no known active or potentially active faults that underlie the campus.

Groundwater was not encountered up to the maximum depth of 48 feet below the ground surface (bgs) explored for the proposed Project. The historic high groundwater in the site vicinity is greater than approximately 40 feet bgs. Surface water drainage currently sheet flows from the Project site to the adjacent roadways (Geocon, 2023).

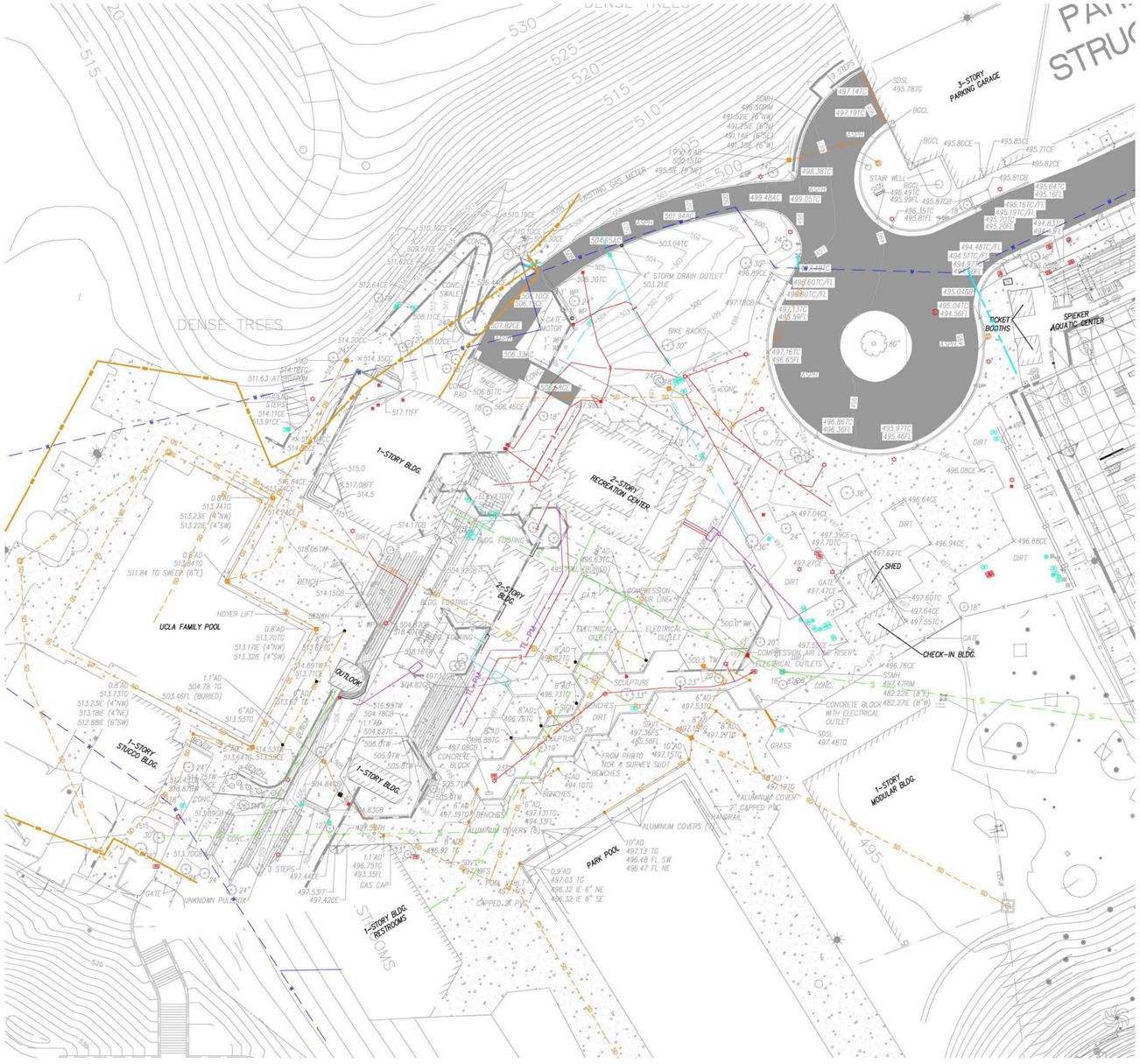
Existing utility infrastructure is located within and surrounding the Project site and is shown on the site survey included on Figure 5.

II.3. Background and Need For The Proposed Project

In 2014 and again in 2021, structural evaluations were conducted to provide seismic ratings for the existing buildings located in the Sunset Rec complex based on the UC Seismic Safety Policy. The 2014 evaluation determined that the Santa Fe Room (Building C), Lookout/Lifeguard Station (Building D), and the Office Center (Building E), had a Seismic Performance Rating (SPR) of V, which was considered to have a “poor” seismic performance based on the UC Seismic Safety Policy in effect at that time. Further, the associated visual assessment identified several structural features with severe distress and loss of structural integrity.

After the 2014 seismic evaluation was conducted, the buildings suffered further deterioration and loss of structural integrity involving dry rot, cracked/deteriorated beams and handrails, insect damage, and a lightning strike. In 2017, the Vista Room (Building A) required exterior bracing to support the second story deck. In April 2018, a portion of the trellis on the Stair Tower/Restroom/Office (Building A2) failed, causing damage to the Santa Fe Room (Building C) and offices below. Additionally, lightning struck the Vista Room (Building A) in January 2019. As shown in Table 2, based on a second seismic evaluation completed in 2021, the existing buildings have seismic ratings ranging from III to VII. As identified previously, in 2020, the Vista Room (Building A), Stair Tower/Restroom/Office (Building A1), and Santa Fe Room (Building C) were red-tagged, vacated, and fenced-off due to unsafe conditions.

[2] The LRDP Final SEIR identifies “mature” trees as those with a trunk diameter at breast height (dbh) measuring at least 12 inches, and also identifies various protected tree species (coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel).



LEGEND

- BOLLARD
- BUILDING COLUMN
- DRAIN INLETS
- ELECTRICAL MANHOLE
- ELECTRICAL PEDESTAL
- ELECTRICAL PULLBOX
- ELECTRICAL RISER
- ELECTRICAL TRANSFORMER
- ELECTRICAL VAULT
- FIRE HYDRANT
- GAS METER
- GAS RISER
- TELEPHONE PULLBOX
- TELEPHONE VAULT
- WATER BACKFLOW ASSEMBLY
- WATER RISER
- WATER VALVE
- IRRIGATION BOX
- IRRIGATION VALVE
- IRRIGATION PULLBOX
- LANDSCAPE LIGHT
- LIGHT POLE
- POOL SKIMMER
- SANITARY SEWER CLEANOUT
- SANITARY SEWER MANHOLE
- SIGN
- STORM DRAIN MANHOLE
- STORM DRAIN VAULT
- LIGHT POLE
- HAND RAIL
- CHAIN LINK FENCE
- IRON FENCE
- WOOD FENCE
- BUILDING DECK
- WALL
- CHAIN LINK FENCE
- IRON FENCE
- WOOD FENCE
- BUILDING DECK
- WALL

- GAS — GAS MAIN
- SD — STORM DRAIN
- E — ELECTRICAL
- S — SEWER MAIN
- W — WATER MAIN
- IRR — IRRIGATION MAIN
- F — FIRE MAIN
- T — TELECOM

Source(s): Latitude 33 Planning & Engineering (04-10-2023)

Figure 5

Not to Scale

Further, because the existing buildings were constructed before 1966, they do not meet current requirements for energy efficiency, accessibility, or general safety. As previously discussed, full ADA access to several of the spaces within the buildings is not available given the multiple levels, stairways, and lack of an elevator. Additionally, modifications such as the installation of latticework across railings have been installed for safety purposes. Leaks and mold have also affected some of the spaces. Moreover, the existing electrical equipment within the electrical vault (Building F) is nearing the end of its service life.

Due to the inability to use the Vista Room, Santa Fe Room, Stair Tower/Restroom/Office, and Office Center, combined with access constraints associated with the current design, and the resulting limitations in space available for recreational programming, the existing main building complex for Sunset Rec is not meeting the needs of the campus population. Prior to the building closures, the three main multi-purpose rooms were used on a daily basis for a wide variety of recreational classes for students and staff, gatherings and meetings for campus groups, and as activity spaces for UCLA's summer youth camps. Many of these activities can no longer occur or can only take place on a limited basis in the remaining multi-purpose spaces (i.e., the Buenos Aires Room and a classroom in the modular building). Furthermore, given the access constraints of the Project site, the mobility-impaired population is unable to utilize the majority of these facilities, resulting in continued inequities that violate UCLA policy.

II.4. Project Description

Replacement Building

The proposed Project involves the demolition of seven existing buildings totaling 6,982 gsf and 5,807 gsf of covered unenclosed space (refer to Table 2), and construction of an approximately 11,500 gsf replacement building with approximately 6,500 gsf of covered unenclosed space, as described further below. The proposed replacement building would provide flexible, student-oriented multi-purpose spaces on two levels plus a rooftop deck. Similar to the existing buildings, the new building would nestle into the adjacent hillside and create strong connections between indoor and outdoor spaces, with terraces and outdoor amenity areas, to capitalize on the surrounding natural setting. The conceptual site plan for the proposed Project is provided on Figure 6.

Conceptual building elevations are provided on Figures 7a and 7b, building sections are provided on Figure 8, and conceptual renderings are provided on Figure 9a and 9b. As shown, the proposed building would have a maximum height of 41 feet above ground level at the southeast and east sides of the building, with a maximum building elevation of 539.25 feet amsl at the top of the canopy. The architecture of the proposed replacement building would consist of a hybrid concrete and steel building designed to respect and provide recognizable visual and material connections to the existing structures at Sunset Rec, including the structures to be demolished. There would concrete shear walls at the ground level and exposed steel beams at all levels. The steel would be intentionally exposed in a similar way to the existing glue-lam beams of the original structure, and the proposed exterior facade would reflect the existing vertical siding. Building materials would include, but not be limited to: aluminum wood-look battens/siding, board-formed concrete walls, mesh cable guard rails, a steel shade structure with a solar photovoltaic (PV) canopy, and a composite metal roof deck over the exposed steel structure (refer to Figure 10). Approximately 46 percent of the building facade would consist of window systems. The glazing

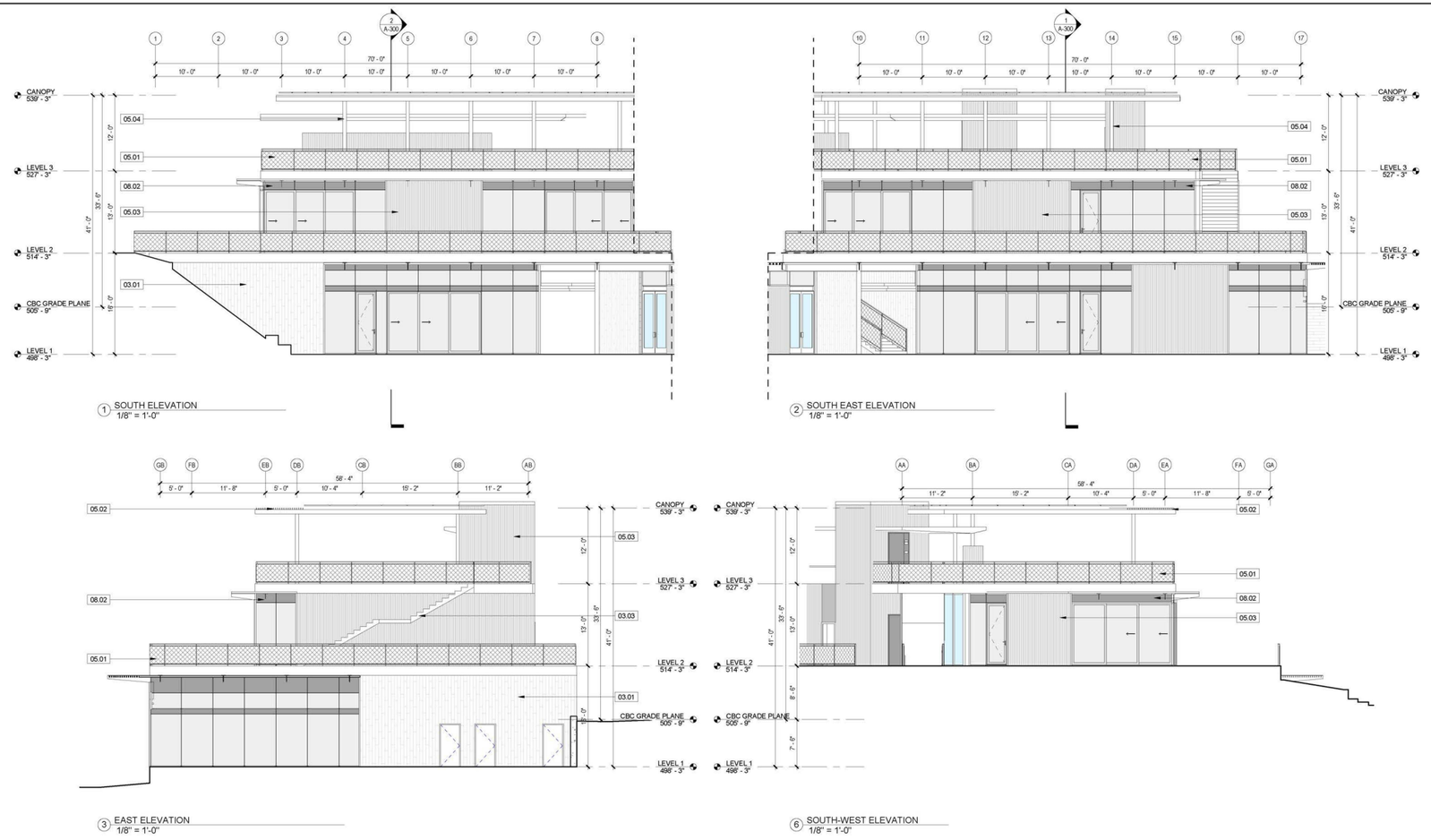


Source(s): Latitude 33 Planning & Engineering (07-11-2023)

Figure 6

Not to Scale

Conceptual Site Plan



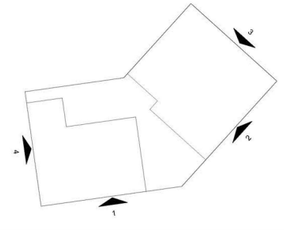
ELEVATION LEGEND

- GLAZING
- MCM INFILL PANEL
- WOOD-LOOK ALUMINUM BATTENS

KEYNOTES

03.01	ARCHITECTURALLY BOARD-FORMED CONCRETE WALLS (EXPOSED TO VIEW)
03.03	PRE-CAST CONCRETE TREADS & RISER ATTACHED TO STL. PLATE STRINGER
05.01	METAL GUARDRAILS
05.02	ALUMINUM "WOOD-LOOK" SUN-SHADING BATTENS
05.03	ALUMINUM "WOOD-LOOK" VERTICAL BATTENS
05.04	NON-RATED STRUCTURAL STEEL PER STRUCTURAL. AESS LEVEL 3
08.02	MCM INFILL PANELS

KEY PLAN

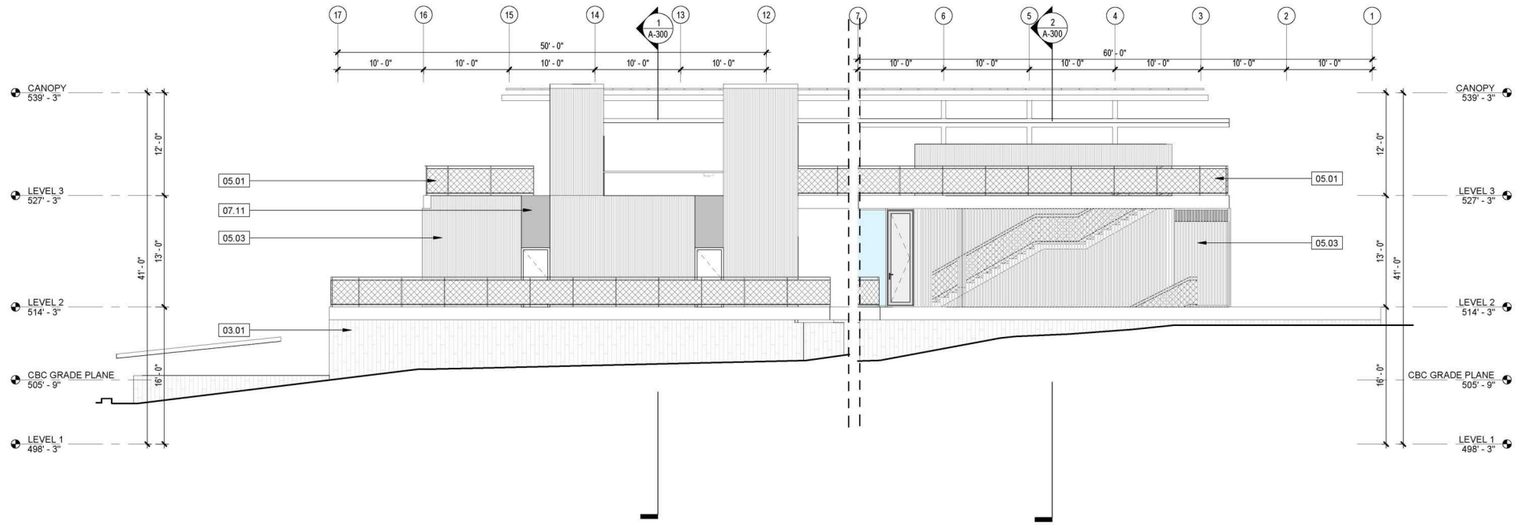


Source(s): Safdie Rabines Architects (05-12-2023)

Figure 7a

Not to Scale

Conceptual Buildings Elevations



1 NORTH-EAST ELEVATION
1/8" = 1'-0"

2 NORTH ELEVATION
1/8" = 1'-0"

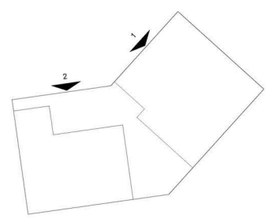
ELEVATION LEGEND

- GLAZING
- MCM INFILL PANEL
- WOOD-LOOK ALUMINUM BATTENS

KEYNOTES

03.01	ARCHITECTURALLY BOARD-FORMED CONCRETE WALLS (EXPOSED TO VIEW)
05.01	METAL GUARDRAILS
05.03	ALUMINUM "WOOD-LOOK" VERTICAL BATTENS
07.11	METAL COMPOSITE MATERIAL PANELS

KEY PLAN

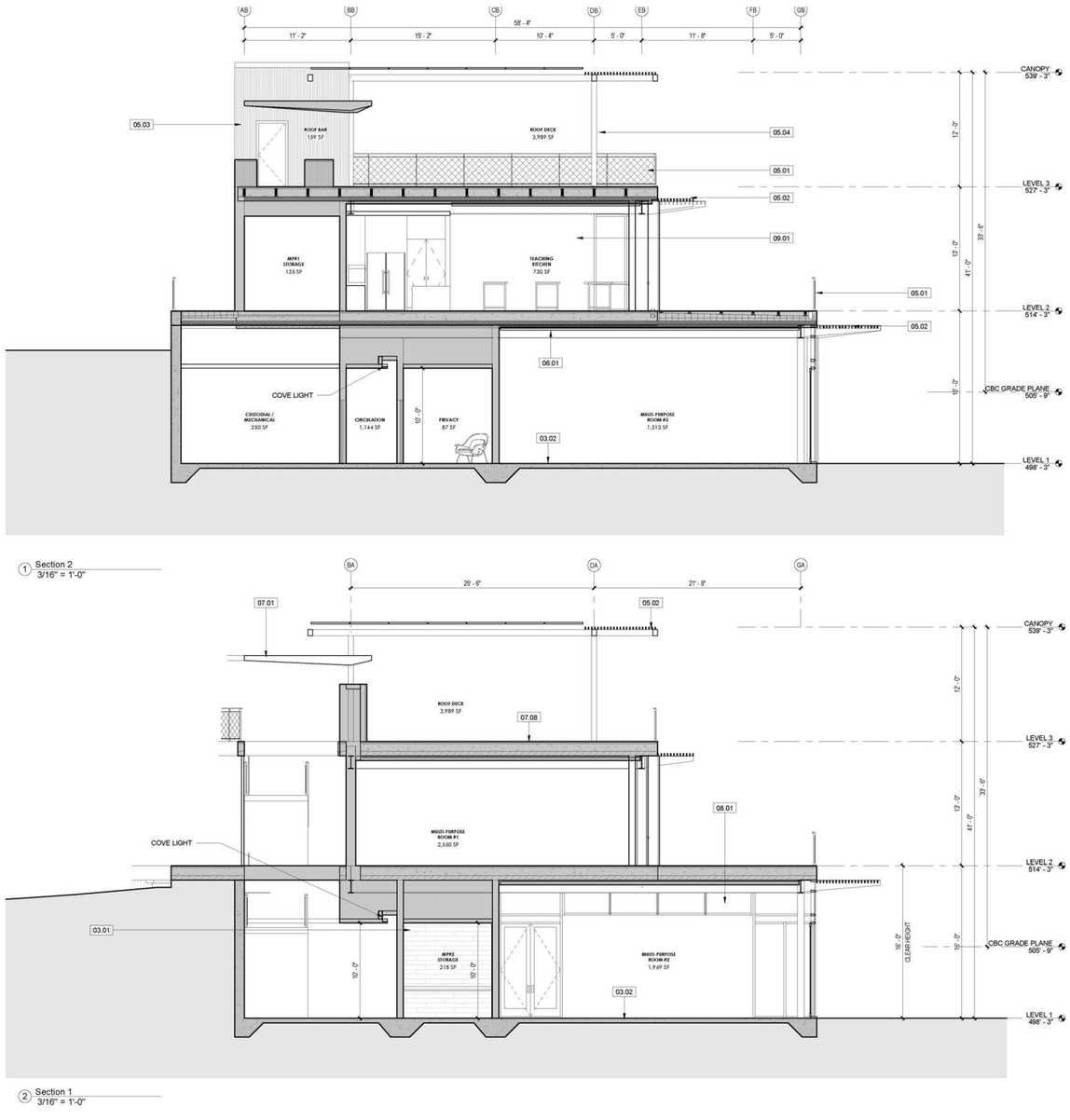


Source(s): Safdie Rabines Architects (05-12-2023)

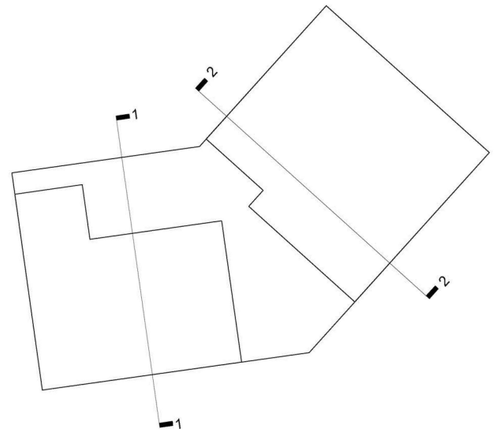
Figure 7b

Not to Scale

Conceptual Buildings Elevations



KEY PLAN



Source(s): Safdie Rabines Architects (05-12-2023)

Figure 8

Not to Scale

Building Sections



Source(s): Safdie Rabines Architects (05-08-2023)

Figure 9a

Not to Scale

Conceptual Building Rendering



Source(s): Safdie Rabines Architects (05-08-2023)

Figure 9b

Not to Scale

Conceptual Building Rendering



1. ALUMINUM WOOD-LOOK BATTENS / SIDING
2. BOARD-FORMED CONCRETE WALLS
3. MESH CABLE GUARD RAIL
4. PORCELAIN TILE PAVER / OAK PLANKS
5. ACOUSTIC WOOD WALL/ CEILING PANELS
6. POLISHED CONCRETE "MIAMI BUFF"
7. SITE PAVER CONTINUES INTO PRIMARY CORRIDOR
8. STEEL SHADE STRUCTURE WITH SOLAR PV CANOPY
9. MULTI-PURPOSE ROOM OUTDOOR SEATING ELEMENT
10. COMPOSITE METAL DECK OVER EXPOSED STEEL STRUCTURE

Source(s): Safdie Rabines Architects (05-12-2023)

Figure 10

Not to Scale

Building Materials

system would include 10-foot-tall multi-panel glass sliding doors tied to a central building management system (BMS) to facilitate natural ventilation and system shut-off when the doors are open.

Conceptual floor plans for each level of the new building are provided on Figures 11 through 14. As shown, the proposed building includes three multi-purpose rooms plus a teaching kitchen and a rooftop deck. The multi-purpose rooms would feature expansive floor-to-ceiling windows that could slide open to the surrounding terraces and decks, creating a seamless transition between the indoor and outdoor spaces. Also included are staff offices with a small conference room, gender inclusive restrooms and a family restroom, a lactation room, storage areas, custodial/mechanical space, a telecommunications/IT room, an ADA-accessible elevator, and circulation areas. Additionally, approximately 6,500 gsf of exterior covered, unenclosed space would be provided, including a reception area between the two ground floor multi-purpose rooms and approximately 4,000 gsf on the roof, covered with a canopy of photovoltaic panels. The rooftop deck would include a small storage room and a bar area to support programs and gatherings.

The proposed building would be designed and constructed in compliance with applicable requirements of the California Building Code and California Health and Safety Code pertaining to fire protection systems. Specifically, fire sprinklers, fire alarm systems, emergency lighting, emergency response notification systems, and illuminated signage would be installed.

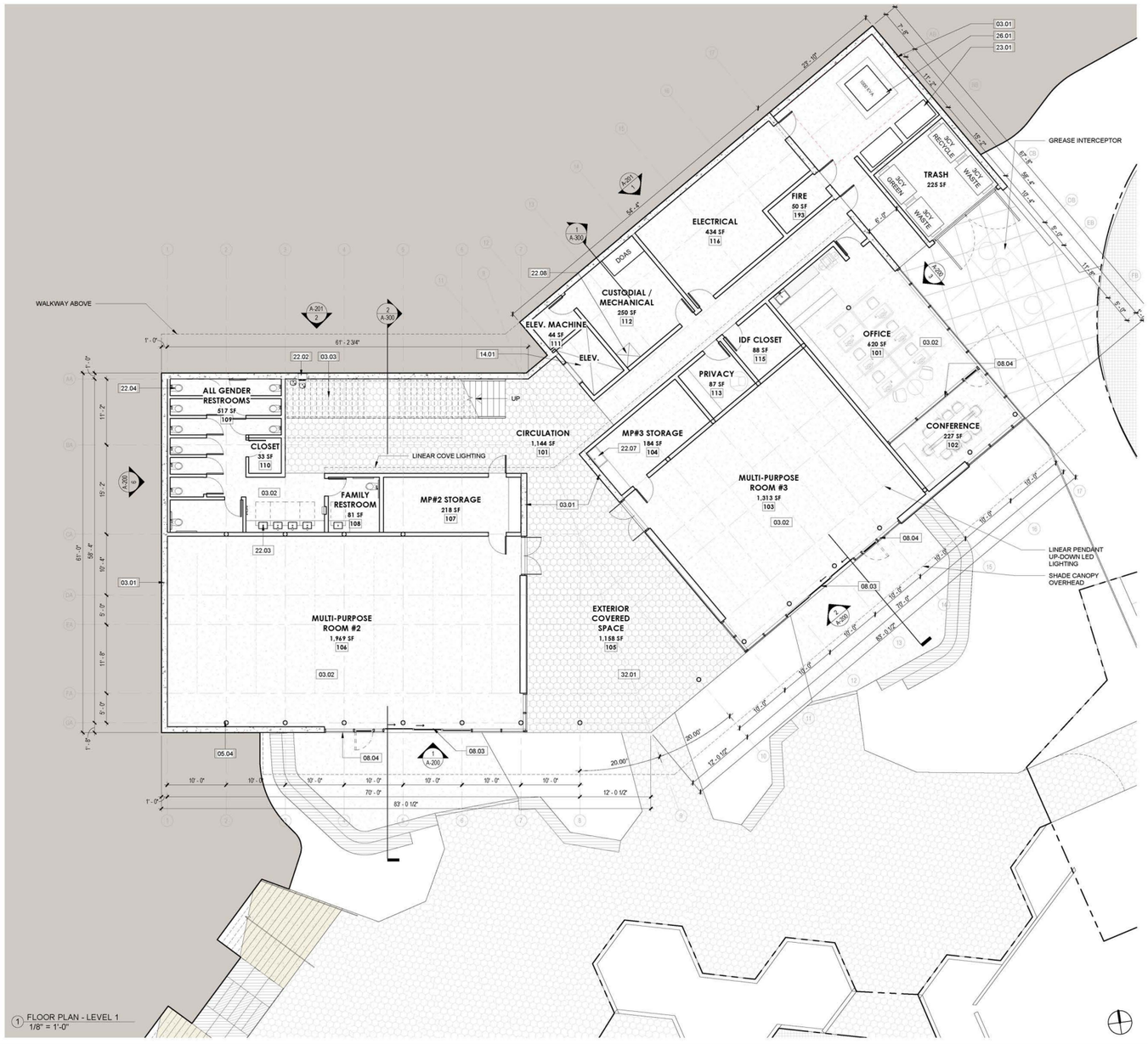
Circulation and Parking

Vehicular access to the proposed building would be the same as under existing conditions (from Easton Drive), and the existing vehicular turnaround adjacent to the main entrance to Sunset Rec would be unchanged. Parking would continue to be provided at the SR parking structure, with sidewalk access to the entry kiosk. The existing entry kiosk, which is a 143 gsf modular building, would be relocated slightly to provide improve the flow of pedestrian traffic from the parking structure to the various uses within Sunset Rec.

Pedestrian access between the lower and upper pools would be enhanced by new stairways to the south of the proposed building, with bench seating and terraces incorporated into the design. Primary ADA access between the two pool levels would be provided via the building elevator, and the existing wheelchair ramp behind the building would remain in place as well.

Landscape and Exterior Lighting

The proposed landscape plan would build upon the existing landscape at Sunset Rec to maintain a wooded and natural setting. As shown on the conceptual landscape plan provided on Figure 15, landscaped areas would be located around the perimeter of the new building and would include trees, shrubs and ground cover, as well as bench seating, thus creating a series of intimate gathering areas. The proposed hex pavers represent a modern, modular variation on the existing hexagonal brick floor pattern. The slope between the lower and upper pools would also feature terraced landscaping to mimic the existing setting. Proposed species would include native and/or drought-tolerant species. Much of the existing vegetation within the Project site would be removed, including an estimated 12 existing mature trees (refer to the discussion of Biological Resources in Section V.4 of this IS), one of which is considered a protected species (western sycamore [*Platanus racemosa*]). However, many of the trees surrounding the proposed building,



KEYNOTES

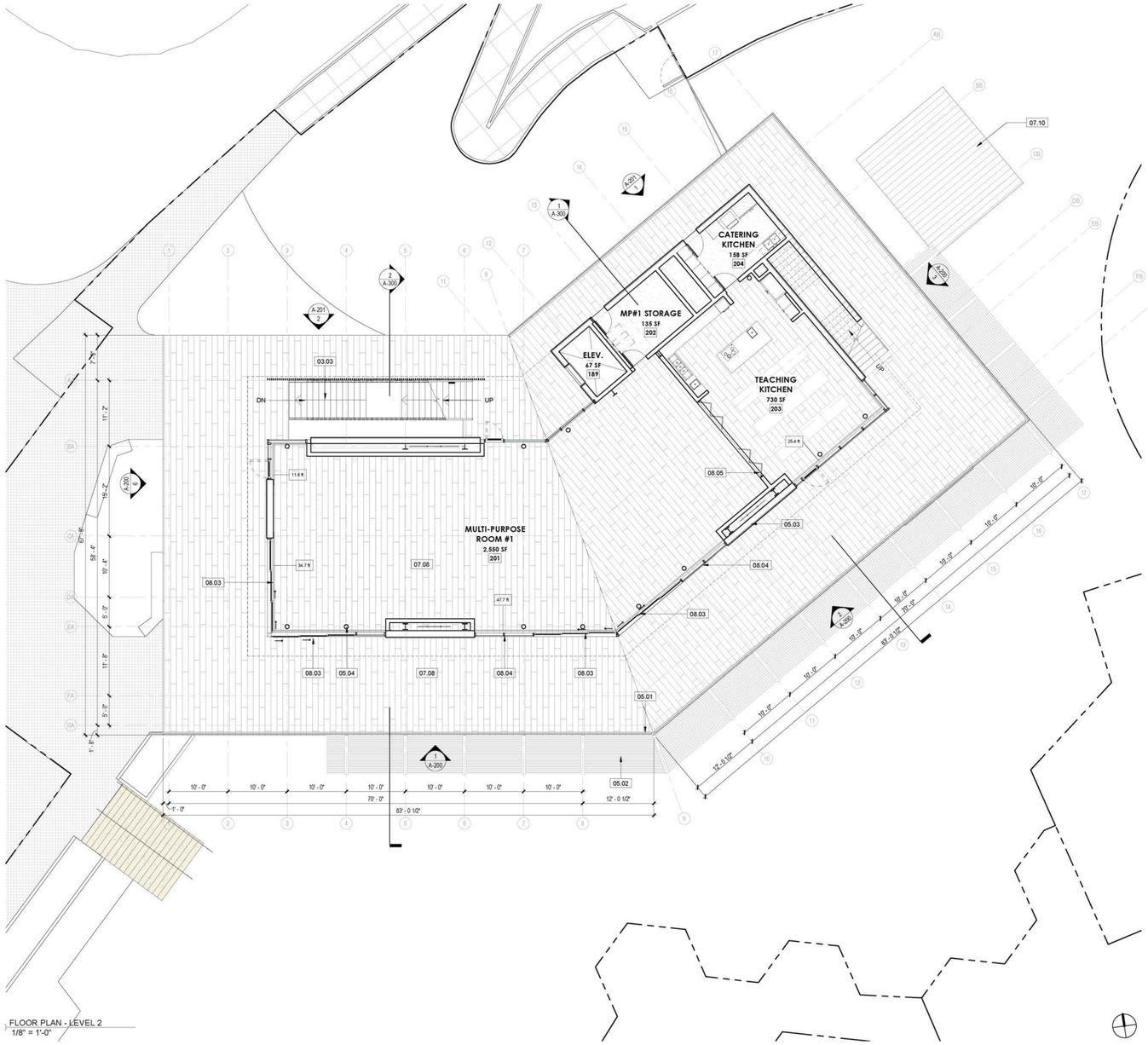
03.01	ARCHITECTURALLY BOARD-FORMED CONCRETE WALLS (EXPOSED TO VIEW)
03.02	POLISHED CONCRETE FLOORS
03.03	PRE-CAST CONCRETE TREADS & RISER ATTACHED TO STL. PLATE STRINGER
05.04	NON-RATED STRUCTURAL STEEL PER STRUCTURAL. AESS LEVEL 3
08.03	EXT. MULTI-PANEL GLASS SLIDING DOORS WITH RECESSED HEAD/SILL TRACK
08.04	MONOLITHIC INTERIOR STOREFRONT WITH RECESSED GLAZING CHANNELS
14.01	PASSENGER ELEVATOR
22.02	COMBINED DRINKING FOUNTAIN / BOTTLE FILLING STATION
22.03	LAVATORY
22.04	WATER CLOSET
22.07	DEEP STAINLESS STEEL WORKSPACE SINK
22.08	FLOOR MOP BASIN
23.01	CONDENSING UNITS PER MECH. SCHEDULE
26.01	TRANSFORMER
32.01	HEX PAVER TILE, FINISH TO MATCH LANDSCAPE HEX PAVER AND SIZE

Source(s): Safdie Rabines Architects (05-12-2023)

Figure 11

Not to Scale

Level 1 Floor Plan



KEYNOTES

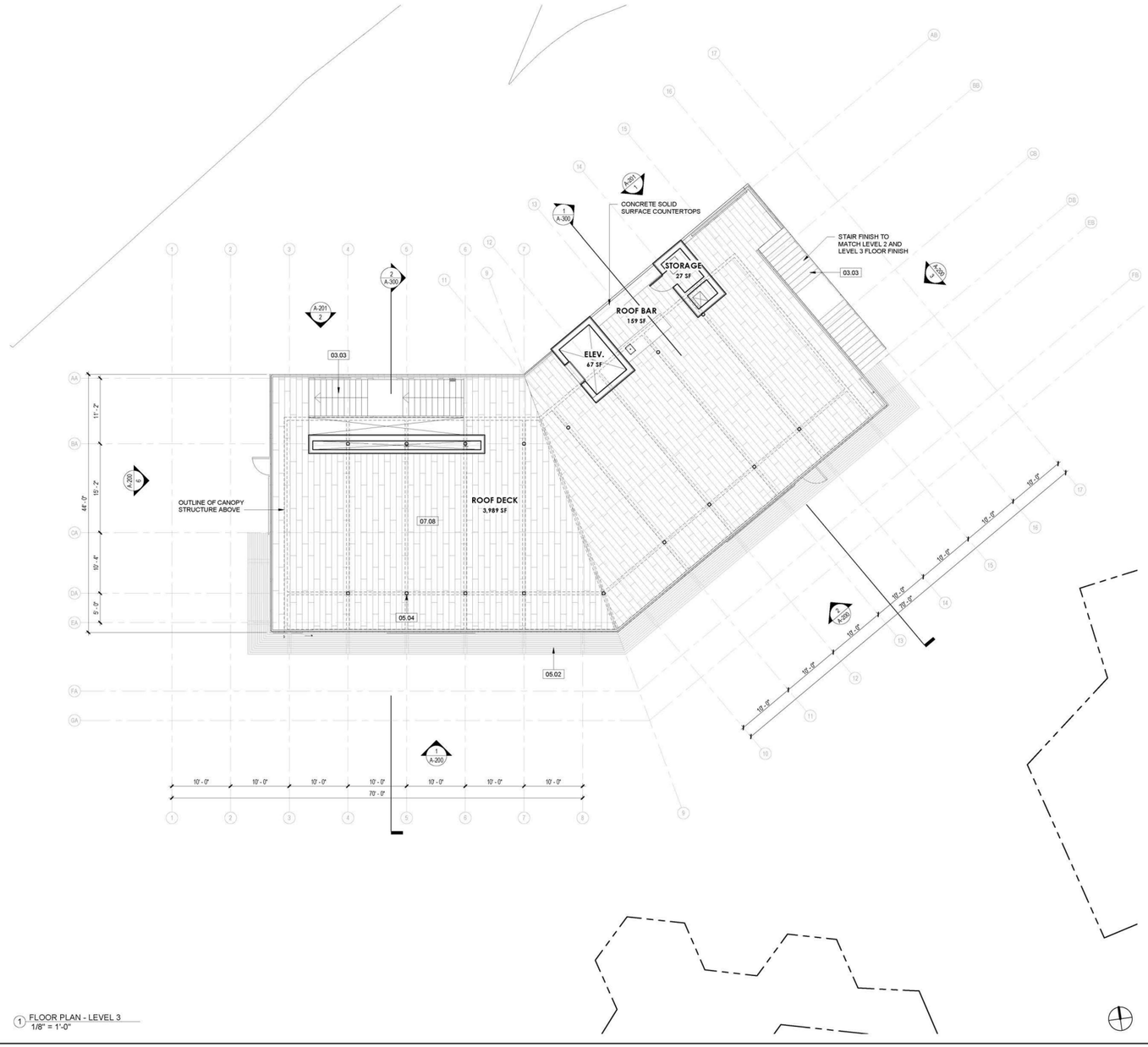
03.03	PRE-CAST CONCRETE TREADS & RISER ATTACHED TO STL. PLATE STRINGER
05.01	METAL GUARDRAILS
05.02	ALUMINUM "WOOD-LOOK" SUN-SHADING BATTENS
05.03	ALUMINUM "WOOD-LOOK" VERTICAL BATTENS
05.04	NON-RATED STRUCTURAL STEEL PER STRUCTURAL. AESS LEVEL 3
07.08	PORCELAIN TILE ROOF PAVER
07.10	STANDING SEAM METAL ROOF PANELS
08.03	EXT. MULTI-PANEL GLASS SLIDING DOORS WITH RECESSED HEAD/SILL TRACK
08.04	MONOLITHIC INTERIOR STOREFRONT WITH RECESSED GLAZING CHANNELS
08.05	ACOUSTICAL PARTITION SYSTEM

Source(s): Safdie Rabines Architects (05-12-2023)

Figure 12

Not to Scale

Level 2 Floor Plan



1 FLOOR PLAN - LEVEL 3
1/8" = 1'-0"

KEYNOTES

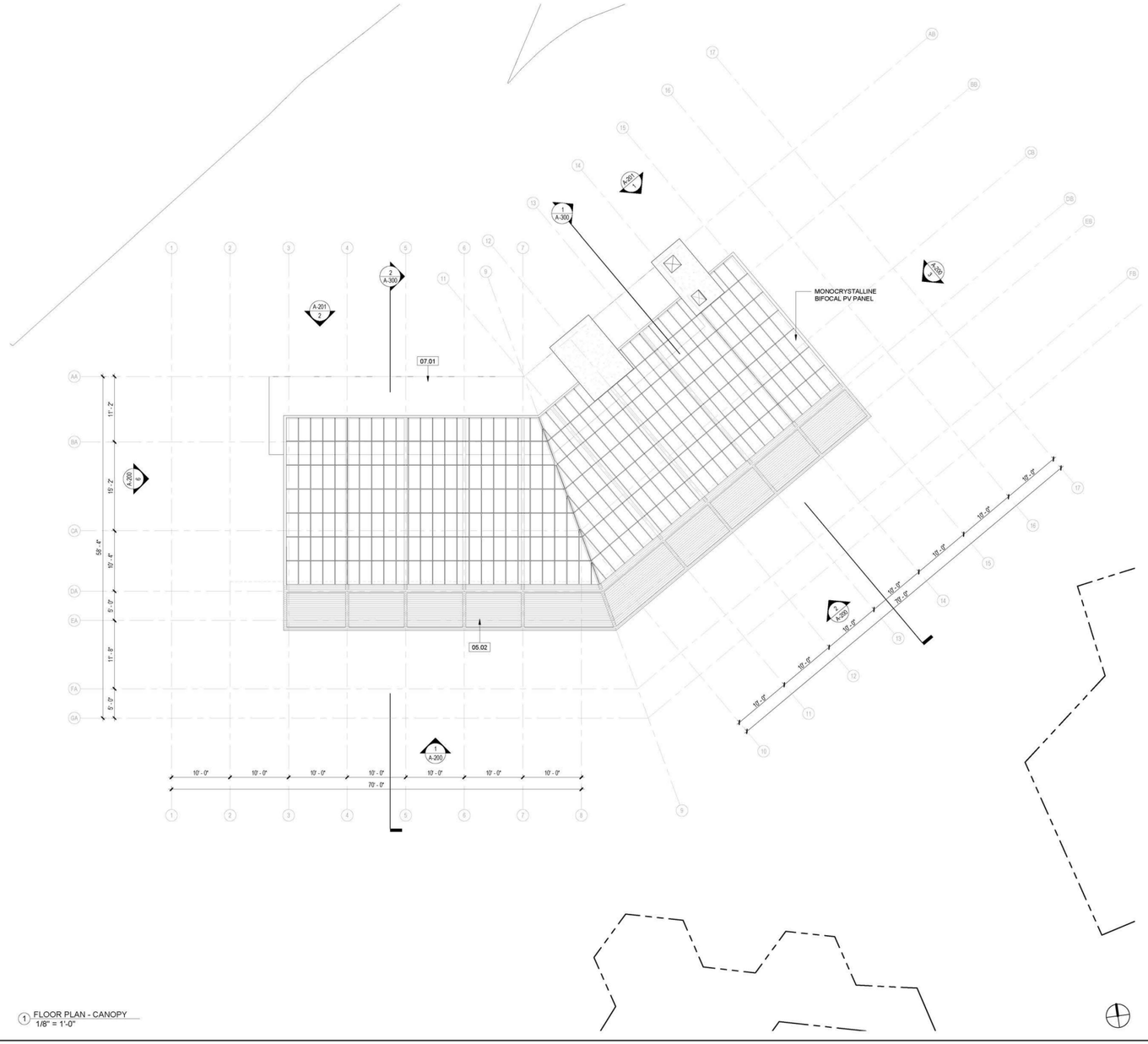
03.03	PRE-CAST CONCRETE TREADS & RISER ATTACHED TO STL. PLATE STRINGER
05.02	ALUMINUM "WOOD-LOOK" SUN-SHADING BATTENS
05.04	NON-RATED STRUCTURAL STEEL PER STRUCTURAL. AESS LEVEL 3
07.08	PORCELAIN TILE ROOF PAVER

Source(s): Safdie Rabines Architects (05-12-2023)

Figure 13

Not to Scale

Level 3 Floor Plan



KEYNOTES

05.02	ALUMINUM "WOOD-LOOK" SUN-SHADING BATTENS
07.01	TPO MMBRANE ROOFING, LIGHT GRAY

1 FLOOR PLAN - CANOPY
1/8" = 1'-0"

Source(s): Safdie Rabines Architects (05-12-2023)

Figure 14

Not to Scale

Roof Deck Floor Plan



Landscape Legend

A. COLORED CONCRETE PAVING - THICKNESS PER GEOTECH 'MIAMI BUFF' BY DAVIS COLORS. SAND FINISH. CUSTOM PATTERNED SAWCUT JOINTS AND EXPANSION JOINTS. (QTY +/- 5,350 SF)

B. CONCRETE UNIT PAVERS - ON ENGINEERED AGGREGATE BASE. 9" ECOHEX PAVER BY ORCO (ORCO.COM)
(QTY +/- 5,410 SF)

C. PAVING OVER STRUCTURE RE: ARCH

D. CONCRETE STAIR - 12" TREAD 6" RISERS WITH NOSINGS. INTEGRAL COLOR 'MIAMI BUFF' BY DAVIS COLORS. SAND FINISH. (QTY +/- 450 LF) PROVIDE STAINLESS HANDRAILS AS REQUIRED BY CODE.

E. RETAINING WALL - POURED IN PLACE CONCRETE. FINISH AND COLOR TO MATCH ARCHITECTURAL EXPOSED WALLS. HEIGHT AND WIDTH PER CIVIL AND STRUCTURAL. (QTY +/- 240 LF)

F. SEATING ELEMENT TYPE (1) - 18" HIGH AND 36" WIDE EACH, STEPPED PER PLAN. POURED IN PLACE CONCRETE BASE WITH IPE/RECLAIMED TEAK CLADDING. (QTY +/- 163 LF)

G. SEATING ELEMENT TYPE (2) - 18" HIGH AND 24", STEPPED PER PLAN. POURED IN PLACE CONCRETE BASE WITH IPE / RECLAIMED TEAK CLADDING. (QTY +/- 100LF)

H. SEATING ELEMENT TYPE (3) - 18" HIGH X 24" WIDE X 8' LONG FIXED TO CONCRETE PAVING. IPE/RECLAIMED TEAK. (QTY +/- 40 LF)

I. 42" HIGH GUARDRAIL - TO MATCH ARCHITECTURAL BALCONY RAILING. EMBEDED ON PROPOSED RETAINING WALL. (QTY +/- 90 LF)

J. STEEL SECURITY FENCE AND (2) GATES - 6' H JAKOBS MESH NET FENCE TO MATCH ARCHITECTURAL RAILINGS. ENTRY GATE TO INCLUDE PANIC HARDWARE.
(QTY +/- 100 LF)

K. 48" BOX TREE - (QTY 14) TREE QUANTITY REQUIRED PER REPLACEMENT CALCULATIONS. TREES NOT INDICATED ON PLAN TO BE LOCATION OFF SITE PER UNIVERSITY DIRECTION.

L. SOD - (QTY +/- 500 SF)

M. PLANTING - WITH 3" AGRIFOREST FOREST MULCH (QTY +/- 10,220 SF)
- 30% 1GALLON 18"OC
- 50% 5 GALLON 30"OC
- 20% 15 GALLON 36" OC

PROVIDE AMENDED SOIL TO 18" DEPTH
PROVIDE 100% DRIP IRRIGATION AND DRAINAGE

N. TABLES, CHAIRS, AND OTHER MOVEABLE SEATING EXCLUDED (NIC)

O. ENTRY KIOSK - RELOCATE EXISTING KIOSK PER PLAN.

P. CONCRETE UNIT PAVERS - ON ENGINEERED AGGREGATE BASE. 9" ECOHEX PAVER BY ORCO (ORCO.COM)
(QTY +/- 580 SF)

Q. PATCH AND REPLACE EXISTING CONCRETE PAVING AS REQUIRED

R. PLANTING - WITH 3" AGRIFOREST FOREST MULCH (QTY +/- 2,442 SF)

S. 48" BOX TREE - (QTY 1) TREE REPLACEMENT REQUIRED PER REPLACEMENT CALCULATIONS

EX. EXISTING TREE - TO BE PROTECTED IN PLACE

NOTE: QUANTITIES TO BE VERIFIED BY CONTRACTOR.

Source(s): Safdie Rabines Architects (06-27-2023)

Figure 15

Not to Scale

Conceptual Landscape Plan

including a large existing Canary Island pine (*Pinus canariensis*) to the south, would be protected in place, as feasible. The proposed Project would provide one new tree for every one mature tree removed, and the western sycamore would be replaced at a 4:1 ratio, in excess of current UCLA requirements.[3]

Exterior lighting would be provided for pedestrian safety and site security. Energy efficient LED signs would be provided at exits, stairwells, along the paths of egress on every floor and where required by code.

Utilities

The proposed Project would include the removal of existing utility infrastructure systems that serve the existing buildings as shown on Figure 16. New utility infrastructure (water, sewer, storm drain, electric and telecommunications) would be installed and would connect to existing utility infrastructure within or adjacent to the Project site. Natural gas would not be used, and the existing natural gas connection would be capped. Following is a description of proposed utility systems to be installed, which are shown on Figure 17:

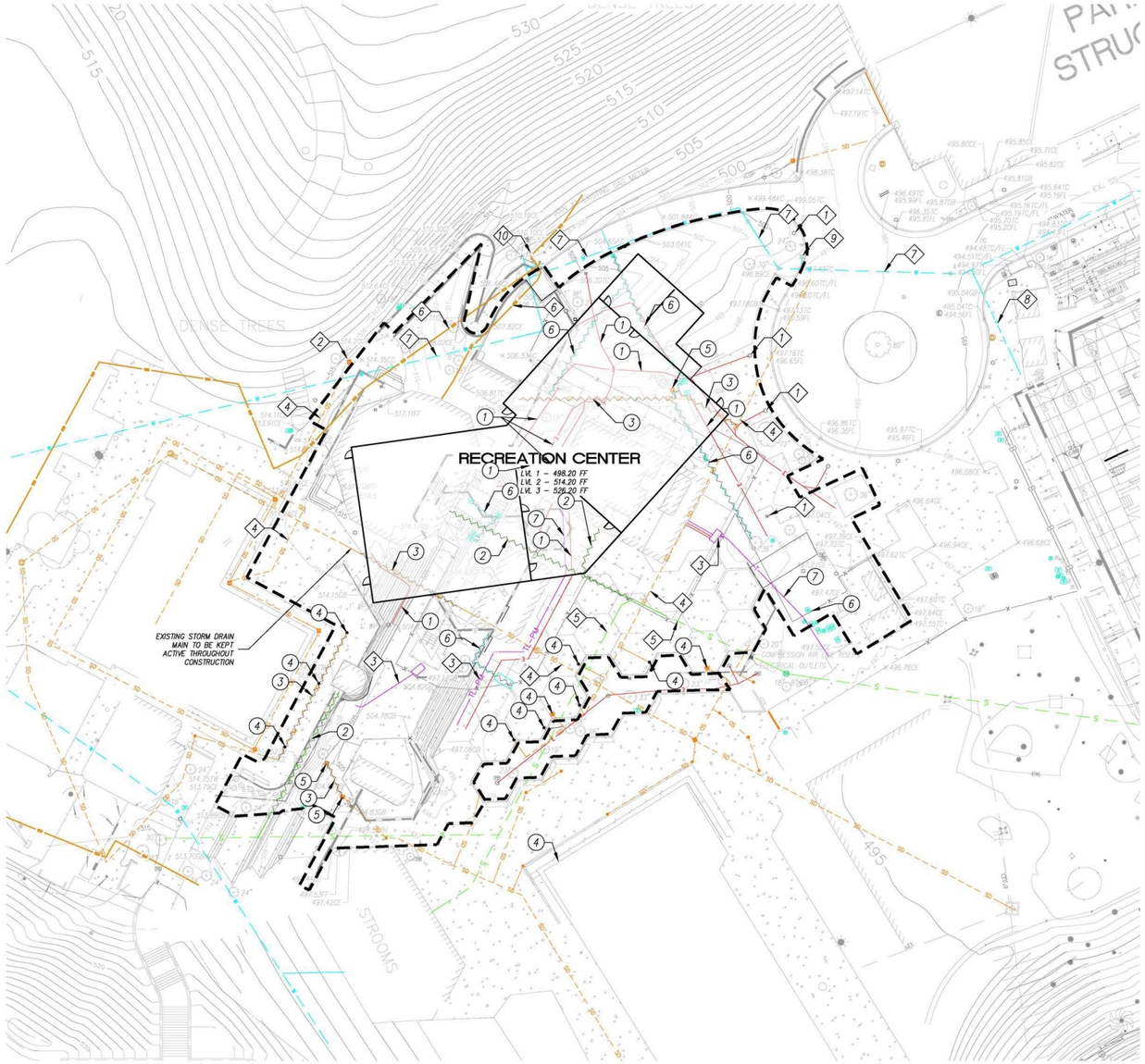
- ***Water –*** Domestic and fire water needs of the proposed Project would be served via an existing six-inch water main that runs in Easton Drive. New lateral water lines would be installed on the northeast side of the proposed building to connect to the existing water main (two-inch line for domestic water service and six-inch line for fire service). Domestic hot water would be provided by electric storage water heaters and delivered to plumbing fixtures in the restroom and kitchen areas.

- ***Sewer –*** The proposed Project would involve the installation of 4-inch sanitary sewer lateral and main lines to connect the proposed building to an existing sewer line at the southeast corner of the proposed building. A new sewer manhole and associated components would also be installed.

- ***Drainage and Water Quality –*** A new 6-inch storm drain, roof drains and associated storm drain facilities would be installed and would be routed to a proposed modular wetland system (MWS) unit that would connect to the existing 8-inch storm drain main that extends northwest to southeast across the Project site.

  As further discussed in Section V.9, Hydrology and Water Quality, of this IS, Phase II of the National Pollutant Discharge Elimination System (NPDES) program regulates storm water discharges from small Municipal Separate Storm Sewer System Permits (MS4s) (such as schools and universities), and UCLA is approved for coverage under the Phase II Small MS4 General Permit. The proposed Project is required to meet Low Impact Development (LID) requirements. Permeable pavers would be installed to decrease the amount of impervious surface on-site, and a MWS unit would be installed to treat the site runoff and for stormwater capture and retention, as needed to comply with applicable regulations. In addition to structural best management practices (BMPs), the proposed Project would implement non-structural BMPs at the Project site related to education and training; landscaping; and monitoring and maintenance of structural BMPs.

[3] LRDP MM 4.3-4 requires the replacement of protected trees at a 2:1 ratio.



PROTECTION NOTES

1. PROTECT IN PLACE EXISTING ELECTRICAL UTILITY, DISTRIBUTION LINES, VAULTS, BOXES, AND APPURTENANCES THROUGHOUT CONSTRUCTION.
2. PROTECT IN PLACE EXISTING STORM DRAIN STRUCTURE THROUGHOUT CONSTRUCTION.
3. PROTECT IN PLACE EXISTING TELEPHONE UTILITY, DISTRIBUTION LINES, VALUTS, BOXES, AND APPURTENANCES THROUGHOUT CONSTRUCTION.
4. PROTECT IN PLACE EXISTING STORM DRAIN PIPE THOUGHOUT CONSTRUCTION.
5. PROTECT IN PLACE EXISTING SEWER THROUGHOUT CONSTRUCTION.
6. PROTECT IN PLACE EXISTING GAS THROUGHOUT CONSTRUCTION.
7. PROTECT IN PLACE EXISTING WATER THROUGHOUT CONSTRUCTION.
8. PROTECT IN PLACE EXISTING FIRE THROUGHOUT CONSTRUCTION.
9. PROTECT IN PLACE FIRE HYDRANT THROUGHOUT CONSTRUCTION.
10. PROTECT IN PLACE EXISTING GAS METER

UTILITY DEMOLITION

1. REMOVE EXISTING ELECTRICAL, SITE LIGHT, ELECTRICAL COMPONENTS, AND FOOTING.
2. DEMOLISH EXISTING SEWER PIPE.
3. DEMOLISH EXISTING STORM DRAIN PIPE.
4. DEMOLISH EXISTING AREA DRAINS AND CLEANOUTS.
5. DEMOLISH EXISTING CATCH BASIN
6. DEMOLISH IRRIGATION PIPE AND COMPONENTS
7. DEMOLISH EXISTING TELECOM

LEGEND

LIMITS OF WORK

EXISTING FENCE

EXISTING BUILDING

DEMOLITION OF UTILITY LINES

Source(s): Latitude 33 Planning & Engineering (07-11-2023)

Figure 16

Not to Scale

Utility Demolition Plan



Source(s): Latitude 33 Planning & Engineering (07-11-2023)

Figure 17

Not to Scale

Conceptual Utility Plan

- ***Electricity*** **–** The existing lower pool concrete electric vault (Building F) would be removed, and the existing electric service equipment (primary and secondary switchboard and transformer) would be disconnected and decommissioned. A new NEMA 3R Stainless Steel primary 12.47kV-480/277V 1000kVA Substation would be located on-grade at the service yard, exterior to the proposed building. A new secondary switchboard would be located within the proposed building's main electrical room and stepped down to 480/277V. The existing panelboards, fire alarm panel, and lighting controls within the existing lower electrical vault would be relocated and refed from the proposed building's secondary switchboard. Other existing electric load branch circuits fed from the existing service (i.e., the locker room and mechanical room) would also be refed to their respective panelboard that is being relocated. New conduit and wire in underground trenching would be provided to extend the existing medium voltage feeder to the final location of the medium voltage substation. In addition, two 4"C spares would be trenched from the upper to lower electrical vault and between the lower electrical vault and the new recreational center building service yard.

Sustainable Building Features

The proposed Project would comply with the University of California Policy on Sustainable Practices and Guidelines and would adopt the principles of energy efficiency and sustainability to the fullest extent possible, consistent with budgetary constraints and regulatory and programmatic requirements. 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 Gold BD+C rating has been established for the proposed Project, and the proposed Project design would strive to achieve a LEED Platinum BD+C rating. To achieve this rating, the proposed Project incorporates a series of green building strategies including, but not limited to, the following:

- Outperforming Title 24 standards by 20 percent; striving to outperform the standards by 30 percent where possible.
- Optimizing the energy efficiency of systems not addressed by the CBC energy-efficiency standards.
- Installing rooftop PV panels (total area of approximately 3,000 sf) to offset the electricity demand for the proposed building.
- Providing an all-electric building (no use of natural gas).
- Incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands.
- Selecting water fixtures (e.g., taps, toilets, and other fixtures) to achieve a 36 percent reduction in per capita water demand (compared to the Fiscal Year 2005-2008 average baseline) and increase water efficiency.

Construction Activities

For purposes of analysis, it is estimated that construction of the proposed Project would begin in May 2024 and be completed in January 2026. Construction of the proposed Project would be

sequenced with overlapping phases, which are generalized as follow: demolition/crushing, site preparation, grading, building construction, architectural coating, paving/landscaping, and building commissioning (concurrent with paving). Depending on the construction phase, implementation of the proposed Project would require common equipment, including, but not limited to: concrete/industrial saws, excavators, dozers, tractors, graders, loaders, backhoes, forklifts, compressors, cranes, generator sets, welders, pavers, and rollers.

The entirety of the Project site, which is shown on the aerial photograph provided on Figure 3 (approximately 37,460 sf or 0.86 acre), would be directly impacted by construction, as analyzed herein. Site demolition would involve the existing buildings, landscaping, and hardscape within the Project site as shown on Figure 18; other areas of Sunset Rec would not be affected. During the demolition phase of construction (estimated to last 66 days or approximately three months), demolition and site preparation debris would be exported from the Project site with 14-cy trucks to a landfill conservatively assumed to be located 36 miles from the Project site. It is estimated that demolition of the existing buildings and related site preparation activities, including removal of existing hardscape, would require an average of three round truck trips (approximately six inbound and outbound trips) per day.

The conceptual grading plan for the proposed Project is provided on Figure 19. Grading activities would involve approximately 7,500 cubic yards of cut, which would be exported from the Project site over an approximately 22-day period with 14-cy trucks to a landfill conservatively assumed to be 35 miles from the Project site. The soil export would require an average of approximately 24 round truck trips (approximately 49 inbound and outbound truck trips) per day for 22 days.

Grading activities would also include excavation to a depth of approximately 20 feet beneath the proposed building footprint (at the northern section in the existing slope), and to a depth of approximately 25 feet for installation of a new storm drain line around the proposed building (with the deepest location measured from the upper pool landing).

The proposed erosion control plan is provided on Figure 20. As required by existing regulations, soil erosion from the Project site during construction would be controlled through the use of BMPs, including, but not limited to: installation of gravel bags/inlet protection, silt fencing, and stabilized driveways at construction entrances and exits. Dust and waste management and materials pollution control BMPs would also be employed.

In addition to the identified construction area, a staging area would be needed to receive, lay down, and prepare materials for use during construction. The construction staging area would be located within Sunset Rec in a location that would not conflict with ongoing activities. Construction workers would park at the SR Parking Structure adjacent to the Project site.

Vehicular and Pedestrian Circulation During Construction

A construction traffic route has been designated to efficiently move construction vehicles to avoid traffic from any other on- and off-campus projects under construction at the same time, to the extent feasible.[4] Pursuant to LRDP PP 4.13-2, the construction of these major projects would be

[4] Major UCLA construction projects on campus or in close proximity that may be under construction at the same time as the proposed Project are identified on Figure 2, UCLA Campus Map, of this IS, and include Gayley Towers (565 Gayley Avenue), Wooden Center Seismic Improvements, and Co-Generation Plant Equipment Replacement.



PROTECTION NOTES

1. PROTECT IN PLACE EXISTING PAVING THROUGHOUT CONSTRUCTION. COORDINATE SAWCUT LINE WITH ENGINEER PRIOR TO DEMO.
2. PROTECT IN PLACE EXISTING TREE THROUGHOUT CONSTRUCTION.
3. PROTECT IN PLACE EXISTING STAIRS.
4. PROTECT IN PLACE EXISTING RETAINING WALL

DEMOLITION NOTES

1. DEMOLISH EXISTING BUILDING AND ASSOCIATED COMPONENTS.
3. DEMOLISH EXISTING LANDSCAPING AND IRRIGATION.
4. DEMOLISH EXISTING RETAINING WALLS AND FOOTINGS.
5. REMOVE TREES AND ROOTS.
6. DEMOLISH EXISTING STAIRS.
7. DEMOLISH EXISTING CONCRETE

LEGEND

LIMITS OF WORK	
EXISTING FENCE	
EXISTING BUILDING	
BUILDING TO BE DEMOLISHED	~5,464 SQUARE FEET
CONCRETE REMOVAL	~14,988 SQUARE FEET
LANDSCAPE AREA REMOVAL	~11,032 SQUARE FEET
CONCRETE SAWCUT LINE	

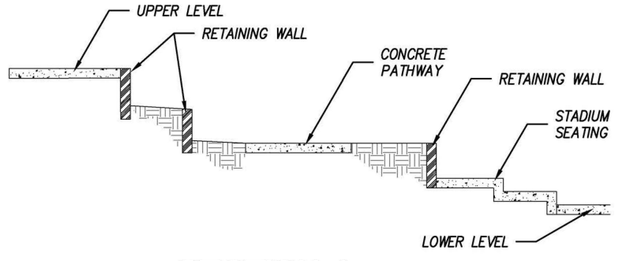
Source(s): Latitude 33 Planning & Engineering (07-11-2023)

Figure 18

Not to Scale

Surface Demolition Plan





SECTION A
NTS

Source(s): Latitude 33 Planning & Engineering (07-11-2023)

Figure 19

Not to Scale

Conceptual Grading Plan



LEGEND

	CONSTRUCTION FENCE
SE–1	SILT FENCE
SE–10	GRAVEL BAGS / INLET PROTECTION
TC–1	CONSTRUCTION ENTRANCE

BEST MANAGEMENT PRACTICES (BMPS) TO BE USED BUT NOT SPECIFICALLY DEPICTED IN PLAN VIEW CONSIST OF THE FOLLOWING:

EC–1	SCHEDULING
NS–1	WATER CONSERVATION PRACTICES
NS–9	VEHICLE AND EQUIPMENT FUELING
NS–10	VEHICLE AND EQUIPMENT MAINTENANCE
SC–10	NON–STORMWATER DISCHARGE
SC–32	OUTDOOR EQUIPMENT OPERATIONS
SC–34	WASTE HANDLING AND DISPOSAL
SC–76	WATER AND SEWER UTILITY MAINTENANCE
WE–1	WIND EROSION CONTROL

Source(s): Latitude 33 Planning & Engineering (07-11-2023)

Figure 20

Not to Scale

Erosion Control Plan

coordinated to adjust construction schedules, work hours, and access routes to the extent feasible in order to reduce construction-related traffic congestion. It is expected that the construction route for the proposed Project would include Interstate 405 (I-405), Wilshire Boulevard, Gayley Avenue, Strathmore Place, Charles E. Young Drive West, De Neve Drive, and Easton Drive.

During construction, the SR parking structure would remain available for Sunset Rec users, and safe pedestrian access from the parking area and the adjacent drop-off roundabout would be maintained. Additionally, pedestrian circulation within Sunset Rec would be maintained to provide access to uses that would remain operational during construction. To maintain access between the upper and lower pools, a protected pedestrian path would be provided; this path would also serve students needing access between the lower pool and nearby Hedrick Summit residence hall. Activities located on the upper lawn would continue to be accessed from De Neve Drive, adjacent to the amphitheater.

II.5. Relationship to The 2002 Long Range Development Plan, As Amended

The proposed Project would involve demolition of seven existing buildings at Sunset Rec that total approximately 6,982 gsf. Therefore, construction of the approximately 11,500 gsf replacement building would result in a net increase of 4,518 gsf of development within Sunset Rec in the Northwest zone.[5] This amount of development is within the total remaining development allocation consistent with the LRDP. Currently, the Northwest zone has 130,682 gsf remaining in the allocation identified in the LRDP.

The proposed Project would involve a replacement recreation building and would not change the overall recreational programming at Sunset Rec. Similar to existing conditions, the new building would offer several multi-use spaces that could be used on a daily basis for a variety of recreational classes for students and staff, gatherings and meetings for campus groups, and as activity spaces for UCLA's summer youth camps. The typical hours of operation are also expected to remain the same (6:00 AM to 8:00 PM Monday through Friday, 8:00 AM to 8:00 PM on Saturday, and 9:00 AM to 8:00 PM on Sundays). Thus, upon Project completion, Sunset Rec would continue to be fully available to UCLA students, faculty and staff, as well as for other related UCLA programs. The proposed Project would not generate an increase in the campus population.

II.6. Anticipated Discretionary Approvals

Under the delegated-authority process, The Regents delegate approval authority to the Chancellor for projects that meet certain criteria. The proposed Project and forthcoming Supplemental EIR would be considered by The Regents or its designee for approval. The University of California and the responsible agencies identified below are expected to use the information contained in this IS and the forthcoming Supplemental EIR for consideration of approvals related to and involved in the implementation of the proposed Sunset Canyon Recreation Replacement Building Project. This IS and the forthcoming Supplemental EIR would inform all state, regional, and local government approvals needed for construction and/or operation of the proposed Project, whether or not such actions are known or are explicitly listed. Anticipated approvals required to implement the proposed Project include, but are not limited to, those listed below.

[5] Consistent with the LRDP EIR, development on the campus does not include gross square footage related to covered unenclosed space.

University of California

- Certification of the Final Supplemental EIR and adoption of the MMRP and CEQA Findings
- Approval of the Sunset Canyon Recreation Replacement Project, including the design and funding

Responsible Agencies

- **State Water Resources Control Board.** UCLA, or its designee, shall comply with requirements of the applicable NPDES Phase II Small MS4 General Permit.

- **South Coast Air Quality Management District.** UCLA, or its designee, shall obtain permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants (e.g., heating, ventilation, and air conditioning units and diesel generators).

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:

The University of California finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	☐
The University of California finds that although the proposed 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.	☐
The University of California finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	☐
The University of California finds that the proposed 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.	☒
The University of California finds that although the proposed 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 proposed project, nothing further is required.	☐

Ashley Rogers
Ashley Rogers
Assistant Director, Environmental Planning

7/12/23
Date

V. EVALUATION OF ENVIRONMENTAL IMPACTS

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

A) **"Additional Project-level Impact Analysis Required"** applies where the project may result in an environmental impact that was not considered in an earlier document, or not considered in sufficient detail, and/or substantial project changes, changed circumstances, or new information of substantial importance triggering CEQA Section 15162 has occurred since certification of the earlier document.

B) **"Project Impact Adequately Addressed in the LRDP EIR"** applies where the potential impacts of the proposed project were adequately addressed in the 2009 Final EIR and either no changes or no substantial changes to the project are proposed, and no new information of substantial importance has been identified.

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).

V.1. Aesthetics

As described previously in Section II, Project Description, of this IS, relevant elements of the proposed Project related to aesthetics/visual character include the demolition of seven existing buildings totaling 6,982 gsf and 5,807 gsf of covered unenclosed space, and construction of an approximately 11,500 gsf replacement building with approximately 6,500 gsf of covered unenclosed space in generally the same location. As described in Section II.4, Project Description, of this IS, the proposed architectural style for the proposed replacement building would consist of a hybrid concrete and steel building designed to respect and provide recognizable visual and material connections to the existing structures at Sunset Rec, including the structures to be demolished. There would concrete shear walls at the ground level and exposed steel beams at all levels. The steel would be intentionally exposed in a similar way to the existing glue-lam beams of the original structure, and the proposed exterior facade would reflect the existing vertical siding. Building materials would include, but not be limited to: aluminum wood-look battens/siding, board-formed concrete walls, mesh cable guard rails, a steel shade structure with a solar PV canopy, and a composite metal roof deck over the exposed steel structure. Approximately 46 percent of the building facade would be a unitized window system (refer to the building elevations shown on Figures 7a and 7b).

As discussed in Section V.4, Biological Resources of the IS, much of the existing landscaping within the Project site would be removed, including an estimated 11 existing mature trees plus one protected tree species. Mature and protected tree species to be removed would be replaced as required by the LRDP MMs presented below. Additionally, the proposed landscape plan would

build upon the existing landscape at Sunset Rec to maintain a wooded and natural setting. The slope between the lower and upper pools would feature terraced landscaping to mimic the existing setting. As with existing conditions, exterior lighting would be provided for pedestrian safety and site security at the Project site.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by bold and underline **(bold and underline)** where text has been added. Changes have been made to reflect that that the 2002 LRDP has been amended since that time.

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.*

PP 4.1-2(b) *The architectural and landscape traditions that give the campus its unique character shall be respected and reinforced.*

PP 4.1-2(c) *Projects proposed under the 2002 LRDP **as amended** shall include landscaping*.

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.*

MM 4.1-3(c) *Ingress and egress from parking areas shall be designed and situated so the vehicle headlights are shielded from adjacent uses. If necessary, walls or other light barriers will be provided.*

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
a) Would the project have a substantial adverse effect on a scenic vista?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that with continued implementation of LRDP PPs, the remaining development allocation contemplated by the LRDP would result in a less than significant impact to scenic vistas. As described in the LRDP EIRs, views of scenic vistas may be generally described in two ways: panoramic views (visual access to a large geographic area for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, setting, or feature of interest).

Examples of panoramic views include urban skylines, valleys, mountain ranges, or large bodies of water. Due to the height of surrounding urban development, mature trees and other vegetation, as well as the change in elevation across the site and in the surrounding area, views of the Project site are limited to vantage points within the site or from immediately adjacent vantage points. More specifically, panoramic views that include the existing Project buildings are only available from locations within Sunset Rec (e.g., from the amphitheater to the north) or from certain dorm rooms within the nearby residence halls. Panoramic views of the existing buildings on-site are not available from public, off-campus vantage points. The proposed Project would involve demolition of existing buildings at Sunset Rec and construction of one new building in generally the same location. The proposed Project would not have impacts on panoramic views, consistent with the finding of the LRDP EIRs.

Focal views include views of natural landforms, public art/signs and visually important structures, such as historic buildings. Focal views on campus include views of outdoor public art spaces (including the Franklin D. Murphy Sculpture Garden and the Rolfe Sculpture Courtyard) and iconic buildings (such as Royce Hall, Powell Library, Haines Hall, Kinsey Hall, and other structures located in the historic core of the Core Campus zone). There are no significant natural landforms on campus, including within the Project site. The closest public art space to the Project site is the Rolfe Sculpture Courtyard, which is located on campus and approximately 0.5 mile to the east and is not in the same viewshed as the Project site. Additionally, while the proposed Project would result in demolition of existing buildings at Sunset Rec that contribute to a historic district, this area is not within or near the campus historic core and not part of a publicly available focal view, as defined in the LRDP EIRs. Therefore, the proposed Project would not have an adverse effect on a focal view, consistent with the finding in the LRDP EIRs. Impacts to historic resources are addressed below in Section V.5, Cultural Resources, of this IS.

The proposed Project would not have a substantial adverse effect on a scenic vista, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

As discussed in the LRDP EIRs, the UCLA campus is located in the City of Los Angeles in an area that is predominantly urban in character, and there are no State-designated scenic highways located near the UCLA campus (Caltrans, 2023). Therefore, the proposed Project would not damage a scenic resource within a State scenic highway.

While there are no State scenic highways in proximity to the Project site, the City of Los Angeles does identify scenic corridors within its City limits. As a constitutional entity, the University of California is not subject to municipal regulations or guidelines; however, information regarding the City's scenic corridors in the vicinity of the UCLA campus is provided herein for informational purposes. Sunset Boulevard is identified as a scenic highway in the Mobility Plan 2035, an Element of the Los Angeles Citywide General Plan. The City has not adopted a Corridor Plan for Sunset Boulevard, but does have Scenic Highways Guidelines to guide future development that may affect a designated scenic highway without an adopted Corridor Plan (City of Los Angeles, 2016). The Project area is located approximately 390 feet southwest of Sunset Boulevard at the nearest point. However, the Project site is not visible from Sunset Boulevard due to intervening mature trees/vegetation and buildings, as well as the elevation changes across the site.

There would be no impact to scenic resources within a State scenic highway resulting from implementation of the proposed Project, consistent with the finding in the LRDP EIRs, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that, with implementation of LRDP PPs 4.1-1(a), 4.1-1(b), and 4.1-2(a) through 4.1-2(c) and LRDP MM 4.3-1(c), the remaining development allocation contemplated

by the LRDP would result in a less than significant impact to the visual character or quality of the campus and the immediately surrounding area.

Primary views of the Project site are from adjacent vantage points, including locations within Sunset Rec (e.g., from the amphitheater to the north) or from certain dorm rooms within the nearby residence halls. Intermittent views are also available to pedestrians and motorists along portions of De Neve Drive and Easton Drive within the campus, but are largely obscured by existing landscaping, trees, and screened fencing. Views from more distant vantage points are obstructed by intervening buildings and landscaping, and in general, public views of the existing buildings on-site are not available from off-campus locations.

The existing visual character of the Project site and immediately surrounding area as viewed from vantage points surrounding Sunset Rec is depicted in the site photographs provided in Figure 21a and 21b. As shown, views of the Project site are largely obstructed by mature vegetation. Views of the existing buildings from vantage points within or adjacent to the Project site, including the buildings that are fenced off and no longer accessible, are provided on Figure 22.

Because the proposed Project is in an urbanized area, potential impacts under this threshold are assessed based on whether the proposed Project would conflict with applicable zoning and other regulations governing scenic quality. With respect to City of Los Angeles zoning and regulations governing scenic quality, as previously indicated, the University of California is not subject to municipal regulations, such as the City of Los Angeles General Plan and the Westwood Community Plan. However, as with other projects on campus, the proposed Project is subject to the UCLA Physical Design Framework (Framework), prepared in July 2009, which describes the approach for development of buildings, infrastructure, and landscape on the campus (UCLA, 2009a). The Framework also defines Physical Design Standards that guide new development to enhance the unique campus aesthetic within the constraints of a fully developed urban environment. The Framework describes the design review process, which ensures that the LRDP objectives and Physical Design Standards are embodied in all new projects. The Framework is used to ensure compatibility of new development with the existing built environment while continuing to strengthen the vibrant identity and design vernacular of the UCLA campus. Additional regulations associated with development of the Project site that are relevant to scenic quality are the LRDP PPs related to design, as identified above. The proposed Project's consistency with the Framework and LRDP PPs is evaluated below.

Physical Design Framework

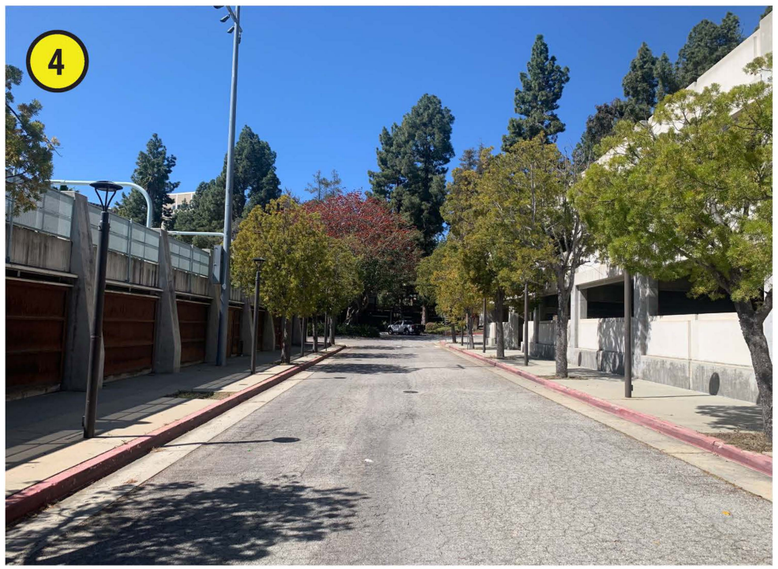
Following is a list of the Physical Design Standards included in the Physical Design Framework, along with an explanation as to how the proposed Project would be consistent with these standards.

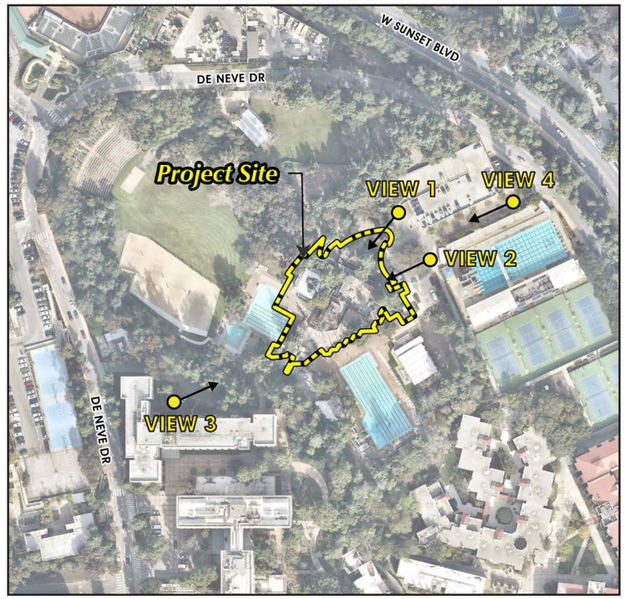
- **Sustainability and Green Buildings.** Consistent with the UC Sustainability Policy and as outlined in Section II, Project Description, of this IS, the proposed Project would achieve a minimum rating of LEED Gold BD+C and would strive to meet a LEED Platinum BD+C rating. To accomplish this, the design, construction, and operation of the proposed Project incorporates a series of green building strategies, as described in Section II of this IS.











Source(s): ESRI, NearMap Imagery (2023)

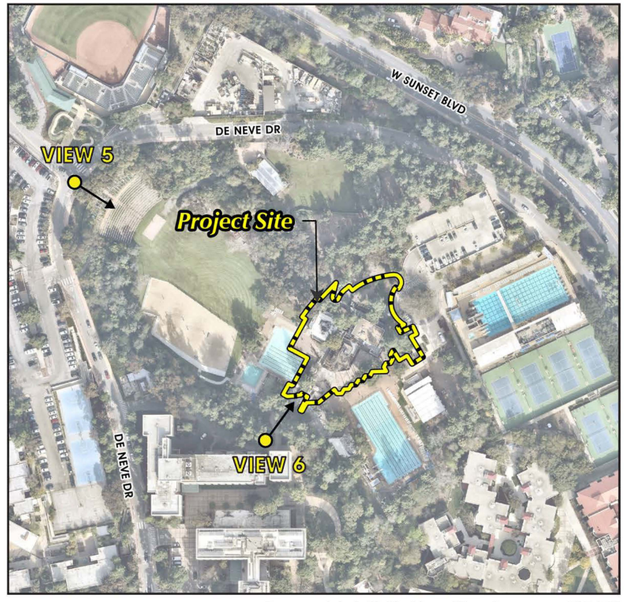
Figure 21a

Not to Scale

Site Photographs







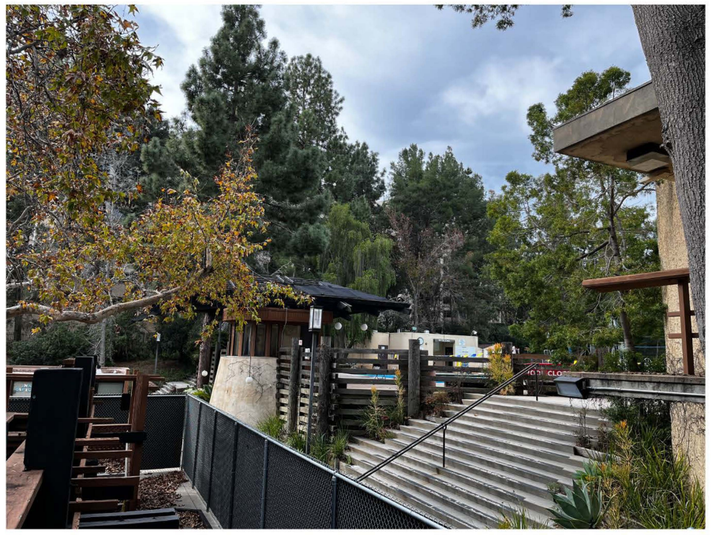
Source(s): ESRI, NearMap Imagery (2023)

Figure 21b

Not to Scale








Source(s): UCLA (Feb 2023)

Figure 22

Not to Scale

Existing Building Photographs

- **Building Materials and Architectural Implementation.** The primary materials of new construction on campus typically include UCLA's iconic blend of brick and buff stone, terracotta, or concrete. However, the architecture and setting at Sunset Rec is unique to the campus, and the use of traditional UCLA materials is not applicable. Furthermore, the Framework acknowledges that design choices may be informed by the more immediate context of a site for a proposed project, as reflected in the historic approach to design and architecture at Sunset Rec. Sunset Rec was originally designed with consideration of its natural setting and the way the space would be used. Given the topography of the area, there is a multi-level placement of buildings, pavilions, and associated pools and gardens that respond to the contours of the land. Historically, the integration of interior and exterior spaces was key, and design elements, such as a hexagonal motif and the use of exposed beams, were repeated in both the buildings and landscape. The use of natural wood was juxtaposed against glass, concrete, and stucco-covered surfaces.

  As described in Section II.4, Project Description, of this IS, the architecture of the proposed replacement building would consist of a hybrid concrete and steel building designed to respect and provide recognizable visual and material connections to the existing structures at Sunset Rec, including the structures to be demolished. There would be concrete shear walls at the ground level and exposed steel beams at all levels. The steel would be intentionally exposed in a similar way to the existing glue-lam beams of the original structures, and the proposed exterior facade would reflect the existing vertical siding. Similar to the design of the original buildings, strong vertical and horizontal elements would continue to create rhythmic patterns of light and shade, and roof canopies would continue to be used as unifying visual elements. Also similar to the existing buildings, the new building would nestle into the adjacent hillside, and expansive floor-to-ceiling windows and sliding doors would create strong connections between the indoor and outdoor spaces, with terraces and outdoor amenity areas, to capitalize on the surrounding natural setting.

- **Pedestrian Circulation and Campus Hardscape.** There are existing pedestrian facilities throughout Sunset Rec that provide access to the various recreational facilities and buildings; however, Sunset Rec is not part of the primary circulation system for the campus. Notwithstanding, as shown on the conceptual site plan provided on Figure 6, pedestrian access between the upper and lower pools would be enhanced by new stairways to the southwest of the proposed building, with bench seating and terraces incorporated into the design. Primary ADA access between the two pool levels would be provided via the building elevator, and the existing wheelchair ramp behind the building would remain in place as well. Additionally, the existing entry kiosk (a 143 gsf modular building), would be relocated slightly to provide improve the flow of pedestrian traffic from the parking structure to the various uses within Sunset Rec. The proposed pedestrian improvements and hardscape have been designed to enhance physical and visual connectivity between the upper and lower pool levels and to provide a new accessible path of travel within the proposed structure and throughout Sunset Rec. Additionally, the proposed hex pavers represent a modern, modular variation on the existing hexagonal brick floor pattern.

- **Open Space and Landscape.** The Physical Design Framework classifies Sunset Rec as a recreational open space area, and the site would continue to be used in this manner under the Project. The replacement building would expand the available floor area for Sunset Rec programs (with a smaller overall building footprint) and improve accessibility.

The proposed Project has been designed to minimize the number of trees to be removed; as discussed in Section V.4, Biological Resources, 12 trees would be removed to accommodate the new building. As identified in the Framework and required by LRDP PPs and MMs, the proposed Project would include the planting of replacement trees and installation of new landscaping, as shown on the conceptual landscape plan provided on Figure 15.

- **Campus Furniture and Signage.** Project signage would be implemented in compliance with the campus signage guidelines. Furniture and other accessories would be compatible with campus standards, as applicable.

- **Site Character and Context.** As with the LRDP, the Framework acknowledges that campus development opportunities will primarily involve infill, reconstruction, and replacement of existing buildings. New projects shall be integrated into the campus context by following these strategies:
    - Recognize major organizing axes in the campus plan
    - Maintain orthogonal orientation as an orienting device
    - Respect and reinforce the open space and edges

  The Project site is located in the northern portion of the Northwest zone and, more specifically, in the central portion of Sunset Rec. The site is not on or near a major axis or campus edge. The Framework indicates that projects in the Northwest zone should utilize the UCLA blend brick in pedestrian accessible areas, and buildings should primarily incorporate buff color tones with some variety of earth tones to accent or highlight building entrances or special function areas. However, as discussed above, the architecture and setting at Sunset Rec is unique to the campus, and the use of traditional UCLA materials is not applicable. Furthermore, the Framework acknowledges that design choices may be informed by the more immediate context of a site for a proposed project, as reflected in the historic approach to design and architecture at Sunset Rec. The proposed Project has been designed to provide recognizable and familiar visual and material connections to the existing Sunset Rec structures without direct replication of the existing architecture, as well as to maintain the indoor/outdoor connections that current exist.

- **Integrated Larger Scale and Imagery.** As demonstrated by the aerial photograph provided on Figure 3 and the site photographs provided on Figure 21, the Project site is surrounding by mature vegetation and is in an area with varying topography. Due to these site conditions, like the existing buildings on-site, the proposed building would not be visible from distant vantage points. These conditions, combined with the Project's modern interpretation of Sunset Rec's original architectural design, would ensure that the proposed Project would not alter the integrated image of the campus.

LRDP PPs

As required and previously identified, the proposed Project incorporates the following PPs, which would ensure that aesthetic impacts are less than significant.

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.

PP 4.1-2(b) *The architectural and landscape traditions that give the campus its unique character shall be respected and reinforced.*

PP 4.1-2(c) *Projects proposed under the 2002 LRDP* ***as amended*** *shall include landscaping*.

To address visual changes associated with implementation of the proposed Project, the proposed replacement building has been designed to ensure that the height and massing is visually compatible with surrounding development within and adjacent to Sunset Rec. As described above, the proposed architectural style for the replacement building would consist of a hybrid concrete and steel building designed to respect and provide recognizable visual and material connections to the existing structures at Sunset Rec. The proposed Project would also include the selective demolition and replacement of surrounding landscape areas, hardscape areas, trees, and utilities as well as a revised entry sequence and perimeter fencing. Consistent with LRDP PP 4.1-2(c), and as shown on the conceptual landscape plan provided on Figure 15, landscaped areas would be located around the perimeter of the new building and would include trees, shrubs and ground cover, as well as bench seating, thus creating a series of intimate gathering areas. The slope between the lower and upper pools would also feature terraced landscaping to mimic the existing setting. Proposed species would include native and/or drought-tolerant species. As discussed in Section V.4, Biological Resources, of this IS, up to 12 trees may be removed but would be replaced at the required ratio with implementation of the proposed Project.

Additionally, consistent with LRDP PP 4.1-1(a), the proposed Project incorporates pedestrian circulation and access improvements to ensure that pedestrian movement in and around the Project site is accommodated safely and in a pleasant visual setting.

In summary, while there would be a visual change as a result of the proposed Project, the proposed Project would not conflict with regulations governing scenic quality at the UCLA campus. Therefore, this impact would be less than significant, consistent with the findings of the LRDP EIRs, and no additional mitigation would be required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

As previously discussed in the LRDP EIRs, future development could create new sources of light from exterior building illumination, lighted recreation/athletic facilities, and parking lots or structures; as well as glare from reflective building surfaces and/or the headlights of vehicular traffic. It was concluded that these new sources of light or glare could affect day or nighttime views of adjacent sensitive land uses on campus or in the immediate vicinity, resulting in a potentially significant impact. However, with implementation of LRDP MMs 4.1-3(a) through MM 4.1-3(b), these impacts were determined to be less than significant.

The proposed demolition activities include the removal of existing sources of lighting, and new lighting would be installed as part of the new building and site improvements. As required by LRDP MM 4.1-3(b), any new lighting would be designed to limit spillover onto adjacent land uses by focusing light on the surfaces to be illuminated. Additionally, with incorporation of energy conservation measures and exterior lighting fixtures with full cutoff features (which is part of the Green Building Design component of the UC Policy on Sustainable Practices and Guidelines), light and glare impacts would be further reduced. The proposed building, which would include low- and/or non-reflecting building materials, would not introduce materials or uses that have the potential to result in substantial glare. Therefore, consistent with the conclusion of the LRDP EIRs, the proposed Project would not result in a substantial new source of light or glare and there would be less than significant impacts related to daytime or nighttime light and glare. No additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to aesthetics. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to aesthetics. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.2. Agriculture and Forestry Resources

There are no relevant elements of the proposed Project related to agricultural resources. There are no relevant PPs or MMs adopted as part of the Final EIR.

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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?	☐	☒	☐	☐
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?	☐	☒	☐	☐
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 nonagricultural use?	☐	☒	☐	☐

Discussion

The LRDP EIRs determined that no farmland, agricultural activity, forest land, or timberland exist on the campus; no portion of the campus is zoned for agricultural, forest land, or timberland; and it is not under a Williamson Act Contract. The Project site is within an area that is not mapped as part of the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP), as confirmed by review of the most recent 2018 FMMP Important Farmland Map for Los Angeles County (DOC, 2023). Additionally, as identified in the LRDP EIRs, no agricultural or forestry resources occur at Sunset Rec under existing conditions. Therefore, the proposed Project would not convert or result in the conversion of agricultural uses to non-agricultural uses, conflict with a Williamson Act Contract, nor would it result in the loss or conversion of forest land. No impact to agricultural or forestry resources would result, consistent with the findings of the LRDP EIRs, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to agriculture and forestry resources. Additionally, no new

information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to agriculture and forestry resources. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.3. Air Quality

Relevant elements of the proposed Project related to air quality include the demolition of seven existing buildings/facilities at Sunset Rec (approximately 6,982 gsf of floor area plus 5,807 gsf of covered but enclosed space) and associated site preparation (including removal of existing hardscape). The existing buildings would be replaced with one new building with approximately 11,500 gsf of recreational floor area plus approximately 6,500 gsf of exterior space that is covered but unenclosed. An estimated approximately 31,150 gsf of debris from demolition and site preparation activities would be exported from the Project site (approximately three round truck trips per day for 66 days), and approximately 7,500 cubic yards of soil would be exported from the Project site (approximately 24 round truck trips per day for 22 days). It is conservatively estimated that demolition and site preparation debris would be hauled approximately 36 miles to a landfill, and the soil would be hauled approximately 35 miles. 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).

The proposed Project would accommodate existing programs at Sunset Rec that would serve the existing campus population and thus would not generate new enrollment or staff, related traffic, or associated motor vehicle emissions. Additionally, per the University of California requirements, the proposed Project would not use natural gas for operations. A rooftop PV array would be installed and would offset the electric demand for the proposed Project.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

PP 4.2-2(a) *The campus 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 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 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 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 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 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 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, LRDP PP 4.15-1 included under the Greenhouse Gas Emissions analysis (Section V.8 of this IS) requires UCLA to 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 (CAP), which would also reduce associated air pollutant emissions.

Air Quality Background

As discussed in the Air Quality sections of the LRDP EIRs, the Project site is located within the South Coast Air Basin (SCAB), which has historically been characterized by relatively poor air quality. The South Coast Air Quality Management District (SCAQMD) has jurisdiction over an approximately 10,743 square-mile area consisting of portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. The SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards.

Air pollutant emissions within the SCAB 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 or operate at a specific identified location, and are usually associated with manufacturing and industrial land uses. 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 and equipment. Mobile sources account for the majority of the air pollutant emissions within the SCAB. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Regulatory Framework

A discussion of the regulatory framework for assessing air quality impacts is provided in the Air Quality sections of the LRDP EIRs and is incorporated by reference. Regulations addressed in the LRDP EIRs include, but are not limited to, the following, which have been updated since preparation of the LRDP EIRs and/or provide context for the environmental analysis below.

The federal Clean Air Act (CAA) (42 U.S.C. Section 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. NAAQS and CAAQS currently in effect and the associated attainment status for the SCAB are presented in Appendix A of this IS and summarized below (CARB, 2022). 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 (PM_{10} and $PM_{2.5}$), and sulfur oxides (SO_X). O_3 is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Thus, VOCs and NO_X 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.

The SCAQMD is principally responsible for air pollution control in the SCAB 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. Currently, these state and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards.

In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP) (SCAQMD, 2022). The 2022 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 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the SCAG 2020-2045 Regional Transportation Plan/Sustainable Community Strategy (Connect SoCal), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements (SCAG, 2020).

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.
- **PM_{10}** 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.

- **$PM_{2.5}$** is a subgroup of PM_{10} that consists of smaller particles that have an aerodynamic diameter of 2.5 micrometers or less. $PM_{2.5}$ 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 O_3, which is a criteria pollutant. The SCAQMD uses the terms VOC and Reactive Organic Gases (ROG) interchangeably.
- **NOx** includes nitric oxide (NO), nitrogen dioxide (NO_2) and nitrous oxide (N_2O), which are formed when nitrogen (N_2) combines with oxygen (O_2). Their lifespan in the atmosphere ranges from one to seven days for NO and NO_2, to 170 years for N_2O. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition.

Existing Air Quality Setting

As previously indicated, 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 USEPA and CalEPA have established NAAQS and CAAQS, respectively, for six of the most common criteria air pollutants: CO, Pb, O_3, particulate matter (PM_{10} and $PM_{2.5}$), NO_2, and SO_2. The attainment designations for the SCAB are presented in Table 3 (CARB, 2022).

The Project site is currently developed with seven buildings and associated unenclosed space. Estimated air pollutant emissions generated by operations at the existing buildings (area and energy source emissions) are presented in Table 4.[6] Emissions associated with mobile sources are not estimated as the proposed Project does not include any features that would increase vehicle trips or mobile source emissions at Sunset Rec, so mobile source emissions would be the same under existing and proposed conditions. As shown, the criteria pollutant emissions from the existing buildings to be demolished range between 0.00 and 0.64 pounds per day (lbs/day).

Table 3
Attainment Status of Criteria Pollutants in the SCAB

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--[1]
O_3 – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment
SO_2	Attainment	Unclassifiable/Attainment
Pb[2]	Attainment	Unclassifiable/Attainment

Source: (CARB, 2022)

1. That National 1-hour O_3 standard was revoked effective June 15, 2005.
2. The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB

[6] In May 2022 California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of California Emissions Estimator Model (CalEEMod version 2022.1). The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in the Air Quality and GHG Analysis included in Appendix A of this IS. It should be noted that O_3 is a byproduct/chemical reaction in the atmosphere and there are no directly emitted ozone emissions from any project that are quantifiable. Pb emissions are not calculated as most projects would result in a negligible amount of Pb. This is underscored by the fact that CalEEMod does not calculate any Pb emissions from construction or operational activities.

Table 4
Existing Building Regional Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Area Source	0.37	< 0.005	0.54	< 0.005	< 0.005	< 0.005
Energy Source	0.01	0.12	0.10	< 0.005	0.01	0.01
Total Maximum Daily Emissions	**0.38**	**0.12**	**0.64**	**0.00**	**0.01**	**0.01**
Winter						
Area Source	0.28	0.00	0.00	0.00	0.00	0.00
Energy Source	0.01	0.12	0.10	< 0.005	0.01	0.01
Total Maximum Daily Emissions	**0.29**	**0.12**	**0.10**	**0.00**	**0.01**	**0.01**

Source: (Urban Crossroads, 2023)

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
a) Would the project conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐

Discussion

The LRDP EIRs determined that implementation of the remaining development allocation contemplated under the LRDP would not obstruct implementation of any SCAQMD AQMPs and there would be a less than significant impact. As identified above, the applicable AQMP for the proposed Project is the SCAQMD 2022 AQMP, which was adopted after preparation of the LRDP EIRs. For a specific project to be consistent with the AQMP, the pollutants emitted from the proposed 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 violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if SCAQMD localized significance thresholds (LSTs) or regional significance thresholds were exceeded. As evaluated under Threshold b and Threshold c, below, the proposed Project's regional and localized construction-source emissions would not exceed applicable regional significance thresholds or LST thresholds, and impacts would be less than significant. Therefore, the proposed Project is determined to be consistent with Criterion No. 1.

With respect to Criterion No. 2, the 2022 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 City of Los Angeles is considered consistent with the AQMP. The proposed Project would involve the replacement of existing buildings at Sunset Rec with a new building to continue the recreational programs currently offered at this recreational facility on campus. The proposed Project would not result in new students, faculty, or staff at UCLA. As further discussed in Section V.14, Population and Housing, of this IS, the proposed Project would not conflict with the local or regional growth assumptions, including growth assumptions in Connect SoCal, which are consistent with the 2022 AQMP. Therefore, the proposed Project is determined to be consistent with Criterion No. 2.

The proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, consistent with the findings of the LRDP EIRs, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The analysis in the LRDP EIRs determined that, even with application of the identified LRDP PPs, implementation of the remaining development allocation on campus would result in significant and unavoidable impacts related to a cumulatively considerable net increase of certain pollutants (specifically, O_3, PM_{10}, and $PM_{2.5}$) for which the region is in nonattainment. Land uses such as the proposed Project affect air quality through construction-source and operational-source emissions, and as identified in the LRDP EIRs, individual proposed development projects on campus are subject to project-specific air quality impact analyses.

The proposed Project would generate PM_{10}, $PM_{2.5}$, and O_3 precursors (NO_X and VOC) during short-term construction and long-term operations. As such, the proposed Project would have an incremental, cumulative contribution to O_3, PM_{10}, and $PM_{2.5}$ levels in the region. SCAQMD's policy with respect to cumulative impacts associated with criteria pollutants and their precursors is that project-specific impacts which are less than significant would also be cumulatively less than significant (SCAQMD, 2003).

The SCAQMD recommends that projects under their jurisdiction 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. As identified in the LRDP EIRs, 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 for regional emissions have not changed since preparation of the LRDP EIRs and are presented in the emission tables presented in this section. Following is the required analysis of the short-term construction-related and long-term operational emissions resulting from implementation of the proposed Project.

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 building materials to and from the Project site and from vehicles driven to and from the Project site by construction workers; and VOCs from painting and asphalt paving operations. The CalEEMod input for construction emissions was based on the proposed Project's construction parameters and default assumptions from CalEEMod, as further identified in the Air Quality and GHG Analysis included in Appendix A of this IS.

Table 5 presents the estimated maximum daily emissions during construction of the proposed Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. The emission estimates include reductions associated with adherence to SCAQMD Rule 403 (refer to LRDP PP 4.2-2[a]). Compliance with LRDP PPs 4.2-2(b), 4.2-2(c), 4.2-2(d), and LRDP MMs 4.2-2(a), 4.2-2(b), and 4.2-2(c) would further reduce construction-related emissions; however, these reductions are not quantified, thus providing a conservative analysis. As shown, emissions resulting from construction of the proposed Project would not exceed the thresholds established by the SCAQMD for emissions of any criteria pollutant, including emissions of criteria pollutants for which the region is non-attainment, and no additional mitigation is required.

Table 5
Estimated Maximum Daily Regional Construction Emissions

Source	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
2024	2.07	22.01	20.81	0.06	4.41	2.08
2025	1.19	7.41	9.29	0.02	0.37	0.30
Winter						
2024	0.82	8.07	9.33	0.02	0.41	0.34
2025	1.19	7.41	9.26	0.02	0.39	0.30
2026	0.65	5.14	6.95	0.01	0.37	0.23
Maximum Daily Emissions	**2.07**	**22.01**	**20.81**	**0.06**	**4.41**	**2.08**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

[1]PM_{10} and $PM_{2.5}$ source emissions reflect 3x daily watering per SCAQMD Rule 403 for fugitive dust.
Detailed construction model outputs are presented in Attachment A of the Air Quality and GHG Assessment.
Source: (Urban Crossroads, 2023)

Operations

The LRDP EIRs conclude that operational activities associated with remaining buildout of the LRDP would result in project-generated emissions of VOC and NO_X that exceed SCAQMD's applicable thresholds. As a result, long-term operational emissions associated with buildout of the LRDP would be significant. The exceedance of the VOC threshold would be principally due to: (1) additional vehicle trips resulting from increased students, staff, and visitors; and (2) increased

on-campus residents using consumer products containing VOC. The NO_X exceedance is almost entirely due to the additional vehicle trips.

Operational-related emissions from the proposed Project are expected primarily from area source emissions, which are the result of consumer products, architectural coatings (maintenance repainting), and landscape maintenance equipment. As previously identified, new operational related mobile source emissions are not expected as no additional vehicle trips would be generated by the proposed Project. Additionally, there would be negligible energy source emissions because no natural gas would be used during operation of the proposed Project, and the planned PV system would offset 100 percent of the electric demand for the proposed Project.

The estimated operational-source emissions from the proposed Project compared to the emissions from operation of the existing buildings are summarized on Table 6. Detailed operational model outputs are presented in Attachment A. As shown on Table 6, operational-source emissions from the proposed Project would not exceed the applicable SCAQMD regional thresholds for emissions of any criteria pollutant. When taking into consideration the emissions from operation of the existing buildings, there would be either a net decrease in emissions or the same emissions for each of the criteria pollutants, including emissions of criteria pollutants for which the region is non-attainment. Therefore, regional operational emissions would be less than significant, and no mitigation is required.

SCAQMD's policy with respect to cumulative impacts associated with criteria pollutants and their precursors is that project-specific impacts that are less than significant would also be cumulatively less than significant (SCAQMD, 2003). Therefore, consistent with SCAQMD policy, the cumulative construction and operational impacts of the proposed Project would also be less than significant.

Table 6
Estimated Project Net New Maximum Daily Regional Operational Emissions

Source	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
Proposed Project	0.34	<0.005	0.50	<0.005	<0.005	<0.005
Existing Building	0.38	0.12	0.64	0.00	0.01	0.01
Net Emissions (Proposed – Existing)	**-0.04**	**-0.12**	**-0.14**	**0.00**	**-0.01**	**-0.01**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Proposed Project	0.26	0.00	0.00	0.00	0.00	0.00
Existing Building	0.29	0.12	0.10	0.00	0.01	0.01
Net Emissions (Proposed – Existing)	**-0.03**	**-0.12**	**-0.10**	**0.00**	**-0.01**	**-0.01**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2023)

Construction and operation of the proposed Project would result in a less than significant cumulatively considerable net increase of any criteria pollutant for which the proposed Project region is in nonattainment under an applicable federal or state ambient air quality standard. Nonetheless, the LRDP concluded that air quality impacts resulting from construction and operational air pollutant emissions associated with development pursuant to the LRDP would be significant and unavoidable. No additional mitigation beyond that adopted as part of the LRDP

and presented previously is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
c) Would the project expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐

Discussion

The LRDP EIRs evaluate the exposure of local sensitive receptors to CO hotspots and substantial criteria pollutant concentrations based on the SCAQMD's Localized Significance Thresholds (LST), as well as pollutant emissions from campus-generated toxic air emissions.[7] Potential impacts were determined to be less than significant.

CO Hotspots

An adverse CO concentration, known as a "hot spot," can occur when an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm occurs. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (with requirements for certain other vehicle types that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, the CO concentration in the SCAB is now designated as attainment. As indicated above and further discussed in Section V.17, Transportation, of this IS, the proposed Project would not increase daily vehicle trips. Therefore, the proposed Project would not increase vehicular delays at any intersections and there would be no potential for a CO hotspot resulting from the proposed Project consistent with the findings of the LRDP EIRs. No mitigation is required.

Localized Emissions

As discussed in the LRDP EIRs, 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 SCAB, the area of the Project site, and distance to the sensitive receptors. The LSTs used in this analysis are specific to SCAQMD Source Receptor Area (SRA) 2, Northwest Coastal Los Angeles County, in which the Project site is located. The nearest land use in proximity to the Project site where an individual could remain for 24 consecutive hours (in this case the nearest residential land use) is the Hedrick Summit student housing hall, which is approximately 63 feet (19 meters)

[7] Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors." These structures typically include residences, hotels, hospitals, etc. as they are also known to be locations where an individual can remain for 24 consecutive hours.

to the southwest (refer to Figure 23). Emissions at other receptors located at a further distance would be less than at this location due to natural dispersion.

LST emissions and thresholds for the proposed Project's construction activities and operations are shown in Tables 7 and 8.[8] Outputs from the model runs for construction LSTs are provided in Attachment A of the Air Quality and GHG Analysis, and outputs from the model runs for operational LSTs are provided in Attachment C. As shown in Tables 7 and 8, the proposed Project's estimated construction and operational emissions would not exceed the SCAQMD's LSTs, and the impact from exposure to these emissions at the nearest sensitive receptors would be less than significant, consistent with the findings of the LRDP EIRs. No additional mitigation is required.

Table 7
Project Localized Construction Impacts

On-Site Emissions	Emissions (lbs/day)			
	NO_X	**CO**	**PM_{10}**	**$PM_{2.5}$**
Demolition & Site Preparation				
Maximum Daily Emissions	**18.98**	**19.67**	**1.33**	**0.86**
SCAQMD Localized Threshold	103	562	4	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading				
Maximum Daily Emissions	**14.98**	**13.98**	**2.69**	**1.55**
SCAQMD Localized Threshold	125	695	5	4
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Building Construction (Includes Infrastructure Improvements)				
Maximum Daily Emissions	**7.99**	**9.08**	**0.36**	**0.33**
SCAQMD Localized Threshold	103	562	4	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Paving, Landscaping, Building Commissioning (Interior)				
Maximum Daily Emissions	**5.24**	**6.25**	**0.23**	**0.21**
SCAQMD Localized Threshold	103	562	4	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Architectural Coating[1]				
Maximum Daily Emissions	**0.00**	**0.00**	**0.00**	**0.00**
SCAQMD Localized Threshold	103	562	4	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

1. On-site equipment used during this phase would be electric; therefore, no emissions would result.
Source: (Urban Crossroads, 2023)

Table 8
Project Localized Operational Impacts

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**0.00**	**0.50**	**< 0.005**	**< 0.005**
SCAQMD Localized Threshold	221	1,531	3	2
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2023)

[8] Thresholds are specific to the Northwest Los Angeles Coastal County Source Receptor Area (SRA) 2.



Source(s): Urban Crossroads (07-06-2023)

Figure 23

Receptor Locations

Toxic Air Contaminant Emissions

Toxic Air Contaminants (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. Proposed Project construction would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. The proposed 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 function of both the emissions rate and the duration of exposure. The total Project construction period is anticipated to last approximately 21 months; however, the construction activities that would involve the use of heavy diesel equipment (e.g., demolition, site preparation, grading) would last approximately four months. Additionally, as identified above local emissions during construction would be less than significant.

Given the relatively limited duration of diesel-intensive equipment use, and the minimal number of pieces of equipment that would be used at any given time, occupants of the nearby on-campus residences and nearby buildings would not be exposed to substantial toxic air pollutants from construction equipment exhaust. The proposed Project involves the replacement of existing buildings for recreational purposes and does not involve any uses or activities that would generate TACs during operations. Therefore, implementation of the proposed Project would not result in exposure of sensitive receptors to substantial concentrations of TACs. There would be a less than significant impact and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that implementation of the remaining development allocation on campus would result in a significant impact related to odor emissions. The Project's construction activities may generate some odors, such as diesel exhaust associated with the operation of construction vehicles. These odors are typical of construction projects and would be subject to construction and air quality regulations and best practices, 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 considered objectionable because any odors that occur would quickly disperse into the atmosphere. Thus, there would be a less than significant impact, and no mitigation would be required, consistent with the findings of the LRDP EIRs.

The proposed 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

site. Long-term operations may involve minor odor-generating activities such as landscape maintenance equipment exhaust, the use of fertilizers for landscape purposes, and cooking activities within the on-site kitchen. These types and concentrations of odors currently occur at or near the Project site. Therefore, construction and operation of the proposed Project would result in less than significant impacts related to odors and no mitigation would be required, consistent with the findings of the LRDP EIRs.

No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to air quality. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to air quality. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.4. Biological Resources

Relevant elements of the proposed Project related to biological resources include removal of existing vegetation within the Project site, including up to 12 mature trees, including one protected tree, and ornamental vegetation. Any mature or protected trees would be replaced, as described below.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

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.*

PP 4.3-1(e) *Examination of these trees by an arborist shall be performed monthly during construction to ensure that they are being adequately maintained.*

MM 4.3-1(a) *Prior to the onset of construction activities that occur between March and mid-August (February 1 through June 30 for raptors), surveys for nesting special status*

avian species and raptors shall be conducted on the affected portion of the campus following USFWS and/or CDFW guidelines. If no active avian nests are identified on or within 250 feet of the construction site, no further mitigation is necessary.

MM 4.3-1(b) *If active nests for avian species of concern or raptor nests are found within the construction footprint or within a 250-foot buffer zone around the construction site, exterior construction activities shall be delayed within the construction footprint and buffer zone until the young have fledged or appropriate mitigation measures responding to the specific situation have been developed and implemented in consultation with CDFW.*

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 boundaries where feasible. If it is not feasible to plant replacement trees at a 1:1 ratio within the campus boundaries, the tree replacement plan will include the planting of native shrubs in ecologically appropriate areas within the campus 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.*

MM 4.3-4 *UCLA shall replace protected trees removed for construction of projects under the 2002 LRDP, as amended, with protected trees of the same species at a 2:1 ratio as presented in the City of Los Angeles Protected Tree Ordinance (Ordinance Number 177404). Protected trees are defined as coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel.*

Regulatory Framework

As previously discussed, the Project site is located within an urban area and is developed with existing recreational buildings and facilities. The LRDP Final SEIR, which has been incorporated by reference, includes a detailed discussion of the federal, state, and local regulatory framework for biological resources, as relevant to an urban campus setting. While the regulations applicable to the proposed Project generally have not changed since certification of the LRDP Final SEIR, certain regulations that provide context for the environmental analysis that follows are summarized below.

Biological resource regulations that are most relevant to the proposed 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.] Section 703), except as allowed by permit (pursuant to 50 CFR Section 21). Also, Section 3503.5 of the California Fish and Game Code specifically protects birds of prey and states:

> *It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any*

such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.

Section 3513 of the California Fish and Game Code duplicates the federal protection of migratory birds (i.e., the MBTA) and states:

It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act 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 Migratory Treaty Act.

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The analysis in the LRDP EIRs concluded that, with implementation of LRDP MMs 4.3-2(a) through MM 4.3-2(e), implementation of the remaining development allocation on campus would result in less than significant impacts on special status plant and wildlife species.

As identified in the LRDP EIRs, the majority of on-campus vegetation consists of non-native ornamental species. Only two limited areas of natural open space occur on the UCLA campus: (1) the “four-acre parcel” between Veteran Avenue and Parking Lot 11 (Northwest zone); and (2) the aboveground portion of Stone Canyon Creek in the northeastern portion of the campus (Core zone) that flows from Sunset Boulevard/Royce Drive (adjacent to the Corinne A. Seeds University Elementary School) to the Andersen School, Collins Executive Education Center.

As identified in the LRDP EIRs, with the exception of the four-acre parcel, vegetation within the Northwest zone, including the Project site, consists primarily of non-native ornamental species. While the proposed Project is located in the Northwest zone, it is not located in or adjacent to the four-acre parcel between Veteran Avenue and Parking Lot 11. The Project site is approximately 750 to the east, and there is intervening development and substantial landscape buffers. Moreover, the proposed Project is not located near Stone Canyon Creek. The Project site does not include any natural habitat that supports special status plants or wildlife species, and no sensitive plant or wildlife species are known or suspected to exist on-site. Therefore, the proposed Project does not have the potential to impact special status plant or wildlife species. Therefore, the proposed Project would have no impact, and no mitigation would be required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The analysis in the LRDP EIRs concluded there would be less than significant impacts to riparian or other sensitive natural communities in the area along Stone Canyon Creek or to coastal sage scrub within the four-acre parcel with implementation of LRDP MMs 4.3-2(a) through 4.3-2(c), MM 4.3-5(a), and MM 4.3-5(b).

As previously discussed, the proposed Project does not involve any development within the four-acre parcel in the Northwest zone or along Stone Canyon Creek in the Core zone; therefore, the proposed Project does not have the potential to impact riparian habitat, wetlands, or other sensitive natural communities that may occur in these areas. Further, the Project site does not support riparian habitat, sensitive natural communities, or wetlands. The proposed Project would have no impact and no mitigation would be required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

As identified in the Biological Resources sections of the LRDP EIRs, the UCLA campus consists primarily of developed and ornamental landscaped areas that are surrounded primarily by developed and ornamental landscaped areas. The campus does not provide a connection between any open space areas, does not contain suitable habitat that could be used as a wildlife corridor, and does not facilitate regional connectivity to core wildlife habitat. There are no established wildlife corridors on campus. The campus also does not include any marshes, wetlands, or tidal zones that could function as wildlife nursery sites.

The analysis in the LRDP EIRs concluded that, with implementation of RLDP PPs 4.3-1(a) through 4.3-1(e) and LRDP MMs 4.3-1(a) through 4.3-1(c), implementation of the remaining development allocation on campus would result in less than significant impacts on nesting birds, including nesting raptors, if trees are removed during the breeding season.

As identified in the LRDP EIRs, future development on campus would require the removal and/or disturbance of trees and shrubs located within project-specific impact areas. Refer to the discussion provided below under Threshold (e) below regarding the loss of trees resulting from the proposed Project. Common species of birds and raptors that occur on campus may nest in trees and shrubs within the Project vicinity. Nesting birds and raptors are protected by the MBTA; raptors are also protected by the California Fish and Game Code. As concluded in the LRDP EIRs, the removal or pruning of trees and shrubs to allow for construction of projects on campus, such as the proposed Project, could have the potential to directly impact nesting birds, including nesting raptors. In addition, the dust, noise, and/or increased human presence associated with proposed 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 (such as “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). Therefore, the proposed Project incorporates LRDP MM 4.3-1(a), which requires a pre-construction survey during the breeding season to determine whether birds or raptor species are nesting within a construction site, and LRDP MM 4.3-1(b), which prohibits construction within a specific buffer zone if occupied nests are found; incorporation of these LRDP MMs would ensure that potential impacts would be less than significant, consist with the findings of the LRDP EIRs. No additional mitigation is required.

Additionally, as identified in the LRDP EIRs, the loss of vegetation (including trees and shrubs) as a result of construction activities on campus could result in a reduction in potential foraging habitat, roosting, and nesting opportunities for birds (including raptors). Construction activities for the proposed Project would remove 12 trees, as discussed under Threshold (e) below. The removal of these trees would result in the loss of habitat. However, pursuant to LRDP MM 4.3-1(c) and MM 4.3-4, mature and protected trees to be removed would be replaced in accordance with prescribed ratios (a total of 15 replacement trees would be needed to mitigate the proposed Project’s impact to trees), resulting in a less than significant impact, consist with the findings of the LRDP EIRs. No additional mitigation is required.

Because the proposed Project incorporates mitigation measures from the LRDP EIRs, impacts on nesting birds and raptors would be less than significant, consistent with the findings of the LRDP EIRs, and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
e) Would the project conflict with any applicable policies protecting biological resources, such as tree preservation policy or ordinance?	☐	☒	☐	☐

Discussion

The analysis in the LRDP EIRs concluded that with implementation of LRDP PPs 4.3-1(a) through 4.3-1(e), and LRDP MMs 4.3-1(c) and 4.3-4, the removal of mature and protected trees would result in a less than significant impact. As noted in the LRDP EIRs, the University of California is not subject to local zoning and planning ordinances, including the City of Los Angeles Native Tree Protection Ordinance (LANTPO, Ordinance No. 186873).[9] Therefore, UCLA mitigates the loss of trees at its own discretion. However, UCLA's currently adopted tree replacement mitigation is consistent with the City's requirements at the time the LRDP Final SEIR was certified.[10] Furthermore, although not required, UCLA has historically met or exceeded the City of Los Angeles tree replacement requirements.

A tree survey was conducted at the Project site by Certified Arborist Trevor Bristle (International Society of Arboriculture Certificate No. WE-10233A; Registered Consulting Arborist #746) on January 18, 2023. Trees documented during the field survey included all mature and protected trees located within the proposed Project work limits, as well as those immediately adjacent to the work limits to account for any potential indirect impacts. The LRDP EIRs identifies "mature" trees as those with a trunk diameter at breast height (dbh) measuring at least 12 inches and requires the replacement of any removed mature trees at a 1:1 ratio (refer to LRDP MM 4.2-1[c]). The LRDP also identifies several "protected tree" species (coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel), which must be replaced at a 2:1 ratio (refer to LRDP M 4.3-4). Accordingly, all trees whose trunk measures at least 12 inches dbh were included in the survey, as well as any protected species greater than four inches dbh (for consistency with the LANTPO). The field survey assessed the size, height, canopy width, aesthetic value, and overall health of each tree, and their locations were mapped using a hand-held Geographic Positioning System unit. Tree data is provided in Appendix B of this IS.

Mature trees occur within the proposed Project work limits and in the immediate surrounding vicinity. Forty-one (41) mature trees, as defined in the LRDP, were documented in the site inventory. These consist of 1 African fern pine (*Afrocarpus falcatus*), 2 strawberry trees (*Arbutus unedo*), 2 weeping bottlebrush trees (*Callistemon viminalis*), 1 South African coral tree (*Erythrina caffra*), 2 white ironbarks (*Eucalyptus leucoxylon*), 1 Chinese flame tree (*Koelreuteria bipinnata*), 2 American sweetgums (*Liquidambar styracfilua*), 18 Canary Island pines (*Pinus canariensis*), 1

[9] The current LANTPO requires the replacement of "protected species," defined as any tree of the oak genus (*Quercus* spp., excluding the scrub oak [*Quercus berberidifolia*]), Southern California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), California bay laurel (*Umbellularia californica*), toyon (*Heteromeles arbutifolia*) and Mexican elderberry (*Sambucus nigra* ssp. *caerulea*). Tree replacement mitigation is determined on a case-by-case basis by the Urban Forestry Division of the Bureau of Street Services, typically at a ratio of 4:1.

[10] City of Los Angeles Ordinance No. 186873 became effective on February 4, 2021. Prior to that, Ordinance No. 177404 required the replacement of protected trees at a 2:1 ratio; additionally, toyon and Mexican elderberry were not included as protected shrubs.

western sycamore (*Platanus racemosa*), 6 coast redwoods (*Sequoia sempervirens*), and 5 Mexican fan palms (*Washingtonia robusta*), as shown in Figure 24).

As shown on Figure 24, the proposed Project is expected to result in the removal of 12 trees on-site: 1 African fern pine, 2 American sweetgums, 5 Canary Island pines, 1 western sycamore, and 3 coast redwood. Pursuant to LRDP MM 4.3-1(c), mature trees (greater than 12 inches dbh) would be replaced at a 1:1 ratio. However, the western sycamore is considered a protected species under the campus LRDP, thus a replacement ratio of 2:1 of the same species is required in accordance with LRDP MM 4.3-4. Notwithstanding, this tree would be replaced at a 4:1 ratio for consistency with the current City of Los Angeles standard. Therefore, a total of 15 replacement trees are proposed to fully mitigate the proposed Project's impacts related to tree removals. A summary of trees to be impacted and the required replacements is provided in Table 9.

Table 9
Anticipated Tree Replacement Summary

Species		Total in Survey Area	Within Work Limits	Tree Replacement Ratio[1]	Tree Replacement Requirement
Common Name	**Scientific name**				
African fern pine	*Afrocarpus falcatus*	1	1	1:1	1
strawberry tree	*Arbutus unedo*	2	—	N/A	—
weeping bottlebrush	*Callistemon viminalis*	2	—	N/A	—
South African coral tree	*Erythrina caffra*	1	—	N/A	—
white ironbark	*Eucalyptus leucoxylon*	2	—	N/A	—
Chinese flame tree	*Koelreuteria bipinnata*	1	—	N/A	—
American sweetgum	*Liquidambar styraciflua*	2	2	1:1	2
Canary Island pine	*Pinus canariensis*	18	5	1:1	5
western sycamore	*Platanus racemosa*[2]	1	1	4:1	4
coast redwood	*Sequoia sempervirens*	6	3	1:1	3
Mexican fan palm	*Washingtonia robusta*	5	—	N/A	—
	Total	**41**	**12**		**15**

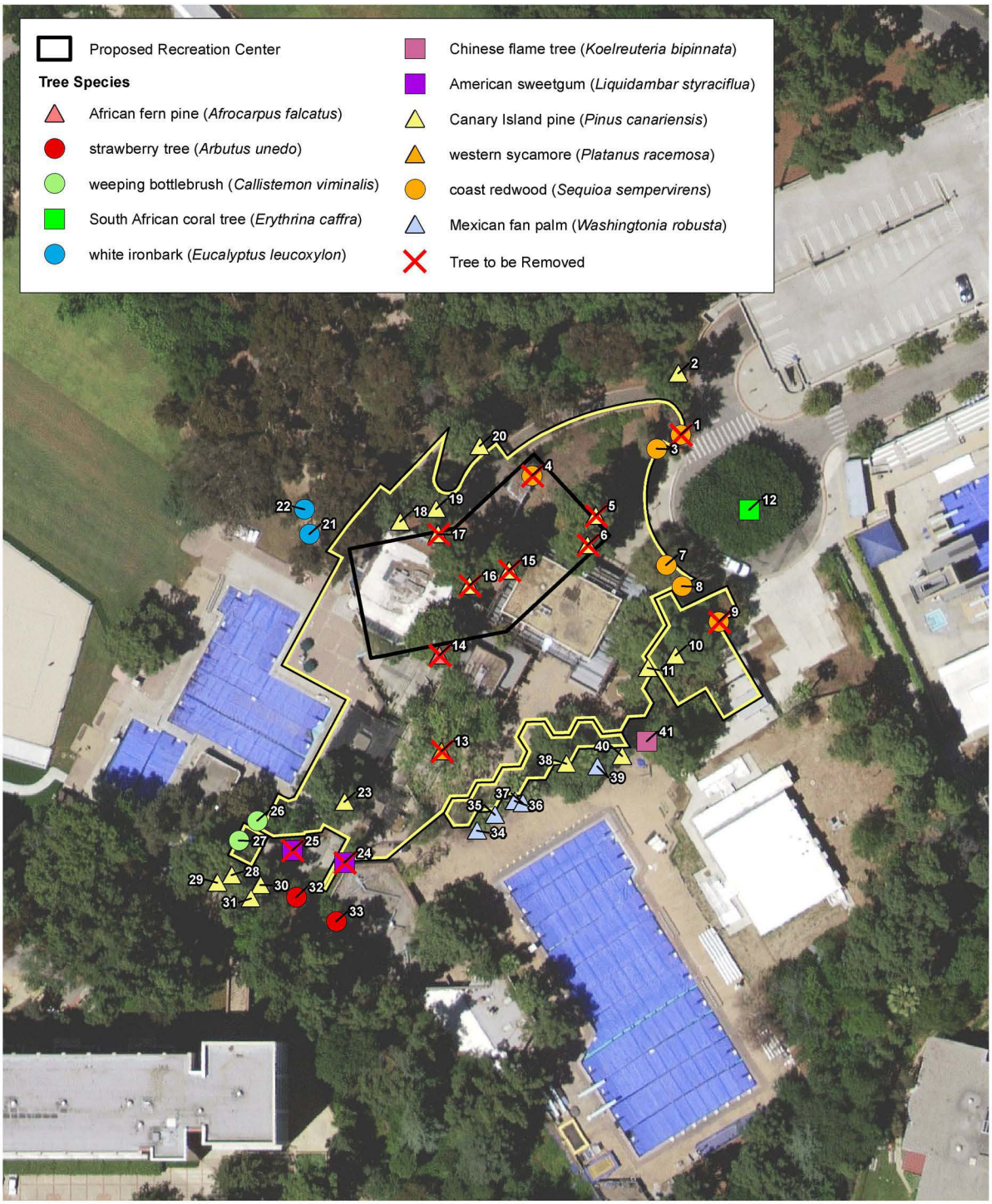
[1] The LRDP does not require in-kind tree replacement. All non-protected tree species subject to regulation by the LRDP must be mitigated at a 1:1 ratio.

[2] Western sycamore is the only species that is a protected species per the campus LRDP. Removal of protected trees subject to LRDP MM 4.3-4 must be replaced at a 2:1 ratio, however a 4:1 replacement ratio is recommended for consistency with the current LANTPO).

Source: (Psomas, 2023)

Trees would be replaced within the Project site to the extent feasible. If it is not feasible to plant replacement trees within the project boundary, the Tree Replacement Plan required by LRDP MM 4.3-1(c) would include the planting of trees or native shrubs in ecologically appropriate areas on-site or within the campus boundaries in order to provide nesting, foraging or roosting habitat for birds such that the replacement number of trees and shrubs would comply with the required replacement ratios for mature and protected trees.

The remaining mature trees within and adjacent to the Project site would be protected in place during Project construction (refer to Figure 23). Although these trees would be protected in place, due to their location adjacent to the construction limits they may be impacted during construction of the proposed Project through impacts to the root zone. To ensure that these are not significantly



Source(s): Psomas (05-22-2023)

Figure 24

Not to Scale

Tree Survey

impacted, the proposed Project incorporates LRDP PP 4.3-1(a) (fencing at the drip line); PP 4.3-1(b) (examination and trimming of trees prior to construction); PP 4.3-1(c) (temporary irrigation and feeding); PP 4.3-1(d) (no storing or construction equipment or vehicles in the fence line of any tree); and PP 4.3-1(e) (monthly examination of trees). Should these trees be impacted during or after construction, replacement requirements under LRDP MM 4.3-1(c) would apply. With implementation of the required tree replacements consistent with LRDP MM 4.3-1(c) and with incorporation of required protection measures (LRDP PPs 4.3-1[a] through 4.3-1[e]), impacts to trees would be less than significant. The required tree replacement for the proposed Project pursuant to the LRDP MMs (replacement of mature trees at a 1:1 ratio and replacement of protected trees at a 2:1 ratio) would reduce potential impacts to a level considered less than significant, consistent with the findings of the LRDP EIR. Replacement of the protected western sycamore at a 4:1 ratio, consistent with the current City of Los Angeles standard, would further reduce this less than significant impact, and no additional mitigation measures are required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 applicable habitat conservation plan?	☐	☒	☐	☐

Discussion

As identified in the LRDP EIRs, the UCLA campus is not located within an area governed by a Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). Therefore, development on campus, including the proposed Project, would not conflict with such plans. Consistent with the findings of the LRDP EIRs, there would be no impact resulting from implementation of the proposed Project and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to biological resources. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to biological resources. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.5. Cultural Resources

Relevant elements of the proposed Project related to cultural resources include excavation to a depth of up to 20 feet for the building foundation and up to 25 feet for the installation of a new storm drain around the proposed building, which would extend into native sediment. Additionally,

the proposed Project involves removal of existing buildings within the complex of core recreation buildings at Sunset Rec that are potentially eligible for listing in the California Register.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

PP 4.4-1(a) *Structures outside the campus Historic Core that appear to have historic significance, or are over 45 years old, that may be directly or indirectly impacted by a proposed development project shall be reviewed by the campus and a qualified architectural historian or historic architect for eligibility for listing on the California Register of Historical Resources. If a structure is identified as eligible for listing in the California Register of Historical Resources, and it is determined that the project could have a significant adverse impact on the structure, the campus and a qualified historic architect shall consider design modifications, mitigation measures and/or alternatives that could minimize, avoid or substantially reduce the impacts, and consider whether and to what extent the project could comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Weeks and Grimmer 1995).*

PP 4.4-5 *In the event of the discovery of a burial, human bone, or suspected human bone, all excavation or grading in the vicinity of the find shall halt immediately, the area of the find shall be protected, and the University immediately shall notify the Los Angeles County Coroner of the find and comply with the provisions of Public Resources Code Section 5097 with respect to Native American involvement, burial treatment, and re-burial, if necessary.*

MM 4.4-2(a) *Prior to site preparation or grading activities, construction personnel shall be informed of the potential for encountering unique archaeological resources and taught how to identify these resources if encountered. This shall include the provision of written materials to familiarize personnel with the range of resources that might be expected, the type of activities that may result in impacts, and the legal framework of cultural resources protection. All construction personnel shall be instructed to stop work in the vicinity of a potential discovery until a qualified, non-University archaeologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of archaeological resources is prohibited.*

MM 4.4-2(b) *Should archaeological resources be found during ground-disturbing activities for any project, a qualified Archaeologist shall first determine whether an archaeological resource uncovered during construction is a "unique archaeological resource" pursuant to Section 21083.2(g) of the Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the CEQA Guidelines. If the archaeological resource is determined to be a "unique archaeological resource" or a "historical resource," the Archaeologist shall formulate a mitigation plan in consultation with the campus that satisfies the requirements of Section 21083.2 and 15064.5. If the Archaeologist determines that the archaeological resource is*

not a "unique archaeological resource" or "historical resource," s/he may record the site and submit the recordation form to the California Historic Resources Information System at the South Central Coastal Information Center. The Archaeologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the University and to the California Historic Resources Information System at the South Central Coastal Information Center.

MM 4.4-2(c) *Prior to initiation of construction activities for projects that require disturbance of native sediments/soils (as identified through site-specific geotechnical analyses), the campus shall retain a qualified non-University Archaeologist to observe grading activities and recover, catalogue, analyze, and report archaeological resources as necessary. The qualified Archaeologist shall submit to the Capital Programs University Representative, a written plan with procedures for archaeological resource monitoring. This plan shall include procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the resources as appropriate. This plan shall also identify procedures for notification of the appropriate Native American Tribe if potential Native American artifacts are encountered. The Native American Monitor shall assist in the analysis of any Native American artifacts for identification as everyday life and/or religious or sacred items, cultural affiliation, temporal placement and function, as much as possible. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the affected tribes. All items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling.*

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☒	☐	☐	☐

Discussion

The LRDP Final SEIR, which has been incorporated by reference, includes a detailed discussion of the federal, state, and local regulatory framework for historical resources. The regulations applicable to the proposed Project (i.e., the National Historic Preservation Act of 1966, the Secretary of the Interior's Standards for Treatment of Historic Properties, CEQA, the California Register, and regulations addressing human remains) have not changed since certification of the LRDP Final SEIR and are not repeated in this IS. Pertinent information will be provided in the forthcoming Draft Supplemental EIR.

As discussed in the 2017 LRDP Final SEIR, the South Central Coastal Information Center (SCCIC) conducted a records search for the UCLA campus on February 23, 2016. The results of the records search show that 16 historic resources have been recorded within the campus boundaries. The Historical Resources Inventory lists 16 historic resources that are either listed or eligible for listing at the federal or state level. The records search did not identify any historic resources on the Project site. An additional 31 historic resources are located outside the campus, within a 0.25-mile radius. Of these, 22 appear eligible for listing at the federal or state level. There have been 52 technical studies conducted on and within a 0.25 mile radius of the campus. Of these, 23 were conducted on the campus. Additional information provided by SCCIC includes site records, report lists, and historic 1902 and 1921 Santa Monica maps for the general area.

With regard to the Project site, Sunset Rec opened in 1966 (57 years ago) and consists of various buildings that house multipurpose rooms, offices, and a kitchen, which are interconnected by open-air elevated walkways, stairways, and paved pathways. Pursuant to LRDP PP 4.4-1(a), because the complex of buildings within the Project site are over 45 years old, the buildings have been reviewed by the campus and a qualified architectural historian or historic architect for eligibility for listing on the California Register of Historical Resources. A historic resources evaluation is being prepared for the Sunset Rec complex. The complex will be evaluated under applicable criteria, including those set forth in the National Register and the California Register. The historic resources evaluation will include an assessment of Sunset Rec and its significance as well as the impact of changes to the site and buildings that have been performed throughout the years for maintenance, safety, and usability purposes. The preliminary results of the evaluation indicate that Sunset Rec appears to be eligible for listing in the California Register under Criterion 3 as a significant work of Smith and Williams Architects, who are widely acknowledged as local masters of post war modernism. It may also qualify for listing in the National Register under Criterion C as a representation of the work of a master[s] if returned to an earlier appearance.

Therefore, the proposed Project would involve demolition of buildings that contribute to a potentially eligible historic resource, resulting in a potentially significant impact that was not identified in the LRDP EIRs. As such, a Supplemental EIR will be prepared to evaluate the proposed Project's impacts on historic resources consistent with applicable regulations, which will be further discussed in the Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs determined that exposed ground on campus consists of fill material or other earth that has been subject to previous disturbance for construction of existing structures and/or infrastructure, resulting in disturbance and development of the majority of the campus. Nonetheless, there is a potential to discover archaeological remains during excavation for future campus projects in areas containing native sediment and soils. As concluded in the LRDP EIRs, the potential to encounter previously unidentified archaeological resources during construction is

a potentially significant impact that would be reduced to a less than significant level with implementation of LRDP MMs 4.4-2(a) through 4.4-2(c).

The records search conducted by the SCCIC for the UCLA campus in 2016 concluded that no historic or prehistoric archaeological sites have been recorded on or within 0.25 mile of the campus, including the Project site.

Excavations of up to approximately 25 feet bgs would be required for construction of the proposed Project. This would include excavation to a depth of approximately 20 feet beneath the proposed building footprint (at the northern section in the slope), and to a depth of approximately 25 feet for installation of a new storm drain line around the proposed building (with the deepest location at the upper pool landing). Based on the site-specific Geotechnical Investigation conducted for the proposed Project and as further discussed in Section V.7, Geology and Soils, of this IS, artificial fill extends approximately 5.5 feet bgs within the Project site, and the artificial fill is underlain by Pleistocene age alluvium (Geocon, 2023). Therefore, disturbance of native alluvial sediments would occur during grading and excavation activities and would have the potential to impact previously unidentified archaeological resources. This would be considered a potentially significant impact, as identified in the LRDP EIRs. The proposed Project therefore incorporates LRDP MM 4.4-2(a), which requires an instructional program to assist construction personnel in identifying archaeological resources; 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 projects occurring on a site with native sediments/soils to have a qualified Archaeological Monitor present during earth-disturbing activities and additional provisions to be made for any project where archaeological resources are identified. With incorporation of these LRDP MMs, the proposed Project would result in a less than significant impact, consistent with the findings of the LRDP EIRs, and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
c) Would the project disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that with implementation of LRDP PP 4.4-5, implementation of the remaining development allocation on campus would have a less than significant impact related to potential disturbance of human remains. No archaeological materials, including human burials, have been discovered on campus. Although the potential still exists for such resources to be present, the likelihood of discovering such resources is extremely low. Additionally, LRDP PP 4.4-5, which is incorporated into the proposed Project, identifies procedures to be followed by UCLA in the event that human remains are discovered, including compliance with State law. Consistent with the findings presented in the LRDP EIRs, this impact would be less than significant, and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to archaeological resources and human remains. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects to archaeological resources and human remains previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to archaeological resources and human remains. Further evaluation of impacts to archaeological resources and human remains is not required in the Draft Supplemental EIR.

However, the LRDP EIRs did not identify the potential for significant and unavoidable impacts to historic resources. Therefore, potential impacts to historic resources at Sunset Rec resulting from implementation of the proposed Project will be evaluated in the forthcoming Draft Supplemental EIR.

V.6. Energy

Relevant elements of the proposed Project related to energy include the use of construction equipment for the proposed construction activities (demolition, site preparation, grading/excavation, building construction, etc.). Operation of the proposed Project would require the direct use of electrical energy primarily for operation of heating and air conditioning (HVAC) equipment and lighting; however, rooftop PV panels (total area of approximately 3,000 sf) would be installed to offset the electricity demand generated by operation of the proposed building. No natural gas service would be provided to the building for operation. Indirect use of electrical energy would be required to provide water and to treat wastewater. As described in Section II.5, Proposed Project Components, under the discussion of “Sustainable Building Features” and discussed below, the Project would comply with the UC Policy on Sustainable Practices which currently requires a minimum LEED BD+C Silver rating. However, the Project is designed to achieve a minimum LEED BD+C Gold rating and would strive for a Platinum rating.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section: LRDP MMs 4.2-2(a), 4.2-2(b), and 4.2-2(c) from the Air Quality section, which address requirements for construction equipment; and LRDP PP 4.15-1 from the Greenhouse Gas Emissions section, which addresses compliance with the UC Policy on Sustainable Practices.

In addition, LRDP 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 Section V.19, Utilities and Service Systems, of this IS, have been incorporated into the proposed Project, as applicable, and require that UCLA continue to implement energy and water conservation measures and reduce solid waste generation which would, in turn, reduce associated energy consumption.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☒	☐	☐

Discussion

Energy consumption is addressed in various sections of the LRDP EIRs that address energy demand and/or conservation. Impacts related to wasteful, inefficient, or unnecessary consumption of energy resources were determined to be less than significant.

Construction

Construction of the proposed Project would consume energy in the use of fossil-fueled and electric-powered construction equipment, fossil-fueled haul trucks, and fossil-fueled and electric-powered worker commute vehicles. LRDP PPs and MMs adopted for the purpose of reducing construction phase air pollutant or greenhouse gas (GHG) emissions also result in positive energy use benefits. Notably, LRDP MM 4.2-2(a) limits the idle time on equipment and delivery trucks, which would reduce energy consumption; MM 4.2-2(b) addresses the use of alternative fuel construction equipment; MM 4.2-2(c) requires that diesel construction equipment be rated as Tier III or better, which means that the equipment would be newer and more efficient than older models that might otherwise be used; and LRDP PP 4.15-1 requires adherence to the UC Policy on Sustainable Practices.

Construction equipment used for the proposed Project would result in single event consumption of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, which promote equipment fuel efficiencies. CCR Title 13, Title 13, Motor Vehicles, Section 2449(d)(3), Idling, limits idling times of construction vehicles to no more than five minutes (as identified in LRDP MM 4.2-2[a]), thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Idling limitations are enforced through periodic site inspections conducted by the UCLA Office of the Environment, Health & Safety (EH&S).

Construction worker and vendor trips would also result in the consumption of fuel. Diesel fuel would be supplied by commercial vendors. The *Final 2022 Integrated Energy Policy Report* Update (IEPR) released by the California Energy Commission (CEC) in February 2023 has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements (CEC, 2023).

Therefore, it is concluded that with the implementation of the applicable LRDP PPs and MMs, construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, resulting in a less than significant impact, consistent with the conclusion of the LRDP EIRs. No additional mitigation is required.

Operations

The proposed Project would include direct use of electricity primarily for operation of the HVAC system, lighting, and the teaching kitchen; indirect energy use for the processing and distribution of water and wastewater; and fossil-fueled and electric-powered vehicles. There are no aspects of the proposed Project that would contribute to wasteful, inefficient, or unnecessary energy consumption. Conversely, the proposed Project would involve the redevelopment of the Project site with a larger building but smaller building footprint, making use of existing infrastructure and improving energy efficiency. Specifically, the existing on-site buildings to be demolished were constructed in the 1960s and thus do not meet current energy conservation requirements, nor the more stringent energy conservation requirements of the UC Policy on Sustainable Practices. The proposed new building would achieve a minimum LEED BD+C Gold rating and strive for a LEED BD+C Platinum rating. To achieve this, the design, construction, and operation of the proposed Project would incorporate a series of green building strategies including, but not limited to, the following, which would serve to improve energy efficiency compared to the existing buildings:

- Outperforming Title 24 standards by 20 percent; striving to outperform the standards by 30 percent where possible.
- Optimizing the energy efficiency of systems not addressed by the CBC energy-efficiency standards.
- Installing rooftop PV panels (total area of approximately 3,000 sf) to offset the electricity demand for the proposed building.
- Providing an all-electric building (no use of natural gas).
- Incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands.
- Selecting water fixtures (e.g., taps, toilets, and other fixtures) to achieve a 36 percent reduction in per capita water demand (compared to the Fiscal Year 2005-2008 average baseline) and increase water efficiency.

Relative to vehicular energy use, as described in Section V.17, Transportation, of this IS, no additional vehicle trips would be generated by the proposed Project. Therefore, there would be no increase in energy demand related to transportation. Further, LRDP PP 4.13-1(d) (discussed in Section V.17, Transportation, of this IS), is incorporated into the proposed Project, and individuals using Sunset Rec would have access to a full range of existing campus TDM programs, including, but not limited to: campus transit; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; and the on-campus car share program. Use of TDM programs serves to reduce vehicle trips associated with campus operations, including at Sunset Rec.

In summary, the proposed Project would conserve energy through the provision of highly efficient building and mechanical systems designed to reduce direct and indirect electricity use; a prohibition on the use of natural gas; use of solar energy to meet the electric demand; and no increase in vehicular trips or associated vehicle energy use. Thus, the proposed Project's operational energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, thus resulting in a less than significant impact, consistent with the conclusion of the

LRDP EIRs, and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

Energy plans and programs applicable to campus operations are addressed in the LRDP EIRs, and with adherence to University of California requirements and LRDP PPs and MMs, it was determined that development pursuant to the LRDP would not conflict with plans related to energy efficiency. Various state and/or University regulations, plans, and policies aimed at GHG emissions reduction focus on energy efficiency and renewable energy. While State and University regulations relative to energy are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided below to identify new or updated regulations, as appropriate, or to provide context for the analysis that follows:

- **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." 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:

  (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.

- **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)[11] 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.

- **California Code of Regulations Title 24.** CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Energy Code), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption. On August 11, 2021, the CEC adopted the 2022 Title 24 Energy Code, which was approved by the California Building Standards Commission (CBSC) in December 2021. The 2022 Title 24 Energy Code includes the 2022 Building Energy Efficiency Standards, which became effective on January 1, 2023. The 2022 Title 24 standards require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting standards for nonresidential buildings.

  CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission (CBSC). CALGreen improves public health, safety, and general welfare through enhanced design and sustainable construction of buildings while conserving natural resources. The California Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy. The 2022 CALGreen Code has also been approved by the CEC and CBSC and went into effect on January 1, 2023.

- **Assembly Bill 1279.** In September 2022, Governor Newsom signed into law AB 1279, or the California Climate Crisis Act.[12] AB 1279 requires the State to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter.[13] The bill requires California to reduce statewide GHG emissions by 85 percent below 1990 levels by 2045 and directs CARB to work with relevant state agencies to achieve these goals and update its Scoping Plan to reflect the 2045 target.[14] In its latest 2022 Scoping Plan Update, CARB set carbon removal/capture targets of 20 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) by 2030 and 100 $MMTCO_2e$ by 2045.[15] Before the recent passage of AB 1279, California had already indicated it was headed in the direction of net-zero emissions by 2045 after Governor

[11] 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.

[12] California Health and Safety Code Section 38562.2

[13] *Id.*

[14] *Id.*

[15] California Air Resources Board, 2022 Scoping Plan For Achieving Carbon Neutrality, at 84 (November 2022), https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf. As mentioned earlier, CARB's Scoping Plans for AB 32 and SB 32 translated the laws' reduction targets to emissions levels in MMTCO2e. However, as demonstrated here, CARB's Scoping Plan provides a carbon removal/capture metric, rather than an emission reduction metric.

Brown signed Executive Order (EO) B-55-18 in 2018, which established an additional statewide goal of achieving carbon neutrality by 2045.[16]

- **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 becoming effective in March 2022). Notably, the UC Policy on Sustainable Practices covers the areas of green building design, clean energy, and sustainable transportation. Particularly relevant to the proposed Project, the UC Policy on Sustainable Practices, under the category of Green Building Design, requires that major construction projects 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, 2022).

- **UCLA Sustainability Plan.** The UCLA Sustainability Plan builds on various existing campus efforts and programs, including the sustainability targets set forth in the UC Policy on Sustainable Practices, and is intended to advance an environmentally conscious, socially just, and fiscally responsible culture across the institution. Relevant goals include achieving the following by 2025: a carbon neutral campus vehicle fleet; climate neutrality from Scope 1 and Scope 2 emissions; obtaining 100 percent clean energy; and reducing per capita potable water consumption by 36 percent compared to a Fiscal Year 2005-2008 average baseline.

Consistency Analysis

As with the existing Sunset Rec buildings, the proposed Project would receive electricity generated by the on-campus Cogeneration Plant, which is powered by purchased landfill gas and natural gas. Operation of the Cogeneration Plant generates steam, chilled water, and electricity, all of which are efficiently used to heat, cool, and power the campus. This system complies with applicable state and UC requirements related to energy conservation.

As discussed in Section II.5, Proposed Project Components, and further discussed in Section V.8, Greenhouse Gas Emissions, of this IS, the proposed Project would meet or exceed the requirements and intent of the UC Policy on Sustainable Practices and the UCLA Sustainability Plan with regard to energy efficiency and green building design. Further, the proposed Project would not increase vehicle trips and would not conflict with sustainable transportation practices. The proposed Project would replace existing buildings that do not meet current UC or state energy conservation requirements, would achieve a minimum LEED BD+C Gold rating, and would outperform the required provisions of Title 24 Energy Efficiency Standards by at least 20 percent. The proposed Project would comply with CALGreen Code Mandatory Measures. Notable features of the proposed Project to address improving energy efficiency are described in the response to Threshold (a) above, and include no use of natural gas and offset of electric demand through the

[16] Exec. Order No. B-55-18 (2018), https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf.

installation of a PV system. Therefore, there would be a net reduction in energy demand compared to the existing buildings, which use natural gas and electricity for operations.

The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, consistent with conclusion of the LRDP EIRs, and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to energy. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects related to energy previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to energy, and further evaluation of this issue is not required in the Draft Supplemental EIR

V.7. Geology and Soils

Relevant elements of the proposed Project related to geology and soils include the removal of existing buildings, including buildings that are structurally deficient or do not meet current University of California seismic safety standards; excavation to a depth of up to 20 feet for the building foundations, and up to 25 feet for the installation of a new storm drain around the proposed building; and construction of the new approximately 11,500 gsf replacement Sunset Canyon Recreation Center recreational building.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

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(b) *The campus shall continue to implement its current seismic upgrade program.*

PP 4.5-1(c) *The campus 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.* [17]

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.*

MM 4.4-3(a) *Prior to site preparation or grading activities, construction personnel shall be informed of the potential for encountering paleontological resources and taught how to identify these resources if encountered. This shall include the provision of written materials to familiarize personnel with the range of resources that might be expected; the type of activities that may result in impacts; and the legal framework of cultural resources protection. All construction personnel shall be instructed to stop work in the vicinity of a potential discovery until a qualified, non-University Paleontologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of paleontological resources is prohibited.*

MM 4.4-3(b) *A qualified Paleontologist shall first determine whether a paleontological resource uncovered during construction meets the definition of a "unique archaeological resource" under Public Resources Code, Section 21083.2(g) or a "historical resource" under Section 15064.5 of the CEQA Guidelines. If the paleontological resource is determined to be a "unique archaeological resource" or a "historical resource", the Paleontologist shall formulate a Mitigation Plan in consultation with the campus that satisfies the requirements of Section 21083.2 of the CEQA Statutes. If the Paleontologist determines that the paleontological resource is not a unique resource, s/he may record the site and submit the recordation form to the Natural History Museum of Los Angeles County. The Paleontologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the University and to the Natural History Museum of Los Angeles County.*

In addition, LRDP PP 4.7-1 and LRDP MM 4.7-1 presented in Section V.9, Hydrology and Water Quality, of this IS, which address water quality protection, would be incorporated into the proposed Project.

The Geology and Soils sections of the LRDP EIRs include a detailed discussion of the federal, state, and University regulatory framework related to geology and soils and are hereby incorporated by reference. While federal, state and University regulations relative to geology and soils are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided in

[17] As the UC Seismic Safety Policy was updated on March 19, 2021, the proposed Project would be subject to this revision.

this section to identify updated regulations, as appropriate, or to provide context for this analysis. 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 version of the California Building Code (CBC) that will be applicable to the proposed Project is the 2022 edition, which became effective in January 2023 and supersedes the 2016 CBC discussed in the LRDP Final SEIR.

Consistent with LRDP PP 4.5-1(a), a site-specific geotechnical study (Geotechnical Investigation) was prepared for the Project by Geocon West, Inc*. (Geocon, 2023)* and is included in Appendix C of this IS*.* The Geotechnical Investigation involved the excavation of four 4-inch diameter borings and two 8-inch diameter borings (B1 through B6) excavated to depths between 11 and 48 feet bgs. Laboratory testing of selected soil samples collected from the borings, a review of public geologic data and available geotechnical engineering information, and a geotechnical engineering analysis of the proposed Project based on the collected data was conducted. The results of the Geotechnical Investigation are summarized in the analysis below, as appropriate.

Project Impact Analysis

Threshold(s)	**Additional Project-level Impact Analysis Required**	**Project Impact Adequately Addressed in the LRDP EIR**	**Less Than Significant Impact**	**No Impact**
a) Would the project expose people or structures to 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.	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☒	☐	☐

Discussion

The LRDP EIRs determined that, with implementation of LRDP PPs 4.5-1(a) through 4.5 1(d), there would be less than significant impacts related to strong seismic ground shaking or seismic-related hazards. As noted above, LRDP PPs 4.5-1(a) through 4.5-1(d) are applicable to the proposed Project.

Ground Rupture

As identified in the LRDP EIRs, there are no known active or potentially active faults with the potential for surface rupture traversing the campus, including Sunset Rec. The Project site is not

within an Alquist-Priolo Earthquake Fault Zone, as established by the California Geological Survey (CGS), or a City-designated Preliminary Fault Rupture Study Area. Therefore, the potential for surface rupture due to faulting occurring beneath the Project site during the design life of the proposed Project is considered low. There would be no impact related to surface rupture of a known earthquake fault, consistent with the conclusion of the LRDP EIRs.

Seismic Groundshaking

The closest surface trace of a Holocene-active fault to the site is the Santa Monica Fault located approximately 1.8 mile to the south of the Project site. Other nearby Holocene-active faults are the Hollywood Fault and the Newport-Inglewood Fault Zone located approximately 3.0 miles east and 4.3 miles southeast of the Project site, respectively. The active San Andreas Fault Zone is located approximately 38 miles northeast of the site. As with all development on campus and in southern California, including the existing buildings at Sunset Rec, the proposed building would be susceptible to moderate to strong, seismically induced ground shaking. As discussed in Section II, Project Description, of this IS, the existing buildings at Sunset Rec, which were likely designed to the 1964 edition of the UBC, have seismic safety ratings ranging from III to VII.[18] In particular, the Vista Room and Santa Fe Room have a seismic safety rating of VII, and these buildings along with the Stair Tower/Restroom/Office were red-tagged by the Campus Building Official due to structural deficiencies and vacated in 2020. Since that time, the buildings have been fenced off and closed to the public.

As identified in the site-specific Geotechnical Investigation, the Project site is classified as Site Class D, and this classification is used as the basis for seismic design parameters to be implemented for the proposed Project in accordance with 2022 CBC standards, which are currently in effect. Another measure of seismic activity calculated in the Geotechnical Investigation is the Maximum Considered Earthquake Ground Motion (MCE), which is the level of ground motion (i.e., Peak Ground Acceleration [PGA]) that has a 2 percent chance of exceedance in 50 years. The MCE is utilized for the evaluation of liquefaction, lateral spreading, and seismic settlement; and to develop seismic design criteria to maintain “Life Safety” during an MCE event. For the Project site, the Geotechnical Investigation calculated a PGA of 0.947g. The Design Earthquake Ground Motion (DE) is the level of ground motion that has a 10 percent chance of exceedance in 50 years. The results of the analysis indicate that the mean earthquake contributing to the MCE peak ground acceleration is characterized as a 6.86 magnitude event occurring at a hypocentral distance of 8.07 kilometers from the site. The predominant earthquake contributing to the DE peak ground acceleration is characterized as a 6.71 magnitude occurring at a hypocentral distance of 12.21 kilometers from the site.

The removal of buildings that are deemed seismically or structurally deficient, and/or that do not meet current CBC design requirements for seismic safety, with a new building designed and constructed in accordance with current CBC requirements and recommendations from the site-specific Geotechnical Investigation (refer to LRDP PP 4.5-1[a]) would reduce the exposure of people or structures to potential substantial adverse effects from strong seismic groundshaking. Further, the proposed Project incorporates LRDP PP 4.5-1(b), which requires continued

[18] Seismic evaluations of the buildings at Sunset Rec were conducted by Nabih Youssef Associates Structural Engineers in 2021 based on the UC Seismic Program Guidelines. The buildings were assigned seismic performance ratings in accordance with UC-defined performance levels. It is noted that Level VII is defined as “posing an immediate life-safety hazard to [the building’s] occupants under gravity loads. The building should be evacuated and posted as dangerous until remedial actions are taken to assure the building can support [California Building Code] prescribed dead and live loads.”

implementation of the campus seismic upgrade program; PP 4.5-1(c), which requires compliance with the University Policy on Seismic Safety; and PP 4.5-1(d), which requires structural peer review and incorporation of peer review recommendations into project design.[19] Potential impacts related to strong seismic ground shaking would be less than significant with implementation of the LRDP PPs. However, additional Project-level MM Sunset GEO-1, detailed below, is proposed to ensure that potential Project impacts related to seismic groundshaking remain less than significant.

Liquefaction and Landslides

As identified in the LRDP EIRs, due to the very dense to hard nature of the older alluvial soils that underlie the campus, the potential for liquefaction occurring beneath the majority of the campus is considered to be remote to nonexistent. Based on review of the California Department of Conservation (CDC) CGS mapping of earthquake zones of required investigation, the Project site is not within an area subject to seismically induced landslides or liquefaction hazards (CGS, 2021).

As identified in the site-specific Geotechnical Investigation, groundwater was not encountered in recent borings at the Project site (drilled to a maximum depth of 48 feet bgs). Also, the dense older alluvial fan deposits and shallow bedrock that underly the site are generally not susceptible to liquefaction. Therefore, the potential for liquefaction and associated ground deformations beneath the site is considered very low.

With respect to landslides, the Project site slopes gently down to the southeast with up to approximately 19 feet of vertical relief across the area of proposed construction. The Project site is not within an area identified as having a potential for seismic slope instability. There are no known landslides near the Project site, nor is the site in the path of any known or potential landslides. Therefore, the potential for landslides to adversely affect the proposed Project is considered low.

The proposed Project would not directly or indirectly cause substantial adverse effects related to seismically-induced liquefaction, settlement or landslides.

In summary, impacts related to seismic shaking and secondary seismic hazards would be less than significant, consistent with the conclusion of the LRDP EIRs. No further evaluation of this issue is required in the Draft Supplemental EIR.

Additional Project-Level Mitigation Measures

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

MM Sunset GEO-1 *Prior to building permit issuance for the Sunset Canyon Recreation Replacement Building Project, a qualified Engineer shall review the final designs and contract specifications to verify that all geotechnical*

[19] 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.

recommendations provided in the site-specific geotechnical investigation(s) for the Project site have been fully and appropriately incorporated. Such recommendations shall comply with applicable provisions and standards set forth in or established by CGS Special Publication 117, the current Uniform Building Code, relevant state and code requirements, and current standards of practice designed to minimize potential geologic, geotechnical, and related impacts. The recommendations for the Project site shall include, but not be limited to, the following geotechnical engineering topics:

- *General Requirements*
- *Soil and Excavation Characteristics*
- *Minimum Resistivity, pH, and Water-Soluble Sulfate Content*
- *Grading*
- *Foundation Setback*
- *Conventional Foundation Design*
- *Foundation Settlement*
- *Lateral Design*
- *Miscellaneous Foundations*
- *Concrete Slabs-on-Grade*
- *Preliminary Pavement Recommendations*
- *Permeable Pavers*
- *Retaining Wall Design*
- *Dynamic (Seismic) Lateral Forces*
- *Retaining Wall Drainage*
- *Elevator Pit Design*
- *Elevator Piston*
- *Temporary Excavations*
- *Shoring (Soldier Pile Design and Installation)*
- *Temporary Tie-Back Anchors*
- *Anchor Installation*
- *Anchor Testing*
- *Internal Bracing*
- *Surcharge from Adjacent Structures and Improvements*
- *Stormwater Infiltration*
- *Surface Drainage*
- *Plan Review*

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
b) Would the project result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐

Discussion

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

Earth-disturbance associated with construction of the proposed Project would include the removal of existing site improvements and vegetation and excavations to a depth of up to 25 bgs for the installation of a storm drain. During construction activities of the proposed Project, soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. Erosion can occur as a result of, 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 for the proposed Project 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, the proposed Project would minimize or eliminate soil erosion through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) as required by LRDP PP 4.7-1 and incorporation of LRDP MM 4.7-1, which requires implementation of structural, nonstructural, and treatment control BMPs. LRDP PP 4.7-1 and LRDP MM 4.7-1 are included in the Hydrology and Water Quality section of this IS and are incorporated into the proposed Project. Although the SWPPP would be specifically focused on water quality, it would 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 LRDP PP 4.7-1 and LRDP MM 4.7-1 would ensure that potential erosion impacts remain less than significant during construction.

Following completion of construction activities, soil transported off site (by wind or water erosion) would be limited due to the presence of development, hardscape and landscaping. Areas of exposed soils within the physical impact area of the proposed Project components would be minimal following Project construction, and potential erosion impacts would be less than significant during operation.

Consistent with the findings of the LRDP EIRs, the proposed Project would have a less than significant impact related to soil erosion and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 risks to life or property?	☐	☒	☐	☐

Discussion

As with the majority of the campus, and as identified in the site-specific Geotechnical Investigation, the Project site is underlain by artificial fill materials from past grading and construction activities, and Pleistocene age older alluvial fan deposits. Based on the soil borings conducted, artificial fill was encountered at a maximum depth of 5.5 feet bgs; however, deeper fill may exist at the Project site. The artificial fill generally consists of brown to olive brown or reddish brown silty sand and clayey sand with various amounts of slate gravel, and is characterized as fine- to coarse-grained, slightly moist, and medium dense. Existing fill materials would be removed and properly compacted to support the proposed building, in accordance with regulatory requirements and sound engineering practices. The Pleistocene age alluvial fan deposits consist primarily of brown to reddish brown, olive to olive brown or grayish brown to yellowish brown interbedded silty sand and sandy silt with varying amounts of gravel (to 2.5-inch maximum dimension). The alluvial soils are primarily slightly moist and loose to very dense or hard. Sedimentary bedrock of the Miocene age Monterey Formation was encountered at a depth of 34 feet in boring B4. The bedrock consists of yellowish brown to dark brown clayey siltstone with some localized white siltstone interbeds. The bedrock is characterized as massive to poorly bedded and medium hard. Where bedding was observed, the bedrock is considered thinly to medium bedded.

Review of the CGS Seismic Hazard Zone Report of the Beverly Hills Quadrangle indicates the historically highest groundwater level in the vicinity of the Project site is greater than a depth of 40 feet bgs. Based on current groundwater basin management practices, it is unlikely that groundwater levels would ever exceed the historic high levels. Groundwater was not encountered in borings excavated to a depth of 48 feet bgs for the proposed Project. Considering the depth to groundwater encountered in previous borings and the reported historic high groundwater level, groundwater is not anticipated to be encountered during construction.

Liquefaction and slope stability/landslides are addressed under Threshold (a) above. As discussed, there would be no impacts related to these issues. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. The Project site is not located within an area of known ground subsidence. No known large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project site or in the general site vicinity. Therefore, there is a low potential for ground subsidence due to withdrawal of fluids or gases at the site.

Laboratory testing of soil materials indicates the on-site soils are corrosive to buried ferrous metals on-site. As recommended in the site-specific Geotechnical Investigation, corrosion-resistant polyvinyl chloride (PVC), ABS (acrylonitrile butadiene styrene), or other approved plastic piping, would be used in lieu of cast-iron when in direct contact with site soils. The Geotechnical Investigation determined that the water-soluble sulfate content of the soils at the Project site possess a sulfate exposure class of "S0" (0.004 percent by weight) to concrete structures. There would be a less than significant impact related to corrosive soils with implementation of LRDP PP MM Sunset GEO-1, which ensures that recommendations from the Geotechnical Investigation are included in the Project design.

The existing upper site soils encountered during the site-specific Geotechnical Investigation have a very low expansive potential and are classified as non-expansive in accordance with the 2022 CBC. The recommendations presented in the Geotechnical Investigation assume that the building foundations and slabs would derive support in these materials. Specifically, the Geotechnical Investigation recommends the structure be supported on conventional spread foundations deriving support in newly placed engineered fill and/or the undisturbed alluvial soils. If needed, the existing artificial fill and site soils are considered suitable for re-use as engineered fill provided all procedures outlined in the grading recommendations of the Geotechnical Investigation are followed. These recommendations would be implemented through LRDP PP 4.5-1(a) and MM Sunset GEO-1.

The Geotechnical Investigation concluded that the proposed Project would be feasible with implementation of the recommendations outlined in the site-specific Geotechnical Investigation, as required by LRDP PP 4.5-1(a). In addition, LRDP PP 4.5-1(c) and PP 4.5-1(d) require the campus to continue to implement the University Policy on Seismic Safety, which requires, in part, that all new structures comply with California Building Code or local seismic requirements, whichever is more stringent, and undergo a structural peer review. Therefore, because the proposed Project includes and incorporates LRDP PP 4.5-1(a), PP 4.5-1(c), and PP 4.5-1(d), there would be less than significant impacts related to unstable or expansive soils, consistent with the findings of the LRDP EIRs. Additionally, MM Sunset GEO-1 would ensure implementation of the Project-specific recommendations from the Geotechnical Investigation. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	**Additional Project-level Impact Analysis Required**	**Project Impact Adequately Addressed in the LRDP EIR**	**Less Than Significant Impact**	**No Impact**
e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☒	☐	☐

Discussion

The LRDP EIRs identified that development on campus would utilize existing wastewater infrastructure and would not use septic tanks or alternative waste water disposable systems. Because no septic tanks or alternative wastewater systems are proposed with the Project, there would be no impact related to the presence of soils incapable of adequately supporting these

systems, consistent with the findings of the LRDP EIRs, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that there would be less than significant impacts related to paleontological resources with implementation of LRDP MMs 4.4-3(a) and 4.4-3(b).

As discussed in the LRDP EIRs, 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. As discussed in the LRDP EIRs, rock units identical to those underlying the UCLA campus and surrounding areas have, in nearby contexts, yielded fossils of substantial number and importance, and the potential exists for the rock units underlying the campus and surrounding areas to yield fossils. Accordingly, although no unique geologic features exist at the Project site, the rock units underlying the campus, including the Project site, are considered paleontologically sensitive.

As discussed above, the Project site is underlain by artificial fill materials (at a depth of approximately three feet bgs), and Pleistocene age older alluvial fan deposits. Excavations of up to approximately 25 feet bgs would be required during construction of the proposed Project and would extend into the native alluvial sediments. As such, excavation activities in native alluvium could damage or destroy unknown fossils, should they exist, resulting in a potentially significant impact. The proposed Project would incorporate LRDP MM 4.4-3(a), which requires an instructional program to assist construction personnel in identifying paleontological resources, and LRDP MM 4.4-3(b), which defines the requirements for review and recordation by a qualified Paleontologist of any paleontological resources encountered on a site. With implementation of LRDP MMs 4.4-3(a) and 4.4-3(b), potential impacts related to paleontological resources would be less than significant, consistent with the findings of the LRDP EIR. No additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to geology and soils. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to geology and soils. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.8. Greenhouse Gas Emissions

Relevant elements of the proposed Project related to GHG emissions include the demolition of seven existing buildings/facilities at Sunset Rec, which comprise approximately 6,982 gsf of floor area plus 5,807 gsf of covered but enclosed space, and replacement of these buildings with one new building with approximately 11,500 gsf of recreational floor area plus approximately 6,500 gsf of exterior space that is covered but unenclosed. Approximately 7,500 cubic yards of soils would be exported from the Project site.

The proposed Project would accommodate existing programs at Sunset Rec, and would not generate new traffic or associated motor vehicle emissions. Additionally, per the University of California requirements, the proposed Project would not use natural gas for operations. A rooftop PV array would be installed and would offset the electric demand for the proposed Project. As previously indicated, the proposed Project would achieve a minimum LEED BD+C Gold rating and strive for a Platinum rating.

The following PP from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

PP 4.15-1 *The campus 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, LRDP PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), 4.14-2(g), 4.14-3, and 4.14-9 included in Section V.19, Utilities and Service Systems, of this IS, have been incorporated into the proposed Project and require that UCLA 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 warming trend of the Earth's average temperature, which is causing changes in the Earth's climate.[20] 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.

[20] 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.

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, 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***[21] 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 (Assembly Bill [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 Final SEIR, which is incorporated by reference.

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

Regulatory Framework

A discussion of the regulatory framework for assessing climate change impacts is provided in Section 4.15, Greenhouse Gas Emissions, of the LRDP Final SEIR and is incorporated by reference. While federal, state, regional, and University regulations relative to GHG emissions are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided below to identify new or updated regulations, as appropriate, or to provide context for this analysis.

Federal

- **SAFE Vehicles Rule and CAFE Standards.** The 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 USEPA 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 USEPA, 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 USEPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO_2 emissions standards by 1.5 percent each year through model year 2026 (NHTSA, 2020). However, on March 14, 2022, USEPA rescinded the SAFE Vehicles Rule, once again allowing California to enforce its own GHG emissions standards.

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 $MMTCO_2e$.

- **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, 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. 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 established a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

  On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045. The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

- **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 proposed Project.

CEQA Guidelines Regarding Greenhouse Gas Emissions

At the direction of the State Legislature in SB 97, the California Natural Resources Agency (CNRA) adopted amendments to the 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, effective March 18, 2010, as revised, provides 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. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
>
> (1) Quantify greenhouse gas emissions resulting from a project; and/or
>
> (2) Rely on a qualitative analysis or performance based standards.
>
> (b) In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. A lead agency should consider the following factors, among others, when determining 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 (see, e.g., section 15183.5(b)). 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. If there is substantial evidence that the possible effects of a particular project are still

cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

(c) A lead agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

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.

California Code of Regulations Title 24

CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Energy Code), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption. On August 11, 2021, the CEC adopted the 2022 Title 24 Energy Code, which was approved by the California Building Standards Commission (CBSC) in December 2021. The 2022 Title 24 Energy Code includes the 2022 Building Energy Efficiency Standards, which became effective on January 1, 2023. The 2022 Title 24 standards require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting standards for nonresidential buildings.

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission (CBSC). CALGreen improves public health, safety, and general welfare through enhanced design and sustainable construction of buildings while conserving natural resources. The California Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy. The 2022 CALGreen Code has also been approved by the CEC and CBSC and went into effect on January 1, 2023.

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 March 2022, and has expanded to cover the areas of climate protection, sustainable transportation, sustainable building and laboratory operations for campuses, zero waste, sustainable procurement, sustainable food services, sustainable water systems, sustainability at UC Health, general sustainability performance assessment, and health and well-being (UC, 2022). The UC Policy on Sustainable Practices includes climate change goals for the ten UC campuses that, at a minimum, must meet AB 32 requirements.

Buy Clean California Act

The Buy Clean California Act (BCCA) (California Public Contract Code Sections 3500-3505) states the Department of General Services (DGS), in consultation with CARB, is required to establish and publish the maximum acceptable Global Warming Potential (GWP) limit for four eligible 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. When used in public works projects, which includes UC facilities, these eligible materials must have a GWP that does not exceed the limit set by DGS.

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. UCLA is in the process of developing a Carbon Neutrality Plan.

UCLA 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

South Coast Air Quality Management District

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. 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 Thresholds (Guidance Document), 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 determine the 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 presumed 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.

UCLA, acting on behalf of the Lead Agency, has elected to use the SCAQMD's Guidance Document screening criteria as thresholds of significance. 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

The Project site is developed with existing buildings at Sunset Rec, the operation of which are existing sources of GHG emissions. The estimated annual GHG emissions associated with the existing buildings are summarized in Table 10 (approximately 86.03 $MTCO_2e$/yr). Since mobile source emissions would not change with the proposed Project (i.e., new vehicular trips would not be generated by the Project, as previously discussed), the associated GHG emissions would remain the same and are not estimated for analysis purposes. Detailed model outputs are presented in Attachment B of the Air Quality and GHG Analysis included in Appendix A of this IS.

Table 10
Existing Building Estimated Greenhouse Gas emissions

Source		Emissions (MT/year)			
	CO_2	CH_4	N_2O	R	Total CO_2e
Area	0.25	< 0.005	< 0.005	0.00	0.26
Energy	60.9	< 0.005	< 0.005	0.00	61.1
Water	1.8	0.02	< 0.005	0.00	2.57
Waste	6.31	0.63	0.00	0.00	22.1
Refrigerants	0.00	0.00	0.00	< 0.005	< 0.005
Total CO_2e (All Sources)	**86.03**				

Source: (Urban Crossroads, 2023)

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that impacts related to GHG emission from development pursuant to the LRDP would be less than significant with incorporation of LRDP PP 4.15-1.

Construction-related GHG emissions were calculated using CalEEMod version 2022.1, as described in Section V.3, Air Quality, of this IS. Construction assumptions are also described in Section V.3 and in the Air Quality and GHG Analysis included in Appendix A of this IS. 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 proposed Project would be approximately 470.88 $MTCO_2e$/year. To estimate annual GHG emissions, the SCAQMD recommends amortizing construction emissions over a project's 30-year lifetime (SCAQMD, 2008b). Therefore, the 30-year amortized construction emissions would be approximately 15.70 $MTCO_2e$/year (Urban Crossroads, 2023).

Operational GHG emissions attributed to the proposed Project would include area sources, purchased electricity, the electricity embodied in water consumption, the energy associated with solid waste disposal, and the use of refrigerants. UCLA has committed to achieving a minimum LEED BD+C Gold rating for the proposed Project, with a goal to try to achieve a LEED BD+C Platinum rating. The proposed Project would also implement energy- and water-efficiency measures that would result in increased energy and water efficiency; these measures are described in LRDP PPs 4.14-2(a) through 4.14-2(d), PP 4.14-2(g), PP 4.14-3, and PP 4.14-9 in Section V.19, Utilities and Service Systems. Estimated operational GHG emissions for the proposed Project are shown in Table 11 and conservatively do not include emission reductions resulting from implementation of the energy- and water-efficiency measures.

As shown in Table 11, when taking into consideration the GHG emissions from the existing buildings, there would be a net reduction in GHG emissions of approximately 24.39 $MTCO_2e$/yr. The proposed Project's net (as well as gross) GHG emissions would be less than the SCAQMD-recommended Tier 3 thresholds of 3,000 $MTCO_2e$/yr threshold for combined land uses. Thus, the direct and indirect GHG emissions of the proposed Project would not be cumulatively considerable and would result in a less than significant impact, consistent with the findings of the LRDP EIRs, and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Table 11
Estimated Annual Operational Greenhouse Gas Emissions

Source		Emissions (MT/year)			
	CO_2	CH_4	N_2O	R	Total CO_2e
Annual construction-related emissions amortized over 30 years[a]	15.50	6.61E-04	5.84E-04	3.81E-03	15. 70
Area	0.23	<0.005	<0.005	0.00	0.23
Energy	22.33	<0.005	<0.005	0.00	22.43
Water	1.67	0.02	<0.005	0.00	2.38
Waste	5.85	0.58	0.00	0.00	20.46
Refrigerants	0.00	0.00	0.00	< 0.005	< 0.005
Total Project CO_2e (All Sources)	**61.21**				
Existing Building Emissions	**86.03**				
Net Increase in Emissions (Proposed-Existing)	**-24.39**				

[a] The total construction-related emissions for the proposed project are 470.88 $MTCO_2e$ per year.
Source: (Urban Crossroads, 2023)

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that development pursuant to the LRDP would not conflict with an applicable plan, policy or regulations for purpose of reducing GHG emissions.

University of California Plans, Policies, and Regulations

The proposed Project incorporates LRDP PP 4.15-1, which ensures implementation of applicable provisions of the UC Policy on Sustainable Practices last updated in 2022 (UC, 2022), the UCLA Climate Action Plan prepared in 2008 (UCLA, 2008), and the UCLA Sustainability Plan also updated in 2022 (UCLA, 2022c). 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 include obtaining 100 percent clean electricity, procedures for campus fleet vehicles, and campus outreach programs. Additional policies are applicable to certain types of projects, but not the proposed Project, such as existing building renovation. The UC Policy on

Sustainable Practices and UCLA CAP policies applicable to the proposed Project are discussed below.

UC Policy on Sustainable Practices, UCLA Climate Action Plan, and UCLA Sustainability Plan

The UC Policy for Green Building Design includes the following representative goals applicable to new buildings design, including the proposed Project:

- All new building projects, other than acute care facilities, will be designed, constructed, and commissioned to outperform the CBC energy-efficiency standards by at least 20 percent or meet the whole-building energy performance targets listed in Table 1 of Section V.A.1 of the UC Policy on Sustainable Practices. The University will strive to design, construct, and commission buildings that outperform CBC energy efficiency standards by 30 percent or more or meet the stretch whole-building energy performance targets listed in Table 1 of Section V.A.1, whenever possible within the constraints of program needs and standard budget parameters.
- No new building or major renovation that is approved after June 30, 2019 shall use on-site 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. This requirement is consistent with the UCLA Sustainability Plan.
- 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 Silver rating is also established in Climate Action Plan Initiative 11.3 and various UCLA Sustainability Plan goals.
- All new building projects will achieve at least two points within the available credits in LEED BD+C Water Efficiency category and prioritize earning waste reduction and recycling credits. Similarly, the UCLA Sustainability Plan calls for new construction projects to meet the LEED Construction and Demolition Waste Management prerequisite and credit to reduce waste generation and divert materials from landfills.
- Projects will utilize the versions of the CBC energy efficiency standards and LEED-BD+C that are in effect at the time of the first submittal of “Preliminary Plans” (design development drawings and outline specifications).
- Register with the Savings By Design program to document compliance with the requirement to outperform CBC energy efficiency standards by at least 20 percent.

As discussed in Section II.5 of this IS, the proposed Project would be designed to achieve a minimum LEED Gold BD+C rating and to exceed Title 24 requirements by 20 percent. The proposed Project would also comply with CALGreen 2022 mandatory requirements. Further, the Project would participate in the Savings by Design building performance incentive program administered by public energy utility under the auspices of the California Public Utilities Commission. Moreover, the proposed Project would include previously adopted water conservation measures (LRDP PP 4.14 2[a] through PP 4.14-2[d]), solid waste conservation measures (LRDP PP 4.14-3), and energy conservation measures (LRDP PP 4.14-9).

Relevant to the proposed Project, the UC Policy for Sustainable Transportation includes mechanisms for reducing commute emissions, which are also discussed in the Climate Action

Plan. The Sustainable Transportation policy includes goals to: (1) reduce the percentage of employees and students commuting by single-occupancy vehicles (SOV) by 10 percent relative to the 2015 SOV commute rates by 2025; and (2) have no more than 40 percent of employees and no more than 30 percent of all employees and students commuting to each campus by SOV by 2050 (as also reflected in UCLA's Sustainability Plan). The Commute Emissions Reduction Initiative 8.2 in the UCLA CAP identifies that reductions in commute emissions would be attained by reducing single occupant vehicle trips to and from campus. While the proposed Project would not increase the number of vehicle trips associated with operations at Sunset Rec, the campus offers a range of alternative mode programs designed to encourage both employee and student commuters to travel to and from campus by means other than driving alone. The proposed Project would not conflict with or otherwise impede continued implementation of these programs.

The UCLA CAP Commute Emissions Reduction Initiative also acknowledges the planned extension of the Metropolitan Transportation Authority's (Metro) Rail system to Westwood, providing subway service in proximity to campus and potentially providing significant further reductions in the drive alone rate. The Metro Purple Line extension to Westwood has been initiated and is expected to be completed by 2027 (Metro, 2023). The Westwood/UCLA Station is along the Wilshire Boulevard, adjacent to the campus and approximately 1.2 miles from the Project site. The Metro Purple Line extension would be easily accessible to the campus population, inducing individuals using Sunset Rec, thus reducing the drive alone rate.

The UC Policy for Zero Waste indicates that the University will achieve zero waste at all locations other than health locations 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 is to: (1) reduce per capita 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 2030; and (2) 90 percent diversion of municipal solid waste from landfills. The proposed Project would be required to comply with UCLA's programs in place to reduce the amount of solid waste diverted to landfills during construction and operation, including those detailed in UCLA's Zero Waste Plan, which is incorporated into the Sustainability Plan. Notably, to comply with these requirements, the proposed Project would include facilities to accommodate three waste streams (recycling, compost, and landfill).

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

State Plans, Policies and Regulations

California's current major initiative for reducing GHG emissions is SB 32. EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. The CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by SB 32, and the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045.

SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reduction target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps California on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions.

As previously identified, the 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure, and indicates that in almost all sectors, electrification will play an important role. Consistent with the 2022 Scoping Plan, the proposed Project would use all-electric appliances without any natural gas connections, propane, or other fossil fuels for space heating, water heating, or indoor cooking. The electric demand from the proposed Project would be offset with the installation of rooftop PV panels.

Energy efficiency measures are intended to maximize energy-efficient building and appliance standards; pursue additional efficiency efforts, including new technologies and new policy and implementation mechanisms; and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As identified above, the proposed Project would be designed to achieve a minimum LEED Gold BD+C rating and to exceed Title 24 requirements by 20 percent. The proposed Project would also comply with the 2022 CALGreen mandatory requirements.

In summary, the proposed Project would not conflict with AB 32, EO S-3-05, EO B-30-15, or SB 32.

Senate Bill 375 and SCAG Connect SoCal

A primary goal of SB 375 and SCAG's Connect SoCal (i.e., the SCAG 2020-2045 RTP/SCS) is to reduce GHG emissions by reducing vehicle trips and associated VMT. As previously identified, the proposed Project would not increase vehicular trips associated with operations at Sunset Rec, and would result in a net reduction in GHG emissions compared to the existing buildings to be demolished. Therefore, the proposed Project would not conflict with SB 375 and the SCAG Connect SoCal.

The above analysis demonstrates the proposed Project's consistency with applicable UC, UCLA, state, and regional plans, policies, and regulations relative to reducing GHG emissions. Therefore, consistent with findings of the LRDP EIRs, the proposed Project would result in a less than significant impact related to conflicts with plans, policies, or regulations pertaining to reducing GHG emissions and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to GHG emissions. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to GHG emissions. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.9. Hazards and Hazardous Materials

Relevant elements of the proposed Project related to hazards and hazardous materials include the demolition of seven existing buildings/facilities at Sunset Rec, which contain environmentally regulated materials, as well as construction activities involving the use of typical fuels, adhesives, paints, and coatings. Operation of the proposed Project would not involve the handling of hazardous materials beyond typical cleaning and maintenance supplies, paints, and pesticides for landscaping, which are already used at Sunset Rec.

The following adopted PPs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP are signified by strikeout (~~strikeout~~) where non-applicable text has been removed.

PP 4.6-1 *The campus 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, LRDP PPs 4.13-5 and 4.13-8 presented in Section V.17, Transportation and Traffic, of this IS, which address emergency access, are also incorporated into the proposed Project and are assumed in the analysis of potential hazards.

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

Building Materials

The LRDP EIRs identified that demolition and renovation of existing buildings could release hazardous materials if asbestos-containing materials (ACMs), lead-based paint (LBP), polychlorinated biphenyls (PCBs), and/or mercury-containing equipment are present in the structure(s). The LRDP EIRs concluded that, with implementation of LRDP PP 4.6-1, there would be a less than significant impact related to the exposure of the public and/or construction workers to hazards and hazardous materials during construction.

Based on the age of the existing buildings, which were constructed in 1966, UCLA directed the preparation of an Environmentally-Regulated Materials (ERM) Survey Report (ERM Report) by Citadel Environmental Services, Inc. (Citadel, 2014), which is included in Appendix D of this IS. Preparation of the ERM Report involved the following:

- Survey of the property (June 12 through June 19, 2014);
- Identification of accessible asbestos-containing materials (ACMs) and asbestos-containing construction materials (ACCMs), and submitting the asbestos bulk samples to an independent and accredited laboratory for analysis;
- Identification of lead-containing materials (LCMs), including lead-containing paint (LCP), and conducting an x-ray fluorescence (XRF) survey of LCMs;
- Visual assessment and identification of other ERMs (polychlorinated biphenyls [PCBs], diethylhexl phthalate [DEHPs], universal and electronic wastes, and ozone depleting substances [ODSs], etc.);
- Visual inspection for signs of visible moisture damage and/or suspect microbial growth (SMG) in the Santa Fe Room; and,

- Identification of hazardous metals contained in chemically treated wood

Relevant to the buildings proposed to be demolished, the ERM Report identified ACMs in the Vista Room (roof and exterior), Buenos Aires Room (roof), and Office Center (first floor tile). ACCMs were identified in the interior and exterior of the Buenos Aires Room (wall plaster). LCP materials were identified during the survey; however, based on XRF surveys none of the LCP samples exceeded 0.7 mg/cm^2. LBP greater than 0.7 mg/cm^2 was found in the Santa Fe Room (two fixtures), in the Buenos Aires Room (wall plaster), and in the Lookout/Lifeguard Station (wall stucco).

Any Project construction-related activity, including demolition or the relocation of underground utilities, that involves cutting, grinding, or drilling where these materials are present could release friable asbestos fibers or lead dust and expose construction personnel unless proper precautions are taken. 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 LCP/LBP have been developed. Per LRDP PP 4.6-1, the UCLA 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, the campus Lead Compliance Program is directed at reducing lead exposure to a less than significant level through education, inspection, testing, and removal.

The ERM Report also identified PCB- and DEHP-containing equipment in light fixture ballasts in the Vista Room, Stair Tower/Restroom/Office, Lookout/Lifeguard Station, and Office Center; universal/electronic and radioactive wastes in each of the buildings to be demolished associated with fluorescent light tubes and/or light bulbs/fixtures; and ODSs in the Vista Room, Santa Fe Room, Buenos Aires Room, and Lookout/Lifeguard Station associated with fire extinguishers. These materials would require special handling during removal to ensure the regulated substances are not released into the environment, as discussed below. It is noted that ODS is not a hazardous waste.

During demolition activities, the contractor will typically dismantle the fluorescent light fixtures, the primary material identified, by removing the tubes and then the ballasts and packaging them for recycling and disposal, regardless of the ballast labeling (i.e., whether or not PCBs/DEHPs are known to be present). The recommended disposal method for ballasts is recycling/incarceration whereby the PCB/DEHP-containing components are removed and incinerated and the metal carcasses are cleaned to be sent to a metal recycler.

California's Universal Waste Rule (Title 22 CCR Section 66273 et. seq.) allows individuals and businesses to transport, handle, and recycle seven categories of hazardous wastes, termed universal wastes, in a manner that differs from the requirements for most hazardous wastes. Universal wastes include, but are not limited to: televisions; computers and other electronic devices; as well as batteries, fluorescent lamps, mercury thermostats, and other mercury-containing equipment. The more relaxed and simplified requirements for managing universal wastes were adopted to ensure they are safely managed and not disposed of in the trash. Any

UCLA construction contractor would be required to manage all universal wastes identified in the existing apartment building in compliance with the California Universal Waste Rule.

Various fire/life safety devices used in residential, industrial, and commercial buildings utilize low-energy radioactive sources such as Americium-241 and Tritium. Common applications are ionization smoke detectors and self-luminous exit signage. While low-energy radioactive devices pose little or no threat to public health, they are subject to certain reporting, handling, and transfer requirements, including proper disposal of unwanted or unused signs as specified by the general licensing agreements of the U.S. Nuclear Regulatory Commission (NRC). Under the licensing agreement, a general licensee must properly dispose of such products; report to the NRC any lost, stolen, or broken devices; and transfer unwanted devices to a specific licensee such as a manufacturer, distributer, licensed radioactive broker, or a low-level radioactive waste disposal facility. Radioactive sources may not be disposed of as architectural/construction waste. The Radiation Safety Division of EH&S administers and monitors campus compliance with the Broadscope licensing requirements, which include routine inspection and monitoring of areas where radioactive materials are used to ensure that surfaces are not contaminated with radioactivity above regulatory levels. Under the Broadscope Radioactive Materials License issued and administered by the Radiologic Health Branch of the California Department of Health Services, renovation or demolition of facilities using radioactive material requires decommissioning of the facilities.

Compliance with federal and state health and safety laws and regulations, as well as continued implementation of existing (or equivalent) campus policies and programs, as required by LRDP PP 4.6-1, would ensure a less than significant impact associated with the potential release of hazardous building materials during demolition activities. Thus, there would be a less than significant impact and no additional mitigation is required.

Construction Activities

The transport, use, and handling of hazardous materials on the Project site 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., dozers, excavators) anticipated to operate on the Project site 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 site 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 USEPA, California Department of Toxic Substances Control (DTSC), SCAQMD, Regional Water Quality Control Board (RWQCB), and University of California. 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 and no additional mitigation is required.

Contaminated Soil and/or Groundwater

There are no known current or historical hazardous materials spills at the Project site. Therefore, no hazardous materials are anticipated to be encountered in the soils underlying the site during excavation activities, and there would be no significant hazard to the public through reasonably foreseeable upset and accident conditions of construction of the proposed Project. Considering the historic depth to groundwater in the area, groundwater is not anticipated to be encountered during excavation activities, which are expected to a depth of approximately 25 feet bgs. However, if any contaminated soil and/or groundwater is discovered, 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 PP 4.6-4 is to ensure that the exposure of contaminated soil and/or groundwater 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 LRDP PPs 4.6-1 and 4.6-4, would ensure that impacts associated with the potential exposure of contaminated soil or groundwater are less than significant and no additional mitigation is required.

Operational Hazards

The proposed Project involves the replacement of existing buildings at Sunset Rec with one new building. It 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 on and off campus, and the potential for accidents involving hazardous materials would not increase. Operations associated with the proposed Project would be consistent with the existing uses at Sunset Rec. The types of hazardous materials that could be used in association with the proposed Project would not require special 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. Pesticides and herbicides are directly applied to affected areas using methods that follow state and County laws and/or guidelines. Additionally, operation of the proposed Project would comply with applicable federal, state, and local laws and regulations and with the existing (or equivalent) PPs that are required by LRDP PP 4.6-1 identified above. Therefore, the proposed 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 and no additional mitigation is required.

In summary, with incorporation of LRDP PPs 4.6-1 and 4.6-4, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This impact would be less than significant, consistent with the findings of the LRDP EIRs, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 LRDP EIRs concluded there would be a less than significant impact related to handling of hazardous materials in proximity to an existing school with implementation of PP 4.6-1. Specifically, the LRDP EIRs concluded that development on campus could require the handling of hazardous or acutely hazardous materials, substances, or waste within a 0.25-mile of an existing or proposed school. However, these materials would not exist in quantities significant enough to pose a risk to occupants of the school or the campus community, as established through the analysis presented for Impacts 4.6-1 through 4.6-4 of the 2009 Final EIR.

The Project site is located on the UCLA main campus. There are existing schools on campus (i.e., the UCLA Lab School [previously Corinne A. Seeds University Elementary School or UES], Fernald Child Development Center, the Infant Development Program, Krieger Childcare Center, and Geffen Academy at UCLA), which are further away than on-campus uses at and adjacent to the Project site. Marymount High School is located north of Sunset Boulevard, approximately 0.3 mile east of the Project site. As discussed under Threshold (a) above, the proposed Project would involve the construction of a replacement building at Sunset Rec, and consistent with the existing uses would not involve hazardous emissions or the handling of hazardous or acutely hazardous materials in quantities significant enough to pose a risk to the campus or existing schools. Consistent with the findings of the LRDP EIRs, with continued compliance with federal, state, and local regulations pertaining to hazardous materials and with existing (or equivalent) campus programs and procedures, as required by LRDP PP 4.6-1, this impact would be less than significant, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

Based on review of the California Environmental Protection Agency (CalEPA) Cortese List Data Resources (DTSC, 2023), and consistent with the findings of the LRDP EIRs, the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 659625. Accordingly, no impact would occur and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 proposed Project result in a safety hazard or excessive noise for people residing or working in the proposed Project area?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that development on campus would have no impact related to public use airports because the UCLA campus is not located within two miles of a public airport or public use airport and has not been included in an airport land use plan. Further, the LRDP EIRs concluded that there would be a less than significant impact related to the safety of people residing or working on campus from helistop operations at the Ronald Reagan UCLA Medical Center (RRUMC). The RRUMC located on campus operates a helistop (with two helipads) under a California Department of Transportation (Caltrans) Aeronautics Heliport Permit. The helistop is located on top of the 10-story RRUMC and receives a very limited number of flights (average of two flights per day) associated with emergency patient transport and support of the organ transplant program. Non-emergency flights are not allowed.

The Project site is located approximately 0.6 mile to the northwest of the RRUMC helistop at the nearest point. The elevation of the proposed Project, which ranges from approximately 490 feet amsl near the western portion of the Project site to approximately 500 feet amsl near Easton Drive, is higher than the RRUMC, which lies at an elevation of approximately 355 feet amsl. However, the RRUMC helipads are located on top of the 10-story building from which the 8:1 approach/departure surface (8 feet horizontal to 1 foot vertical) is determined.[22] The elevation at the helipad is approximately 150 feet above ground level, or at an elevation of approximately 505 feet amsl. Therefore, a building at the Project site would have to be approximately 900 feet amsl to encroach the 8:1 approach/department surface. The proposed building would have a maximum elevation of approximately 539.25 feet amsl at the top of the canopy. Based on the proposed building height, the proposed new building would not penetrate the established 8:1 approach/departure surface, consistent with the requirements of the Caltrans Aeronautics Heliport Permit. Also, implementation of the proposed Project would not increase the number or frequency of medical helicopter operations at the RRUMC. The provisions of the existing Caltrans Aeronautics Heliport Permit ensure that potential safety hazards associated with operations of the helistop remain less than significant, and no mitigation is required. Further, the Project site is located outside the 65-dBA helicopter noise level contour (UCLA, 2009b), and the noise levels experienced at the Project site from a limited number of daily helicopter flights would not be excessive. There would be no impact related to proximity to the RRUMC helistop, consistent with the findings of the LRDP EIRs, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

[22] The Caltrans Aeronautics Heliport Permit establishes an 8:1 approach/departure surface for the RRUMC helistop. This means that an imaginary surface extends upward from each helipad at an angle of 12.5 percent (i.e., 1 divided by 8 = 0.125). Therefore, the farther from the helipad a building is, the taller it can be before penetrating this surface.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that there would be a less than significant impact related to impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan with implementation of development on campus pursuant to the LRDP. As identified in the LRDP EIRs, the campus has developed and implemented a number of emergency response plans. The campus' emergency response materials and methods of dissemination have evolved with changing technology, with emergency resource information provided online (e.g., the OEM homepage, the Bruins Safe Online website, and BruinAlert).

Sunset Rec serves as a regional evacuation area for the campus Northwest zone (UCLA, 2022a). Construction and operation of the proposed Project would be designed to ensure that existing emergency response and evacuation plans are maintained and do not impede emergency access on campus, including existing fire lanes near the Project site. Fire and emergency access would be maintained during construction and operation via Easton Drive and De Neve Drive. Multiple emergency access or evacuation routes are provided on campus to ensure that in the event one roadway or travel lane is temporarily blocked, another may be utilized, as required by LRDP PP 4.13-5. Additionally, ongoing coordination among the University of California Police Department (UCPD), the Los Angeles Fire Department (LAFD), and UCLA pursuant to LRDP PP 4.13-8 ensures that roadway or travel lane closures would be coordinated with emergency response personnel.

Therefore, the proposed Project would not impair implementation of or physically interfere with emergency response and evacuation efforts with incorporation of LRDP PPs 4.13-6 and 4.13-8 (included in Section V.17, Transportation, of this IS), consistent with the findings of the LRDP EIRs. No additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded development on campus pursuant to the LRDP would have no impact related to wildfires because the UCLA campus is not located within a wildland area.

As further discussed in Section V.20, Wildfire, of this IS, the Project site is not located in a Wildfire Severity Zone as shown in Figure 13-8 of the City of Los Angeles LHMP (City of Los Angeles, 2018), which is based on CalFire's Fire and Resources Assessment Program (FRAM). The nearest Wildfire Severity Zone is located north of the Project site, off campus and on the north side of Sunset Boulevard. Additionally, as further discussed in Section V.15, Public Services, the proposed building would be designed and constructed in compliance with applicable requirements of the California Building Code and California Health and Safety Code pertaining to fire protection systems. Implementation of the proposed Project would not expose people or structures to wildland fires. No impact would result, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to hazards and hazardous materials. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to hazards and hazardous materials. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.10. Hydrology and Water Quality

Relevant elements of the proposed Project related to hydrology and water quality include a decrease in impervious surfaces on the Project site, which is currently developed with seven buildings/facilities and associated landscape and hardscape areas. Structural and non-structural BMPs would be used to capture and treat runoff as described in Section II.5, Proposed Project Components, and per LRDP MM 4.7-1, which would manage the post-development hydrology in compliance with all applicable regulations. The captured runoff would be discharged to the street though curb drains, similar to the existing condition.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

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)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that with implementation of LRDP PP 4.7-1 and LRDP MM 4.7-1 there would be a less than significant impact related to violation of existing water quality standards or waste discharge requirements and degradation of water quality.

Surface Water Quality

Section 4.8, Hydrology and Water Quality, of the LRDP Final SEIR, includes a detailed discussion of the regulatory framework for hydrology and water quality, which is relevant to the Project site, and is incorporated by reference. While federal and state regulations relative to water quality are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided here to identify updated regulations, as appropriate, or to provide context for this analysis. In summary, the State Water Resources Control Board (SWRCB) and the nine RWQCBs are responsible for the protection of water quality in California; the Project site is within the Los Angeles RWQCB (LARWQCB). The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which is further discussed under Threshold (e), below, implements a number of federal and state laws for the 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, herein referred to as the "Construction General Permit."[23] 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.

Phase II of the NPDES program regulates storm water discharges from small Municipal Separate Storm Sewer Systems (MS4s). As part of Phase II, the SWRCB adopted a General Permit for the Discharge of Storm Water from Small MS4s (WQ Order No. 2003-0005-DWQ) to provide permit coverage for smaller municipalities, including non-traditional Small MS4s, which include public campuses. The Phase II Small MS4 General Permit covers Phase II Permittees statewide.[24] UCLA was approved for coverage under the Phase II MS4 permit program on July 12, 2013 and was assigned a Water Discharge identification (ID) number (WDID 4 19M2000037). UCLA is

[23] The SWRCB adopted a revised Statewide construction stormwater general permit on September 8, 2022 (Order WQ 2022-0057-DWQ) (NPDES No. CAS000002), which supersedes Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and 2012-0006-DWQ, with certain exceptions.

[24] On February 5, 2013, the Phase II Small MS4 General Permit was adopted and became effective on July 1, 2013 (WQ Order No. 2013-0001-DWQ), and subsequently amended.

required to comply with the requirements of the MS4 permit and the campus' Storm Water Management Program (refer to LRDP PP 4.7-1).

Construction-Related Impacts

Consistent with the analysis presented in the LRDP EIRs, implementation of the proposed Project would result in runoff exiting the Project site during construction. Storm water runoff during construction could contain pollutants such as soils and sediments released during grading and excavation activities as well as petroleum-related pollutants due to spills or leaks from heavy 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 proposed Project would not involve construction activities on more than 1.0 acre (the site is approximately 0.86 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, the proposed Project would comply with the campus' MS4 permit, which requires the contractor to prepare a Storm Water Pollution Prevention Plan (SWPPP), as required by LRDP PP 4.7-1, which incorporates BMPs for reducing or eliminating construction-related pollutants in runoff from the site. The MS4 permit also requires incorporation of Low Impact Development (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 proposed Project include watering exposed soils; covering stockpiles of soil; installing sandbags to minimize off-site runoff; providing stabilized driveways at construction entrances and exits; and timing grading to avoid the rainy season (i.e., November through April). Compliance with these requirements would reduce short-term, construction-related water quality impacts to a less than significant level, consistent with the findings of the LRDP EIRs, and no additional mitigation is required.

Operational Water Quality Impacts

As discussed in the LRDP EIRs, the UCLA campus is not considered a point source for regulatory purposes and is not subject to waste discharge requirements (WDRs). While the campus has an industrial wastewater permit for wastewater discharge associated with the food service, laboratory, and medical land uses on campus, no hazardous waste is discharged into the sewer or storm drain system on campus. The proposed Project would not involve any uses that would be subject to the provisions of the campus' industrial wastewater permit. Therefore, the proposed Project would not violate WDRs.

In accordance with LRDP PP 4.7-5 and LRDP MM 4.7-1, a site-specific hydrologic evaluation would be conducted as part of the proposed Project design process, and required BMPs to meet LID requirements would be implemented. Permeable pavers would be installed to decrease the amount of impervious surface on-site, and a MWS unit would be installed to treat the site runoff and for stormwater capture and retention, as needed to comply with applicable regulations. The required sizing of structural BMPs would be determined as part of the site-specific hydrology evaluation and would be based on the regulatory requirements of the applicable NPDES permit at the time of construction. In addition to structural BMPs, the proposed Project would implement non-structural BMPs at the Project site (e.g., BMPs related to education and training; landscaping;

and monitoring and maintenance of structural BMPs). Consistent with the findings of the LRDP, compliance with operational water quality requirements would ensure that operational water quality impacts are less than significant, and no additional mitigation is required.

Groundwater

As previously discussed in Section V.7, Geology and Soils, of this IS, the historically highest groundwater level in the vicinity of the Project site is greater than a depth of 40 feet bgs. Based on current groundwater basin management practices, it is unlikely that groundwater levels would exceed the historic high levels. Considering the depth to groundwater, it is not anticipated that groundwater would be encountered during excavation activities, which are expected to a maximum depth of approximately 25 feet bgs. Therefore, the proposed Project would not degrade groundwater quality and this impact would be less than significant, consistent with the conclusion of the LRDP EIRs.

In summary, the proposed Project would comply with applicable water quality regulations at the time of construction, as required by LRDP PP 4.7-1 and LRDP MM 4.7-1, to ensure that discharges of post-construction pollutants remain less than significant. There would be less than significant impacts related to water quality, consistent with the findings of the LRDP EIRs. No additional mitigation would be required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that implementation of development on campus pursuant to the LRDP would result in a less than significant impact related to substantial depletion of groundwater supplies or interference with groundwater recharge.

The Project site is located within the Santa Monica Basin. As identified in the LRDP EIRs, the UCLA campus is not a designated groundwater recharge area for the 4,800-acre Santa Monica Groundwater Basin. No potable groundwater wells are located on the Project site or are proposed by the proposed Project. Potable water for the proposed Project would be obtained from the LADWP, and the proposed Project would not involve direct withdrawal of groundwater. While water sources for the LADWP include groundwater supplies, the LADWP currently has adequate water supplies to serve the proposed Project (refer to analysis of Threshold (b) in Section V.19, Utilities and Service Systems, of this IS). Therefore, the proposed Project would not substantially decrease groundwater supplies, and potential impacts would be less than significant, consistent with the findings of the LRDP EIRs. No mitigation is required.

Implementation of the proposed Project would result in an overall increase in pervious surface coverage as compared to existing conditions (an increase of approximately 74 percent when accounting for the addition of permeable pavers). Given the relatively small size of the Project site (approximately 0.86 acre), which is negligible from a regional recharge perspective, the proposed Project would not result in a notable change in the associated recharge capability of the Santa Monica Basin as a whole. Additionally, the Project site does not accept run-on from adjacent properties, only direct precipitation, providing little overall opportunity for recharge under existing conditions. Furthermore, the Project site is not a designated groundwater recharge area for the Santa Monica Basin. As such, implementation of the proposed Project would not substantially interfere with groundwater recharge such that the proposed Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, consistent with the findings of the LRDP EIRs. No mitigation is required.

No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRS concluded that with implementation of LRDP PPs 4.7-1 and 4.7-5 and LRDP MM 4.7-1 there would be less than significant impacts related to the alteration of drainage patterns. Stone Canyon Creek, which is located in the eastern portion of the campus, is the only regional drainage feature that traverses the campus and is not located within or near the Project site. Implementation of the proposed Project would not alter the course of a stream or river.

Erosion and Siltation

As previously discussed, construction of the proposed Project would involve 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, consistent with the conclusion of the LRDP EIRs.

In the long term, although there would be an overall reduction in impervious area compared to existing conditions, areas of exposed soils would be minimal following construction of the proposed Project. The impervious surfaces include permeable pavers, and undeveloped areas would be landscaped. Therefore, the potential erosion impacts would be less than significant during operation, consistent with the conclusion of the LRDP EIRs, and no additional mitigation is required.

Site Drainage and Storm Water Runoff

As identified under Threshold (b) above, development of the proposed Project would increase the amount of pervious surface at the Project site compared to existing conditions (an increase of approximately 74 percent when accounting for the addition of permeable pavers), resulting in an overall reduction in storm water runoff from the Project site. In the proposed developed condition, the Project site has been designed to generally drain in the same direction as the existing condition. Stormwater would be collected and conveyed from the roof drains, planter drains, and area drains through the building via gravity through a system of vertical stacks and storm drains, and would connect to the existing 8-inch storm drain main that extends northwest to southeast across the Project site. Pursuant to LRDP PP 4.7-5 and LRDP MM 4.7-1, a site-specific hydrologic evaluation would be conducted during design of the proposed Project 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. With adherence to applicable storm water management regulations and incorporation of LRDP PP 4.7-5, the proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site and would not exceed the capacity of the existing storm drain system.

Further, the proposed Project would generate urban pollutants similar to existing uses at Sunset Rec, including the Project site. As discussed under Threshold (a), above, with incorporation of required structural and non-structural BMPs, the proposed 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, consistent with the finding so of the LRDP EIRs and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
d) Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that implementation of development on campus pursuant to the LRDP would have no impacts related to development within a 100-year flood hazard area; flooding as a result of failure of a levee or dam; or inundation by seiche, tsunami, or mudflow.

The Project site is within Federal Emergency Management Agency (FEMA) "Zone X," which is identified as an area of minimal flood hazard (FEMA, 2008). Based on review of Figure 12-2 of the City of Los Angeles 2018 LHMP, the Project site is not within a mapped tsunami inundation area in the West Los Angeles Area Planning Commission area (City of Los Angeles, 2018). Further, the Project site is not near a body of water and would not be subject to a seiche. The Project site is also not within the mapped dam inundation area for Stone Canyon Reservoir dam (DSOD, 2023). Therefore, the proposed Project would not result in a risk related to the release of pollutants due to Project inundation, consistent with conclusion of the LRDP EIRs. No mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that with implementation of the LRDP PPs and MMs, implementation of development on campus pursuant to the LRDP would result in less than significant impacts related to water quality and groundwater.

The Project site is located within the jurisdiction of the Los Angeles 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 the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which was most recently updated in September 2014 (LARWQCB, 2014). 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 PP 4.7-1 and LRDP MM 4.7-1, the proposed 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 proposed 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. The California Department of Water Resources (DWR) currently categorizes the Santa Monica Basin as a "medium-priority" basin; therefore, the Santa Monica Basin is subject to the requirements of the SGMA (DWR, 2023). The Santa Monica Basin Groundwater Sustainability Agency (SMBGSA) was formed in 2017 in accordance with the SGMA. The five member agencies of the SMBGSA include the City of Santa Monica, the City of Beverly Hills, the City of Los Angeles, by and through its Department of Water and Power, the City of Culver City, and the County of Los Angeles. The five member agencies signed a Memorandum of Understanding (MOU) for the formation of the SMBGSA in May 2017. The SMBGSA is responsible for developing a GSP pursuant to SGMA, and the regulations issued in accordance therewith. The GSP for the Santa Monica Basin was adopted by the SMBGSA in January 2022. As previously discussed, the proposed Project would not entail the extraction of groundwater located beneath the site during Project operation, would not impact groundwater quality, and the Project site is not within a groundwater recharge area. Therefore, the proposed Project would not obstruct with or conflict with a sustainable groundwater management plan.

The proposed Project would not involve any construction activities that would encounter groundwater and would not include the installation or use of groundwater wells. The proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and this impact would be less than significant, consistent with the findings of the LRDP EIRs. No mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to hydrology and water quality. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to hydrology and water quality. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.11. Land Use and Planning

Relevant elements of the proposed Project related to land use include the development of a new two-story (plus rooftop deck), student-oriented, multi-purpose building at Sunset Rec, which would provide approximately 11,500 gsf of recreational floor area plus approximately 6,500 gsf of exterior space that is covered but unenclosed. Additionally, associated utility, landscape, and hardscape improvements would be installed. The new building would replace a series of seven existing buildings/facilities at Sunset Rec, which comprise approximately 6,982 gsf of floor area

plus 5,807 gsf of covered, unenclosed space. The new building would result in a net increase of 4,518 gsf of development within Sunset Rec in the Northwest zone.[25] There would be no increase in the campus population as a result of the proposed Project.

The buildings to be demolished are seismically deficient, substantially damaged/deteriorated (and therefore some of which are no longer habitable), non-compliant with current ADA requirements, otherwise constrained from a programming perspective, or, in some cases, inextricably physically, structurally, or programmatically dependent upon the deficient structures.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

PP 4.8-1(c) *Infill development of the campus shall be continued, which reduces vehicle miles traveled and energy consumption.*

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.*

PP 4.8-1(e) *Facilities shall be sited and designed to enhance spatial development of the campus while maximizing use of limited land resources.*

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

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
a) Would the project physically divide an established community?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that development on campus pursuant to the LRDP would have no impact related to division of an established community. The proposed Project would involve the demolition of seven existing buildings at Sunset Rec and construction of a replacement building in the same location. The proposed Project is located entirely within the campus boundaries and would not physically divide an established community. Consistent with the findings of the LRDP EIRs no impact would occur and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

[25] Consistent with long-standing UCLA practices, development on the campus does not include gross square footage related to covered unenclosed space.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded there would be less than significant impacts related to conflicts with applicable land use plans, policies, and regulations.

UCLA Plans

Following is an analysis of the proposed Project's consistency with the 2002 LRDP, as amended through 2017. The proposed Project's consistency with the 2009 UCLA Physical Design Framework is discussed in Section V.1, Aesthetics, of this IS. As identified therein, the proposed Project would not conflict with the Physical Design Framework, which describes the approach for development of buildings, infrastructure, and landscape on the campus.

As identified in Section 4.9, Land Use and Planning, of the LRDP Final SEIR:

> *The primary objective of the Existing LRDP is to establish a land use plan that represents the best possible relationship among UCLA academic goals, faculty and student needs, site characteristics, and integration with the surrounding community. It remains the same as in the previous LRDPs approved by The Regents in 1963, 1983, 1990, and 2002. The 2002 LRDP, as amended in March 2009, retains the basic land use designations of the 1990 LRDP (including academic, recreational, residential, health sciences, and other land uses) contained in the same eight land use zones envisioned in the 1990 LRDP. Campus land use zones are shown on Figure 4.9-1. Space allocations in the campus land use zones serve as "capacity envelopes" and are sized to accommodate projected needs within the planning horizon of the current LRDP. The use of these capacity envelopes is intended to provide future flexibility; to accommodate changes in program space requirements; and to respond to needs and circumstances that are not anticipated in the current LRDP.*

- **LRDP Land Use Designation.** The proposed Project is located in the Northwest zone as shown in Figure 2 of this IS. Existing uses in this zone include residential and recreational uses, and other functions that support housing and the greater academic community. Uses in the Northwest zone that support the academic community include the Southern Regional Library and the Krieger Child Care Center. This zone also includes campus-wide recreational facilities, such as Sunset Rec, Sunset Canyon Tennis Courts, Sycamore Tennis Courts, Easton Stadium, and the Spieker Aquatics Center. Therefore, the proposed Project, which would involve the replacement of existing buildings that are structurally or seismically deficient or are not accessible, with a new building that meets

current building requirements, would not conflict with objectives outlined in the adopted LRDP.

- **LRDP Square Footage.** The proposed Project involves the demolition of seven existing buildings at Sunset Rec that total approximately 6,982 gsf and construction of an approximately 11,500 gsf replacement building, resulting in a net increase of 4,518 gsf of development within Sunset Rec in the Northwest zone. This amount of development is within the total remaining development allocation permitted under the LRDP and in the Northwest zone. Currently, the Northwest zone has 130,682 gsf remaining in the LRDP development allocation.

- **LRDP Population.** The proposed Project would involve a replacement recreation building and would not change the overall recreational programming at Sunset Rec. Similar to existing conditions, the new building would offer several multi-use spaces that could be used on a daily basis for a variety of recreational classes for students and staff, gatherings and meetings for campus groups, and as activity spaces for UCLA's summer youth camps. Thus, upon Project completion, Sunset Rec would continue to be fully available to UCLA students, faculty and staff, as well as for other related UCLA programs. The proposed Project would not generate an increase in the campus population.

- **LRDP Campuswide Development Objectives.** As identified in the LRDP, future development on campus "will be guided by the institutional objectives that fall into three major categories: academic, physical and operational."

  Relevant *academic objectives* include the following:

  - *Create an environment for student life that fosters students' academic, personal, and social development.*

    This objective would be met by providing several modern, flexible, multi-use rooms to accommodate a range of recreational programming that improves the quality of student life, supports the academic community, and fosters personal and social development for students, faculty, staff and other UCLA visitors.

  Relevant *physical objectives* include the following:

  - *Maintain the 1990 LRDP campus parking cap of 25,169 spaces*.

    The proposed Project would not alter the parking cap of 25,169 parking spaces, which was established with the 1990 LRDP and has been maintained through the current LRDP. The proposed Project does not include the addition or removal of parking. Therefore, the proposed Project would not conflict with the established campus parking cap.

  - *Maintain the 1990 LRDP campus vehicle trip cap of 139,500 average daily trips*.

    The proposed Project would not alter the trip cap of 139,500 average daily trips, which was established with the 1990 LRDP and maintained through the current LRDP. The proposed Project would not change the nature of recreational programs at Sunset Rec and would not increase daily vehicle trips associated with operations at Sunset Rec.

Therefore, the proposed Project would not conflict with the established campus vehicle trip cap.

- *Develop a maximum of 1.67 million gsf of additional building space, which represents the remaining approved development allocation when considering the 2017 LRDP Amendment and Student Housing Projects*.[26]

  As discussed above under "LRDP Square Footage," the proposed Project would be within the total remaining development allocation for the Northwest zone, which in included in the remaining development allocation for the campus.

- *Continue the infill development of the UCLA campus, which reduces vehicle miles traveled and energy consumption*.

  This physical objective is incorporated into the proposed Project through LRDP PP 4.8-1(c). The proposed Project is an infill development located on a site currently developed with existing buildings at Sunset Rec constructed in the 1960s. As with the existing buildings, the proposed replacement building would serve the existing UCLA campus population and would accommodate existing recreational programming. The proposed Project would not result in an increase in vehicle miles traveled compared to existing conditions. Further, the proposed replacement building would adhere to current energy conservation requirements (refer to Section V.6, Energy, of this IS), which are more stringent than those in effect when the existing buildings were constructed.

- *Retain the human scale and rich landscape of the campus while enhancing its function as a mature university in a fully developed urban environment*.

  The Project site is located at Sunset Rec in the Northwest zone; the uses surrounding the Project site are on campus and primarily include other recreational facilities at Sunset Rec, residential uses, and the SR Parking Structure. There is a dense mix of urban development in this zone as well as in the adjacent areas of the City of Los Angeles, with varied architectural styles, building massing, and building heights. The proposed replacement building would have a maximum elevation of approximately 539.25 feet amsl at the top of the canopy, which would be within the range of elevations for existing uses in the area. Notably, Hedrick Summit and Hedrick Hall southwest of the Project site each have a maximum building elevation of 619 feet amsl at the roof level. Additionally, the proposed building architecture has been designed to break up the massing of the structure and maintain a human scale at ground level.

- *Site and design facilities to enhance spatial development of the campus while maximizing use of limited land resources.*

  This physical objective is incorporated into the proposed Project through LRDP PP 4.8-1(e). As shown on the Campus Map in Figure 2, there are limited areas on campus, including the Northwest zone, that are undeveloped, which requires careful site design to maximize the available land resources. The proposed Project would

[26] As of June 2023, the total remaining development allocation based on the 2017 LRDP Amendment and recently constructed or approved buildings is 648,085 gsf.

involve the redevelopment of a site currently developed with buildings constructed in the 1960s that have physical deficiencies related to safety, accessibility, and programming (refer to Section II.3, Background and Need for the Proposed Project). Under existing conditions, three of the seven buildings to be demolished have been red-tagged and another was vacated due to water intrusion and mold, thus limiting the usability of the facilities at Sunset Rec.

- *Continue to integrate landscaped open space (including plazas, courts, gardens, walkways and recreational areas) with development, to encourage use through placement and design.*

  As shown on the site plan provided on Figure 6, similar to the existing buildings, the new building would nestle into the adjacent hillside and create strong connections between indoor and outdoor spaces, with terraces and outdoor amenity areas, to capitalize on the surrounding natural setting. The conceptual landscape plan, which is shown on Figure 15, would build upon the existing landscape at Sunset Rec to maintain a wooded and natural setting. Landscaped areas would be located around the perimeter of the new building and would include trees, shrubs and ground cover, as well as bench seating, thus creating a series of intimate gathering areas. The slope between the lower and upper pools would also feature terraced landscaping to mimic the existing setting.

- *Provide recreational facilities for students, faculty, and staff on campus.*

  The proposed Project involves the demolition of buildings at Sunset Rec that are seismically deficient, substantially damaged/deteriorated (and therefore some of which are no longer habitable), non-compliant with current ADA requirements, otherwise constrained from a programming perspective, or, in some cases, inextricably physically, structurally, or programmatically dependent upon the deficient structures. These buildings would be replaced with a new modern building that provides several flexible, multi-use rooms to accommodate a range of recreational programming to improve the quality of student life, support the academic community, and foster personal and social development for students, faculty, staff and other UCLA visitors.

- *Site new building projects to ensure compatibility with existing uses and the height and massing of adjacent facilities, to the extent feasible*.

  This physical objective is incorporated into the proposed Project through LRDP PP 4.8-1(d). As discussed above, the proposed Project involves the replacement of existing buildings at Sunset Rec with one new building to accommodate a range of recreational programming consistent with existing conditions. The elevation of the proposed replacement building would be within the range of building elevations associated with existing uses in the Northwest zone. To avoid substantial landform alterations and to provide building heights and massing compatible with the existing development in the area, the building design and orientation take into consideration the site topography.

- *Provide accessibility for the disabled in the siting and design of new buildings or the renovation, restoration, or reconstruction of existing buildings*.

  Full ADA access to spaces within the existing buildings is not available given the multiple levels, stairways, and lack of an elevator. A key objective of the proposed Project is to provide a recreational building that meets current ADA requirements, improves site accessibility, and supports inclusive programming.

- *Clarify and strengthen existing pedestrian and vehicular circulation to enhance way-finding and promote safety*.

  Vehicular access to Sunset Rec is provided from Easton Drive via De Neve Drive. The proposed Project would not impede pre-construction vehicular or pedestrian movement along these roadways. The existing entry kiosk, which is a modular building, would be relocated slightly to improve the flow of pedestrian traffic from the SR Parking Structure to the various uses within Sunset Rec. Pedestrian access between the lower and upper pools at Sunset Rec would also be enhanced by new stairways to the south of the proposed building, with bench seating and terraces incorporated into the design. Primary ADA access between the two pool levels would be provided via the building elevator, and the existing wheelchair ramp behind the building would remain in place as well.

Relevant *operational objectives* include the following:

- *To the extent practicable, continue to incorporate design features, technological adaptations, and/or planning principles into future campus development to encourage or reinforce the concept of environmental sustainability and stewardship, including the conservation of resources, and the minimization of waste.*

  The proposed Project would achieve a minimum LEED Gold BD+C rating and strive to achieve a LEED Platinum BD+C rating. To achieve this, the proposed Project incorporates a series of green building strategies including, but not limited to, the following:

  - Outperforming Title 24 standards by 20 percent; striving to outperform the standards by 30 percent where possible.
  - Optimizing the energy efficiency of systems not addressed by the CBC energy-efficiency standards.
  - Installing rooftop PV panels (approximately 3,000 sf) to offset the electricity demand for the proposed building.
  - Providing an all-electric building (no use of natural gas).
  - Incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands.
  - Selecting water fixtures (e.g., taps, toilets, and other fixtures) to achieve a 36 percent reduction in per capita water demand (compared to the Fiscal Year 2005-2008 average baseline) and increase water efficiency.

- *Promote the efficient use of water through the use of natural drainage patterns, drought tolerant landscaping and recycling and reuse.*

  As further discussed in Section V.10, Hydrology and Water Quality, of this IS, the storm drain system would retain the existing drainage pattern, and storm water runoff would be managed in accordance with applicable regulations. The building would be designed to encourage recycling by providing receptacles to accommodate three waste streams (recycling, compost, and landfill). Additionally, building construction and operation would comply with UC requirements related to solid waste management as further discussed in Section V.19, Utilities and Service Systems, of this IS.

- *Encourage energy efficiency through thoughtful design that considers the effective placement of buildings and the use of shading, to the extent feasible.*

  The proposed building has been sited and designed to minimize solar gain and increase natural day lighting and reduce the hours of artificial lighting. Internal and external lighting strategies would be designed to reduce energy use.

- *Provide and promote opportunities for the use of alternative transportation modes.*

  As discussed above, the proposed Project would improve pedestrian circulation and accessibility within Sunset Rec, and would not impede existing pedestrian facilities along the roadways that serve Sunset Rec.

The proposed Project would be consistent with the current UCLA LRDP, including academic, physical, and operational development objectives that serve to mitigate environmental impacts.

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 (SCAG, 2023). The policies and strategies of SCAG's regional planning programs, including Connect SoCal, are not applicable to the Project because the proposed Project is not of statewide, regional, or areawide significance based on the established criteria in Section 15206 of the CEQA Guidelines, which are applied by SCAG to determine regional significance. For example, a commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space is considered regionally significant; the proposed Project would involve a net increase of 4,518 gsf of building area on campus, and there would be no increase in employment generation.

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 the Coastal Watersheds of Los Angeles and Ventura Counties (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.

Local Planning Programs

As discussed in the LRDP EIRs, the University of California, as a constitutional entity, is not subject to municipal regulations, such as the City of Los Angeles General Plan or the North Westwood Village Specific Plan. UCLA is currently designated as "Public Facilities" in the Westwood Community Plan General Plan Land Use Map (City of Los Angeles, 2010), the Generalized Land Use Map for Westwood (City of Los Angeles, 2020), and the Generalized Zoning Map for the City of Los Angeles (City of Los Angeles, 2022). Although UCLA is not subject to the Westwood Community Plan, the proposed Project, which involves the replacement of seven existing buildings at Sunset Rec with a single building to serve the UCLA campus population is consistent with this land use designation.

Consistent with the findings of the LRDP EIRs, the proposed Project would not 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, and this impact would be less than significant. No additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to land use and planning. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to land use and planning. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.12. Mineral Resources

There are no relevant elements of the proposed Project related to mineral resources. Additionally, there are no relevant LRDP PPs or MMs.

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that development on campus pursuant to the LRDP would have no impact on mineral resources since there are no mineral resources of value to the State or region nor mineral resource sites defined by the City of Los Angeles General Plan on the UCLA campus. Consistent with this findings, there are no mineral resources at the Project site, and no impact would occur. No mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to mineral resources. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to mineral resources. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.13. Noise

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

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

PP 4.9-6(a) *The campus 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 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 that are sensitive to noise.*

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

PP 4.9-7(d) *The campus shall continue to conduct regular meetings with on-campus constituents to provide advance notice of construction activities in order to*

coordinate these activities with the academic calendar, scheduled events, and other situations, as needed.

PP 4.9-8 *The campus 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 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.*

MM 4.9-7 *A solid noise barrier that would break the line of sight between the construction site and a sensitive use area would reduce construction noise by at least 5 dBA. Therefore, when detailed construction plans are complete, the campus shall review the locations of sensitive receptor areas in relation to the construction site. If it is determined that a 12-foot-high barrier would break the line of sight between an 11-foot-high noise source and adjacent sensitive use areas, a temporary barrier shall be erected to the extent practicable. The barrier shall be solid from the ground to the top with no openings, and shall have a weight of at least 3 pounds per square foot, such as plywood that is ½-inch thick.*

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.

Furthermore, decibels are measured on a logarithmic scale and cannot be added or subtracted through ordinary arithmetic. A doubling of the sound pressure from a source, such as doubling of traffic volume, would increase the sound level by 3 dB; a halving of the energy would result in a 3-dB decrease. By way of example, if an air conditioner produces a sound level of 50 dB at 50 feet, two air conditioners at the same distance would produce a sound level of 53 dB, not 100 dB.

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. 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 roughly: (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); or (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

Per the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (September 2018) (FTA, 2018), vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as pile driving.

In contrast to airborne noise, ground-borne vibration outdoors is not a common environmental problem, and annoyance from ground-borne vibration is almost exclusively an indoor phenomenon. Therefore, the effects of vibrations should only be evaluated at a structure, and any potential dampening effects of the building structure on the vibration levels should be considered. Wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings. In contrast, large masonry buildings with spread footings have a low response to ground vibration. In general, the heavier a building is, the lower the response will be to the incident vibration energy. Additionally, historic buildings constructed in accordance with older building codes may be more fragile or susceptible to building damage from vibration. However, all structures reduce vibration levels due to the coupling of the building to the soil (FTA, 2018).

To analyze vibration impacts originating from the operation and construction of the Project, vibration-generating activities are appropriately evaluated against standards established under a jurisdiction's Municipal Code, if such standards exist. However, neither UCLA nor the City of Los Angeles identify specific vibration level limits. Therefore, for analysis purposes, the Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans, 2020) is used in this noise analysis to assess potential temporary construction-related impacts at adjacent building locations. The construction vibration potential damage criteria include consideration of the building conditions. Table 12 describes the maximum acceptable transient and continuous vibration building damage potential levels by structure type and condition. The existing buildings adjacent to the Project site can best be described as historic and older buildings, with a maximum acceptable continuous vibration threshold of 0.25 peak particle velocity in inches per second (PPV [in/sec]).

Table 12
Building Damage Vibration Criteria

Structure and Condition	Maximum Transient Vibration Levels PPV (in/sec)	Maximum Continuous Vibration Levels PPV (in/sec)
Extremely fragile historic buildings	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: (California Department of Transportation, April 2020)

For vibration-sensitive receiver locations, potential disturbance due to construction-related vibration levels is evaluated based on the Caltrans perception criteria. Table 13 describes the maximum acceptable criteria used to describe the transient and continuous sources of vibration. To describe the human reaction due to construction vibration levels, this analysis relies on the distinctly perceptible maximum transient vibration threshold of 0.25 PPV (in/sec).

Table 13
Human Perception Vibration Criteria

Human Response	Maximum Transient Vibration Levels PPV (in/sec)	Maximum Continuous Vibration Levels PPV (in/sec)
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

Source: Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Tables 20, p. 38.

Ambient Daytime Noise Levels

Existing ambient daytime noise levels were measured in 2017 during preparation of the LRDP Final SEIR at five locations on campus in order to identify representative noise levels during the regular academic session. The nearest measurement locations to the Project site and potentially affected receivers are shown on Figure 23 of this IS: Location 1 (off campus) along Veteran Avenue between Sunset Boulevard and Gayley Avenue (approximately 0.17 mile southwest of the Project site), and Location 5 (on campus) along Sunset Boulevard near the intersection of De Neve Drive and Charles E Young Drive (approximately 0.22 southeast of the Project site). Based on the noise level measurements, the average hourly daytime noise level was 69 dBA L_{eq} at Location 1, with occasional maximum noise levels reaching 83 dBA L_{max}. The average hourly daytime noise level at Location 5, was 76 dBA L_{eq}, with occasional maximum noise levels reaching 94 dBA L_{max}. The primary noise source at both locations was traffic along Veteran Avenue and Sunset Boulevard, respectively. As the Project site is located between these two measurement

locations and is also subject to traffic noise from nearby roadways, the ambient daytime noise levels at Sunset Rec are expected to be in the range of 69 to 76 dBA L_{eq}.

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

Noise-sensitive receptors are generally considered to be those people engaged in activities or utilizing land uses that may be subject to substantial interference from noise. Activities usually associated with sensitive receptors include, but are not limited to, talking, reading, and sleeping. Designated on-campus noise-sensitive receptors include residential, hospital, library, day care, and school uses. As shown on Figure 23, residential uses (i.e., student dormitories) in the Northwest zone are the nearest sensitive receptors to the Project site. The nearest off-campus sensitive receptors are located over 500 feet to the northeast and east across Sunset Boulevard, and over 1,000 feet to the west across Veteran Avenue. Ambient noise at these locations, and near Sunset Boulevard in particular, are dominated by existing traffic noise.

Construction Noise

The LRDP Final SEIR concluded that development pursuant to the LRDP would result in significant and unavoidable impacts related to on- and off-campus ambient noise levels during construction even with implementation of LRDP MM 4.9-7, and LRDP PPs 4.9-7(a) through 4.9-7(d), and PP 4.9-8.

During construction, nearby noise-sensitive receptors, which include on-campus residential uses in the Northwest zone, would be exposed to occasional high noise levels associated with the operation of heavy equipment, such as loaders, dozers, and excavators. Construction equipment noise would not be constant because of the variations of power, cycles, and equipment location. LRDP PP 4.9-7(a) limits construction activities on campus, to the extent feasible, to the hours of 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. No construction is allowed on Sunday and national holidays. Additionally, in accordance with LRDP MM 4.9-7, which is incorporated into the proposed Project, solid noise barrier(s) would be installed along the southwestern Project site boundary by Hedrick Summit to reduce noise levels to the nearest receptor.

To describe construction noise activities, this construction noise analysis was prepared using reference construction equipment noise levels from the Federal Highway Administration (FHWA) published the Roadway Construction Noise Model (RCNM) (FHWA, 2006). The RCNM equipment database provides a comprehensive list of the noise-generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to

estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. The anticipated construction stages and loudest pieces of equipment by stage are provided in Table 14.

Table 14
Reference Noise Levels of Construction Equipment by Stage

Construction Stage	Reference Construction Equipmnet[1]	Maximum Noise Level @ 50 Feet (dBA L_{max})	Hourly Noise Level @ 50 Feet (dBA L_{eq})[2]	Composite Reference Noise Level (dBA L_{eq})
Demolition/Site Preparation	Jack Hammer	89.0	82.0	83.5
	Dozer	82.0	78.0	
Grading	Excavator	81.0	77.0	81.8
	Scraper	84.0	80.0	
Building Construction	Crane	81.0	73.0	74.8
	Generator (<25kVA)	73.0	70.0	
Paving	Paver	77.0	74.0	76.1
	Dump Truck	76.0	72.0	
Architectural Coating	Man Lift	75.0	68.0	75.0
	Compressor (air)	78.0	74.0	

[1] FHWA Road Construction Noise Model 2006.
[2] Based on duty factor presented in the LRDP Final SEIR, Table 4.10-5.

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project's construction noise levels at the nearest sensitive receiver locations were completed. To assess a reasonable worst-case construction scenario and account for the dynamic nature of construction activities, the Project construction noise analysis models the equipment combination with the highest reference level as a moving point source within the construction area (Project site boundary). This is simulated by modeling multiple pieces of construction as moving point sources. As shown on Table 15, the construction noise levels are expected to range from 43.9 to 68.8 dBA L_{eq}, and the highest construction levels are expected to range 52.4 to 68.8 dBA L_{eq} at the nearest receiver locations. Appendix E includes the detailed C

Based on noise measurements collected for preparation of the LRDP Final SEIR (Locations 1 and 5 shown on Figure 23), discussed previously, the average ambient daytime noise levels of on-campus residences averages 69 dBA L_{eq} (Location 1), and daytime noise levels at the nearest off-campus residences averages 76 dBA L_{eq} (Location 5). CadnaA construction noise model inputs.

Table 15
Project Construction Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})						
	Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	57.8	56.5	56.7	49.3	50.7	49.5	57.8
R2	58.0	56.7	56.9	49.5	50.9	49.7	58.0
R3	68.8	67.5	67.7	60.3	61.7	60.5	68.8
R4	52.4	51.1	51.3	43.9	45.3	44.1	52.4

[1] Noise receiver locations are shown on Figure 23. R3 is the nearest receptor and located on campus; all others are located off campus.
[2] Construction noise level calculations are based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix E of this IS.

To represent a conservative assessment, the lowest ambient noise level is used to describe the existing environment at the on-campus residences closest to the Project site (represented by R3, shown on Figure 23), which would experience the highest construction noise levels without accounting for obstructions such as intervening trees/landscaping. Based on modeling with the lowest ambient noise level at Location 1 (69 dBA Leq) and the highest construction noise level at receiver R3 (68.8 dBA Leq), construction noise levels could range up to 2.9 dBA above ambient noise levels (i.e., 69.0 dBA sound level + 68.8 dBA sound level = 71.9 dBA Leq), which is considered a barely perceptible change in sound. Similarly, at the nearest off-campus residence (represented by R1 on Figure 23), without accounting for obstructions, and using Location 5 data to proximate the ambient noise level, typical construction noise levels would not be noticeable over the ambient noise levels.

The loudest noise levels at all locations would occur during the demolition, site preparation, and grading/excavation stages. Based on the predicted noise levels at the nearest receptors, the Project is anticipated to result in a less than significant noise impact related to on-site heavy equipment use during this period. Additionally, at the conclusion of these phases, the use of heavy equipment would be limited, and noise levels related to construction activity would be much lower, as shown in Table 15.

Although there would not be a substantial noise increase at nearby sensitive receptors during construction, noise attenuation would be provided with the Project's incorporation of LRDP PP 4.9-7(b), which requires the muffling or shielding of equipment; LRDP 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, LRDP MM 4.9-7, which requires the installation of noise barriers.

Even with noise attenuation measures, construction activities could potentially be heard at neighboring residences on- and off-campus above the existing noise levels and could create temporary annoyance. The Project incorporates LRDP PPs 4.9-7(d) and 4.9-8, which require the campus to conduct regular meetings with on- and off-campus constituents to provide notice of construction activities, and LRDP PP 4.9-7(a) (consistent with Section 41.40 of the Los Angeles Municipal Code) which prohibits construction activities to occur during recognized sleep hours for residents.

With respect to construction vehicle noise impacts, truck trips associated with debris and soil export from the Project site would occur during the demolition/site preparation and grading phases. As discussed in Section II.5, Project Description, of this IS, during demolition and site preparation activities, which area estimated to last a total of approximately 66 days, there would be an average of approximately three daily round truck trips (six inbound and outbound trips) per day. During grading, which is estimated to last 22 days, there would be an average of approximately 24 daily round truck trips (49 inbound and outbound trips) per day. These trips, lasting for a limited duration of time, would represent a small proportion of total existing traffic levels along most of the haul route established for the proposed Project, which includes Wilshire Boulevard, Gayley Avenue, Strathmore Place, Charles E. Young Drive West, De Neve Drive, and Easton Drive (refer to the discussion of construction activities in Section II.5, Proposed Project Components, of this IS). While any single truck passing may be audible, it is expected that the overall noise from Project-related construction truck traffic would be indistinguishable from typical traffic noise, particularly along the off-campus roadways of Gayley Avenue and Wilshire Boulevard. A doubling of traffic volumes is required to increase average traffic noise levels by 3 dBA, a change which is barely discernable to human hearing. The quantitative increase in hourly noise levels would be negligible at sensitive uses adjacent to the roadways along the construction traffic route and, thus, would be less than significant. No mitigation measures would be required for mobile (truck) noise during construction.

In summary, the construction activities associated with the proposed Project would not result in the generation of a substantial temporary increase in ambient noise levels in the vicinity of the project during construction, and this impact would be less than significant. Nonetheless, the LRDP concluded that both on- and off-campus construction-related noise impacts would be significant and unavoidable. No additional mitigation beyond that adopted as part of the LRDP is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Operational Noise

The LRDP EIRs concluded that operation of uses on campus pursuant to the LRDP would result in less than significant impacts related to the following:

- On- or off-campus ambient roadway noise levels with implementation of PP 4.13-1(c) and PP 4.13-1(d); and
- On- or off-campus ambient stationary source noise levels with implementation of PP 4.9-6(a).

Project operations are not expected to change the overall noise levels experienced at on- and off-campus sensitive receptors because the proposed Project would replace several existing recreational buildings with a single building that would serve similar functions. The proposed Project does not include the types of outdoor recreational uses that presently generate the loudest noise levels at Sunset Rec (e.g., amphitheater, ball fields, or swimming pools). Additionally, as with the existing buildings on-site, there would continue to be indoor and outdoor activities associated with the ongoing recreational programming at Sunset Rec. The Project would allow for outdoor gatherings of people, which are anticipated to be similar in nature to the gatherings that currently occur at the site. Furthermore, as previously discussed, the Project is not expected to increase programming or the size of permitted groups or events at Sunset Rec, nor would it increase the campus population. The typical hours of operation are also expected to remain the same (6:00 AM to 8:00 PM Monday through Friday, 8:00 AM to 8:00 PM on Saturday, and 9:00

AM to 8:00 PM on Sundays). Thus, campus gatherings at the Project are not anticipated to result in a notable increase in ambient noise levels. Additionally, UCPD would continue to be available to respond to any noise complaints at the Project site. As such, operational noise would not result in a significant Project impact under CEQA.

With regard to stationary equipment, with incorporation of PP 4.9-6(a) into the proposed Project, which requires the shielding of new stationary noise sources located in close proximity to noise-sensitive buildings and uses, operation of the proposed Project's HVAC system would not create significant noise impacts to nearby noise-sensitive uses.

As identified in Section V.17, Transportation, of this IS, the proposed Project would not result in an increase in vehicular trips associated with Sunset Rec operations. Therefore, there would be no increase in traffic-related noise levels and no long-term traffic-related noise impacts resulting from implementation of the proposed Project.

In summary, the proposed Project would not result in a substantial permanent increase in noise levels on- or off-campus, and this impact would be less than significant. No additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that development on campus pursuant to the LRDP would result in less than significant impacts related to off-campus vibration from heavy trucks during construction, and on- and off-campus vibration during long-term campus operations. On-campus vibration during construction was determined to be potentially significant and unavoidable, even with implementation of LRDP MM 4.9-2, and LRDP PPs 4.9-2, 4.9-7(a), and 4.9-7(d), in instances where the use of medium-sized or smaller equipment is not feasible and construction activities occur within 43 feet of occupied residence halls, within 34 feet of non-residential/non-sensitive buildings, or within 135 feet of buildings that house sensitive instrumentation or similar vibration-sensitive equipment or activities.

Vibration of building components can also take the form of an audible low-frequency rumbling noise, which is referred to as groundborne noise. Typically, groundborne noise is a concern that occurs with railroad and similar transit sources. As there are no railroad or transit noise and vibration sources in the campus area, the impact of groundborne noise was not addressed in the LRDP EIRs and is also not a concern for the proposed Project.

Typical construction activities associated with the proposed Project could generate and expose users or residents of the buildings within 35 feet of the Project site to noticeable groundborne vibration levels. The nearest structures are part of Sunset Rec, which are not considered vibration sensitive uses. Additionally, any potential vibration impact associated with heavy equipment would be reduced with implementation of LRDP MM 4.9-2, which requires the use of medium-

sized or smaller equipment within 34 feet of non-sensitive buildings. Therefore, the Project would result in less than significant vibration impacts to nearby sensitive receivers, consistent with conclusion of the LRDP EIRs (i.e., the specific circumstances under which impacts were concluded therein to be significant would not occur under the Project).

As previously discussed, heavy trucks would transport debris and soil from the Project site during the demolition/site preparation/grading phases, with an average of approximately three daily round truck trips (six inbound and outbound trips) during demolition and site preparation (estimated 66 days), and an average of approximately 24 daily round truck trips (49 inbound and outbound trips) during grading (estimated 22 days). The access routes for haul trucks and most construction vehicles would include Wilshire Boulevard, Gayley Avenue, Strathmore Place, Charles E. Young Drive West, De Neve Drive, and Easton Drive. These are all paved, generally smooth roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. Haul trucks typically generate groundborne vibration velocity levels of 0.036 PPV (in/sec) at 50 feet; this level of vibration may be perceptible but would not be a strong or annoying vibration and would be well below the 0.25 PPV (in/sec) threshold of human perception. As such, the proposed Project would not expose occupants of buildings adjacent to haul truck routes to excessive groundborne vibration levels, and this impact would be less than significant.

Consistent with the findings of the LRDP EIRs, vibration impacts would be less than significant and no additional mitigation would be required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 proposed Project area to excessive noise levels?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that implementation of development on campus pursuant to the LRDP would have no impact related to noise from airport operations.

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, consistent with the findings of the LRDP EIRs. The proposed Project is located 0.6 mile to the northwest of the RRUMC, which operates a helistop (with two helipads) under a Caltrans Aeronautics Heliport Permit. The helistop is located on top of the 10-story facility and generates a limited number of flights, with emergency helicopter operations occurring approximately twice per day. Implementation of the proposed Project would not increase the frequency of or otherwise affect helicopter operations at RRUMC. The Project site is located outside the 65-dBA helicopter noise level contour that defines the area for aircraft noise impacts to noise-sensitive land uses (UCLA, 2009b). Accordingly, as with existing conditions at Sunset Rec, the helicopter noise levels experienced by people at the proposed replacement building would not be excessive. Therefore,

the proposed Project would not expose people at the Project site to excessive noise levels from RRUMC helistop operations. There would be a less than significant impact consistent with the findings of the LRDP EIRs, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to noise. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to noise. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.14. Population and Housing

The proposed Project does not involve any increase in the UCLA campus population, including students, faculty, or staff.

There were no LRDP PPs or MMs related to population and housing.

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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)?	☐	☒	☐	☐
b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that implementation of development on campus pursuant to the LRDP would not result in substantial population growth, either directly or indirectly (i.e., through job creation).

The proposed Project involves a replacement recreation building and would not change the overall recreational programming at Sunset Rec. Similar to existing conditions, the new building would offer several multi-use spaces that could be used on a daily basis for a variety of recreational classes for students and staff, gatherings and meetings for campus groups, and as activity spaces for UCLA's summer youth camps. Thus, upon Project completion, Sunset Rec

would continue to be fully available to UCLA students, faculty and staff, as well as for other related UCLA programs. The proposed Project would not generate an increase in the campus population. No new housing or infrastructure is proposed that would induce unplanned population growth and there would be no displacement of people or housing. Consistent with findings of the LRDP EIRS, no impact would occur and no mitigation is required. Further evaluation of this issue is not required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to population and housing. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to population and housing. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.15. Public Services

Consistent with LRDP PP 4.12-1(a), relevant elements of the proposed Project related to public services include the development of a new two-story (plus rooftop deck) building at Sunset Rec, which would provide approximately 11,500 gsf of recreational floor area plus approximately 6,500 gsf of exterior space that is covered but unenclosed. The new building would replace seven existing buildings/facilities at Sunset Rec, which comprise approximately 6,982 gsf of floor area plus 5,807 gsf of covered, unenclosed space. The new building would result in a net increase of 4,518 gsf of development within Sunset Rec in the Northwest zone. There would be no increase in the campus population as a result of the proposed Project.

The buildings to be demolished are seismically deficient, substantially damaged/deteriorated (and therefore some of which are no longer habitable), and non-compliant with current ADA requirements.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

PP 4.11-1 *Fire alarm connections to the University Police Command Center shall continue to be provided in all new and renovated buildings to provide immediate location information to the Los Angeles Fire Department to reduce response times in emergency situations.*

PP 4.11-2(a) *Police staffing levels and equipment needs shall continue to be assessed on an ongoing basis as individual development projects are proposed and on an annual basis during the campus budgeting process to ensure that the appropriate service levels will be maintained to protect an increased campus population and an increased level of development.*

In addition, LRDP PPs 4.12-1(a) and 4.12-1(b), discussed in Section V.15, Recreation, of this IS, have been incorporated into the proposed Project and require the campus to continue to provide

recreational facilities for students, faculty, and staff on campus and to continue to integrate landscaped open space with development.

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 LRDP EIRs concluded that, with implementation of LRDP PP 4.11-1, there would be a less than significant impact related to the need for new or physically altered fire protection facilities to accommodate the increased demand resulting from implementation of development on campus pursuant to the LRDP and to maintain acceptable response times and fire flows.

The proposed Project involves the replacement of existing buildings at Sunset Rec that were built in the 1960s, including three buildings that are currently red-tagged for safety purposes, as well as buildings that do not meet current fire protection and accessibility requirements. There would be a net increase of 4,518 gsf of building area at the Project site. The types of service calls are anticipated to be similar to those associated with the existing uses at Sunset Rec, including, but not limited to, structural fires and emergency medical and rescue services.

The LAFD provides fire suppression and rescue operations for the UCLA campus, including at Sunset Rec. Fire alarm calls on campus are received by UCPD command center staff members, who screen calls; determine the call location; and then alert the LAFD. Fire Station No. 37 is located at 1090 Veteran Avenue, approximately 1.0 mile south of the Project site, and would have primary responsibility for a first alarm call to the Project site. In cases where there is a need for backup support, additional LAFD fire stations would provide the necessary assistance. Fire Station No. 37 includes a truck and two engines; Basic Life Support (BLS, for evening hours only) and Advanced Life Support (ALS, staffed 24 hours per day/7 days per week) ambulances; and a Fire Chief command car. The station is staffed daily by 14 fire personnel, including 1 paramedic and 1 member of the battalion command team. On a community-wide (Westwood Community) basis from January to December 2022, Fire Station No. 37 had initial response times of 7 minutes and 23 seconds for emergency medical services (EMS) calls; 6 minutes and 53 seconds for non-EMS calls; 6 minutes and 6 seconds for critical ALS calls, and 5 minutes and 40 seconds for structure fires (LAFD, 2023). In addition to LAFD paramedics, UCLA paramedics and ambulances from the RRUMC respond to emergency calls both on and off campus (UCLA, 2018).

Additionally, UCLA Fire, a California state fire agency has authority over all UCLA-owned and occupied interests, both on and off campus. UCLA Fire sworn peace officers respond to calls for emergency service (i.e., 911 calls), mitigate threats/hazards to the University, prepare the public to manage emergencies, partner with stakeholders to respond to and recover from emergencies and disasters, investigate fire and explosion incidents, and enforce California fire and explosion

law. UCLA Fire takes responsibility as first responder to all UCLA fire alarm calls, and upon assessment of the situation, they request Fire Station No. 37 to provide response for actual fire situations.

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the CBC); fire protection and notification systems; fire protection devices, such as extinguishers and smoke alarms; building access; high-rise building and childcare facility standards; emergency response notification systems; and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California, including at UCLA.

Consistent with the campus' standard procedures, the Campus Fire Marshal would review and approve the proposed Project to ensure that: (1) adequate fire flows are maintained; (2) an adequate number of fire hydrants is provided in the appropriate locations; and (3) circulation and design features allow adequate emergency vehicle access. The Campus Fire Marshal also inspects buildings during and after construction, and buildings can only be occupied with the approval of the Fire Marshal. In addition, the proposed 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.

The proposed Project incorporates LRDP PP 4.11-1, which requires direct fire alarm connection to the University Police command center to facilitate emergency response by providing immediate location information. UCLA Fire would continue to be the first responder to all fire alarms initiated from the proposed new building and would request backup support from LAFD only as needed. Based on compliance with current fire protection regulations, the proximity of Fire Station No. 37 to the Project site, and because the proposed Project involves the development of a replacement building that would accommodate the same types of uses and recreational programming that currently exist, the proposed Project would not substantially increase the demand for fire protection services such that new or physically altered fire protection facilities would be required to serve the proposed Project or to maintain acceptable response times and fire flows. No physical environmental impacts related to the provision of fire protection services would result, and impacts related to maintaining acceptable performance metrics would be less than significant, consistent with the findings of the LRDP EIRs. No additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
b) Police protection?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that there would be a less than significant impact related to the need for new or physically altered police facilities to accommodate the increased demand resulting from implementation of development on campus pursuant to the LRDP and to maintain acceptable response times.

According to Section 92600 of the California Education Code, the UCPD has concurrent jurisdiction with the Los Angeles Police Department (LAPD) within a one-mile radius of University-owned property. The UCPD is often the first responder at properties around the campus and may take primary responsibility for events off campus. The UCPD is comprised of duly sworn police officers under 830.2(b) of the California Penal Code and its jurisdictional responsibilities are articulated in the California Education Code. The UCPD station is located on campus, at the northwestern corner of the intersection of Charles E. Young Drive South and Westwood Plaza (601 Westwood Plaza), approximately 0.6 mile southeast of the Project site.

The UCPD has primary responsibility for police protection services on campus. UCPD personnel are used in crime prevention, investigations, and administration. All sworn officers are available on an on-call basis to respond in emergency situations. On a part-time basis, students are employed as Community Service Officers (CSOs) to provide escort services, equipment security services, and patrol assistance. UCPD has indicated that staffing levels are currently considered acceptable with approximately 64 sworn officers, 42 non-sworn personnel, and 130 students employed as CSOs (UCPD, 2023). The campus evaluates police protection needs on an ongoing basis and considers the need to augment UCPD and CSO staffing levels as institutional priorities. Consistent with LRDP PPs 4.11-2(a) and 4.11-2(b), which have been incorporated into the proposed Project, the campus would continue to assess police staffing levels as individual development projects are proposed.

Additionally, to ensure adequate response to life-safety issues and as required by LRDP PP 4.11-1, the proposed building would have direct fire alarm connections to the UCPD command center to facilitate emergency response by providing immediate location information. In addition, the UCPD would continue its current practice of cooperating with the LAPD, the Santa Monica Police Department, and the California Highway Patrol to help ensure the adequacy of police protection services across the campus and surrounding area.

The proposed Project, which involves the development of a replacement building at Sunset Rec that would accommodate the same types of uses and recreational programming that currently exist, would not substantially increase the demand for police protection services provided by the UCPD and/or LAPD such that new or physically altered police protection facilities would be required to serve the proposed Project or to maintain acceptable response times. No physical environmental impacts related to the provision of police protection services would result, and impacts related to maintaining acceptable performance metrics would be less than significant, consistent with the findings of the LRDP EIRs. No additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
c) Schools?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that there would be a less than significant impact to Los Angeles Unified School District (LAUSD) services and facilities with implementation of development on campus pursuant to the LRDP.

The proposed Project involves the development of a replacement building at Sunset Rec that would accommodate the same types of uses and recreational programming that currently exist, with no increase in the campus population. The proposed Project would not result in the generation of elementary, middle, or high school students. Therefore, there would be no increase in demand for LAUSD services and facilities. The proposed Project would not result in a need for the construction of new or altered school facilities, and no physical environmental impacts would result, consistent with the findings of the LRDP EIRs. Consistent with the findings of the LRDP EIRs, this impact would be less than significant and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
d) Parks?	☐	☒	☐	☐

Discussion

The analysis of the proposed Project's impacts on parks and other recreational facilities is provided in Section V.16, Recreation, of this IS.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
e) Other public facilities?	☐	☒	☐	☐

Discussion

The proposed Project involves the development of a replacement building at Sunset Rec that would accommodate the same types of uses and recreational programming that currently exist. There would be no increase in the campus population as a result of the proposed Project. Therefore, the proposed Project would not result in an increased demand for on- or off-campus library services or other public services, nor would new or expanded library facilities or other public facilities be required, and no physical environmental impacts would result. Consistent with the findings of the LRDP EIRs, this impact would be less than significant and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to public services. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to public services. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.16. Recreation

Relevant elements of the proposed Project related to recreation include the development of a new two-story (plus rooftop deck), student-oriented, multi-purpose building at Sunset Rec, which would provide approximately 11,500 gsf of recreational floor area plus approximately 6,500 gsf of exterior space that is covered but unenclosed. Additionally, associated utility, landscape, and hardscape improvements would be installed. The new building would replace a series of seven existing buildings/facilities at Sunset Rec, which comprise approximately 6,982 gsf of floor area plus 5,807 gsf of covered, unenclosed space. The new building would result in a net increase of 4,518 gsf of development within Sunset Rec. There would be no increase in the campus population as a result of the proposed Project.

The buildings to be demolished are seismically deficient, substantially damaged/deteriorated (and therefore some of which are no longer habitable), non-compliant with current ADA requirements, otherwise constrained from a programming perspective, or, in some cases, inextricably physically, structurally, or programmatically dependent upon the deficient structures.

The following adopted PPs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

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

PP 4.12-1(b) *The campus shall continue to integrate landscaped open space (including plazas, courts, gardens, walkways, and recreational areas) with development to encourage use through placement and design.*

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that development on campus pursuant to the LRDP, with an associated increase in the average weekday campus population, would result in less than significant impacts related to substantial physical deterioration of on- or off-campus recreational facilities.

The proposed Project involves the construction of a new building to support existing recreational programming at Sunset Rec, which would replace several existing, deficient buildings. As previously discussed, the Project is not expected to increase programming at Sunset Rec, nor would it increase the campus population. Therefore, the proposed Project would not increase the demand for on- or off-campus recreational facilities such that a substantial physical deterioration

of on-campus recreational facilities or acceleration of such deterioration would occur. This impact would be less than significant, consistent with the findings of the LRDP EIRs, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
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 LRDP EIRs identified that future recreational facilities, such as the proposed Project, would be subject to project-specific environmental review in accordance with CEQA. This IS provides the required environmental review for the proposed Project, which involves the construction of a replacement building to support existing recreational programming at Sunset Rec. The potential environmental impacts resulting from implementation of the proposed Project have been addressed in this IS and will also be evaluated in the forthcoming Draft Supplemental EIR. As identified throughout the analysis presented in this IS, with the exception of impacts to historic resources, which are addressed in Section V.5, Cultural Resources, of this IS, the proposed Project's impacts would be less than significant with implementation of applicable LRDP PPs and MMs, and no further evaluation of such issues is needed in the Draft Supplemental EIR.

The existing buildings to be demolished are within the complex of core recreation buildings at Sunset Rec that are potentially eligible for listing in the CRHR. Potential impacts to historic resources will be evaluated in the Cultural Resources section of the forthcoming Draft Supplemental EIR. However, no further evaluation of recreation impacts is required.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to recreation. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to recreation. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.17. Transportation

Relevant elements of the proposed Project related to transportation include short-term construction activities that would involve heavy trucks on the identified construction routes (as described in Section II.5, Proposed Project Components, under "Construction Activities", of this IS), and improvements to the on-site non-vehicular circulation system and accessibility. There would be no increase in traffic or parking associated with the proposed Project.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section.

PP 4.13-1(a) *The campus shall continue to maintain the 1990 LRDP vehicle trip cap of 139,500 average daily trips.*

PP 4.13-1(b) *The campus shall continue to maintain the 1990 LRDP parking cap of 25,169 spaces.*

PP 4.13-1(d) *The campus shall continue to implement a TDM program that meets or exceeds all trip reduction and AVR requirements of the SCAQMD. The TDM program may be subject to modification as new technologies are developed or alternate program elements are found to be more effective.*

PP 4.13-2 *UCLA Capital Programs will assess construction schedules of major projects to determine the potential for overlapping construction activities to result in periods of heavy construction vehicle traffic on individual roadway segments, and adjust construction schedules, work hours, or access routes to the extent feasible to reduce construction-related traffic congestion.*

PP 4.13-5 *To the extent feasible, the campus shall maintain at least one unobstructed lane in both directions on campus roadways. At any time only a single lane is available, the campus 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 shall provide appropriate signage indicating alternative routes.*

PP 4.13-6 *For any construction-related closure of pedestrian routes, the campus shall provide appropriate signage indicating alternative route and provide curb cuts and street crossings to 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 to disclose temporary lane or roadway closures and alternative travel routes.*

MM 4.13-11 *To the extent that construction worker parking demand exceeds historical levels or available supply, off-site construction worker parking shall be provided with shuttle service to and from the remote parking location.*

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that implementation development on campus would not conflict with applicable plans and policies addressing the circulation system, resulting in a less than significant impact.

As previously discussed in Section V.11, Land Use and Planning, 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 the campus but is not bound by those plans and policies in its planning efforts. The following discussion analyzes the proposed Project's transportation impacts (vehicular and non-vehicular) taking into consideration UCLA and local transportation plans and policies, as appropriate.

Transit

As discussed in Section V.8, Greenhouse Gas Emissions, of this IS, the UC Policy on Sustainable Practices and UCLA CAP address reducing dependency on use of single occupancy vehicles to reduce emissions from mobile sources. An extensive transit network serves the UCLA campus and Westwood area, including bus lines managed by the Los Angeles County Metropolitan Transportation Authority (Metro), Santa Monica Big Blue Bus (BBB), Antelope Valley Transit Authority (AVTA), City of Santa Clarita Transit, Amtrak, and Los Angeles Department of Transportation (LADOT). These bus lines provide a variety of bus services and, when transfer opportunities are considered, those outlined below provide access to Metro rail services, Metrolink, and numerous other bus routes served by Metro, LADOT, and other municipal bus operators. There are bus stops within a "reasonable/comfortable walking distance" (approximately one-quarter mile or less) of the Project site, with the closest bus stops located at the intersection of Sunset Boulevard and Bellagio Drive. When transfer opportunities are considered, the Project site is accessible to and from the greater Los Angeles region via public transit. Further, the UCLA TDM program is a comprehensive program that offers a broad range of services to encourage and assist UCLA commuters in utilizing alternatives to the single-occupancy vehicle. The proposed Project does not include the installation of a new bus stop, the relocation of an existing bus stop, or the modification of an existing bus stop.

Roadways

As discussed in the Transportation sections of the LRDP EIRs, which are incorporated by reference, the UCLA campus, which includes the Project site, is well-served by freeways, avenues, and local streets. Freeways are located to the west and south (I-405 and I-10,

respectively) and provide convenient access to the larger, regional roadway network. Within the vicinity of the Project site, the primary roadways are Sunset Boulevard, which forms the northern perimeter of the campus, and De Neve Drive, which is one of the primary roadways accommodating vehicular circulation in the Northwest zone. Sunset Rec is accessed from Easton Drive via De Neve Drive.

Construction Activities

For purposes of analysis in this IS, construction of the proposed Project is expected to begin in Spring 2024 and be completed in Winter 2026. Construction traffic resulting from the proposed Project would primarily be associated with construction workers commuting to and from the Project site; removal of demolition materials associated with removal of the existing building and hardscape features; delivery of building materials; transport of construction equipment (including large equipment); and export of soil. Construction workers do not typically commute during peak hours as they generally arrive prior to morning (AM) peak hour and leave prior to the evening (PM) peak hour. The use of heavy trucks for the transport and disposal of building materials, equipment, and soils would occur periodically throughout the workday but largely outside of peak hours. For the proposed Project, the peak days for construction-related heavy truck traffic would occur when haul trucks transport demolition materials and soil being exported from the Project site.

As discussed in Section II, Project Description, of this IS, it is conservatively estimated that on a peak construction day there would be an average of approximately 24 daily round truck trips (49 inbound and outbound trips) during the grading period (estimated to last a total of 22 working days). These trips would be spread out over a typical eight-hour construction day; however, it is conservatively estimated that the truck trips would occur over six hours. Therefore, approximately eight round truck trips would be generated during an average hour. With a typical construction day starting at 7:00 AM, approximately eight equivalent round trips would be generated during the AM peak hour during the period of heaviest construction activity. Construction would typically be completed each day prior to the PM peak hour; therefore, no PM peak hour impacts are anticipated.

The proposed Project incorporates LRDP PP 4.13-5, which requires one travel lane in each direction and actions to take when lane closures are needed; and LRDP PP 4.13-6, which requires signage for alternate pedestrian routes when closure of a pedestrian route during construction is required. Implementation of these PPs would reduce potential circulation impacts during construction to a less than significant level.

Construction of the proposed Project would overlap with several other major UCLA construction projects, including the following: Gayley Towers (off campus), Wooden Center Seismic Improvements, and Co-Generation Plant Equipment Replacement. Refer to the Campus Map presented in Figure 2, which identifies the location of these projects. Additionally, non-UCLA development projects may be under construction in the surrounding community. Although heavy truck trips generated by construction activities associated with the proposed Project may coincide with on- and off-campus construction activities, most of these projects would have distinct haul routes with minimal overlap, different construction sequencing with separate peak periods of truck trips, and/or be subject to City of Los Angeles permitting requirements intended to reduce overlapping haul routes. Additionally, as required by LRDP PP 4.13-2, UCLA would continue to monitor the construction schedules of major projects as they proceed and would adjust construction schedules, work hours, or access routes as needed to reduce construction-related

traffic congestion. Therefore, concurrent heavy truck traffic associated with the proposed Project and other major projects in the area would be minimized to the extent possible to avoid substantial traffic congestion on local roadways.

Operational Traffic

The proposed Project would not involve changes to the nature of recreational programming at Sunset Rec and thus would not result in an increase in daily vehicular trips or an increase in parking demand. Pursuant to LRDP PPs 4.13-1(a) and 4.13-1(b), the proposed Project would maintain the daily trip and parking caps established in the 1990 LRDP.

The proposed Project would not involve the construction of any new roadways; Easton Drive would continue to provide primary vehicular access to Sunset Rec, including the Project site and the SR Parking Structure. Notwithstanding, UCLA students, faculty and staff using Sunset Rec would have access to a full range of existing campus TDM programs required by LRDP PP 4.13-1(d), including, but not limited to: campus transit; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; on-campus car share program; zip cars; public transit incentives; and use of UCLA's Commuter's Guide. Continued implementation of the campus TDM program would reduce reliance on single occupancy vehicles.

Bicycle and Pedestrian Facilities

Based on review of the UCLA Bike Map, there are Campus Bike Routes and Campus Bike Lanes on the roadways in the vicinity of Sunset Rec (De Neve Drive and Charles E. Young Drive North), and these bicycle facilities provide connections to other on campus bicycle facilities along on-campus roadways (UCLA, 2019). Additionally, Sunset Rec provides shower facilities, bike racks, and a repair stand with a bike pump. There is also an extensive system of pedestrian facilities within and surrounding Sunset Rec that allow for pedestrian access to the Project site under existing conditions.

The proposed Project does not require the construction of any new bicycle or pedestrian facilities to serve Sunset Rec; however, pedestrian access within the Project site would be improved. As shown on the conceptual site plan provided on Figure 6, pedestrian access between the lower and upper pools would be enhanced by new stairways to the south of the proposed building, with bench seating and terraces incorporated into the design. New ADA access between the two pool levels would be provided via the proposed building's elevator, and the existing wheelchair ramp behind the building would remain.

In summary, the proposed Project would incorporate LRDP PP 4.13-1(d), PP 4.13-2, PP 4.13-5, and 4.13-6, which require implementation of TDM programs to reduce reliance on single vehicle occupancy trips and measures to minimize impacts to the circulation system during construction. The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Consistent with the findings of the LRDP EIRs, this impact would be less than significant and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒

Discussion

SB 743, codified in PRC Section 21099, directed the State to adopt new guidelines for evaluating transportation impacts. In response to SB 743, the 2019 updates to the CEQA Guidelines, which occurred subsequent to preparation of the LRDP EIRs, included the addition of CEQA Guidelines Section 15064.3(b). Section 15064.3(b) establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric.

Although UCLA is not required to follow LADOT's Transportation Assessment Guidelines (TAG) (LADOT, 2022), the TAG as well as the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Impacts in California Environmental Quality Act (December 2018) were used as a guide for a qualitative VMT Assessment for the proposed Project. To assist in determining which development projects would conflict with CEQA Guidelines Section 15064.3(b)(1), the TAG establishes two screening criteria to evaluate the requirement of further analysis of a land use project's impact based on VMT. The TAG identifies that if the answer is "no" to either of these criteria, further analysis is not required for Threshold T-2.1, and a "no impact" determination can be made for this threshold:

1. The land use project would generate a net increase of 250 or more daily vehicle trips.
2. The land use project would generate a net increase in daily VMT.

As previously discussed, the proposed Project would not change the nature of recreational programming at Sunset Rec and would not result in additional daily traffic generation during operation. Therefore, the proposed Project would not generate a net increase of 250 or more daily vehicle trips and would not generate an increase daily VMT. As such, pursuant to the LADOT TAG, no further VMT analysis is required, and the proposed Project would have no VMT impact. No mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The concluded that construction activities and operations associated with implementation of development on campus pursuant to the LRDP would result in less than significant impacts related to hazards along roadways.

The proposed Project is located on campus at Sunset Rec. As shown on the conceptual site plan provided on Figure 6, vehicular access to the Project site is provided from Easton Drive via De Neve Drive. Easton Drive provides access to the SR Parking Structure and a service drive for the existing buildings on-site and terminates at a roundabout adjacent to the Project site.

Vehicular Hazards During Construction

Construction staging would occur within Sunset Rec, and construction workers would park in the SR Parking Structure adjacent to the Project site. Construction activities associated with the proposed Project could result in the temporary disruption of travel along portions of Easton Drive (mainly at the roundabout, adjacent to the Project site) during various construction activities, including, but not limited to, accommodating the delivery of construction supplies, providing adequate site access for construction vehicles and equipment, and demolition or installation of utility infrastructure. Any potential reduction of roadway capacity, narrowing of traffic lanes, or the occasional interruption of traffic flow on Easton Drive and other streets along the construction route during construction could pose hazards to vehicular traffic due to localized traffic congestion, decreased turning radii, or the condition of roadway surfaces. To minimize traffic disruption and congestion, the Project's construction traffic would be routed to minimize affected roadways and efficiently move traffic through the campus and Project area.

In addition, implementation of LRDP PP 4.13-5, which requires maintenance of one travel lane in each direction (to the extent feasible) and/or the provision of signal carriers (i.e., flagpersons) when only a single lane can be maintained, would ensure that impacts associated with a construction-related traffic lane or roadway closures remain less than significant, consistent with the findings of the LRDP EIRs.

Pedestrian/Bicyclist Hazards During Construction

There are existing sidewalks located along each side of Easton Drive, including the roundabout at its terminus, and along the west side of De Neve Drive near the Project site. To avoid conflicts or potential hazards to pedestrians during construction, the section of sidewalk along Easton Drive's roundabout adjacent to the Project site would be closed during portions of the construction period. However, full pedestrian access from the SR Parking Structure to the Sunset Rec entry kiosk would be maintained. Safe pedestrian movement within and around the Project site and access to Sunset Rec uses that would remain operational during construction would likewise be maintained as efficiently as possible. It is noted that the existing ADA ramp located behind the existing buildings on-site would be closed during Project construction, and UCLA Rec would provide shuttle service between the lower and upper levels/facilities as needed. The proposed Project also incorporates LRDP PP 4.13-6, which requires appropriate signage of alternate pedestrian routes around the proposed Project. The proposed Project would not interfere with or require closure of existing on-road bicycle facilities. As such, there would be less than significant impacts related to pedestrian and bicyclist hazards along roadways during construction.

Hazards During Operation

No long-term changes to public roadways, service roads, vehicular circulation routes, or pedestrian or bicycle facilities along roadways are proposed as part of the Project. Additionally, the proposed Project does not involve any operational activates that would substantially increase hazards to vehicles, pedestrians or bicyclists during operation, consistent with the findings of the LRDP EIRs.

Consistent with the findings of the LRDP EIRs, the proposed Project would not substantially increase vehicular, pedestrian or bicyclist hazards due to a geometric design feature or incompatible uses. This impact would be less than significant and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	Less Than Significant Impact	No Impact
d) Would the project result in inadequate emergency access?	☐	☒	☐	☐

Discussion

The LRDP EIRs concluded that construction and operational activities associated with implementation of development on campus pursuant to the LRDP would result in less than significant impacts to emergency access with implementation of LRDP PP 4.13-8.

Emergency Access During Construction

Easton Drive via De Neve Drive provides access to the Project site. Construction activities may result in the temporary closure of a traffic lane along Easton Drive, most likely at the existing roundabout, to permit the delivery of construction materials, to transport soil, to accommodate the demolition or installation of utility infrastructure, or to provide adequate site access. Any potential reduction of roadway capacity, narrowing of traffic lanes, or the occasional interruption of traffic flow could temporarily impair emergency access. Construction activities would be planned so that access for emergency vehicles is maintained at all times. Additionally, implementation of LRDP PP 4.13-8 as part of the proposed 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 proposed Project, and no additional mitigation is required.

Emergency Access During Operation

With implementation of the proposed Project, emergency access points would be maintained. Consistent with the campus' standard procedures, the Campus Fire Marshal would review and approve the proposed Project to ensure that circulation and design features allow adequate emergency vehicle access in compliance with the California Building Code. Therefore, there would be less than significant impacts related to emergency access during operation of the proposed Project and no mitigation is required.

Consistent with the findings of the LRDP EIRs, there would be less than significant impacts related to emergency access during construction and operation of the proposed Project and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to transportation. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to transportation. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.18. Tribal Cultural Resources

Relevant elements of the proposed Project related to tribal cultural resources include excavation to a depth of up to 25 feet bgs that would extend into native soils.

LRDP MM 4.4-2(c) presented in Section V.5, Cultural Resources, of this IS, is considered part of the proposed Project and is assumed in the analysis presented in this section.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

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 proposed project if they have requested notice of projects proposed within that area. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document.

AB 52 became effective on July 1, 2015 and requires that the lead agency provide project notifications to California Native American tribes that request notification in writing prior to a lead agency's release of a Notice of Preparation (NOP) for an EIR, an MND, or Negative Declaration (ND). Once Native American tribes receive a project notification, they have 30 days to respond as to whether they wish to initiate consultation regarding the project and specifically consultation regarding mitigation for any potential project impacts. To date, UCLA has received one request (from the Torres Martinez Desert Cahuilla Indians) to be notified of projects occurring on campus; this request was received on May 2, 2016. On May 13, 2016, the University of California, Office of the President (UCOP) sent a letter to Michael Mirelez, Cultural Resource Coordinator of the Torres Martinez Desert Cahuilla Indians, advising Mr. Mirelez that based on information from the NAHC, the Torres Martinez Desert Cahuilla Indians did not appear to be traditionally and culturally affiliated with any UC campus other than the University of California, Riverside.

Notwithstanding this correspondence from UCOP, UCLA subsequently sent notifications regarding three projects to the Torres Martinez Desert Cahuilla Indians pursuant to AB 52. However, no response to these notifications was received. Therefore, UCLA sent a letter on October 31, 2016 to inform Mr. Mirelez that the Torres Martinez Desert Cahuilla Indians would no longer be notified of UCLA projects and to request confirmation of concurrence on UCLA's decision. No response was subsequently received from Mr. Mirelez.

The Project site is currently developed and has been subject to previous ground disturbance. As discussed in Section 4.4, Cultural and Tribal Cultural Resources, of the LRDP Final SEIR, which is incorporated by reference, the SCCIC conducted a records search for the UCLA campus, which includes the Project site, and the area within 0.25 mile of the campus, on February 23, 2016. The records search did not identify any historic or prehistoric archaeological sites at or near the Project site. As previously addressed in Section V.5, Cultural Resources, of this IS, historic resources located within the Project site include the existing buildings constructed in the 1960s. No tribal cultural resources, including those listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, have ever been recovered or recorded on or near the Project site.

Nonetheless, as previously addressed in Section V.5, Cultural Resources, excavation and grading at the Project site is expected to disturb native alluvial sediments and, therefore, may have the potential to impact previously unidentified tribal cultural resources. The potential to encounter previously unidentified tribal cultural resources during construction is a potentially significant impact that would be reduced to a less than significant level with implementation of LRDP MM 4.4-2(c), which specifies procedures to be taken by the project archaeologist if potential Native American artifacts are encountered. No additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to tribal cultural resources. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to tribal cultural resources. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.19. Utilities and Service Systems

Relevant elements of the proposed Project related to utilities and service systems include the development of a new multi-purpose building at Sunset Rec, which would provide approximately 11,500 gsf of recreational floor area plus approximately 6,500 gsf of exterior space that is covered but unenclosed. The new building would replace a series of seven existing buildings/facilities at Sunset Rec, which were constructed in the 1960s and comprise approximately 6,982 gsf of floor area plus 5,807 gsf of covered, unenclosed space. The new building would result in a net increase of 4,518 gsf of development within Sunset Rec, and a net increase of 693 gsf of covered, unenclosed space. Existing utility infrastructure would be removed and new infrastructure installed as necessary to serve the proposed replacement building.

The proposed Project would be designed to achieve a minimum LEED Gold rating with a target of achieving a LEED Platinum rating. The proposed Project would also comply with all current CALGreen mandatory requirements. The design, construction, and operation of the proposed 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. No natural gas would be used, and a rooftop PV system would be installed to offset the electric demand from operation of the proposed Project.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project, and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP are signified by strikeout (~~strikeout~~) where non-applicable text has been removed.

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) *The campus shall promptly detect and repair leaks in water and irrigation pipes.*

PP 4.14-2(d) *The campus shall minimize the use of water to clean sidewalks, walkways, driveways and parking areas.*

PP 4.4-2(g) *The campus shall educate the campus community on the important of water conservation measures.*

PP 4.14-5 *As part of the design process for proposed projects, an evaluation of the on campus sewer conveyance capacity shall be undertaken, and improvements provided if necessary in order to ensure that connections are adequate and capacity is available to accommodate estimated flows.*

PP 4.14-3 *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 *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, LRDP PP 4.15-1, discussed in Section V.8, Greenhouse Gas Emissions, of this IS, requires implementation of the provisions of the UC Policy on Sustainability Practices; and LRDP PPs 4.7-1 and 4.7-5, and LRDP MM 4.7-1, discussed in Section V.10, Hydrology and Water Quality, of this IS, requires development and implementation of BMPs to manage runoff, all of which are also incorporated into the proposed Project.

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that there would be a less than significant impact related to the need to construct new or expanded utility infrastructure with implementation of LRDP PPs 4.14-2(a) through 4.14-2(d) and PPs 4.14-2(f), 4.14-2(g), and 4.14-5. Potential impacts from construction of required infrastructure were comprehensively analyzed at a program level in the LRDP EIRs.

As previously described in Section II.5, Project Components, of this IS, under the discussion of Utilities, and as shown on Figure 5, utility infrastructure necessary to serve the Project currently exists within or adjacent to the Project site. As shown on Figures 16 and 17, respectively, the proposed Project would involve the removal of existing utility infrastructure and the installation of new utility infrastructure that would connect to existing water, sewer, electricity, and telecommunications facilities. As discussed herein and further below, the existing utilities have sufficient capacity to serve the proposed Project, and the construction of new or expanded

facilities off-site would not be required beyond that necessary to accommodate connections to the new building. No off-site improvements would be necessary.

Implementation of the Project would result in a decrease in runoff from the Project site compared to existing conditions due to an increase in pervious surface area (an increase of approximately 74 percent when accounting for the addition of permeable pavers). Additionally, through compliance with the Phase II MS4 requirements, storm water drainage would be controlled such that the construction of new or expanded storm drainage facilities would not be necessary. Storm water management and water treatment facilities required for the proposed Project would be located within the construction impact footprint.

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, consistent with the findings of the LRDP EIRs. No additional impacts would occur and no additional mitigation is required beyond that identified in this IS for construction-related impacts. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 LRDP EIRs concluded that, although implementation of the remaining development allocation on campus would generate an additional demand for water, with implementation of LRDP PPs 4.14-2(a) through 4.14-2(d) and PP 4.12(g), it would not require water supplies in excess of existing entitlements and resources or result in the need for new or expanded entitlements. Impacts were determined to be less than significant.

The proposed Project would result in a minimal net increase (4,518 gsf) of development at Sunset Rec, which is within the remaining development allocation established by the LRDP for the Northwest zone. The proposed Project would replace existing building constructed in the 1960s with a new building designed to meet or exceed water conservation requirements established by the State or the University of California. Additionally, the following water conservation measures would be implemented as required by LRDP PP 4.14-2(9): incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands; and selecting water fixtures (e.g., taps, toilets, shower heads, and other fixtures) to achieve a reduction in water demand and increase water efficiency (consistent with and using recycled/reclaimed storm water for irrigation). Further, LRDP PPs 4.14-2(b) through 4.14-(d) are incorporated into the Project which require reducing irrigation needs; promptly detecting and repairing water and irrigation pipe leaks; and minimizing the use of water to clean walkways and other hardscape, respectively. Therefore, an overall net decrease in water demand relative to existing conditions is anticipated due to updated fixtures, improved water efficiency, drought-tolerant landscaping, etc.. However, the analysis conservatively assumes no change in overall water consumption.

The LADWP supplies domestic water to properties within the City of Los Angeles, including the UCLA Campus, and ensures that the water meets all applicable state water quality standards. Section 4.14, Utilities and Service Systems, of the LRDP Final SEIR, which is incorporated by reference, includes a discussion of domestic water service provided by LADWP. The Los Angeles Aqueducts (LAA), local groundwater, purchased imported water from the Metropolitan Water District of Southern California, and recycled water are the primary sources of water supplies for the City. In their 2020 Urban Water Management Plan (UWMP), LADWP 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. LADWP is projected to have sufficient water supply to meet all demands for normal year, single-dry year, and multiple-dry year conditions through the planning period of 2025 to 2045 (LADWP, 2021). The 2020 UWMP assumes growth in the region as anticipated in SCAG's Connect SoCal, including buildout of the LRDP.

The net increase in development resulting from the proposed Project is consistent with the remaining development allocation for the campus under the LRDP and is therefore within the established demand projections of the 2020 UWMP. Additionally, with no net increase in water demand resulting from the proposed Project, water usage for the proposed Project would be within the established demand projections of the LADWP as outlined in the current 2020 UWMP. There would be sufficient water supplies for implementation of the Project and particularly in light of improved water conservation and efficiency with implementation of the Project, a less than significant impact related to water supply would occur. No additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that there would be a less than significant impact related to the need to construct new or expanded wastewater treatment facilities with implementation of LRDP PPs 4.14-2(a) through 4.14-2(d) and PPs 4.14-2(f), 4.14-2(g), and 4.14-5.

The City of Los Angeles provides wastewater (or sewer) conveyance facilities from the campus to the City's Hyperion Water Reclamation Plan (HWRP) located in Playa del Rey directly west of the Los Angeles World Airport. The HWRP treats wastewater from most of the City of Los Angeles and various contracting cities and agencies. Wastewater generated by the proposed Project would be treated by the HWRP, consistent with the existing buildings at Sunset Rec.

Because the amount of wastewater entering HWRP can double on rainy days, the HWRP was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day (mgd) and peak wet weather flow of 800 mgd. On average, 275 million gallons of wastewater enters the HWRP on a dry weather day (LA Sanitation, 2023).

Therefore, the HWRP currently operates at approximately 61 percent of its capacity, with approximately 175 mgd of available dry weather capacity. Because wastewater generation is correlated with water usage, continued water conservation practices would reduce the volume of wastewater generated. Continued implementation of LRDP PPs 4.14-2(a) through 4.14-2(d), PP 4.14-2(f), and PP 4.14-2(g), which emphasize a variety of water conservation practices, would further reduce wastewater generation. Conservatively assuming that all water used at the Project would ultimately flow into the local sewer system, there would be no net increase in wastewater generated at the Project site and treated at the HWRP.

Consistent with the findings of the LRDP EIRs, there would be a less than significant impact related to adequate wastewater treatment capacity to serve the Project's projected demand in addition to the provider's existing commitments, and no additional mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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

The LRDP EIRs concluded that with implementation of LRDP PPs 4.14-3 and 4.15-1, there would be a less than significant impact related to solid waste generation (i.e., there would be adequate capacity in landfills serving the campus) and compliance with all applicable federal, State, and local statutes and regulations related to solid waste.

UCLA contracts with a private waste disposal company (Athens Services) to collect, recycle, and dispose of solid waste generated by UCLA facilities located both on and off campus. Following waste separation, sorting and recycling activities, trash is transported to the Chiquita Canyon Landfill, located in an unincorporated area of northern Los Angeles County in the community of Castaic. The maximum daily capacity and remaining permitted capacity of Chiquita Canyon Landfill is 12,000 tons/day and, as of 2018, 60.41 million tons, respectively (CalRecycle, 2023). UCLA's recyclable materials are transported to Athens Material Recovery Facility in Sun Valley located in the San Fernando Valley, and compostable organics are sent to Recology Blossom Valley Organics in Lamont, Kern County.

Section 4.14, Utilities and Service Systems, of the LRDP Final SEIR, which is incorporated by reference, provides a discussion of the regulatory framework for solid waste management relevant to UCLA projects. While state and University regulations relative to solid waste management are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided here to identify updates, as appropriate, or to provide context for this analysis. AB 939 required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal was later increased to 75 percent by 2020 per SB 341. Further, 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, timelier, 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. Additionally, the CALGreen Code requires all new developments to divert 65 percent of non-hazardous construction and demolition (C&D) debris.

Notwithstanding the State's requirements, the UC Policy on Sustainable Practices, previously discussed in Section V.8, Greenhouse Gas Emissions, 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 is committed to achieving a 25 percent reduction of waste per person from FY 2015/2016 by 2025, a 50 percent reduction of waste per person from FY 2015/2016 by 2030, and a total 90 percent solid waste diversion rate from the landfill. This requirement exceeds those established by AB 341 and the CALGreen Code.

According to the most current annual data available from the UCLA 2019-2021 FY Waste Report (UCLA, 2022b), the UCLA campus achieved a solid waste diversion of 89 percent for construction waste. With regard to operational waste, the Athletics and Recreation departments collectively account for only two percent of the campus solid waste generation. Operational waste diversion was calculated to be 83 percent for compost, 100 percent for recycling and green waste, and zero percent for landfill (trash), meaning that of the waste disposed of as trash (as opposed to disposal as compost or recycling), all of it is ultimately received at a landfill. UCLA's extensive multi-stream waste diversion is accomplished 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. UCLA also operates a SAFE Collection Center at an EH&S facility that accepts off-campus residential hazardous and electronic waste for recycling at no charge. UCLA is able to monitor and enforce compliance with established diversion requirements through review of waste hauler receipts.

As further discussed below, the proposed Project would generate solid waste during construction activities and during operation.

- **Construction.** Based on the USEPA new construction waste generation rate of 4.34 lbs/sf for non-residential structures (USEPA, 2009), the proposed approximately 18,000 gsf of new construction (including covered unenclosed space) would generate a total of approximately 39.1 tons (78,120 lbs) of solid waste. Because the Project site is currently developed with seven buildings (approximately 12,789 gsf including covered unenclosed space), the proposed Project's construction activities would include demolition. Based on the USEPA demolition waste generation rate of 158 lbs/sf for non-residential structures, the existing buildings are calculated to generate approximately 1,010.3 tons (2.02 million lbs) of demolition waste. As such, the total the construction waste generated by the Project would be approximately 1,049.4 tons.

  A minimum LEED Gold rating for the proposed Project has been established, exceeding the current UC Sustainable Practices Policy. The UCLA campus is committed to achieving at least 90 percent waste diversion, which includes demolition and other construction waste. This would reduce the Project's total amount of construction waste to be disposed to approximately 104.9 tons with a 90 percent waste diversion. If the FY 2019-2022

construction diversion rate of 89 percent is assumed, the Project would require the disposal of approximately 115.4 tons.

Inert wastes, such as construction waste, yard trimmings, and soils, are typically disposed of at inert waste landfills.[27] One inert waste landfill, Azusa Land Reclamation Landfill in Azusa, has a full solid waste facility permit, although several other inert debris facilities operate in the County, most of which are located in Irwindale. Given its average disposal rate and remaining permitted capacity, Azusa Land Reclamation Landfill is estimated to reach its capacity in 201 years, although its current permit will expire in 2045. Combined with the other inert debris facilities, adequate long-term capacity is expected to remain available.[28]

The Project's construction waste stream would be disposed of at appropriate disposal facilities periodically over the construction period, rather than all in one day. Therefore, construction of the proposed Project, which incorporates LRDP PP 4.14-3 and PP 4.15-1, would result in a less than significant impact to landfill space.

- **Operation.** Based on solid waste generation factor of 1.57861 lbs per year per gsf provided in the LRDP EIRs, the proposed Project (with a net increase of 5,211 gsf of building area and covered, unenclosed space) is conservatively estimated to require the disposal of an additional 4.1 tons of trash per year (0.01 tons per day), compared to existing conditions.[29] The proposed Project would be served by the same private waste disposal company as on-campus facilities and therefore would be provided with the same collection, diversion, and disposal programs and facilities as.

  Continued waste diversion exceeding AB 939 requirements would be accomplished through UCLA's waste reduction and minimization efforts, as required by LRDP PP 4.14-3. This includes, but is not limited to, recycling and composting. The proposed Project would include three-stream receptacles to facilitate these efforts. Further, compliance with the UC Policy on Sustainable Practices is required (refer to LRDP PP 4.15-1), including provisions related to waste management practices. Specifically, UCLA is committed to achieving a 90 percent solid waste diversion rate from the landfill.

  To determine the Project's operational impact on solid waste facilities, the projected solid waste disposal need was compared to the total remaining capacity at the anticipated receiving landfill, Chiquita Canyon Landfill. This landfill has a daily maximum permitted capacity of 12,000 tons (yearly equivalent of 3.1 million tons) and received an average of 6,114 tons per day in 2020.[30] As of December 31, 2020 it had an estimated remaining lifespan of 27 years and a permit expiration date of 2047. Based on an estimated disposal need for an additional 4.1 tons per year, the Project's increased trash stream would represent approximately 0.0004 percent of the landfill's remaining annual capacity. Thus, Chiquita Canyon Landfill would have sufficient permitted capacity to accommodate the

[27] Inert waste is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

[28] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2020 Annual Report, October 2021.

[29] This solid waste generation factor is conservatively based on the amount of solid waste generated on campus in 2007 with a waste diversion of only 42 percent, which does not reflect the more stringent solid waste management actions imposed on campus since then.

[30] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2020 Annual Report, October 2021.

Project. Therefore, with incorporation of LRDP PPs 4.14-3 and PPs 4.15-1 into the proposed Project, there would be a less than significant impact to landfill space.

Consistent with the findings of the LRDP EIRs, proposed Project impacts related to solid waste would be less than significant and no mitigation would be required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to utilities and service systems. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to utilities and service systems. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.20. Wildfire

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 LRDP EIRs concluded development on campus pursuant to the LRDP would have no impact related to wildfires because the UCLA campus is not located within a wildland area.

The Project site is located within the limits of the City of Los Angeles and is therefore not within a State Responsibility Area where the California Department of Forestry and Fire Protection (CalFire) is responsible for fire suppression. The Project site is not located in a Wildfire Severity Zone as shown in Figure 13-8 of the City of Los Angeles LHMP (City of Los Angeles, 2018), which is based on CalFire's Fire and Resources Assessment Program (FRAM). The nearest Wildfire Severity Zone is located north of the Project site across Sunset Boulevard. Therefore, the proposed Project would have no impacts related to wildfires or the associated issues identified in Thresholds a through d, above. No impacts would occur, consistent with the findings of the LRDP EIRs, and no mitigation is required. No further evaluation of this issue is required in the Draft Supplemental EIR.

Conclusion

With respect to Section 15162 of the CEQA Guidelines, no substantial changes are proposed with the proposed Project, or the circumstances under which the proposed Project is being implemented that will require major revisions to the LRDP EIRs due to new or substantially more severe significant effects related to wildfire. Additionally, no new information of substantial importance shows the proposed Project will have one or more significant effects not discussed in the LRDP EIRs, or that significant effects previously examined would be more severe. For these reasons, there are no major revisions required to the analysis provided in the LRDP EIRs related to wildfire. Further evaluation of this environmental issue is not required in the Draft Supplemental EIR.

V.21. Mandatory Findings of Significance

Project Impact Analysis

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 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 Section V.4, Biological Resources, of this IS, the proposed Project would have no potential to impact special status plant and wildlife species, sensitive habitats (as the Project area is not within Stone Canyon Creek), or wildlife corridors (as there are none on campus). The proposed Project incorporates LRDP MMs 4.3-1(a) and 4.3-1(b) and, as a result, would have a less than significant impact on nesting birds. The proposed Project also incorporates LRDP MM 4.3-1(c) to ensure a less than significant impact related to the removal of existing trees, and LRDP MMs 4.3-1(a) through 4.3-1(e) to address the protection of trees to remain. Therefore the potential for the proposed Project to degrade the quality of the environment related to biological resources would result in a less than significant impact. Additionally, the proposed Project would not require excavation in native soils; therefore, it would not impact important examples of the major periods of California history or prehistory.

As discussed under Section V.5, Cultural Resources, of this IS, the proposed Project would involve excavation in native sediments and, although unlikely, there is a potential for previously unknown archaeological or paleontological resources to be encountered. Incorporation of LRDP PP 4.4-5, MM 4.4-2(a) through MM 4.4-2(c), MM 4.4-3(a), and MM 4.4-3(b) into the proposed Project would ensure that potential impacts would be reduced to a less than significant level.

As discussed under Section V.5, Cultural Resources, of this IS, the proposed Project would result in potentially significant impacts on historic resources and further evaluation is required in the Subsequent Draft EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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 defined in CEQA Guidelines Section 15355, cumulative impacts refer to two or more individual effects, which, when considered together, are considerable or which compound or increase other environmental impacts. Per CEQA Guidelines Section 15130(b)(1), the analysis of cumulative impacts may be based on a list of past, present, and probable future projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency. Relevant to the current analysis, the LRDP EIRs concluded that cumulative impacts resulting from buildout of the LRDP development allocation would be less than significant with the exception of cumulative air quality impacts during construction and operation, noise and vibration impacts if there were concurrent construction activities in the same area, and cumulative construction-related transportation impacts. The LRDP EIRs also concluded that cumulative operational traffic impacts at study intersections would be significant and unavoidable; however, pursuant to SB 743, automobile delay, as measured by level of service (LOS) and other similar metrics, no longer

constitutes a significant environmental effect under CEQA. Therefore, no analysis of intersection impacts is required for the proposed Project. Notwithstanding, as discussed in Section V.17, Transportation, of this IS, the proposed Project would not increase vehicular trips generated by operations at Sunset Rec.

The following known major UCLA construction projects are proposed, approved, and/or under construction either on the UCLA campus. Refer to the Campus Map presented on Figure 2, which identifies the location of these projects.

- **Wooden Center Seismic Improvements** – The proposed project at the John Wooden Center, located in the center of campus, would improve the building from a seismic performance rating of VI to at least a seismic performance rating of IV, in compliance with current UC Seismic Safety Policy requirements. Also included are accessibility improvements, enclosure of the exterior loggia to add approximately 2,600 gsf of programmable space, and a new roofing membrane. Construction is estimated to last from Fall 2024 through Fall 2026.

- **Co-Generation Plant Equipment Replacement** – UCLA's co-generation plant is an 86,000-sf building that provides electric power, chilled water, and steam to the campus. The proposed project involves the replacement and upgrade of the plant's combined power generating equipment. Improvements would include, but not be limited to, the installation of two new gas turbine generators, modifications to two existing heat recovery steam generators, modification of existing piping and ductwork, and modifications to the existing structure to accommodate the new generators and mechanical and electrical equipment. These activities are projected to last from approximately Summer 2023 to Summer 2024.

- **Gayley Towers Redevelopment Project** – Located at 565 Gayley Avenue, this project involves the development of a co-living style of student housing on an approximately 20,831 square foot (sf) (0.48 gross acre) Project site, which is currently developed with a University-owned developed with a University-owned six-level, approximately 57,075 gsf apartment building. The project would involve the development of an eight-level, approximately 112,000 gsf residential structure with a landscaped interior courtyard. There would be 187 bedrooms and up to 545 beds provided; at least 65 percent of these beds (358 beds) would be offered as affordable beds. This represents an increase of 136 units/rooms and 445 beds. Construction activities are projected to occur between 2024 and 2026.

As discussed in Section V.3, Air Quality, of this IS, the proposed 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.

With respect to other topical issues, the proposed Project would have no impact, a less than significant impact, or a less than significant impact with continued implementation of applicable PPs and MMs from the LRDP Final SEIR. Therefore, the proposed Project would not result in a cumulatively considerable contribution to any potential cumulative impacts. Nonetheless, the LRDP concluded that cumulative air quality impacts during construction and operation, cumulative noise and vibration impacts, and cumulative transportation impacts during construction would be significant and unavoidable. No additional mitigation beyond that adopted as part of the LRDP is

required. No further evaluation of cumulative impacts in the Draft Supplemental EIR is required for these environmental issues.

With respect to historic resources, the potential cumulative impacts to historic resources will be addressed in the forthcoming Draft Supplemental EIR.

Threshold(s)	Additional Project-level Impact Analysis Required	Project Impact Adequately Addressed in the LRDP EIR	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, with the exception of potential impacts to historic resources, all impacts of the proposed Project would be less than significant with incorporation of relevant LRDP PPs and MMs. No significant and unavoidable adverse environmental effects to human beings would occur as a result of the proposed Project, and no additional mitigation measures are required. No further evaluation of this issue is required in the Draft Supplemental EIR.

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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VII. REPORT PREPARERS

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The following Technical Appendices to the Sunset Canyon Recreation Replacement Building Project Initial Study are available at:
https://www.capitalprograms.ucla.edu/content/PDF/Sunset_Rec_IS_Appendices.zip

A Air Quality and Greenhouse Gas Emissions Analysis

B Tree Data

C Geotechnical Investigation

D Environmentally-Regulated Materials Survey and Report

E Noise Monitoring Results

NOP Comment Letters Received

Department of Transportation
Native American Heritage Commission

DEPARTMENT OF TRANSPORTATION
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Making Conservation a California Way of Life.

July 26, 2023

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Los Angeles, CA 90095-1365

RE: Sunset Canyon Recreation Replacement Building Project – NOP (Notice of Preparation)
SCH # 2023070306
GTS #07-LA-2023-04274
Vic. LA Multiple

Dear Ashley Rogers,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed Project would consist of the development of a new two-story (plus rooftop deck), student-oriented, multi-purpose building at Sunset Canyon Recreation Center (Sunset Rec) within the University of California, Los Angeles (UCLA) campus. The new building would replace a series of seven existing buildings set for demolition at Sunset Rec, which is located in an area with hillside topography, undeveloped open space areas, and numerous mature trees within and surrounding the area. In 2014 and 2021, structural evaluations were conducted to provide seismic ratings for the buildings at the Sunset Rec complex. Results identified several structural features with severe distress and loss of structural integrity, and a further study indicated that the buildings do not meet current requirements for energy efficiency, accessibility, or general safety.

After reviewing the initial study, Caltrans has the following comments:

Vehicular access to the proposed building would remain the same as under existing conditions from Easton Drive. The existing vehicular turnaround adjacent to the main entrance to Sunset Rec would also remain unchanged. Parking would continue to be provided at the three-story SR parking structure, and the Proposed Project does not include the addition or removal of parking spaces. During construction, the SR parking structure would remain available for Sunset Rec users.

Caltrans recommends the implementation of Transportation Demand Management (TDM) strategies, as research indicates that reducing the amount of car parking supplied acts against

enabling driving over other methods of transit. Additionally, implementing electrical car charging spaces would encourage the usage of plug-in hybrid vehicles (PHEVs) or fully electric vehicles (BEVs), which can help to reduce tailpipe emissions and minimize reliance on fuel. Should surface parking be built, it is advised that it does not face the street directly. The implementation of active frontage and landscaping against the sidewalk encourages recreational walking by providing a barrier for pedestrians.

As stated, a goal of the UCLA Long Range Development Plan (LDRP)'s Campuswide Development Objectives is to clarify and strengthen existing pedestrian and vehicular circulation to enhance way-finding and promote safety. Recommended physical and programmatic elements for a circulation plan may consist of on-site bikeshare programs, transportation allowance for regional transit passes as currently allotted by the existing campus TDM program, and locating information such as current maps, routes, and schedules for public transit routes within one-half mile of the project site where students and visitors may easily access to view.

Caltrans would also like to confirm plans to provide bike racks and a repair stand with a bike pump at Sunset Rec. While the Proposed Project states that there is no requirement for construction of new bicycle or pedestrian facilities, we recommend that existing bicycle facilities be preserved, and that more than one protected pedestrian path be maintained throughout the construction phase. To best support a walkable core area, the most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing.

Lastly, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2023-04274.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR Branch Chief

cc: State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION

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July 19, 2023

Governor's Office of Planning & Research

July 24 2023

STATE CLEARINGHOUSE

Ashley Rogers
University of California
1111 Franklin St.
Oakland, CA 94607

Re: 2023070306, Sunset Canyon Recreation Replacement Building Project, Los Angeles County

Dear Ms. Rogers:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).

2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.

3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).

4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:

- **a.** The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
- **b.** Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:

- **a.** If part or all of the APE has been previously surveyed for cultural resources.
- **b.** If any known cultural resources have already been recorded on or adjacent to the APE.
- **c.** If the probability is low, moderate, or high that cultural resources are located in the APE.
- **d.** If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- **a.** The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
- **b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse