Sunset Canyon Recreation Replacement Building Project

Draft Supplemental EIR
SCH No. 2023070306

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SECTION 1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that lead agencies consider the environmental consequences of projects over which they have discretionary approval authority prior to taking approval action on such projects. An Environmental Impact Report (EIR) is a public informational document designed to provide the lead, responsible, and interested agencies; special districts; local and State governmental agency decision makers; and the public with an analysis of potential environmental consequences to support informed decision making.

The University of California, Los Angeles (UCLA) proposes the development of a new two-story recreational building at the Sunset Canyon Recreation Center (Sunset Rec) within the Northwest zone of the UCLA campus, which would replace a series of seven existing buildings/facilities at Sunset Rec. A summary description of the proposed Project is provided below, and a detailed description is provided in Section 3.0, Project Description.

This EIR addresses the potential environmental effects associated with implementation of the proposed Project and has been prepared pursuant to the requirements of CEQA (Public Resources Code, [PRC] Sections 21000, et seq.), the CEQA Guidelines (14, California Code of Regulations [CCR], Sections 15000 et seq.), and the University of California Procedures for the Implementation of CEQA. As discussed in Section 2.2, Type of Environmental Impact Report, and in accordance with CEQA, this Draft EIR is a Supplemental EIR (SEIR) tiered from previously certified EIR analyses. Specifically, the UCLA Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (LRDP Final Subsequent EIR; State Clearinghouse [SCH] No. 2017051024) was certified by the University of California Board of Regents (The Regents) in January 2018.[1] The LRDP Final Subsequent EIR 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 Final EIR by reference, they collectively serve as the CEQA documentation for construction and operation of development on campus and are referred to herein as the "LRDP EIRs."

UCLA has reviewed and revised, as necessary, all submitted drafts, technical studies, and reports for consistency with UC policies and requirements and has commissioned the preparation of this SEIR to reflect its own independent judgment, including: (1) reliance on appropriate UCLA technical personnel; and (2) review of all technical subconsultant reports. Data for this SEIR was obtained from on-site field observations; review of adopted plans and policies; review of available studies, reports, and data; and a specialized environmental assessment prepared for the proposed Project (e.g., historic resources assessment).

This Executive Summary has been prepared in accordance with CEQA Guidelines Section 15123, which states that an EIR should contain a brief summary of the proposed actions and its

[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.

consequences and should identify: (1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; (2) areas of controversy known to the lead agency including issues raised by agencies and the public; and (3) issues to be resolved including the choice among alternatives and whether and how to mitigate significant effects.

1.2 PROJECT SUMMARY

1.2.1 PROJECT LOCATION AND SETTING

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. The UCLA 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 3-1 in Section 3.0, Project Description, of this Draft SEIR, depicts the regional location and local vicinity of the UCLA campus. For the purposes of description in this Draft SEIR, 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) within Sunset Rec.

Sunset Rec encompasses approximately 9.0 acres and 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 is operated by UCLA Recreation and provides various indoor and outdoor activity spaces for use by students, staff, and UCLA camps. 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.

As discussed in Section 3.2, Environmental Setting, of this Draft SEIR, with the exception of two modular buildings and various small storage structures, construction of the existing buildings within Sunset Rec was completed in 1966. Most of the existing buildings at Sunset Rec 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. Due to their structurally unsound and deteriorated conditions, the Vista Room (Building A), Stair Tower/Restroom/Office (Building A2), and Santa Fe Room (Building C) were “red-tagged” by the Campus Building Official (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 the nearby modular building beginning in 2019/2020.

As discussed in Section 4.1, Cultural Resources, of this Draft SEIR, the Sunset Canyon Recreation Center Historic District (Sunset Rec Historic District or Historic District) has been identified on-site and currently retains sufficient integrity of location, setting, design, materials, workmanship, feeling, and association to be recognizable and convey its significance as a mature work of Smith and Williams (Sunset Rec architect) for listing in the California Register of Historical Resources (California Register) under Criterion 3 (Design/Construction). Therefore, the eligible Sunset Rec Historic District is a historic resource pursuant to CEQA.

1.2.2 PROJECT DESCRIPTION

As more thoroughly described in Section 3.0, Project Description, of this Draft SEIR, the proposed Project involves the demolition of seven existing buildings totaling 6,982 gross square feet (gsf) and 5,807 gsf of covered unenclosed space and construction of an approximately 11,500 gsf replacement recreational building with approximately 6,500 gsf of covered unenclosed space. 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 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. The proposed landscape plan would build upon the existing landscape at Sunset Rec to maintain a wooded and natural setting.

The proposed Project would comply with the current version University of California Policy on Sustainable Practices and Guidelines (UC Sustainable Practices Policy), which became effective on July 13, 2023, and would adopt the principles of energy efficiency and sustainability to the fullest extent possible, consistent with budgetary constraints and regulatory and programmatic requirements. Consistent with the UC Sustainable Practices Policy, a minimum Leadership in Energy and Environmental Design (LEED™) Gold rating has been established for the proposed Project, and the proposed Project design would strive to achieve a LEED Platinum rating.

Vehicular access to the proposed building would remain 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; no new parking or change to the existing parking configuration is required or proposed.

The proposed Project would include the removal of existing utility infrastructure systems that serve the existing buildings. New utility infrastructure (water, sewer, storm drain, electric and telecommunications) would be installed and would connect to existing utility systems within or adjacent to the Project site. Natural gas would not be used.

For purposes of analysis, it is anticipated that construction of the proposed Project would begin in May 2024 and be completed in January 2026. Construction would be sequenced with overlapping phases, which are generalized as follows: demolition/crushing, site preparation, grading, building construction, architectural coating, paving/landscaping, and building commissioning (concurrent with paving).

Six of the seven buildings to be demolished, including the buildings that are currently red-tagged or otherwise vacant, are contributors to the Sunset Rec Historic District. 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.

The proposed Project would result in a net increase of 4,518 gsf of development within Sunset Rec in the Northwest zone.[2] 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. Additionally, the proposed Project would not generate an increase in the campus population.

The actions to be considered by the University of California for the proposed Project include: (1) certification of the Final SEIR and adoption of the Mitigation Monitoring and Reporting Program (MMRP), CEQA Findings, and Statement of Overriding Considerations; and (2) approval of the Sunset Canyon Recreation Replacement Project, including its design.

1.2.3 PROJECT ALTERNATIVES

In compliance with the CEQA Guidelines Section 15126.6(a), an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives." As discussed in Section 1.5 below, the proposed Project would result in the loss of the California Register-eligible Sunset Rec Historic District because the District would no longer be recognizable and would therefore cause a significant adverse impact to a historic resource, as defined in CEQA Guidelines Section 15064.5, which cannot be mitigated to a less than significant level. No other significant impacts would occur with implementation of the proposed Project. Therefore, in accordance with CEQA Guidelines Section 15126.6, this Draft SEIR addresses alternatives to the proposed Project that may reduce or avoid the proposed Project's significant and unavoidable impact to a historic resource.

Section 5.0 of this Draft SEIR identifies alternatives that have been rejected from further consideration and provides descriptions of each alternative carried forward for analysis. Alternatives that have been rejected from further consideration include the following, which are discussed in Section 5.4 of this Draft SEIR:

- No Project/No Development Alternative
- No Project/Demolition of Existing Structurally Deficient Buildings
- On- and Off-Campus Alternative Sites
- Recreational Programming Moved to an Existing Recreational Facility Elsewhere on Campus
- Partial Reuse/Partial Mothball Alternative
- Building Replacement with Reduced Demolition Alternative

Following is a summary description of the alternatives evaluated in Section 5.0 of this Draft SEIR. For each of these alternatives, a comparative analysis of the environmental impact of the alternative to the environmental impact resulting from the proposed Project, and a discussion of each alternative's ability to meet the Project objectives is provided. Each of these alternatives would retain the Sunset Rec Historic District's eligibility for the California Register and would avoid

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

the proposed Project's significant and unavoidable impact to a historic resource (discussed in Section 1.5 below).

- **Alternative 1: No Project/Mothballing Alternative**. With the No Project/Mothballing Alternative, all existing buildings within the Project site, including the contributors to the Historic District, would remain and no new recreation building would be constructed. Assuming hypothetical approval by the Campus Building Official to retain the existing red-tagged or otherwise vacated buildings (Vista Room, Stair Tower/Restroom/Office, Santa Fe Room, and Office Center) without major improvements, these structures would also remain in place and remain unoccupied. The historic "hat" roof structure at the Lookout/Lifeguard Station, which is a contributor but has not been red-tagged, would be repaired or replaced in accordance with Standard 6 of the Secretary of the Interior (SOI) Standards. Since vacant buildings cannot survive indefinitely without some degree of ongoing maintenance, and since historic buildings in particular may be prone to deterioration without proper care, the red-tagged or otherwise vacated buildings and structures in the eligible Historic District would be "mothballed" in accordance with National Park Service guidance in Preservation Brief 31: Mothballing Historic Buildings. The following steps would be taken at the buildings to be mothballed: (1) documentation of the architectural and historical significance of the buildings and their current conditions; (2) structural stabilization, pest control/extermination, and protection from moisture penetration; and (3) mothballing actions related to security, ventilation, utilities and mechanical systems, as well as development and implementation of a maintenance and monitoring plan. This No Project Alternative was evaluated in accordance with CEQA Guidelines Section 15126.6(e).
- **Alternative 2: Secretary of the Interior (SOI) Standards Compliant Alternative.** The SOI Standards Compliant Alternative would retain and rehabilitate all Sunset Rec Historic District contributors within the Project site according to the SOI Standards and SOI Guidelines, and in particular, the Rehabilitation Standards. In addition, it is assumed the California Historic Building Code (CHBC) would be applied were possible under the provisions of the code. This alternative includes rehabilitation of the following contributors: the Vista Room, Buenos Aires Room, Stair Tower/Restroom/Office, Santa Fe Room, Lookout/Lifeguard Station, and Office Center. Structural improvements would be implemented to address seismic deficiencies and other structural issues caused by deterioration to the extent that such improvements would comply with the SOI Standards. Similarly, improvements to address ADA compliance would be made only to the extent they would comply with the SOI Standards. As such, more invasive changes would not be part of the alternative, and non-compliance with certain ADA requirements would remain in some areas. Notably, accessible connectivity among the buildings and site levels would remain lacking since there would not be direct ADA-compliant paths to connect all site and building levels. Additionally, at the Stair Tower/Restroom/Office, full accessibility could not be achieved at its Level 1 restroom and Level 3 office while complying with the SOI Standards. This alternative would also include renovation of the existing Electric Vault, which is not a contributor to the Sunset Rec Historic District.
- **Alternative 3: Partial Preservation and Code Compliant Alternative.** The Partial Preservation and Code Compliant Alternative would rehabilitate most of the existing buildings proposed for demolition under the proposed Project to address the safety issues while meeting most of the seismic and accessibility requirements. It is assumed the CHBC would be applied where possible under the provisions of the code. Where it is not possible, approaches consistent with the SOI Standards would be implemented. This alternative would involve demolition of the Stair Tower/Restroom/Office, a contributor to the Sunset Rec Historic District, and its replacement with a new elevator tower to provide accessible

routes and connectivity among the Vista Room, the Buenos Aires Room, and the Santa Fe Room. Landings on opposite sides of the elevator shaft would be provided at a total of four levels, with ramps connecting to the three adjacent buildings. No landing at the Middle Level of the Project site would be included, as insufficient height exists to allow for two stacked stops to access the Middle Level and the Santa Fe Room. Accordingly, access to the Office Center would be limited due to the lack of an ADA-compliant accessible path. Therefore, it is assumed under this alternative that use of the Office Center would be restricted to storage.

The exterior stairway of the Stair Tower/Restroom/Office could not be replaced in-kind due to space constraints and new elevator landings. Therefore, a new exterior stairway would be needed at the Vista Room to provide secondary emergency access.

1.3 ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123(b)(3) requires that an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With respect to the proposed Project, the key issues to be resolved involve decisions by the University of California, as Lead Agency, as to:

- Whether this environmental document adequately describes the environmental impacts of the proposed Project;
- Whether the recommended mitigation measures and identified campus programs, practices and procedures should be modified and/or adopted;
- Whether the proposed Project's benefits outweigh any environmental impacts that cannot be feasibly avoided or mitigated to a level below significance;
- Whether there are other mitigation measures that should be applied to the proposed Project besides those identified in the SEIR; and
- Whether there are any alternatives to the proposed Project that would substantially lessen or avoid any of its significant impacts while achieving most of the basic Project objectives.

1.4 AREAS OF CONTROVERSY

CEQA Guidelines Section 15123(b)(2) indicates that an EIR summary should identify areas of controversy known to the lead agency, including issues raised by agencies and the public. This Draft SEIR has taken into consideration the comments received from state agencies in response to the Notice of Preparation (NOP), as well as the comments received from the public during the public scoping session held on August 1, 2023. The NOP comments received are contained in Appendix A of this Draft SEIR, and a summary of comments provided at the scoping meeting are identified in Section 2.4.1, Scoping Process. Based on input received during the scoping process, the public has expressed no areas of controversy known to the University of California at this time.

Potential areas of controversy and issues of concern may also include those environmental issues where the potential for a significant and unavoidable impact has been identified. As evaluated in this Draft SEIR, such issues are limited to historic resources.

1.5 SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Pursuant to CEQA Guidelines Sections 15126.2 and 15126.4, an EIR is required to identify any potentially significant adverse impacts and recommend feasible mitigation measures that could

minimize these impacts. The environmental issue area identified for study in this Draft SEIR is cultural resources (specifically, historic resources), due to the proposed Project's potentially significant impacts to the eligible Sunset Rec Historic District, which is an historic resource pursuant to CEQA.

For all other CEQA-required topical issues (aesthetics, agricultural, air quality, biological resources, cultural resources (archaeological and human remains), energy, geology and soils, greenhouse gas emissions, hydrology and water quality, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire), the proposed Project would result in no impacts, less than significant impacts, or less than significant impacts with implementation of the previously adopted LRDP campus programs, practices, and procedures (PPs) and mitigation measures (MMs).

Section 4.1 of this Draft SEIR provides the required environmental analysis of the proposed Project's potential impacts to historic resources. Table 1-1 below presents a summary of the identified environmental impact resulting from the proposed Project. As shown in Table 1-1, even with incorporation of the applicable LRDP PP, as well as implementation of Project-specific mitigation measures, the proposed Project would result in a potentially significant impact to a historic resource. Therefore, this impact is considered significant and unavoidable.

Because unavoidable significant adverse impacts would result from the Project, the University of California, as Lead Agency, must prepare a Statement of Overriding Considerations before it can approve the Project. A Statement of Overriding Considerations must indicate that the decision-making body has balanced the benefits of a proposed project against its unavoidable significant environmental effects and has determined that the benefits of the project outweigh the adverse effects and, therefore, the adverse effects are considered to be acceptable.

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS, APPLICABLE LRDP PROGRAMS, PRACTICES AND PROCEDURES, AND PROJECT-SPECIFIC MITIGATION FOR THE SUNSET CANYON RECREATION REPLACEMENT BUILDING PROJECT

Summary of Impacts	Applicable LRDP Programs, Practices and Procedures (PP) and Project-Specific Mitigation Measures (MM)	Level of Significance After Mitigation
Cultural Resources (Section 4.1)		
The proposed Project involves demolition of six of the 10 contributors to the eligible Sunset Rec Historic District. This includes the Vista Room, which is the largest building and anchors the district as the main entrance to Sunset Rec. It also includes the Santa Fe Room, Buenos Aires Room, and the Stair Tower/Restroom/Office that serves as the vertical circulation and organizational spine around which the aforementioned buildings are located. The last remaining "hat" roof structure at the Lookout/Lifeguard Station would also be demolished, along with the altered but still contributing Office Center. Some of the associated landscape and site elements, including the cascading stairs, portions of the original hexagonal motif, and wood cribbing at the retaining walls, would also be removed. The demolition of these original built, landscape, and site elements would result in the eligible Sunset Rec Historic District being no longer recognizable or able to convey its significance as the work of Smith and Williams. Therefore, implementation of the proposed Project would cause a substantial adverse change in the significance of a historical resource, as defined in CEQA Guidelines Section 15064.5, resulting in a significant impact pursuant to CEQA.	***LRDP PP*** **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). *Note: the analysis required by PP 4.4-1(a) has been completed and is included in this Draft SEIR.* ***Project-Specific MMs*** **MM Sunset HIST-1** Prior to the start of demolition, the UCLA Sunset Canyon Recreation Center Historic Resource Technical Report, prepared by Page & Turnbull (October 2023) and included in Appendix B of this Draft SEIR, shall be submitted to UCLA Library Special Collections to accompany prior photo-documentation of Sunset Rec. Following coordination with UCLA Library Special Collections, the report shall be submitted in their preferred format (e.g., printed on archival paper, in digital format, etc.). The drawing sets associated with the Sunset Canyon Recreation Center in the possession of UCLA Capital Programs from circa 1963 through 2023 shall also be organized by project and date and submitted digitally to UCLA Library Special Collections in an archival format. **MM Sunset HIST-2** Prior to the start of demolition, the Project sponsor shall create a salvage plan identifying elements and materials that can be saved and re-used. Salvaged elements shall be reused at the Project site, incorporated into an interpretive display, donated to a local historical society or other owners of Smith and Williams works, and/or be given to an architectural salvage company. The plan shall be developed with the assistance of a	Significant and Unavoidable

Summary of Impacts	Applicable LRDP Programs, Practices and Procedures (PP) and Project-Specific Mitigation Measures (MM)	Level of Significance After Mitigation
	qualified architectural historian, historic architect, or historic preservation professional who meets the *Secretary of the Interior's Professional Qualifications Standards*. At a minimum, the pendant globe light fixtures, including any intact fixtures previously removed and preserved at the site, shall be salvaged and considered for re-use in the proposed Project or offered to interested parties. **MM Sunset HIST-3** To commemorate the eligible Sunset Canyon Recreation Center Historic District as a work of Smith and Williams, a publicly accessible interpretive program shall be developed. The public in this case shall be the users of Sunset Canyon Recreation Center. The interpretive program shall include descriptions of the architectural design, site planning, and integration of exterior and interior elements, as well as the architects, Smith and Williams. Creative solutions regarding the medium and format of the interpretive program are encouraged, but all interpretive materials shall be displayed in a manner that is accessible to the public and appropriate within the context of Sunset Canyon Recreation Center. Examples include an exhibit at the UCLA Library Special Collections, a video documentary, an online website, or an on-site display at Sunset Canyon Recreation Center. Interpretive media shall include both text and graphics, which may include historic photographs, maps, architectural drawings, or other imagery. The text shall be sufficient to convey the significance of the core recreational buildings as the work of Smith and Williams. The interpretative program shall be developed with the assistance of a qualified architectural historian or historic preservation professional who meets the *Secretary of the Interior's Professional Qualifications Standards*. The interpretive program shall be completed and available to the public prior to issuance of a certificate of occupancy.	

SECTION 2.0 INTRODUCTION

The University of California, Los Angeles (UCLA) proposes to develop a new two-story (plus rooftop deck), student-oriented, multi-purpose building at the Sunset Canyon Recreation Center (Sunset Rec) within the UCLA main 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 but unenclosed space. As further discussed in Section 4.1, Cultural Resources, of this Supplemental Environmental Impact Report (SEIR), most of these existing buildings are contributors to the Sunset Canyon Recreation Center Historic District (Historic District), which is eligible for listing in the California Register of Historic Resources (California Register) and is therefore considered a historic resource under the California Environmental Quality Act (CEQA). A detailed description of the proposed Sunset Canyon Recreation Replacement Building Project (proposed Project) is provided in Section 3.0, Project Description, of this SEIR.

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

This SEIR has been prepared in conformance with CEQA (Public Resources Code [PRC] Sections 21000, et seq.), the CEQA Guidelines (14, California Code of Regulations [CCR], Sections 15000 et seq.), and the University of California Procedures for the Implementation of CEQA to evaluate the potential environmental impacts associated with implementation of the proposed Project and related actions. The University of California is the Lead Agency under CEQA and is responsible for preparing this SEIR. The determination that the University of California shall serve as the Lead Agency has been made in accordance with CEQA Guidelines Sections 15051 and 15367, which define the Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project. Further, preparation of this SEIR is subject to PRC Section 21080.09(c), which identifies that the approval of projects on a campus of public higher education are subject to CEQA and may be addressed in a tiered environmental analysis based upon a Long Range Development Plan (LRDP) EIR.

The University of California has prepared this SEIR for the following purposes:

- To satisfy the requirements of CEQA, the CEQA Guidelines, and the University of California Procedures for the Implementation of CEQA.
- To inform the University of California (Lead Agency), responsible and interested public agencies, and the general public of the scope of the proposed Project and to identify the potential environmental effects, measures to mitigate those effects, and alternatives to the proposed Project.
- To enable the University of California to consider all potential environmental consequences when deciding whether to approve the proposed Project.
- To serve as a source document for responsible agencies to issue permits and approvals, as required, for implementation of the proposed Project.

As described in CEQA and the CEQA Guidelines, public agencies are charged with the duty to avoid or substantially lessen significant environmental effects, where feasible. In satisfying this duty, a public agency has an obligation to balance the proposed Project's significant effects on the environment with its benefits, including economic, social, technological, legal, and other benefits. This SEIR is an informational document, the purpose of which is to identify the proposed Project's potentially significant effects on the environment and to indicate the manner in which

those significant effects can be avoided or significantly lessened; to identify any significant and unavoidable adverse impacts that cannot be mitigated; and to identify reasonable and feasible alternatives to the proposed Project that would eliminate any significant adverse environmental effects or reduce such impacts to a less than significant level.

The Lead Agency is required to consider the information in the SEIR, along with any other relevant information, in making its decisions on the proposed Project. Although the SEIR does not determine the ultimate decision that will be made regarding approval of the proposed Project, CEQA requires the University of California to consider the information in this SEIR and make findings regarding each significant and unavoidable effect identified herein. The University of California will review and consider certification of the Final SEIR prior to any decision on whether to approve the proposed Project.

2.2 TYPE OF ENVIRONMENTAL IMPACT REPORT

The UCLA Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (LRDP Final Subsequent EIR) (State Clearinghouse [SCH] No. 2017051024) (UCLA, 2018) was certified by the University of California Board of Regents (The Regents) in January 2018.[1] The LRDP Final Subsequent EIR 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) (UCLA, 2009), 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 anticipated when the 2009 LRDP EIR was prepared. As the LRDP Final Subsequent EIR incorporates the 2009 LRDP EIR by reference, they collectively serve as the CEQA documentation for construction and operation of development at the UCLA main campus and are referred to herein as the "LRDP EIRs." It is noted that the current LRDP was originally approved in 2002 and has been amended several times. Collectively, the 2002 LRDP and subsequent amendments comprise the documentation guiding growth and development at the UCLA main campus.

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. The design and implementation of individual campus projects, such as the proposed Project, must include features to implement relevant PPs and MMs from the LRDP MMRP (LRDP PPs and MMs). Accordingly, all relevant LRDP PPs and MMs, which are identified in the Initial Study included in Appendix A of this SEIR, and in Section 4.1, Cultural Resources, of this SEIR, are incorporated into and would be implemented as a part of the proposed Project and monitored through a Project-specific MMRP.

The LRDP EIRs are Program EIRs prepared in accordance with CEQA, the CEQA Guidelines, and the University of California Procedures for the Implementation of CEQA. CEQA Guidelines Section 15162 provides that a Subsequent EIR is required if one of the following occurs:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant

[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.

environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration 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 or the negative declaration was adopted, shows any of the following:

    A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    B. Significant effects previously examined will 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 previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines Section 15163 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, CEQA Guidelines Section 15152 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 SEIR is hereby tiered from the LRDP EIRs, which are incorporated by reference and are available for review along with the 2002 LRDP, as amended, at the UCLA Capital Programs office, at the address listed in Section 2.4, and online at:

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

CEQA Guidelines Section 15152(f) instructs that when tiering, a later EIR or negative declaration shall be prepared only when, based on an Initial Study or the other analysis, the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. Significant environmental effects are considered to have been "adequately addressed" if the Lead Agency determines that:

1. 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
2. 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.

Following review of the current LRDP and the analysis presented in the LRDP EIRs, the University of California determined that the proposed Project is a "project" under CEQA, whose potential environmental effects may not have been fully addressed in the LRDP EIRs. As such, a tiered Initial Study was 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, which are identified in the Initial Study; (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 in the Initial Study, for which no further evaluation is required; and (3) identify those topics, if any, for which the proposed Project could have a new or more severe impact that was not previously identified in the LRDP EIRs, thus requiring further analysis in an EIR. The Initial Study is included in Appendix A of this SEIR and concludes that the proposed Project would involve the demolition of existing buildings at Sunset Rec that are contributors to an eligible Historic District, which is eligible for listing in the California Register and is therefore considered a historic resource under CEQA, resulting in a new potentially significant impact not addressed in the LRDP EIRs. Therefore, the University of California determined that a SEIR tiered from the LRDP EIRs is the appropriate environmental document for the proposed Project. As further discussed in Section 2.4, SEIR Focus, below, the Initial Study also concludes that no further evaluation is required relative to the remaining environmental issues identified in the CEQA Guidelines Appendix G environmental checklist.

In summary, this tiered SEIR provides a Project-specific analysis of impacts to historic resources to determine if the proposed Project would result in any significant impacts not adequately addressed in the LRDP EIRs and/or if additional mitigation measures beyond those adopted in the LRDP MMRP would reduce the significance of the identified impacts. Alternatives to the proposed Project that would avoid or lessen the Project's significant impacts and that would feasibly attain most of the Project objectives are also evaluated.

2.3 REVIEW OF THE ENVIRONMENTAL IMPACT REPORT

The University of California, serving as Lead Agency for the proposed Project, and other public agencies (i.e., responsible and trustee agencies) that may use this SEIR in their decision-making or permitting processes will consider the information in this SEIR along with other information that may be presented during the CEQA process.

Upon certification of the Final SEIR, the University of California will consider whether to approve the proposed Project and associated discretionary actions identified in Section 3.7, Anticipated Discretionary Approvals, of this SEIR. As a part of the consideration for Project approval, the University of California must adopt Findings and a Statement of Overriding Considerations (if required) and adopt a MMRP. Where feasible mitigations are not available to reduce significant environmental impacts to a less than significant level, impacts are considered significant and unavoidable. Written findings will be prepared for any significant adverse environmental effect identified in the Final SEIR, as required by CEQA Guidelines Section 15091. If the University of California certifies a Final EIR for a project that has significant and unavoidable impacts, the University of California shall also state, in writing, the specific reasons for approving the project based on the Final EIR and any other information in the public record. This is called a Statement

of Overriding Considerations and is used to explain the specific reasons that the benefits of a proposed project outweigh its unavoidable environmental effects. Additionally, the University of California must adopt the MMRP to ensure compliance with applicable LRDP MMs and PPs and any Project-specific MMs that have been incorporated into the proposed Project to reduce or avoid significant effects on the environment during construction and/or implementation.

The actions that may be involved in implementing the proposed Project are described in Section 3.7, Anticipated Discretionary Approvals, of this SEIR. Other agencies that may have discretionary approval over the proposed Project, or components thereof, including responsible and trustee agencies, are also listed in Section 3.7.

2.4 SUPPLEMENTAL EIR FOCUS

2.4.1 SCOPING PROCESS

In compliance with CEQA Guidelines Section 15201, UCLA has taken steps to provide opportunities for public participation in the CEQA process. A Notice of Preparation (NOP) for the Draft SEIR, which included a link to the Initial Study and a registration link for the public Scoping Meeting discussed below, was distributed on July 17, 2023, to 29 relevant public agencies, campus and community organizations, and interested parties for a 30-day public comment period that concluded on August 16, 2023. The purpose of the NOP is to provide information about the proposed Project, including potential environmental impacts, and to seek public input regarding the proposed scope of the SEIR analysis. The NOP and the Initial Study were also posted on the Governor's Office of Planning and Research CEQAnet Web Portal for review by State agencies. Further, the NOP, Initial Study and Scoping Meeting registration link were posted on the UCLA Capital Programs website. UCLA received a total of two NOP comment letters from public agencies). The NOP, Initial Study, and NOP comment letters received are included in Appendix A of this SEIR. Table 2-1 below includes a summary of the NOP comments received and a column that identifies which section(s) of this SEIR in which the individual comments are addressed or reflected.

On August 1, 2023, UCLA held a virtual Scoping Meeting to describe the proposed Project and to seek public input regarding the proposed scope of the SEIR analysis. As identified above, a registration link for the public Scoping Meeting was provided with the NOP and on the UCLA Capital Programs website. A notice of the Scoping Meeting was also posted at four locations within Sunset Rec and published in the UCLA Daily Bruin (both print and online editions) on July 17, 2023. The Scoping Meeting was attended by seven members of the public, including current and former UCLA students. Two members of the public provided oral comments at the Scoping Meeting. One individual asked questions about the historic significance of the buildings to be removed at Sunset Rec, the architect for these buildings, and whether the proposed Project would increase the capacity at Sunset Rec. Another individual expressed support for the proposed Project. No other attendees provided comments at the Scoping Meeting. With respect to the questions raised at the Scoping Meeting, detailed information about the historic significance and architect for the original buildings is provided in Section 4.1, Cultural Resources, of this SEIR. Additionally, as discussed in Section 3.0, Project Description, of this SEIR, notwithstanding the limited increase in gross building area, the overall recreational programming at Sunset Rec would not change as a result of the proposed Project.

TABLE 2-1
NOTICE OF PREPARATION COMMENT LETTERS RECEIVED

Agency/Individual	Date	Comments	Addressed in Section(s)
State Agencies			
California Department of Transportation (Caltrans)	July 26, 2023	• Caltrans recommends the following: o Implementation of Transportation Demand Management (TDM) strategies; o Implementation of electrical car charging facilities; o Surface parking, if provided, should not face the street directly; o Existing bicycle facilities at Sunset Rec (i.e., bike racks and repair stand) be preserved; o One pedestrian path be maintained through the construction phase; and o Pedestrian and bicyclist exposure to vehicles be reduced. • The use of oversized transport vehicles on State highways requires a Caltrans transportation permit. • Large size truck trips should be limited to off-peak commute periods.	Section 3.0 of this SEIR Section V.17 of the Initial Study
California Native American Heritage Commission (NAHC)	July 19, 2023	• An analysis of Tribal Cultural Resources is required as a separate category of cultural resources. • Consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project is recommended and a summary of the requirements of Assembly Bill (AB) 52 and Senate Bill (SB) 18, which address Native American tribal consultation, is provided. • Recommendations for cultural resources assessments are provided.	Section V.18 of the Initial Study

2.4.2 EFFECTS FOUND NOT TO BE SIGNIFICANT

The Initial Study included in Appendix A of this SEIR, which is tiered from the LRDP EIRs, identifies environmental topics for which the proposed Project would result in no impacts, less than significant impacts, or less than significant impacts with implementation of the previously adopted LRDP PPs and MMs and, therefore, it has been determined that those environmental issues are adequately addressed in the LRDP EIRs. Based on the Project-level analysis and incorporation of all applicable previously adopted LRDP PPs and MMs, the University of California determined that the tiered Initial Study adequately addresses the following topics in their entirety, and the analysis results do not alter the conclusions of the impact analysis in the LRDP EIRs: 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 Initial Study adequately addresses potential impacts to archaeological resources and human remains. As such, these environmental issues are not evaluated in further detail in this SEIR. A more detailed summary of the impacts that were determined to be adequately addressed in the LRDP EIRs and the tiered Initial Study is provided in Section 6.1, Effects Found Not to be Significant, of this SEIR.

2.4.3 POTENTIALLY SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT ADDRESSED IN THIS SUPPLEMENTAL EIR

The NOP, Initial Study, and written and oral comments received during the scoping process were used to establish the scope of issues addressed in this SEIR. The University of California determined that additional Project-level analysis is required to evaluate potential impacts to historic resources (i.e., the Historic District) resulting from implementation of the proposed Project. Section 4.1, Cultural Resources, of this SEIR provides the required environmental analysis and identifies mitigation measures addressing this environmental issue.

2.5 PUBLIC REVIEW OF THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

This Draft SEIR is being circulated to relevant public agencies, campus and community organizations, and interested parties for a public review and comment period of not less than 45 days. The comment period will begin on November 8, 2023, and end on January 3, 2024. A virtual public meeting on the Draft SEIR, where oral comments may be presented, will also be held during the public review period. During the review period, the Draft SEIR, including its technical appendices, will be available on the UCLA website at http://www.capitalprograms.ucla.edu/EnvironmentalReview/ProjectsUnderEnvironmentalReview and at the Charles E. Young Research Library located on campus.

This Draft SEIR and documents referenced herein will also be available for review by appointment at the Capital Programs building located at 1060 Veteran Avenue from during regular business hours. To schedule an appointment please contact Ashley Rogers at ARogers@capnet.ucla.edu. Written comments on the Draft SEIR should be addressed as follows:

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

Following the Draft SEIR public review period, responses to all written comments received and all oral comments provided at the public meeting will be prepared and published in a Final SEIR. The Final SEIR—which will consist of the Draft SEIR or a revision thereto; comments received on the Draft SEIR; a list of commenters; written responses to those comments; and a MMRP—will be considered for certification by the University of California, consistent with CEQA Guidelines Section 15090. All responses to public agencies' comments regarding this Draft SEIR will be provided to those agencies at least ten days prior to final action on the proposed Project. The University of California must consider the Final SEIR prior to any decision to approve or reject the proposed Project; these actions can only be taken once the Final SEIR has been certified and the MMRP adopted.

SECTION 3.0 PROJECT DESCRIPTION

This section provides a description of the proposed Sunset Canyon Recreation Replacement Building Project (proposed Project), including the Project location and geographic setting, environmental setting, Project background, Project objectives, Project components, and anticipated discretionary actions required to implement the proposed Project.

3.1 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 3-1, which depicts the regional location and local vicinity). The UCLA 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 3-2 provides a map of the UCLA campus and specifically shows the location of the proposed Project.

For purposes of analysis in this Draft Supplemental Environmental Impact Report (SEIR), 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) within the UCLA Sunset Recreation Center (Sunset Rec).

3.2 ENVIRONMENTAL SETTING

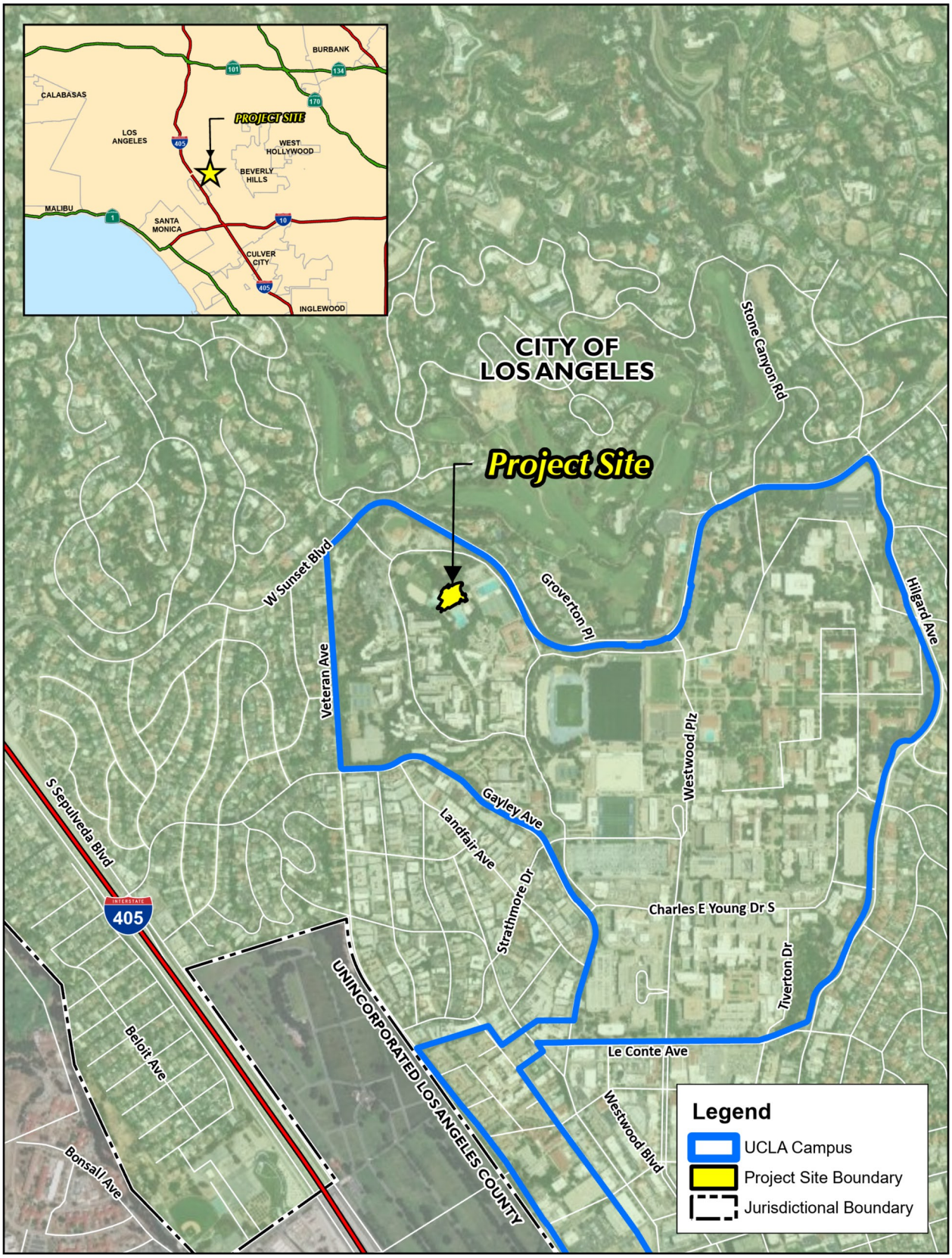
As previously discussed in Section 2.0, Introduction, of this Draft SEIR, the UCLA Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (LRDP Final Subsequent EIR) (State Clearinghouse [SCH] No. 2017051024) (UCLA, 2018), and the UCLA 2008 Northwest Housing Infill Project and Long Range Development Plan Amendment Final Environmental Impact Report (2009 LRDP EIR) [SCH No. 2008051121]) (UCLA, 2009), 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 include descriptions of the environmental settings for the region, the UCLA campus, and surrounding areas. The UCLA campus and surrounding areas have not substantially changed since certification of the LRDP EIRs. Therefore, the description of the environmental setting for the region and the campus is not repeated in this document. However, a summary of this information and/or updated information is provided in the tiered Initial Study for the proposed Project included in Appendix A of this Draft SEIR for each environmental issue, as applicable.

Following is a summary of the environmental setting for the campus, the Northwest zone, and Sunset Rec, including the Project site. Additional information regarding the environmental setting related to the historic resources within Sunset Rec is provided in Section 4.1, Cultural Resources, of this Draft SEIR.

3.2.1 UCLA MAIN CAMPUS

The approximately 419-acre UCLA campus has been developed with a variety of academic and related uses, with facilities dedicated to instructional, research, support, recreational, medical, and housing uses. The UCLA Long Range Development Plan (LRDP) delineates eight campus

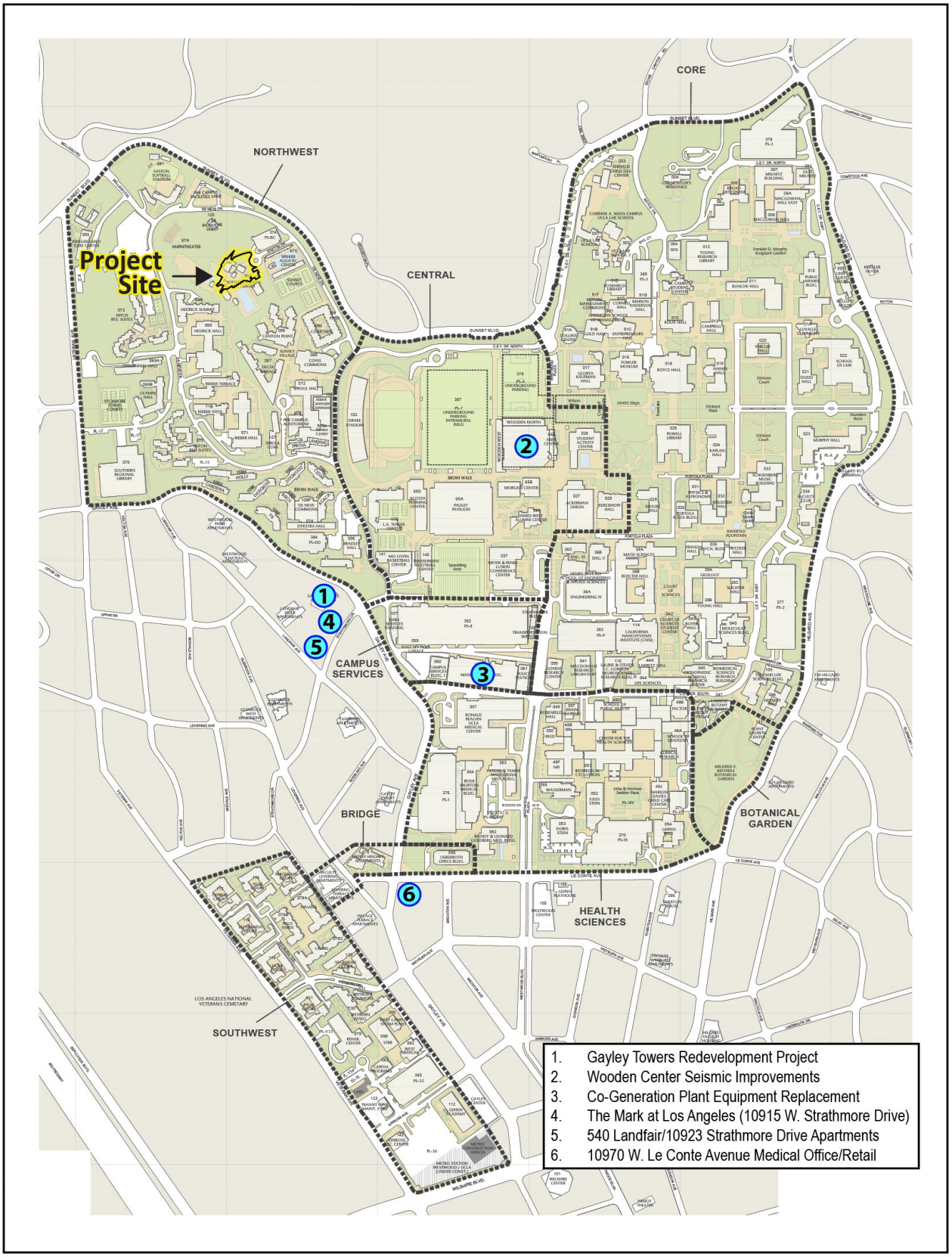


Source(s): Esri, LA County (2023)

Figure 3-1

0 325 650 1,300 Feet

Regional and Local Vicinity Map



Source(s): UCLA (April 2023)

Figure 3-2

Not to Scale

Campus Map and Related Projects

land use zones within the campus and allocates new development square footage according to the strategic needs identified for each zone. As of March 2023, the total remaining development allocation for the campus based on the current LRDP and recently constructed buildings is estimated at 648,085 gross square feet (gsf). The campus map provided in Figure 3-2 depicts the campus zones, existing uses, and major construction projects on campus.

The campus is primarily surrounded by residential land uses, with the exception of the Westwood Village commercial area (generally south of the Health Sciences zone and east of the Southwest zone) and a portion of the Los Angeles National Cemetery (west of the Southwest zone).

3.2.2 NORTHWEST ZONE

As shown on Figure 3-2, the proposed Project is located at Sunset Rec in the Northwest zone, which encompasses approximately 90.5 acres of the campus. Existing uses in this zone include residential and recreational uses and related 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. Currently, the Northwest zone has an estimated 130,682 gsf remaining in the LRDP development allocation.

There is a dense mix of urban development in the Northwest zone and the adjacent areas of the City of Los Angeles, with varied architectural styles, building massing, and building heights. 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. Due to the density of urban development, the 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 Sunset Rec and areas surrounding the Project site are shown in the photographs presented on Figures 3-3a and 3-3b.

3.2.3 SUNSET CANYON RECREATION CENTER AND THE PROJECT SITE

As shown on the aerial photograph provided on Figure 3-4, 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.

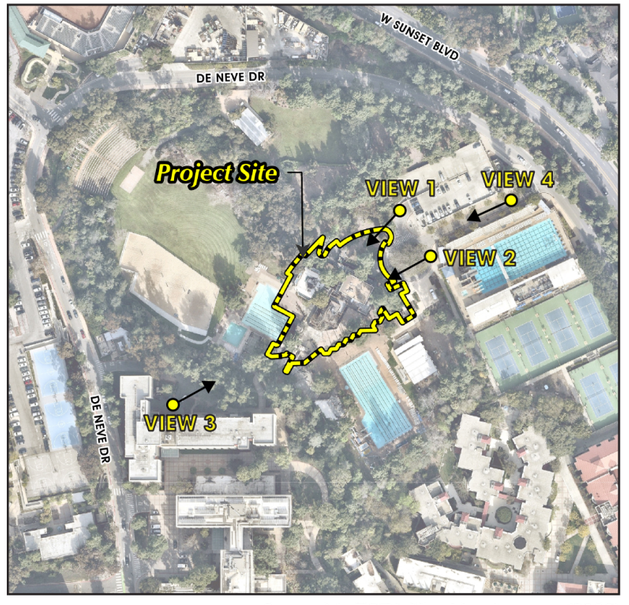
Sunset Rec encompasses approximately 9.0 acres and opened in 1966. Sunset Rec is operated by UCLA Recreation and provides various indoor and outdoor activity spaces for use by students, staff, and UCLA camps, including several multi-purpose rooms, offices, a small kitchen, and storage areas; two swimming 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 (Building K) and a modular building with office space (Building J) and a multi-purpose room (refer to Figure 3-5). The main entrance to Sunset Rec is located at the terminus of Easton Drive just west of 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 3-1; Figure 3-6 depicts the respective "levels" described below.











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

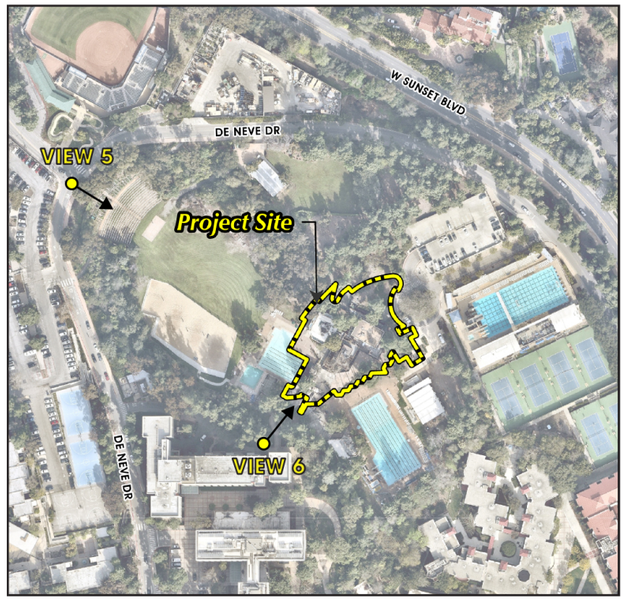
Figure 3-3a

Not to Scale

Site Photographs







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

Figure 3-3b

Not to Scale

Site Photographs

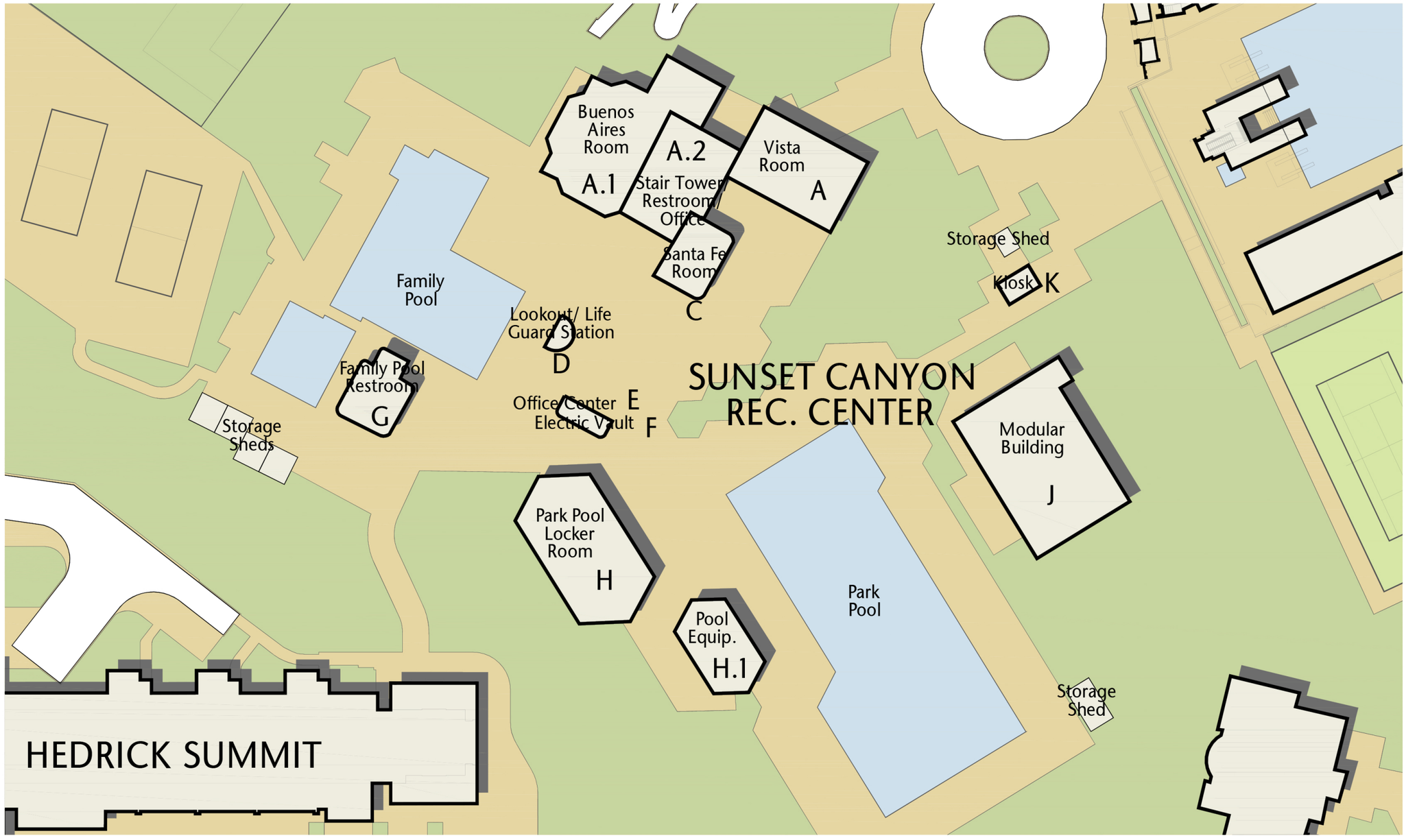


Source(s): ESRI, NearMap Imagery (2023)

Figure 3-4

0 37.5 75 150
Feet

Aerial Photograph

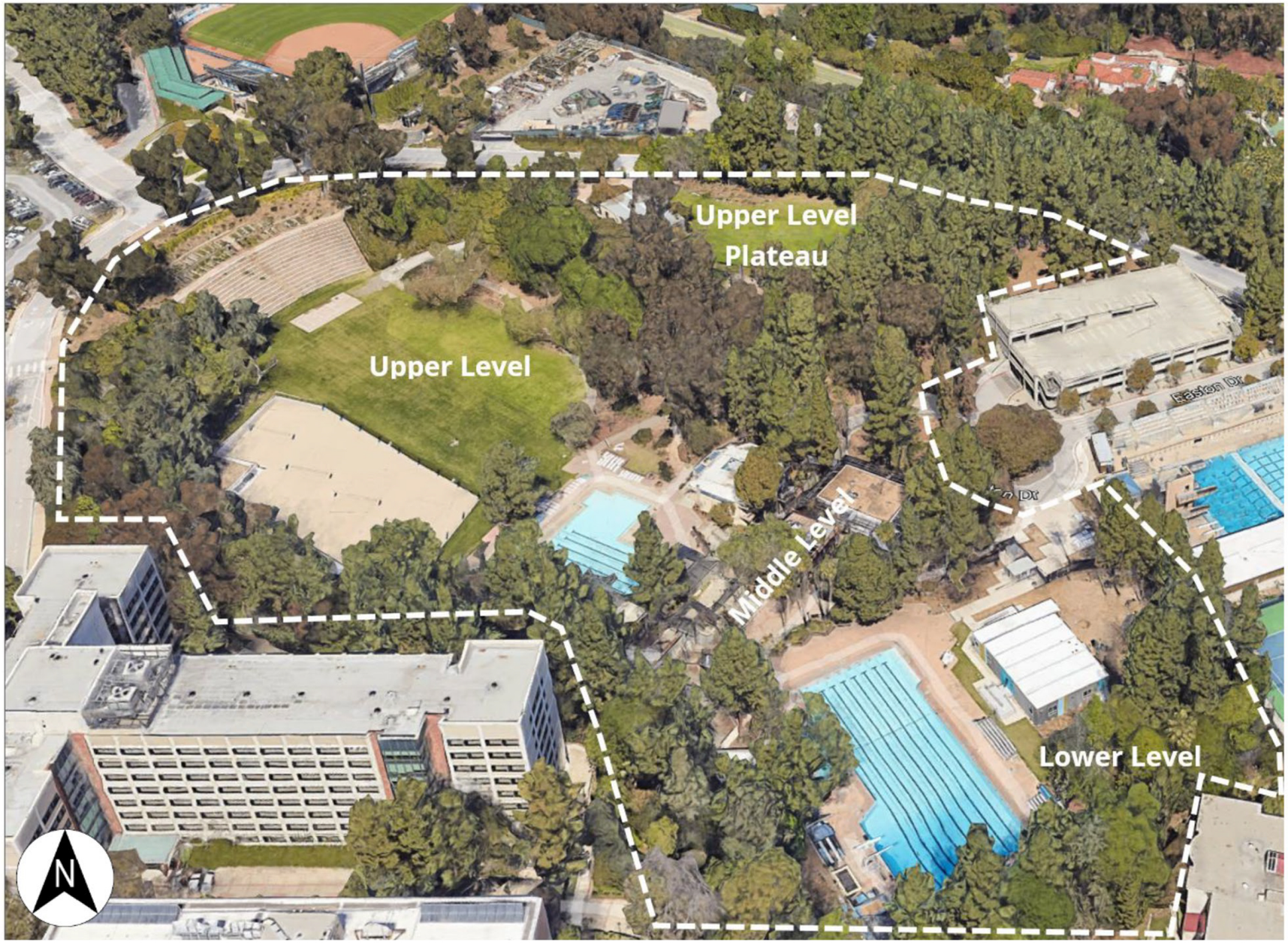


Source(s): UCLA (07-05-2023)

Figure 3-5

Not to Scale

Sunset Rec Existing Site Plan



Source(s): Page & Turnball (09-05-2023)

Figure 3-6

Not to Scale

Sunset Rec Topographic Levels

TABLE 3-1
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.

With the exception of two modular buildings and various small storage structures, 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 3-2 below.

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 for outdoor activities and events. 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 Family Pool Restrooms (Building G) 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 of 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, Park Pool Locker Rooms (Building H), and modular building are located.

Given the sloping topography of Sunset Rec, the existing buildings within the proposed Project site are sited at various elevations ranging from 495 feet amsl to 515 feet amsl. The Vista Room (Building A), Buenos Aires Room (Building A1), Stair Tower/Restroom/Office (Building A2), and Santa Fe Room (Building 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. The Office Center (Building E) sits at a middle elevation between the upper and lower pool levels that

TABLE 3-2
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.

can only be accessed via stairs. The maximum elevation of the existing rooflines is approximately 536 feet amsl. Americans with Disabilities Act (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 in recent years, as the buildings do not meet many current building code requirements.

Most of the existing buildings at Sunset Rec 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, as shown in the existing building photographs provided on Figure 3-7 and Figure 3-8. 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, Stair Tower/Restroom/Office, and Santa Fe Room 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 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 the nearby modular building beginning in 2019/2020.

As further discussed in Section 4.1, Cultural Resources, of this Draft SEIR, the Sunset Canyon Recreation Center Historic District (Sunset Rec Historic District or Historic District) has been identified onsite and currently retains sufficient integrity of location, setting, design, materials, workmanship, feeling, and association to be recognizable and convey its significance as a mature work of Smith and Williams Architects (widely acknowledged as local masters of post war modernism), for listing in the California Register of Historical Resources (California Register) under Criterion 3 (Design/Construction). Therefore, the eligible Sunset Rec Historic District is a historic resource pursuant to CEQA.

As further discussed in Section V.4, Biological Resources, of the Initial Study included in Appendix A, 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*).[1] 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 V.7, Geology and Soils, of the Initial Study included in Appendix A, 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.

[1] The LRDP Final Subsequent EIR 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).



Vista Room (red-tagged)



Santa Fe Room (red-tagged)



Stair Tower/Restroom/ Office (red-tagged)



Office Center at right (vacated)



Buenos Aires Room

Source(s): UCLA (08-01-2023)

Figure 3-7

Not to Scale

Existing Building Photographs



Support beams added below Vista Room (red-tagged)



Damaged beams at Vista Room (red-tagged)



Damaged wood at Stair Tower/Restroom/Office (red-tagged)



Cracked beams at Vista Room (red-tagged)



Damaged beams at Vista Room (red-tagged)

Source(s): UCLA (08-01-2023)

Figure 3-8

Not to Scale

Deteriorated Building Conditions

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 3-9.

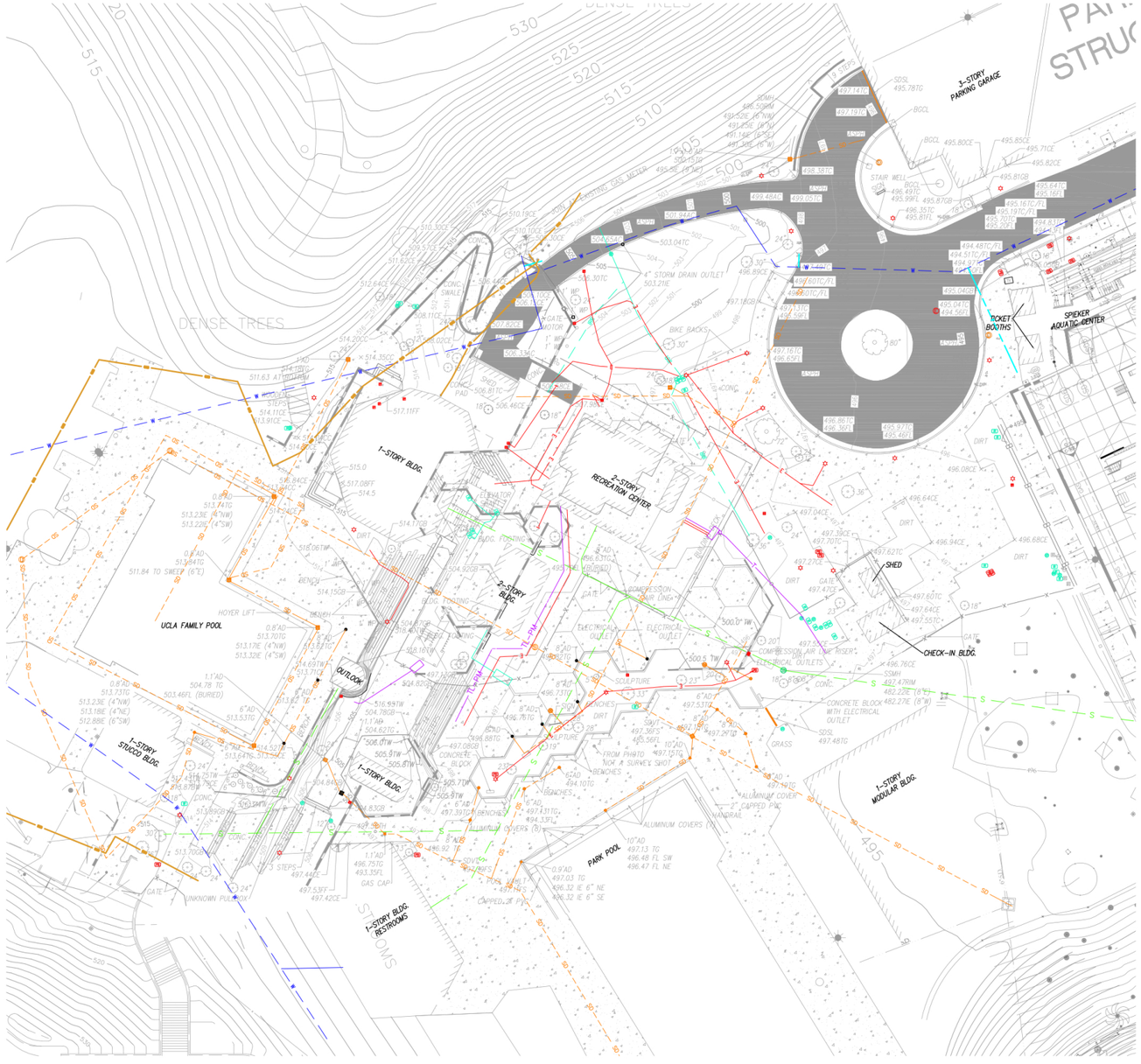
3.3 BACKGROUND AND NEED FOR THE PROJECT

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 University of California (UC) Seismic Safety Policy. The 2014 evaluation determined that the Santa Fe Room, Lookout/Lifeguard Station (Building D), and the Office Center, each 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 required exterior bracing to support the second story deck. In April 2018, a portion of the trellis on the Stair Tower/Restroom/Office failed, causing damage to the Santa Fe Room and offices below. Additionally, lightning struck the Vista Room in January 2019. As shown in Table 3-2 in Section 3.2 above, based on a second seismic evaluation completed in 2021, the existing buildings have seismic ratings ranging from III to VII. Due to their structurally unsound and deteriorated conditions, the Vista Room, Stair Tower/Restroom/Office, and Santa Fe Room were "red-tagged" by the Campus Building Official (meaning that the buildings are considered unsafe and should not be entered) and were subsequently vacated and fenced-off in 2020. The Office Center was also vacated in 2021 due to water intrusion and mold. Some of the multi-purpose spaces, 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.

Further, because the existing buildings were constructed before 1966, they do not meet current requirements for energy efficiency, accessibility, or general safety. 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 electric 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 daily 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 are not consistent with UCLA policy.



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 MAIN
- STORM DRAIN
- ELECTRICAL
- SEWER MAIN
- WATER MAIN
- IRRIGATION MAIN
- FIRE MAIN
- TELECOM

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

Figure 3-9

Not to Scale

3.4 PROJECT OBJECTIVES

CEQA Guidelines Section 15124(b) establishes the requirement to identify the underlying purpose and objectives of a project in the Project Description section of an EIR. In addition to supporting the project's underlying purpose, the objectives are relevant to the development of project alternatives that will be considered in an EIR and in the preparation of Findings or Statement of Overriding Considerations, if necessary, in support of the decision-making action. The underlying purpose of the proposed Project is to replace or restore the multipurpose spaces at Sunset Rec that are no longer usable in order to correct existing deficiencies and provide, at minimum, an equivalent capacity for recreational programming to that previously available. The following objectives have been established for the proposed Project to support the underlying purpose and to aid decision makers in their review of the proposed Project and its associated impacts:

1. Provide several modern, flexible, multi-use rooms to replace existing deficient spaces used for 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.
2. Continue to co-locate recreational facilities near existing student housing and associated student amenities in the Northwest zone of the campus, which is the zone on campus designated in the UCLA Long Range Development Plan (LRDP) to include residential facilities and support functions for undergraduate students.
3. Address existing structural and existing seismic safety deficiencies to comply with the UC Seismic Safety Policy and to provide an acceptable level of safety for students, employees, and the public.
4. Support inclusive programming and address existing accessibility deficiencies by providing a recreational facility that meets current ADA requirements and improves overall site accessibility, including connectivity between buildings/uses.
5. Concentrate new development within a previously developed area on campus in order to most efficiently use the limited land resources of a mature urban University.
6. Enhance recreational facilities at Sunset Rec while preserving Sunset Canyon's unique, natural setting and related open spaces by minimizing building footprint(s), retaining trees and landscaping, and siting development in a manner that respects the site's varying topography.
7. Design recreational spaces that integrate indoor and outdoor areas and foster a sense of connection with the surrounding landscape.

3.5 PROPOSED PROJECT COMPONENTS

3.5.1 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 3-2) 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 3-10.



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

Figure 3-10

Not to Scale

Conceptual Site Plan

Conceptual building elevations are provided on Figures 3-11a and 3-11b, building sections are provided on Figure 3-12, and conceptual renderings are provided on Figures 3-13a and 3-13b. 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 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 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 3-14). Based on the latest conceptual designs, approximately 46 percent of the building facade would consist of window systems. The glazing system would include 10-foot-tall multi-panel glass sliding doors tied to a central building management system (BMS) to facilitate natural ventilation and a system shut-off when the doors are open.

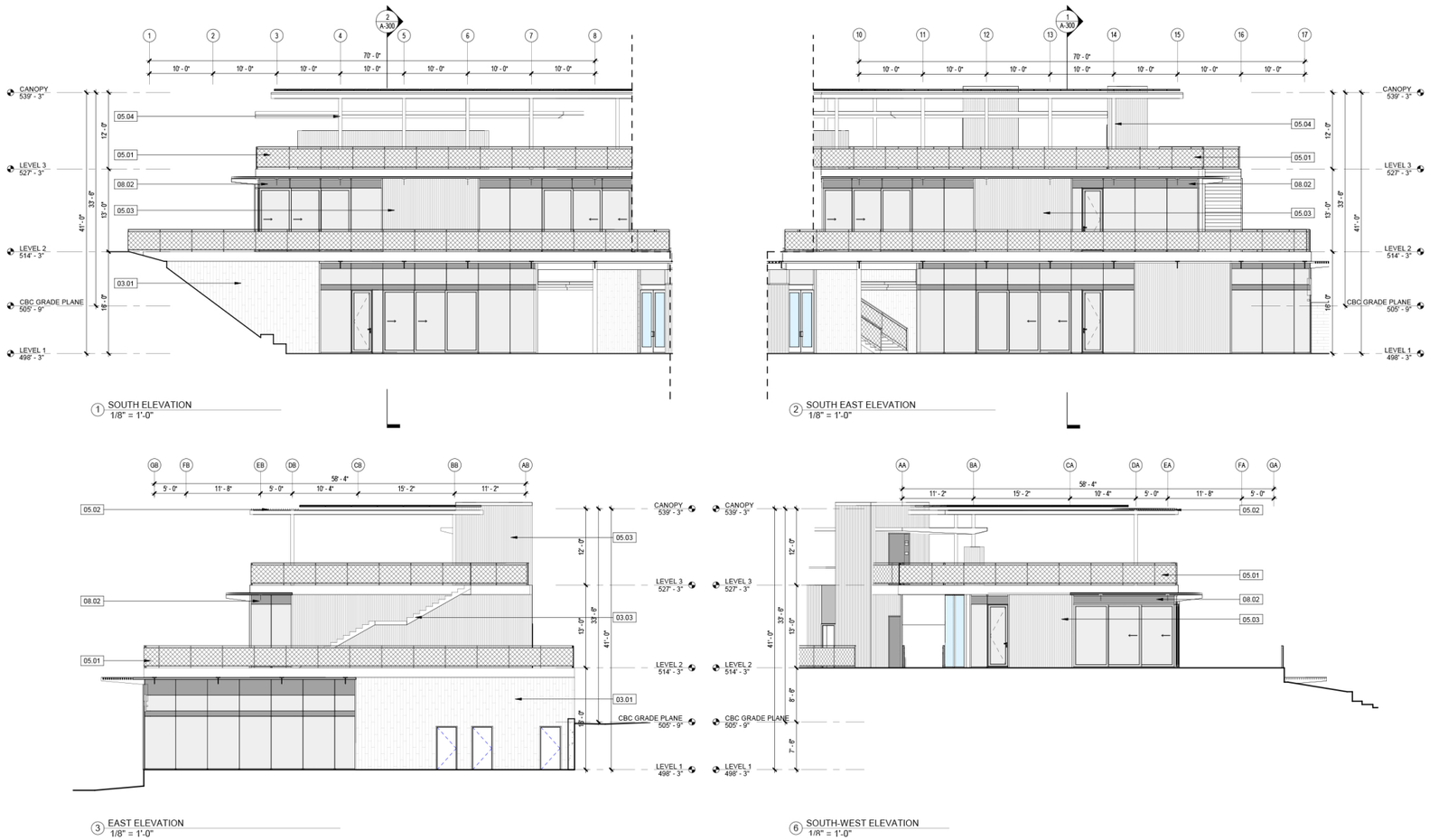
Conceptual floor plans for each level of the new building are provided on Figures 3-15 through 3-18. As shown, the proposed building's primary recreational spaces would include three multi-purpose rooms plus a teaching kitchen and a rooftop deck. The multi-purpose rooms would feature expansive floor-to-ceiling 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, all gender 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, which would be shaded by the PV canopy. The rooftop deck would include a small storage room and a refreshment area to support Sunset Rec programs and gatherings.

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

3.5.2 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; no new parking or change to the existing parking configuration is required or proposed.[2] The existing entry kiosk, which is a 143 gsf modular building, would be relocated slightly to improve the flow of pedestrian traffic from the parking structure to the various uses within Sunset Rec.

[2] While electric vehicle (EV) chargers are not currently available at the SR parking structure, both Level 1 and Level 2 EV chargers are available at the nearby Sunset Village parking structure, which is an approximately 6.5-minute walk from Sunset Rec. UCLA continues to expand its EV charging infrastructure throughout the campus in accordance with goals identified in the UCLA EV Readiness Plan (UCLA, 2023).



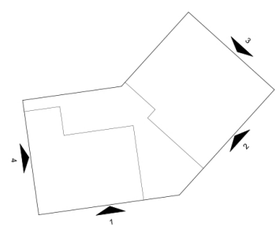
ELEVATION LEGEND

- 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

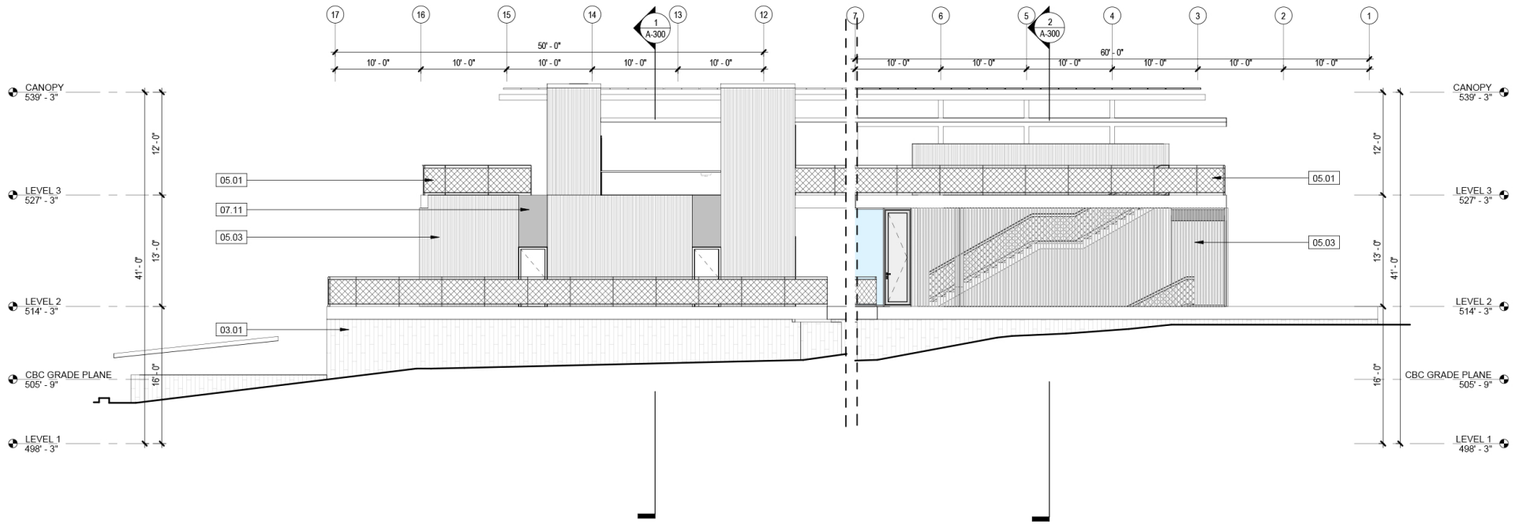


Source(s): Safdie Rabines Architects (05-12-2023)

Figure 3-11a

Not to Scale

Conceptual Buildings Elevations



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

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

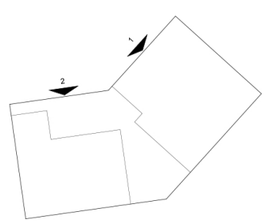
ELEVATION LEGEND

- 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

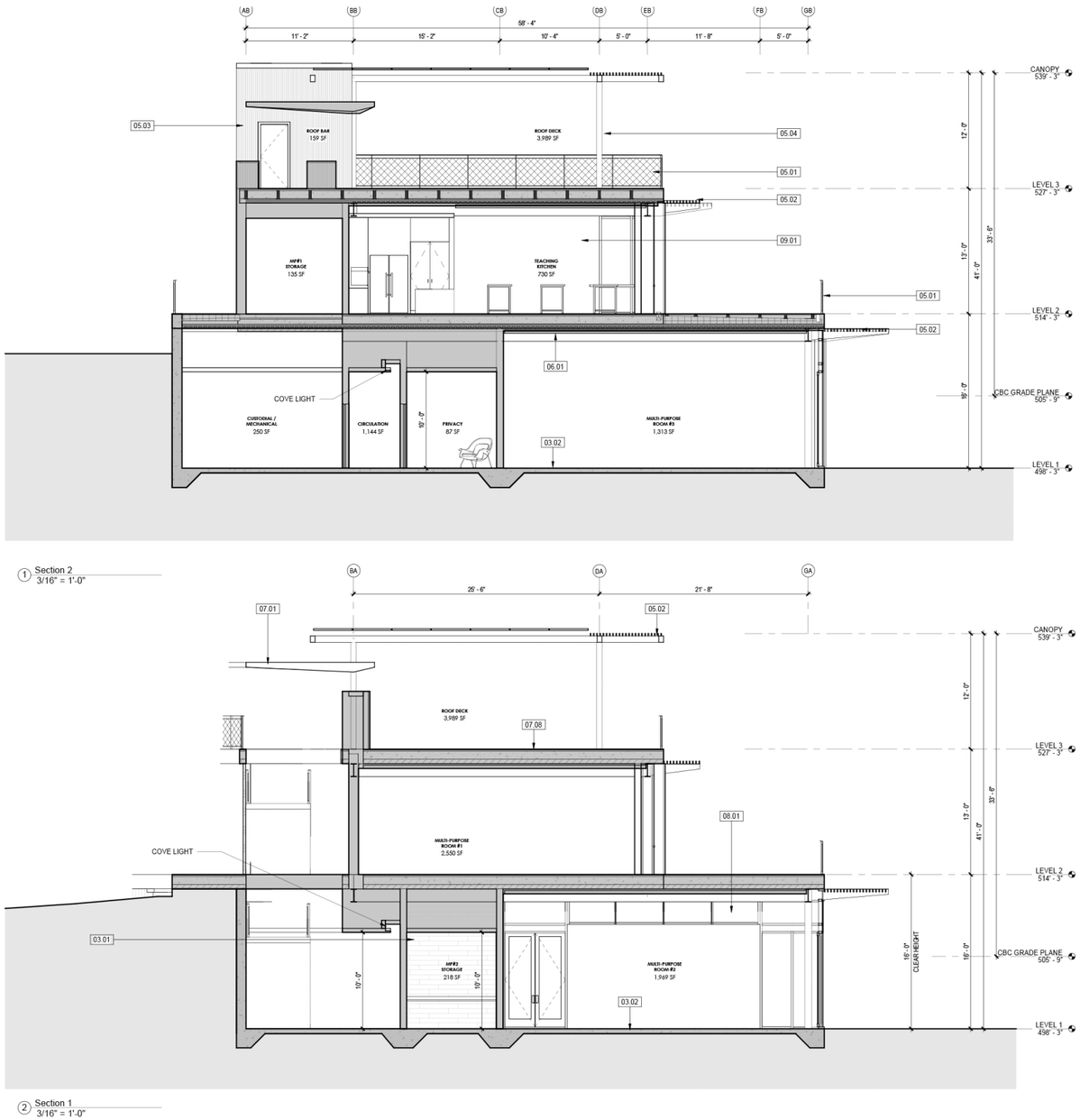


Source(s): Safdie Rabines Architects (05-12-2023)

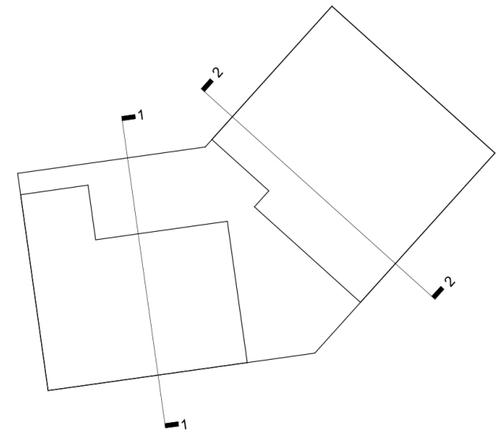
Figure 3-11b

Not to Scale

Conceptual Buildings Elevations



KEY PLAN



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

Figure 3-12

Not to Scale

Building Sections



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

Figure 3-13a

Not to Scale

Conceptual Building Rendering

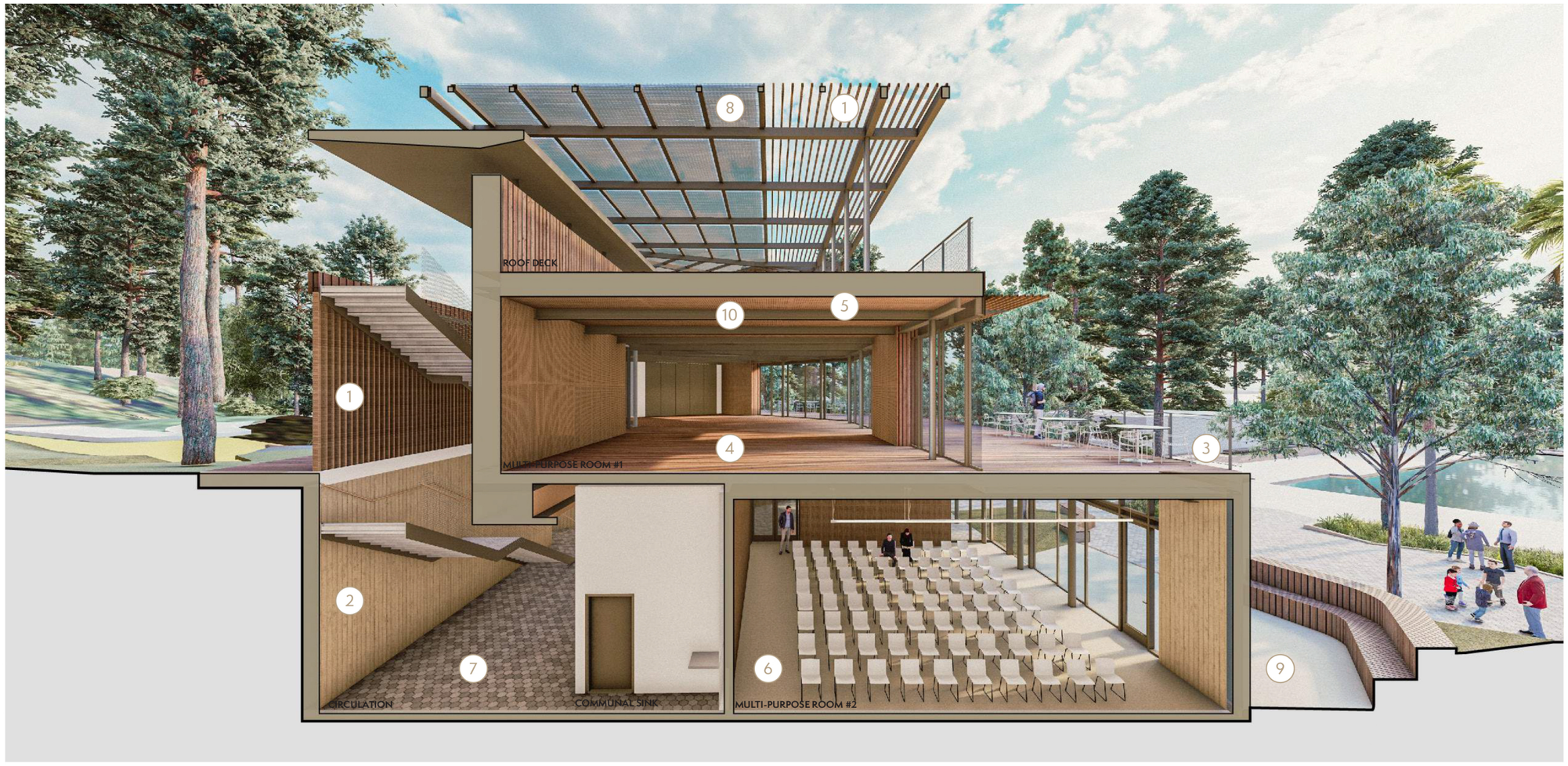


Source(s): Safdie Rabines Architects (05-08-2023)

Figure 3-13b

Not to Scale

Conceptual Building Rendering



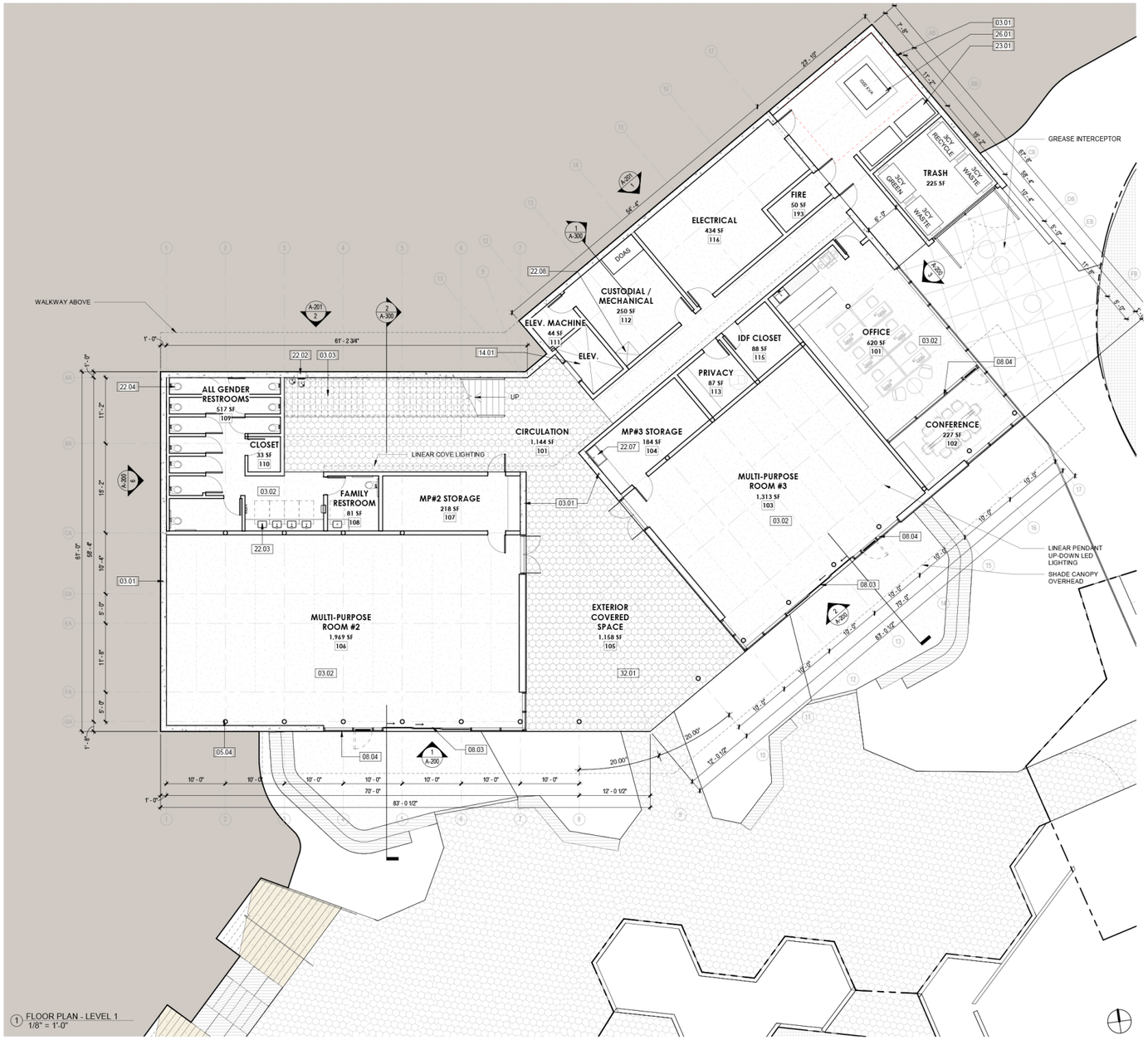
1. ALUMINUM WOOD-LOOK BATTENS / SIDING
2. BOARD-FORMED CONCRETE WALLS
3. MESH CABLE GUARD RAIL
4. PORCELAIN TILE PAVER / OAK PLANKS
5. ACOUSTIC WOOD WALL/ CEILING PANELS
6. POLISHED CONCRETE "MIAMI BUFF"
7. SITE PAVER CONTINUES INTO PRIMARY CORRIDOR
8. STEEL SHADE STRUCTURE WITH SOLAR PV CANOPY
9. MULTI-PURPOSE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

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

Figure 3-14

Not to Scale

Building Materials



KEYNOTES

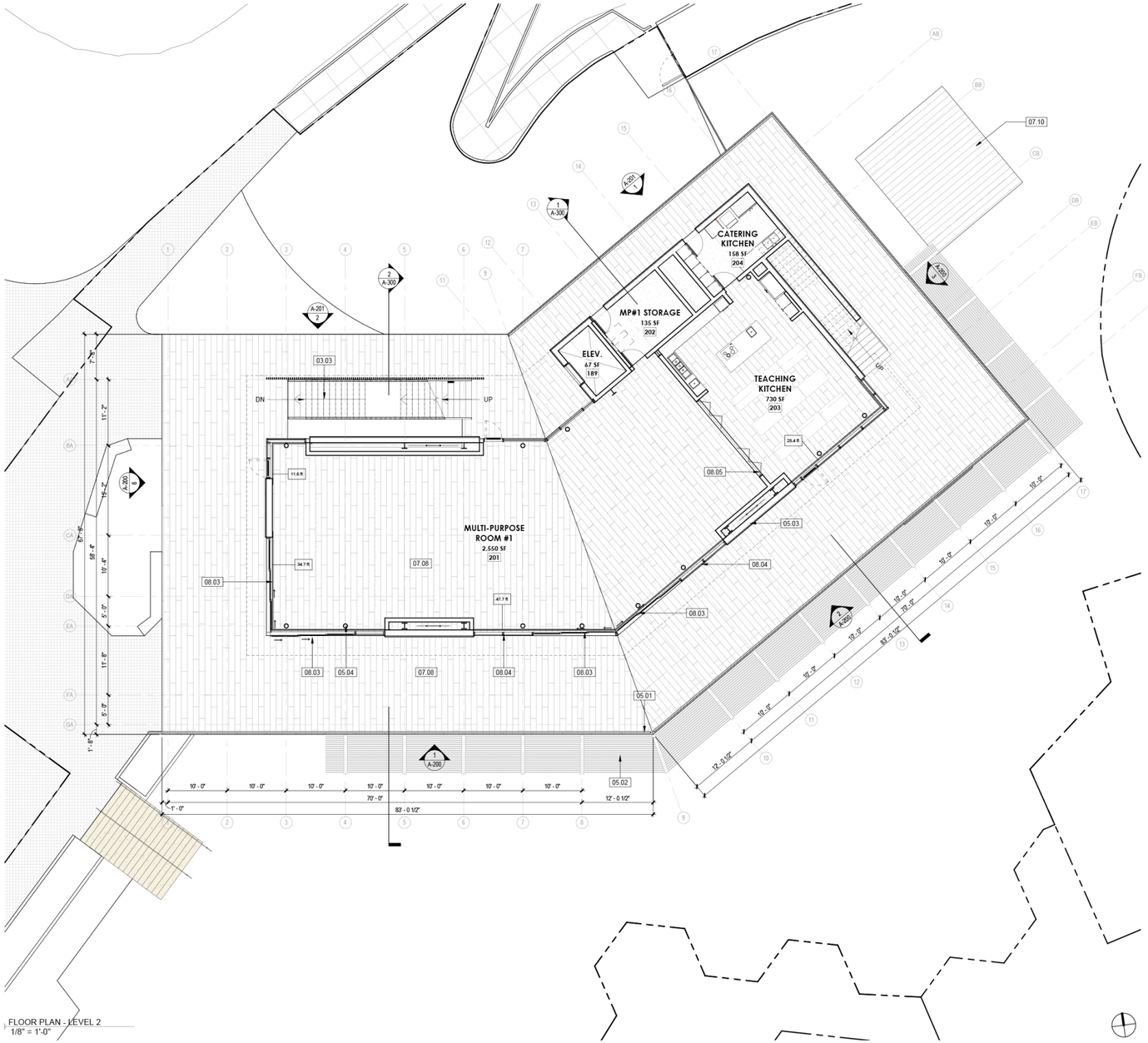
03.01	ARCHITECTURALLY BOARD-FORMED CONCRETE WALLS (EXPOSED TO VIEW)
03.02	POLISHED CONCRETE FLOORS
03.03	PRE-CAST CONCRETE TREADS & RISER ATTACHED TO STL. PLATE STRINGER
05.04	NON-RATED STRUCTURAL STEEL PER STRUCTURAL. AESS LEVEL 3
08.03	EXT. MULTI-PANEL GLASS SLIDING DOORS WITH RECESSED HEAD/SILL TRACK
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 3-15

Not to Scale

Level 1 Floor Plan



KEYNOTES

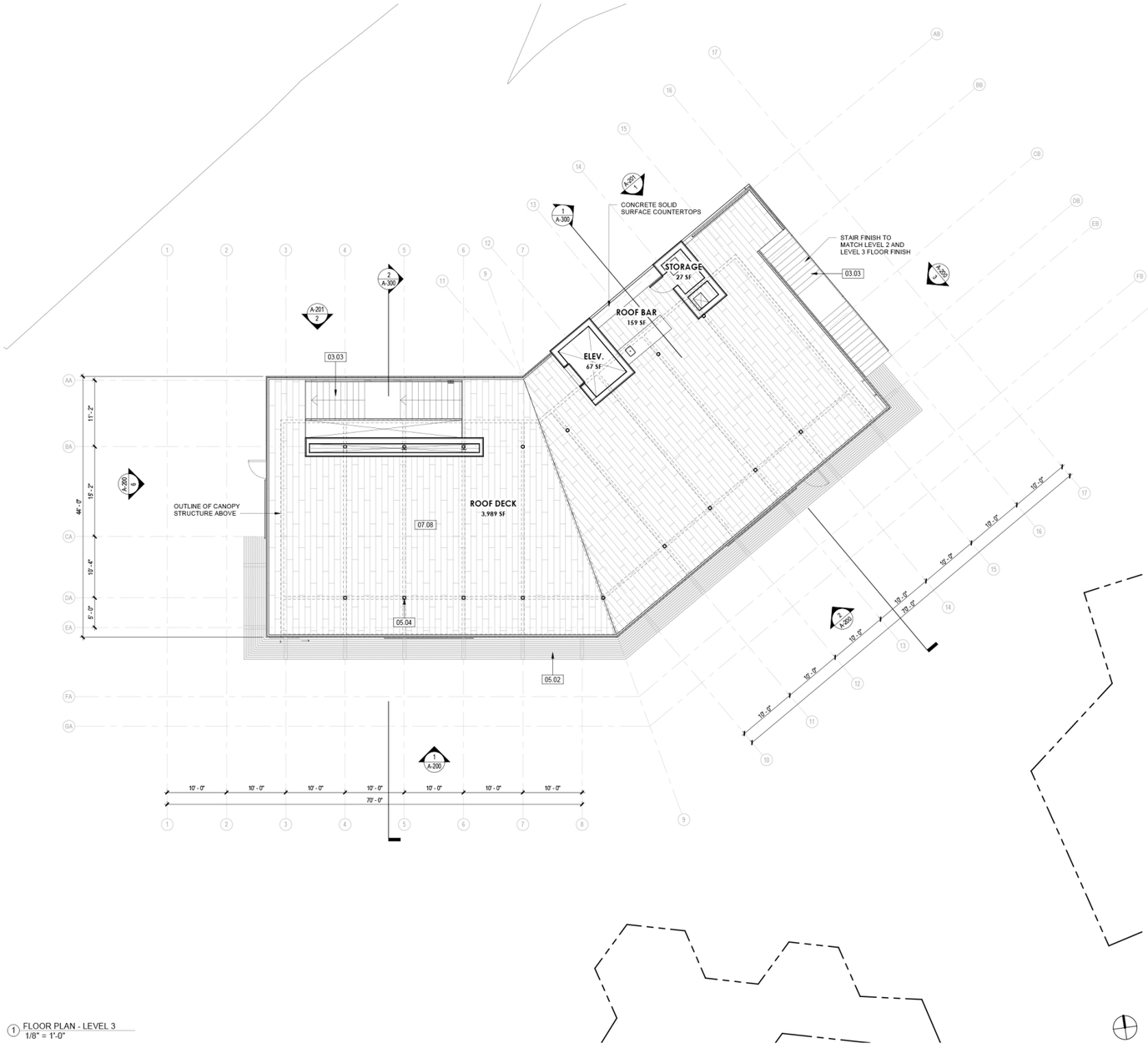
03.03	PRE-CAST CONCRETE TREADS & RISER ATTACHED TO STL. PLATE STRINGER
05.01	METAL GUARDRAILS
05.02	ALUMINUM "WOOD-LOOK" SUN-SHADING BATTENS
05.03	ALUMINUM "WOOD-LOOK" VERTICAL BATTENS
05.04	NON-RATED STRUCTURAL STEEL PER STRUCTURAL. AESS LEVEL 3
07.08	PORCELAIN TILE ROOF PAVER
07.10	STANDING SEAM METAL 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 3-16

Not to Scale

Level 2 Floor Plan



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

KEYNOTES

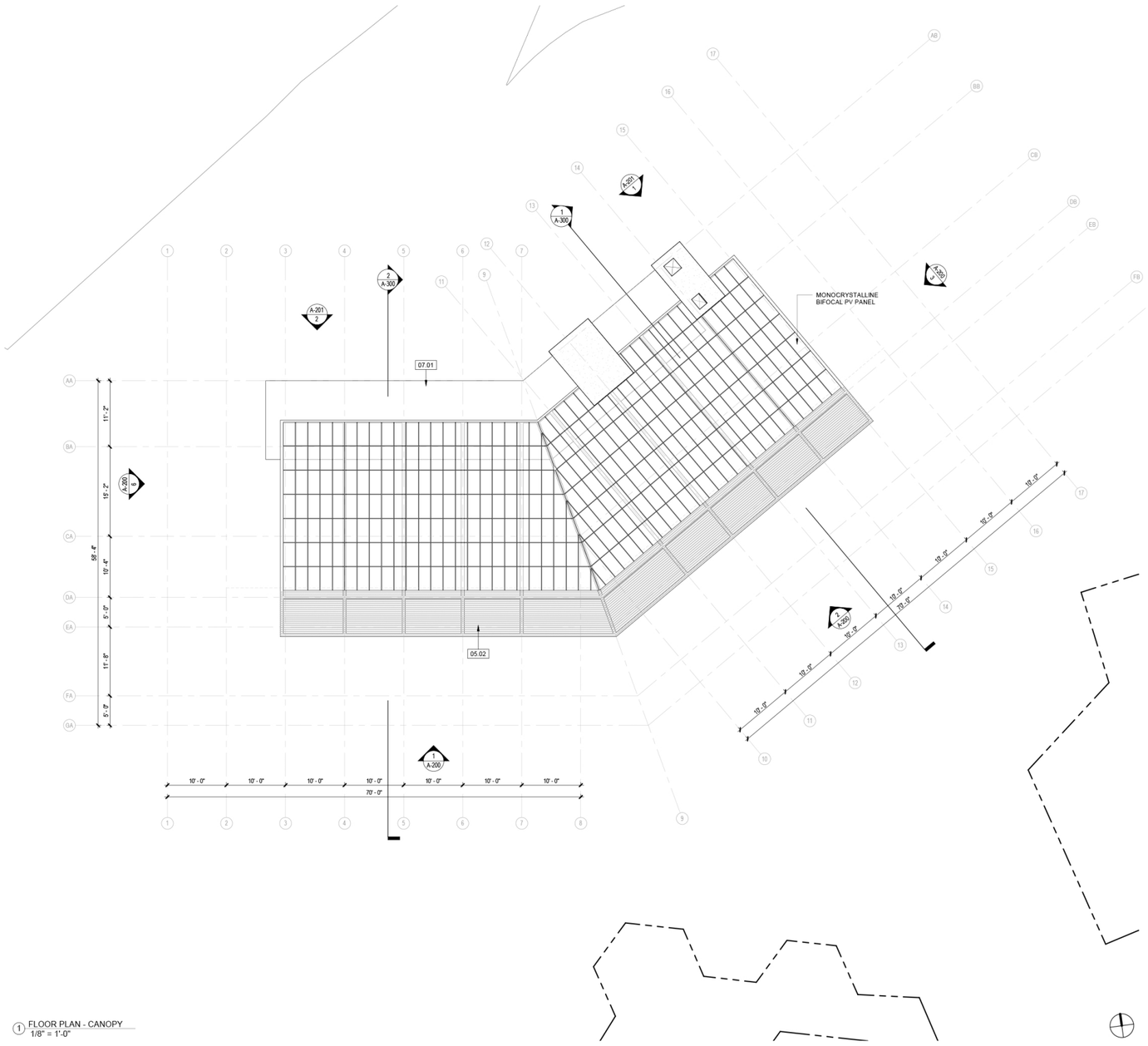
03.03	PRE-CAST CONCRETE TREADS & RISER ATTACHED TO STL. PLATE STRINGER
05.02	ALUMINUM "WOOD-LOOK" SUN-SHADING BATTENS
05.04	NON-RATED STRUCTURAL STEEL PER STRUCTURAL. AESS LEVEL 3
07.08	PORCELAIN TILE ROOF PAVER

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

Figure 3-17

Not to Scale

Roof Deck Floor Plan



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

KEYNOTES

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

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

Figure 3-18

Not to Scale

Roof Deck Canopy Plan

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. 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 new building elevator, and the existing wheelchair ramp behind the building would remain in place as well.

There are designated Campus Bike Routes and Campus Bike Lanes on the roadways in the vicinity of Sunset Rec (specifically, 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. Additionally, Sunset Rec currently provides shower facilities, bike racks, and a repair stand with a bike pump, which would be replaced with the proposed Project.

Individuals using the facilities at Sunset Rec, including the proposed replacement building, would continue to have access to a full range of existing campus transportation demand management (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.

3.5.3 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 3-19, 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 paving pattern at Sunset Rec. 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 and replaced, including an estimated 12 existing mature trees (refer to the discussion of Biological Resources in Section V.4 of the Initial Study including in Appendix A), one of which is considered a protected species, western sycamore (*Platanus racemosa*). However, many of the existing trees surrounding the proposed building site, including a large Canary Island pine (*Pinus canariensis*) to the south, would be protected in place. 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.

3.5.4 UTILITY INFRASTRUCTURE

The proposed Project would include the removal of existing utility infrastructure systems that serve the existing buildings, as shown on Figure 3-20. 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 3-21:

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



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

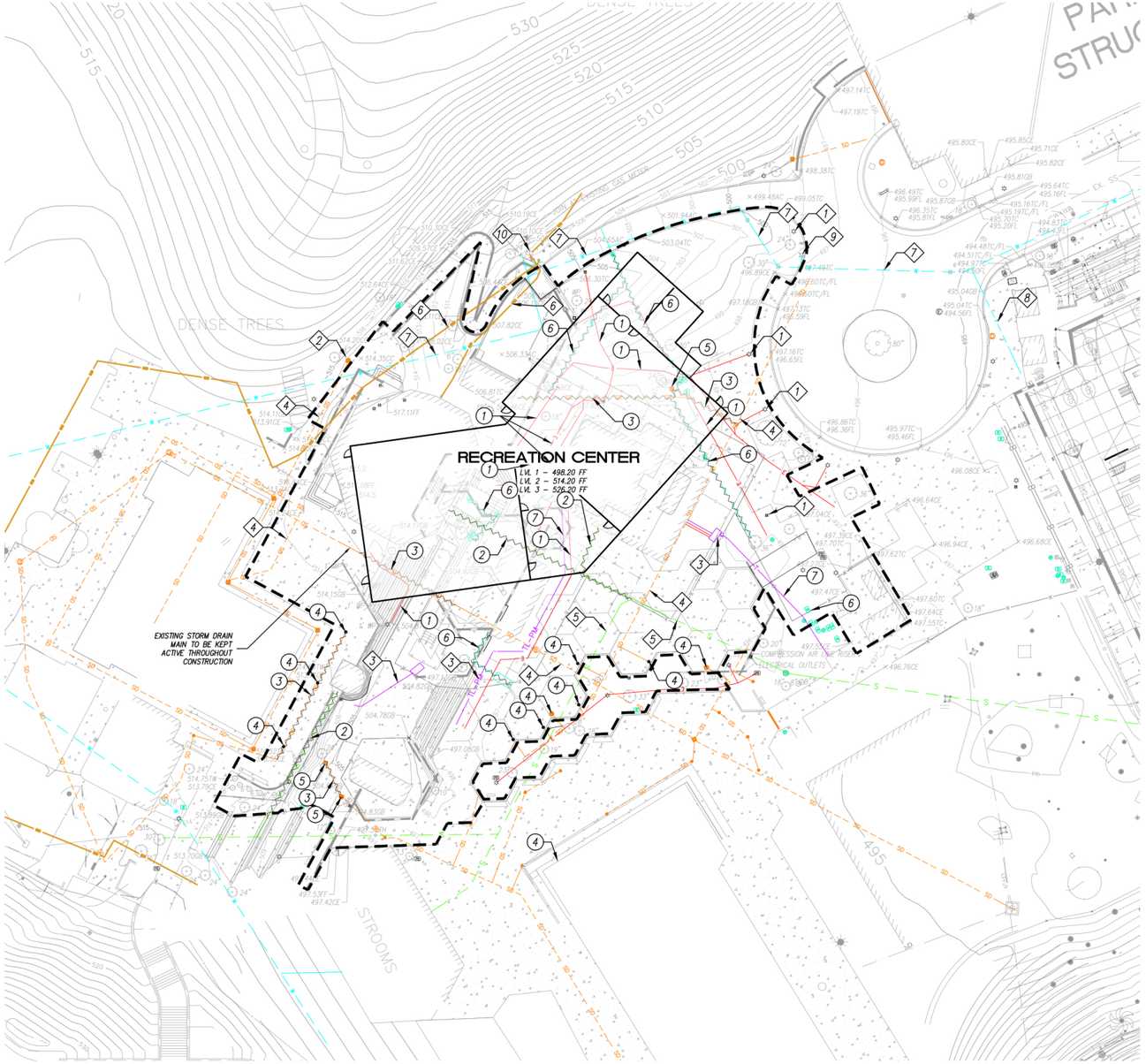
NOTE: QUANTITIES TO BE VERIFIED BY CONTRACTOR.

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

Figure 3-19

Not to Scale

Conceptual Landscape Plan



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

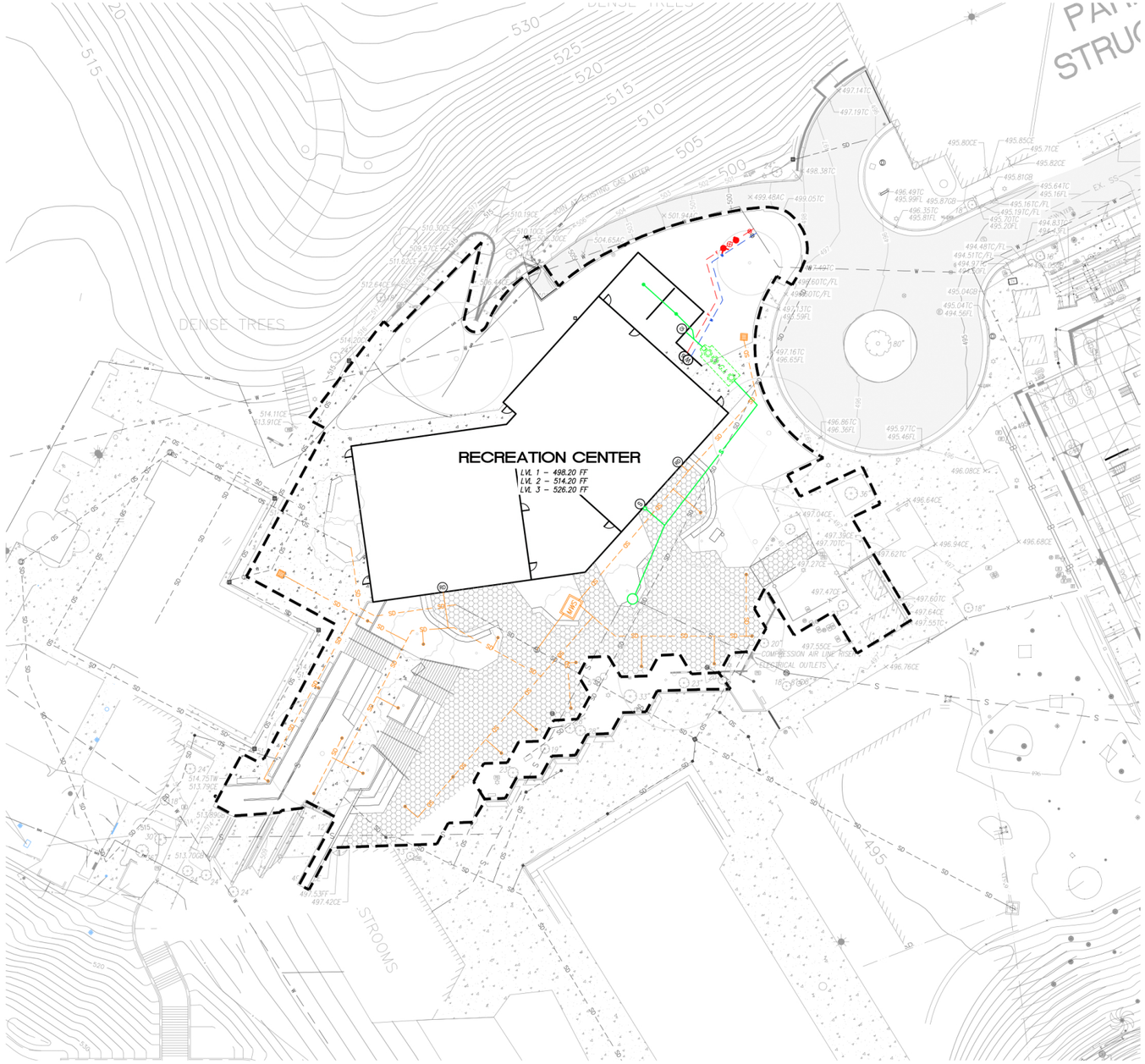
- LIMITS OF WORK
- EXISTING FENCE
- EXISTING BUILDING
- DEMOLITION OF UTILITY LINES

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

Figure 3-20

Not to Scale

Utility Demolition Plan



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

Figure 3-21

Not to Scale

Conceptual Utility Plan

- ***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 the Initial Study included in Appendix A, 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.
- ***Electricity –*** The existing lower pool concrete electric vault 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.

3.5.5 SUSTAINABLE BUILDING FEATURES

The proposed Project would comply with the current version University of California Policy on Sustainable Practices and Guidelines (UC Sustainable Practices Policy) (UC, 2023), which became effective on July 13, 2023, and would adopt the principles of energy efficiency and sustainability to the fullest extent possible, consistent with budgetary constraints and regulatory and programmatic requirements. Consistent with the UC Sustainable Practices Policy, a minimum Leadership in Energy and Environmental Design (LEED™) Gold rating has been established for the proposed Project, and the proposed Project design would strive to achieve a LEED Platinum rating. 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. To achieve a minimum LEED Gold rating, the proposed Project incorporates a series of green building strategies including, but not limited to, the following:

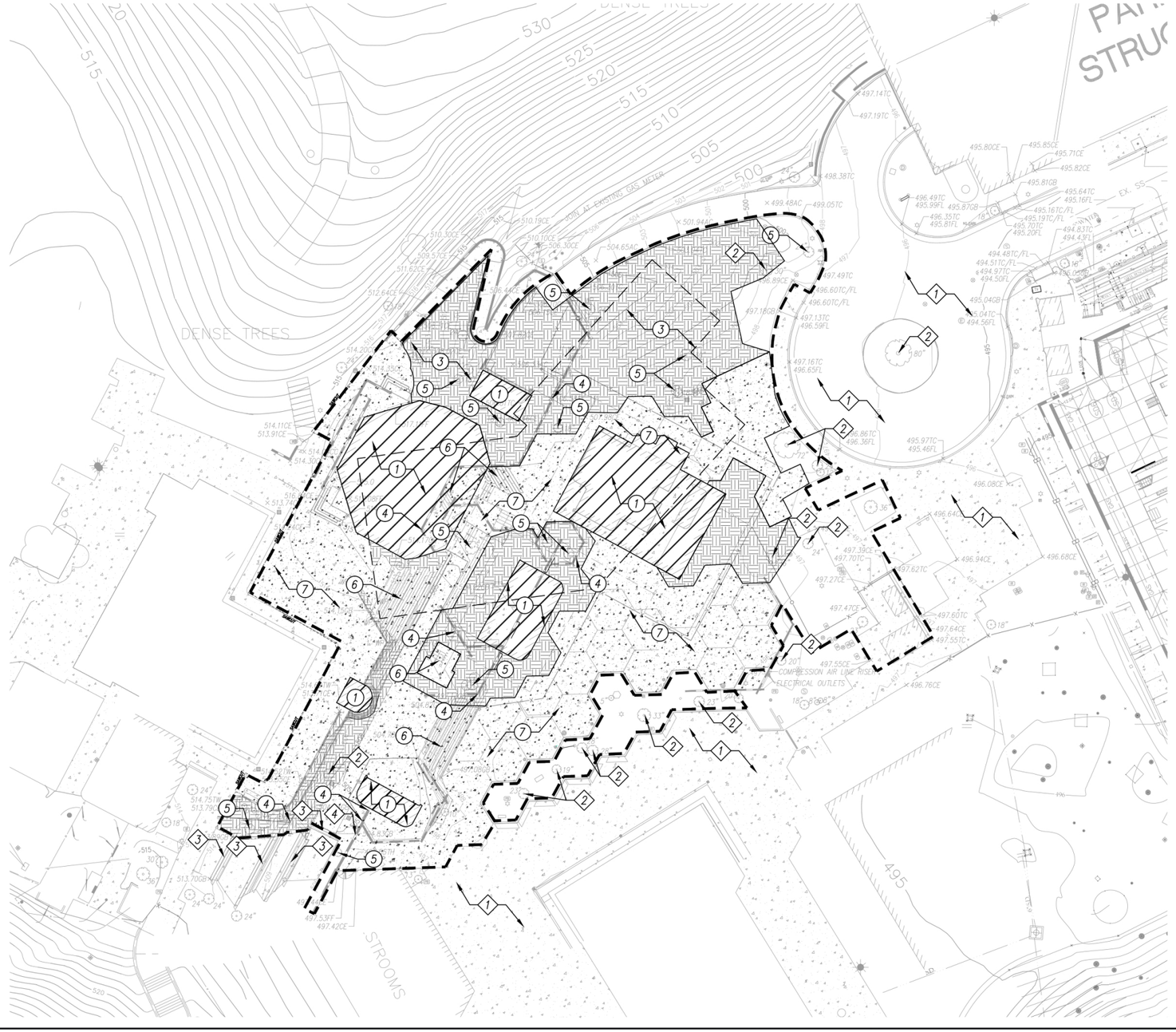
- Outperforming Title 24 standards by 20 percent; striving to outperform the standards by 30 percent where possible.
- Optimizing the energy efficiency of systems not addressed by the CBC energy-efficiency standards.
- Installing rooftop PV panels (total area of approximately 3,000 sf) to offset the 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.

3.5.6 CONSTRUCTION ACTIVITIES

For purposes of analysis, it is anticipated that construction of the proposed Project would begin in May 2024 and be completed in January 2026. Construction would be sequenced with overlapping phases, which are generalized as follows: 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 3-4 (approximately 37,460 sf or 0.86 acre), would be directly impacted by construction activities, as analyzed herein. Site demolition would involve the existing buildings, landscaping, and hardscape within the Project site as shown on Figure 3-22; 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 3-23. 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 located 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.



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

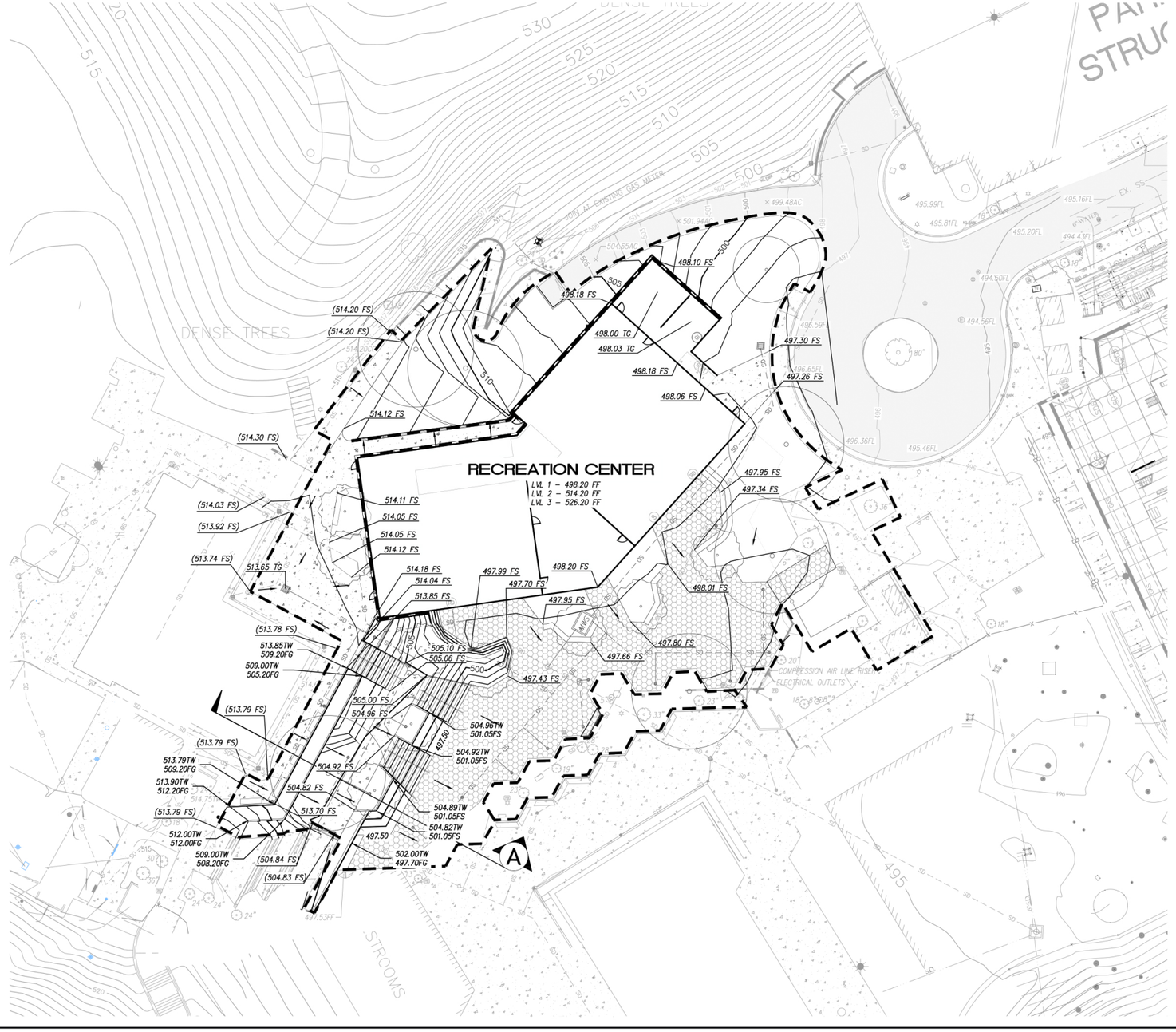
LIMITS OF WORK	
EXISTING FENCE	
EXISTING BUILDING	
BUILDING TO BE DEMOLISHED	~5,464 SQUARE FEET
CONCRETE REMOVAL	~14,988 SQUARE FEET
LANDSCAPE AREA REMOVAL	~11,032 SQUARE FEET
CONCRETE SAWCUT LINE	

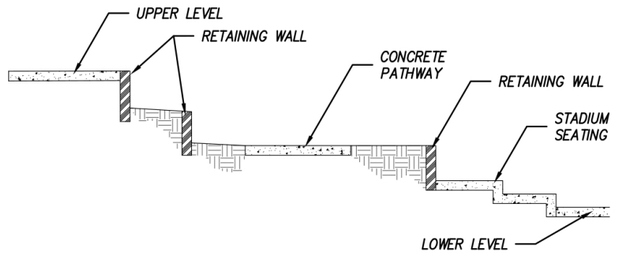
Source(s): Latitude 33 Planning & Engineering (07-11-2023)

Figure 3-22

Not to Scale

Surface Demolition Plan





SECTION A
NTS

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

Figure 3-23

Not to Scale

Conceptual Grading Plan

Grading activities would also include excavation to a depth of approximately 20 feet beneath the proposed building footprint (at the northern section of the site, 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 3-24. 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 identified to efficiently move construction vehicles and to avoid traffic from 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 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. Further, as required by LRDP PP 4.13-5, one travel lane in each direction would be maintained on nearby roadways during construction, and if at any time only a single lane is available, actions would be taken (e.g., temporary traffic signals, flagpersons, etc.) to allow travel in both directions.

Safe pedestrian access from the SR parking structure and the adjacent drop-off roundabout would be maintained during construction. Additionally, pedestrian circulation within Sunset Rec would be maintained to provide access to all uses that would remain operational during construction. As required by LRDP PP 4.13-6, signage would be installed identifying alternate pedestrian routes when closure of a pedestrian route during construction is required. 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 the nearby Hedrick Summit residence hall. Activities located on the upper lawn would continue to be accessed from De Neve Drive, adjacent to the amphitheater.

3.6 RELATIONSHIP TO THE 2002 LONG RANGE DEVELOPMENT PLAN, AS AMENDED

As previously indicated, the proposed Project would involve the 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]

[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 3-2, UCLA Campus Map, and include Gayley Towers (565 Gayley Avenue), Wooden Center Seismic Improvements, and Co-Generation Plant Equipment Replacement.

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



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 3-24

Not to Scale

Erosion Control Plan

This amount of development is within the total remaining development allocation consistent with the LRDP. Currently, the Northwest zone has an estimated 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 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.

3.7 ANTICIPATED DISCRETIONARY APPROVALS

Under the delegated authority process, The Regents delegate approval authority to the UCLA Chancellor for projects that meet certain criteria. The proposed Project and this Draft SEIR are expected to be eligible for delegated approval to be considered by the Chancellor. The University of California and the responsible agencies identified below are expected to use the information contained in this Draft SEIR, including the Initial Study provided in Appendix A, for consideration of approvals related to and involved in the implementation of the proposed Sunset Canyon Recreation Replacement Building Project. This Draft SEIR, including the Initial Study, will 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.

University of California

- Certification of the Final SEIR and adoption of the MMRP, CEQA Findings, and Statement of Overriding Considerations.
- Approval of the Sunset Canyon Recreation Replacement Project, including its design.

Responsible Agencies

- **State Water Resources Control Board.** UCLA, or its designee, shall comply with the 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 any new stationary sources of equipment that emit or control air contaminants (e.g., heating, ventilation, and air conditioning units and diesel generators).

- **California Department of Transportation.** UCLA, or its designee, shall obtain a transportation permit(s), as needed, if any oversized transport vehicle will require travel on a State highway.

SECTION 4.0 ENVIRONMENTAL IMPACT ANALYSIS

This section provides the analysis of the potential environmental impacts to cultural resources, and specifically historic resources, resulting from implementation of the proposed Sunset Canyon Recreation Replacement Building Project (proposed Project). As discussed in Section 2.0, Introduction, of this Draft Supplemental Environmental Impact Report (SEIR), this Draft SEIR is tiered from the UCLA Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (LRDP Final Subsequent EIR) (State Clearinghouse [SCH] No. 2017051024) (UCLA, 2018), and the UCLA 2008 Northwest Housing Infill Project and Long Range Development Plan Amendment Final Environmental Impact Report (2009 LRDP EIR) (SCH No. 2008051121) (UCLA, 2009), which 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 provide a broad analysis of the environmental effects of implementing the remaining development allocation on campus, including in the Northwest zone of campus. Based on the Initial Study included in Appendix A of this Draft SEIR, the University of California, as the Lead Agency, has determined that the proposed Project requires a Project-level analysis in a tiered SEIR to further evaluate certain Project impacts. The Initial Study concludes that most of the impacts of the proposed Project (which incorporates applicable campus programs, practices, and procedures [PPs] and mitigation measures [MMs] required by the LRDP Mitigation Monitoring and Reporting Program [MMRP]) were fully addressed by the analysis in the LRPD EIRs, but that Project-specific impacts to historic resources were not adequately covered in the LRDP EIRs, and additional Project-specific analysis is required. It should be noted that the analysis in the Initial Study concludes that impacts to other cultural resources (i.e., archaeological resources and human remains) would be less than significant with incorporation of LRDP PPs and MMs; therefore, no further analysis of these environmental issues is provided in this section.

This section includes the following subsections: Regulatory Framework, Environmental Setting, Project Impacts (including established thresholds of significance), Mitigation Measures, and Cumulative Impacts. In addition to information incorporated from the LRDP EIRs, this section is based on the following technical report prepared by Page & Turnbull and included in Appendix B of this Draft SEIR (Page & Turnbull, 2023a).

- UCLA Sunset Canyon Recreation Center Historic Resource Technical Report, Los Angeles, California (Historic Resources Technical Report).

4.1 CULTURAL RESOURCES

4.1.1 REGULATORY FRAMEWORK

Section 4.4 of the LRDP Final Subsequent EIR provides a complete discussion of the regulatory framework for the analysis of cultural resources. The following discussion focuses on regulatory information regarding historic resources, as presented in the LRDP Final Subsequent EIR and the Historic Resources Technical Report, that is particularly relevant to the proposed Project.

Federal

National Register of Historic Places

The National Historic Preservation Act (NHPA) of 1966 (as amended) established the National Register of Historic Places (National Register) as the official federal list of cultural resources that

have been nominated by state offices for their historical significance at the local, State, or national level. Cultural resources are considered during federal undertakings chiefly under Section 106 of the NHPA (16 United States Code [U.S.C.] 470f) through its implementing regulation (36 CFR 800, Protection of Historic Properties) and through the National Environmental Policy Act (NEPA).

The National Register is the nation's most comprehensive inventory of historic resources. The National Register is administered by the National Park Service and includes districts, sites, buildings, structures and objects significant in American history, architecture, archeology, engineering, and culture. These resources contribute to an understanding of the historical and cultural foundations of the Nation at the national, state, or local level. Typically, properties over 50 years of age may be eligible for listing in the National Register if they meet any one of the four significance criteria and if they retain sufficient historic integrity to convey that significance. Properties under 50 years of age may be determined eligible if it can be demonstrated that they are of "exceptional importance." Other criteria considerations apply to cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed buildings, and properties primarily commemorative in nature. National Register criteria are defined in depth in National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation (National Park Service, 1995).

Historic Significance

The National Register has four basic criteria under which a property may be considered eligible for listing:

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

A property may be considered significant on a national, state, or local level to American history, architecture, archaeology, engineering, and culture.

Integrity

In addition to qualifying for listing under at least one of the National Register criteria, a property must be shown to have sufficient historic integrity in order to be considered eligible for listing in the National Register. The concept of integrity is essential to identifying the important physical characteristics of historic resources and hence, in evaluating adverse changes to them. Integrity is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance."

According to the National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation, these seven aspects are generally defined as follows:

- **Location** is the place where the historic property was constructed.
- **Design** is the combination of elements that create the form, plans, space, structure and style of the property.
- **Setting** addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building/s.
- **Materials** refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property.
- **Workmanship** is the physical evidence of the crafts of a particular culture or people during any given period in history.
- **Feeling** is the property's expression of the aesthetic or historic sense of a particular period of time.
- **Association** is the direct link between an important historic event or person and a historic property.

Integrity is a "yes" or "no" determination. A historic property either has adequate integrity, or it does not. To retain historic integrity, a property will often possess several, if not all, of the aforementioned aspects. Specific aspects of integrity may also be more important, depending on the criteria for which it is significant.

It is important to note that historic integrity is not synonymous with condition. A building or structure can possess all or many of the seven aspects of integrity, even if the condition of the materials has degraded. Condition comes into consideration when there is a substantial loss of historic material or other character-defining features.

Secretary of the Interior's Standards for Treatment of Historic Properties

The Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards) (Grimmer, 2017) have been developed by the National Park Service (NPS) within the U.S. Department of the Interior to provide guidance for reviewing proposed work on historic properties(They are accompanied by the illustrated Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (SOI Guidelines) that offer general design and technical recommendations in applying the SOI Standards.

The Secretary of the Interior offers four sets of standards to guide the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. Typically, one set of standards is chosen for a project based on the project scope. However, since the proposed Project involves the removal of existing buildings and structures rather than their retention and improvement, an evaluation of compliance with the SOI Standards is not provided in this section. Instead, the analysis herein focuses on eligibility for listing in the relevant historic registers. Refer to Section 5.0, Alternatives to the Proposed Project, of this Draft SEIR, for an evaluation of variations on the proposed Project that reflect compliance with the SOI Standards.

State

California Register of Historical Resources

The California Register of Historical Resources (California Register) is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and

feasible, from substantial adverse change." A property may be eligible for listing in the California Register if it meets one or more of the following criteria:

- **Criterion 1 (Event).** Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

- **Criterion 2 (Persons).** Associated with the lives of persons important in our past;

- **Criterion 3 (Design/Construction).** Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

- **Criterion 4 (Information Potential).** Has yielded, or may be likely to yield, information important in prehistory or history.

These criteria are based upon National Register criteria; however, the California Register does not impose as specific requirements for integrity and age as the National Register. Properties eligible for listing in the California Register must retain enough of their historic character or appearance to be recognizable as historic resources and to convey the reasons for their significance. While the National Register guidelines for integrity can be applied for California Register eligibility, it is possible that resources, which may not retain sufficient integrity for listing in the National Register, may still be eligible for the California Register. Moved or reconstructed buildings, structures, or objects may also be considered for listing in the California Register under specific circumstances. In addition, properties that were constructed less than 50 years ago or which achieved significance less than 50 years ago may be eligible for inclusion in the California Register provided that sufficient time has passed to understand their significance within a historic context. With the exception of some properties with additional criteria consideration (50 years or less, moved buildings, etc.), properties that meet the National Register criteria typically also meet the California Register criteria and vice versa, and the determinations are often evaluated together.

California Environmental Quality Act

In accordance with the CEQA Guidelines Section 15378, a "Project" is defined as "…the whole of an action, which has the potential for resulting in either a direct change in the environment, or a reasonably foreseeable indirect physical change in the environment" and which involves an activity directly undertaken by a public agency, an activity that requires public agency assistance or entitlement, or an activity that requires discretionary approval by a public agency. Historic and cultural resources are considered to be part of the environment.

A building may qualify as a historic resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a), which are defined as:

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

2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4852).

4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Pub. Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Pub. Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Pub. Resources Code Sections 5020.1(j) or 5024.1.

Properties listed or formally determined eligible for listing in the National Register are listed automatically in the California Register. As such, they are considered historic resources under CEQA.

CEQA stipulates that a project with an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment. CEQA further states that a project that conforms to the Secretary Standards may be considered to have less than significant impact with regard to historic resources.

Local

As a constitutionally created entity, the University of California has autonomy from local land use regulation. Accordingly, the City of Los Angeles Cultural Heritage Ordinance, adopted in 1962 and amended in 2007 (Administrative Code Section 22.171), and the Historic Preservation Overlay Zone ordinance adopted in 2004 (Municipal Code Section 12.20.3) do not apply to the Project.

4.1.2 ENVIRONMENTAL SETTING

Historic Resources on Campus

Table 4.4-1 in Section 4.4 of the 2009 LRDP EIR identifies 13 campus structures that were identified as potentially eligible for listing in the National Register and/or the California Register. Most of these structures are within the campus historic core in the Core zone, which is approximately 0.4 mile east of Sunset Rec. As described in the 2009 LRDP EIR, the campus historic core is formed by Royce Hall (1929), along with Powell Library (1929) across Dickson Plaza (including the bridge) to its south; with Haines Hall (1929) to its east; Kinsey (1929) to its southeast; and its linkages to Moore Hall (1930), Kerckhoff Hall (1931), the Men's Gym (1932), and Glorya Kaufman Hall (1932) at the foot of Janss Steps. Murphy Hall (1937) is also considered to be part of the Historic Campus Core. In addition to the oldest and grandest campus structures, the historic core includes urban design elements, such as decorative sidewalks, landscape design, and the ornamental lights of Dickson Plaza and Janss Steps. The 2009 LRDP EIR also acknowledges that, over time, additional campus structures may be eligible for listing and, therefore, individual development projects must consider historic resources in accordance with CEQA.

The South Central Coastal Information Center (SCCIC) conducted a records search for the UCLA campus on February 23, 2016 during preparation of the LRDP Final Subsequent EIR. The results of the records search show that 16 historic resources have been recorded within the campus boundaries. The Historical Resources Inventory lists 13 historic resources that are either listed or eligible for listing at the federal or State level, as discussed above. 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. The records search did not identify historic resources within Sunset Canyon Recreation Center (Sunset Rec), within which Project site is located. Further, no historic or prehistoric archaeological sites have been recorded on or within 0.25 mile of the campus.

The Historical Resources Assessment prepared to support the tiered Initial Study/Mitigated Negative Declaration for the Pauley Pavilion Renovation and Expansion Project (SCH No. 2009041133; July 2009) determined that Pauley Pavilion is potentially eligible for listing in the National Register and California Register; however, Pauley Pavilion is not listed in these registers. Pauley Pavilion is the closest off-site, on-campus eligible historic resource to the Project site and is located more than 0.3 mile to the southeast.

Sunset Canyon Recreation Center

As required by LRDP PP 4.4-1(a), Sunset Rec has been evaluated for eligibility for listing in the California Register. The Historical Resource Report prepared by Page & Turnbull (Page & Turnbull, 2023a) is included in Appendix B of this Draft SEIR and provides a description of the historic context related to the UCLA post-World War II campus development and the Sunset Rec design team; site history for Sunset Rec including planning and design, construction and opening, and alterations; overall organization and features at Sunset Rec; a detailed description of the core Sunset Rec buildings and other support buildings and site features, including those that contribute to the identified Sunset Canyon Recreation Center Historic District (Sunset Rec Historic District or Historic District); and an evaluation of the Historic District as a historic resource eligible for listing in the National Register and California Register. A thorough discussion of the historic context for UCLA is provided in the Historic Resource Report included in Appendix B of this Draft SEIR; a summary of the most relevant information is provided below.

Historic Context – Design Team

Architect – Smith and Williams

With respect to the Sunset Rec design team, Whitney R. Smith and Wayne R. Williams founded their architectural firm (Smith and Williams) in 1946. Both graduates of the University of Southern California (USC) School of Architecture, the architects remained firm partners until 1973, and each achieved fellowship in the American Institute of Architects. Over the course of their joint and individual careers, they completed hundreds of commissions, designing residential and commercial buildings and complexes; churches, schools, and government buildings; recreational facilities; and master plans. Although widely known and appreciated in the West, and southern California in particular, Smith and Williams were not as extensively published as some of their contemporaries in the national press. However, Sunset magazine, the popular and influential guide to and chronicler of western lifestyles, featured Smith and Williams over thirty times between 1940 and 1961. Arts and Architecture, also an influential postwar California-based publication, featured the duo nearly as many times. Additional information about these architects is provided in the Historic Resource Report included in Appendix B of this Draft SEIR.

A 2013 exhibition at the Art, Design & Architecture Museum at the University of California, Santa Barbara devoted to the work of Smith and Williams described their architectural design as a balance of opposites: closed versus open, private versus public, restraint versus exuberance, and light versus shadow. Rather than labeling themselves as modernists, Smith and Williams approached architecture as a problem-solving activity conditioned by the constraints and opportunities of the site, with landscape regarded as integral to the building and the overall design.

By the mid-1960s, Smith and Williams had a diversified and prosperous practice and had earned the respect of both the architectural community and clients. Although their work cannot be pigeon-holed into any one idiom, the Smith and Williams firm was noted for its work in the "post and beam" genre of modern architecture. An outgrowth of the International Style, post-and-beam architecture was a regional interpretation responsive to the southern California climate, topography, and lifestyle. It was characterized by wood construction, glass walls, and a close integration of interior and exterior spaces. The post-and-beam architecture also reflected California's proximity to the Pacific Rim and longstanding Japanese influences introduced to the region by the early 20th-century Arts and Crafts movement. Smith and Williams were amongst the foremost practitioners of post-and-beam architecture, in the company of architects Buff and Hensman, A. Quincy Jones, Harwell Hamilton Harris, and others. Additional scholarship on Smith and Williams has focused on the Japanese influences that shaped the firm's decades-long evolution of post-and-beam modernism.

Signature Smith and Williams approaches such as shaping spaces as layered volumes suggested by panels rather than defined by walls derives from the sliding shoji screen; rooms and buildings connected by exterior walkways and connected raised decks derives from the *engawa*, a covered corridor around the outside perimeter of a pavilion. Early residential commissions exhibited specifically Japanese strategies such as expressive framing and attention to site design that put landscape on an equal footing with architecture. The firm utilized these approaches in more than residential work, expanding them to commercial, civic, and recreational commissions. The design of Sunset Rec exhibits a mature expression of these principles at large scale involving both architecture and landscape.

Over the years, the firm won several American Institute of Architects awards including in 1959 for the celebrated office building for Community Facilities Planners in South Pasadena. The building showcased several hallmarks of the Smith and Williams approach to architecture, including the architects' preference that the program for the building shape its design, rather than the opposite. In this case, a flexible space allowed for both individual practices as well as cooperative ventures. The integration of the garden into the space was a paramount consideration. The overhead mesh created patterns of light and shade, and a wood "umbrella" within the space created further shelter. These concepts are also evident at Sunset Rec. The firm also amassed a small but impressive portfolio of recreation-related projects.

In addition to Sunset Rec, Smith and Williams designed a Cyclotron building at the UCLA Medical Center (undated; demolished in 2002) and after their partnership ended in 1973, Wayne Williams designed the campus' Associated Students North Campus Facility.

Landscape Architect – Cornell, Bridgers & Troller

The landscape architecture firm Cornell, Bridgers & Troller is responsible for the original landscape design at Sunset Rec. The firm was part of the original design team under Smith and Williams that produced the "Canyon Recreation Center Project No. 940530" drawing set in circa 1963-1964. Their landscaping plans in that set included the site's concrete retaining walls, wood deck and fencing, and hexagonal paving plan immediately adjacent to the swimming pools and core recreation buildings. In addition, the firm developed the "West Campus Utilities & Site

Development: Site Development and Landscape" drawing set dated June 4, 1965 that included the amphitheater and initial barbeque areas at the Upper Level, the sitting area in the Lower Level (replaced by lawn at an unknown date, and where a modular building was added in 2019/2020), the jagged-edge concrete stairway toward the southwest end of the Middle Level at the secondary student entrance to Sunset Rec (to match the two existing stairways of the central cascading stairs already in place), and many of the plantings on the site.

Cornell, Bridgers & Troller was founded in 1955 by Ralph Cornell (1890-1972), one of California's leading landscape architects, who had worked in solo practice between 1933 and 1955. Junior partners S. William Bridgers and Howard E. Troller joined Cornell in 1955. As Cornell, Bridgers & Troller, the firm was responsible for the landscape design of several prominent sites in Los Angeles. Cornell and the firm had a long working relationship with Welton Becket and Associates.

Cornell oversaw development of other universities and colleges but was the consulting landscape architect for the UCLA campus landscape from 1937 until his death in 1972. Starting in 1955, Cornell, Bridgers & Troller designed the major landscape projects at UCLA as well as various common features that unified the landscape. Among the firm's work are UCLA's Franklin D. Murphy Sculpture Garden and the Inverted Fountain located adjacent to Knudsen Hall.

Jere Hazlett became a partner in the firm in 1969, and the firm was renamed Cornell, Bridgers, Troller and Hazlett. Following the death of Ralph Cornell in 1972, the firm continued as Bridgers, Troller & Hazlett Landscape Architects. Hazlett, who had previously worked as a landscape architectural draftsman and UCLA campus landscape architect before joining the firm, was appointed to the role of consulting landscape architect for UCLA following Cornell's death. As Bridgers, Troller & Hazlett, the firm's known commissions included a sculpture garden for the Los Angeles County Museum of Art (LACMA) and Culver/Slauson Park in Culver City. In 1978, Troller left to establish an independent practice, and in 1979, Bridgers followed suit. Hazlett continued to work as a consulting landscape architect for UCLA until at least the mid-1980s.

Supervising Architect – Welton Becket and Associates

Welton Becket and Associates is listed as the supervising architect on the Smith and Williams plans for Sunset Rec. Welton Becket (1902-1969) served as supervising architect, originally with his partner William Wurdeman (1903-1949) as Wurdeman and Becket, and later as Welton Becket and Associates from 1948 until 1960. In 1960, the title changed from supervising to consulting architect, and Becket continued to serve as UCLA's consulting architect until his death in 1969. In addition, Wurdeman & Becket (until 1949) and later Welton Becket and Associates designed at least 21 buildings at UCLA during Becket's two-decade tenure. The first of that group was the Service Building (no longer extant) which was completed in 1948. Welton Becket Associates designed the original UCLA Medical Center and more than 1.5 million square feet of space in at least ten medical buildings at the Center for Health Sciences between 1954 and 1967.

As supervising/consulting architect for UCLA, Welton Becket and Associates typically had a role in reviewing and commenting on the design of new campus buildings developed by other firms who were the executive architects. Their input was provided usually during the schematic and design development phases, but their specific involvement and contribution to Sunset Rec as the Supervising Architect on the project is unknown.

Site History

As discussed in the Historic Resources Technical Report provided in Appendix B of this Draft SEIR and summarized here, physical planning for Sunset Rec started as early as 1955. Faced with the steady expansion of the campus and growth in the student and faculty populations,

campus administration identified a need to "have different kinds of environments on campus…to preserve some sort of park atmosphere and natural areas" where the student experience could transcend the impersonality and formality of traditional campus settings. (Seidenbaum, 1966) By 1962, programming was underway for Sunset Rec on one of those preserved sites, a nine-acre plot adjacent to four newly completed residence halls. The planning shifted to social goals focused on "providing a place where young people might develop their own values through informal, out-of-class education," an area to enhance "educational objectives through creative uses of leisure time on campus and to reduce the anonymity…of a large urban university." (Dundjerski, 2011) The administration envisioned a space that would accommodate visual arts, music, theater, aquatics, outdoor living and contemplation. They hoped it would act as a meeting ground for faculty, students, and university families, a place both informal and intimate outside the anonymity of a massive institution, a place to break barriers between discipline and specialties, status and age.

UCLA contracted with the architectural firm of Smith and Williams in 1963 to design spaces for "the new leisure." As discussed above, firm partner Wayne Williams possessed both the experience as a recreation planner and the preferred approach. The architects were given few program specifics: provide large and small pools, outdoor areas wired for performance or concerts, snack spaces and barbeque pits, and lounges suitable for receptions or poetry readings or informal discussions. Further, they were tasked with maximizing open space with few physical boundaries in order to encourage informal mingling of faculty and students.

Smith and Williams largely retained the natural contours of the site topography. The plans located the swimming pools and associated locker and pool equipment buildings on advantageous flat areas at the Upper and Lower Levels (described below) and placed the core recreation center buildings and circulation across or adjacent to the sloping center of the land. The plans addressed formal movement between elevation changes with cascading staircases and navigated other site extremes with several concrete and wood crib retaining walls. The landscape plans in the original plan set by Cornell Bridgers & Troller laid out a hexagonal paving plan for the site's hardscape that would complement the hexagonal footprint of some of the adjacent buildings.

As the design principal, Williams eschewed the idea of single-purpose buildings whose uses were dictated by design. The concept for Sunset Rec was purposefully non-rectangular and intended to be a blank canvas upon which the users of the space could leave their imprint. The designers focused on creating a place that would defy the constricting modules and defined spaces of a typical student building. The solution was a series of small stand-alone pavilions in a garden setting. The core recreation center buildings hugged the Middle Level of the site, visually unified by their wood post-and-beam circulation system of decks, elevated walkways and stairs, and distinguishing trellis and "hat" roofs. The site's masonry pathway system, characterized by hexagonally shaped paving blocks, large scale hexagonally shaped paving patterns, and hexagonally-or zig-zag-shaped planters, anchored the core buildings. The circulation systems allowed the various core buildings to be approached from different sides.

Open floor plans within the buildings accommodated a variety of uses and allowed easy reconfiguration. The Park Pool (Unit N) and Family Pools (Units L and M) with their associated locker and pool equipment buildings used a design vocabulary in contrast with the predominantly wood post-and-beam buildings at the core of the complex. The Lower Level Building H – Park Pool Locker Room and Building H.1 – Park Pool Mechanical Room (Units A and P) featured hexagonal footprints, Unit P with board-formed concrete walls and Unit A with stucco clad walls and an altered northeast façade with vertical wood cladding. Building G – Family Pool Restrooms (Unit H) featured a rectangular footprint with curved corners, a small entrance enclosure for vending equipment, and both heavy dash and sand finish stucco-clad exterior. Note that the reference to "units" corresponds to the original (1963) building identification (refer to Table 4.1-1),

consistent with the nomenclature used in the Historic Resource Technical Report provided in Appendix B of this Draft SEIR.

TABLE 4-1
ELIGIBLE SUNSET REC HISTORIC DISTRICT CONTRIBUTORS AND NON-CONTRIBUTORS

1963 Designation	UCLA Building Name 2023	Site Level	District Status	Proposed in Project
Unit A	Building H – Park Pool Locker Rooms	Lower	Non-Contributor	N/A - Outside project boundaries
Unit B*	Building A – Vista Room	Lower	Contributor	Demolish
Unit C*	Building C – Santa Fe Room	Lower/ Middle	Contributor	Demolish
Unit D*	Building A1 – Buenos Aires Room	Upper	Contributor	Demolish
Unit E*	Building A2 – Stair Tower/Restroom/Office	Lower/ Middle	Contributor	Demolish
Unit F*	Building D – Look Out/Lifeguard Station	Upper	Contributor (excluding enclosure)	Demolish
Unit G*	Building E – Office Center	Middle	Contributor	Demolish
Unit H	Building G – Family Pool Restrooms	Upper	Contributor	N/A - Outside project boundaries
Unit L/M	Family Pool	Upper	Non-Contributor	N/A - Outside project boundaries
Unit N	Park Pool	Lower	Contributor	N/A - Outside project boundaries
Unit P	Building H.1 – Park Pool Mechanical Room	Lower	Contributor	N/A - Outside project boundaries
N/A	Unifying landscape and site elements	All	Contributor	Partially demolish or alter
N/A	Building F – Electric Vault	Lower	Non-Contributor	Demolish
N/A	Diving Pool	Upper	Non-Contributor	N/A - Outside project boundaries

*Denotes core recreation building
Source: (Page & Turnbull, 2023a)

The site preparation, architectural design refinements, and construction progressed over several years, with the plans evolving between 1963 and 1965 as Smith and Williams worked with the expected users of the center. Landscape design commenced in mid-1965. That plan included the designs for the informal sitting area adjacent to the Lower Level pool, as well as the amphitheater and barbeque area at the Upper Level. It also introduced several scales of plant material to create edges, emphasis, and texture within the acreage. Tall specimen and common tree species were planned for the perimeter of the entire site, the wooded glade on the north side of the Upper Level, and along the northeast-southwest circulation axis through the center of the site.

Sunset Rec opened on February 7, 1966. Open year-round, it was free to UCLA students and their families and available for a modest fee to University faculty and staff. The facility was completed with little fanfare or even awareness around campus. A Los Angeles Times article stated that the Daily Bruin had mentioned the project when it was conceived but had hardly mentioned it since. Five months later, usage was still low, averaging 100 to 500 people daily and spiking on weekends and holidays. Eventually, Sunset Rec became a highly popular fixture in the

lives of the populations it was intended to serve. Three years after opening, an article noted "the rural calm and informal atmosphere" at the facility, as the complex lacked signs giving direction, which added to its relaxed and peaceful demeanor. Trees and grass also contributed to this atmosphere, in contrast with other areas of campus. In 1970, Sunset Rec received a national first place landscape award from the American Association of Nurserymen for landscape contributing to environmental improvement with its forest-like atmosphere.

Since its opening, Sunset Rec appears to have been broadly used as intended, serving all members of the campus population as a relaxing recreational facility. The Olympic-sized Park Pool (Unit N) has been an occasional exception. For many years, the men's water polo team utilized it for practice and matches. During the 1984 Olympics, aquatics teams housed in the adjacent dormitories used the pool for training and practice. Currently, the US Artistic Swimming Team uses the pool for training.

Overall Sunset Rec Organization[1]

Sunset Rec spans variable topography including four levels described in Table 3-1 in Section 3.2, Environmental Setting, and shown on Figure 3-6 of this Draft SEIR: Lower (Pool) Level, Middle Level, Upper (Pool Level) and Upper Plateau. Detailed information about the buildings and uses at each level is provided in the Historic Resource Technical Report. As shown on Figure 4.1-1, the original plan for Sunset Rec comprised nine buildings, all extant with some modifications. The six core recreation buildings are located along a northeast-southwest axis through the middle of the site across the lower three levels. Building A – Vista Room (Unit B), Building C – Santa Fe Room (Unit C), and Building A1 – Buenos Aires Room (Unit D) are organized on three different levels around the central stair tower of Building A2 – Stair Tower/Restroom/Office (Unit E). This building group is wrapped with an open post-and-beam frame that shelters exterior footpaths and supports exterior decks, walkways, and stairs, creating the illusion of multiple treehouse pavilions. Building D – Look Out/Lifeguard Station (Unit F) at the Upper Level and Building E – Office Center (Unit G) at the Middle Level stand just beyond this core group to the southwest.

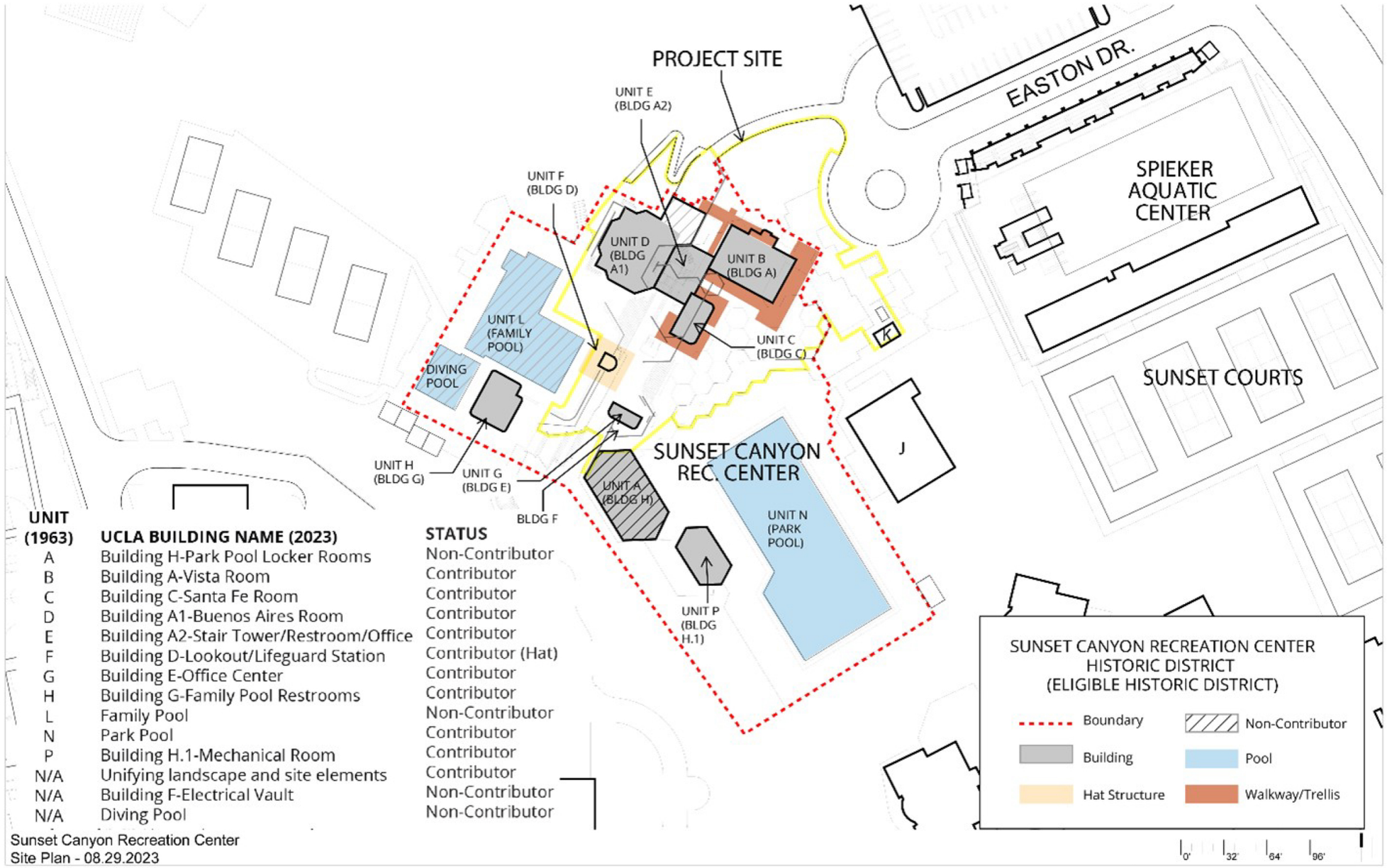
Three buildings support pool functions: Building H – Park Pool Locker Rooms (Unit A) and Building H.1 – Park Pool Mechanical Room (Unit P) on the Lower Level and Building G – Family Pool Restrooms (Unit H) on the Upper Level. A thematic hexagonal pattern is evident in the paving plan and landscape planters, the arrangement of retaining walls, and the built forms at the ground plane of the Lower, Middle, and Upper Levels primarily around the buildings. Other storage sheds and modular buildings have been added to the site since its opening in 1966.

Eligible Sunset Recreation Historic District

Both the National Register and California Register define property types that are eligible for listing as buildings, structures, objects, sites, or districts. Historic districts are defined by the National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation as follows: "A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." The California Office of Historic Preservation provides a more extended definition:

> *Historic districts are unified geographic entities which contain a concentration of historic buildings, structures, or sites united historically, culturally, or architecturally. Historic districts are defined by precise geographic boundaries. Therefore, districts with unusual boundaries require a description of what lies*

[1] The format of the building nomenclature herein reflects that used in the Historic Resource Technical Report and varies from the format used in other sections of this Draft SEIR.



Source(s): UCLA; Page & Turnbull (10-31-2023)

Figure 4-1

Not to Scale

Sunset Canyon Recreation Center Historic District

> *outside the area, in order to define the edge of the district and to explain the exclusion of adjoining areas. The district must meet at least one of the criteria for significance […].* (OHP, 2001)

Features in a historic district may be individually distinctive or lack individual distinction if the grouping achieves significance as a whole within its historic context. However, the majority of the components should add or contribute to the district's historic character, and each component must possess integrity along with the district as a whole.

The boundaries of a district typically encompass the area of land containing the significant concentration of buildings, sites, structures, or objects that convey a shared significant context. A district's significance and historic integrity should help determine the boundaries with consideration of visual barriers, visual changes, boundaries of a specific time, and clearly differentiated patterns of historic development. The National Park Service's National Register Bulletin 21: Defining Boundaries for National Register Properties further lists integrity, setting and landscape features, use, and research potential as factors to consider when defining boundaries. Additional factors to take into account when selecting boundaries include:

- Distribution of resources
- Current legal boundaries
- Historic boundaries
- Natural features
- Cultural features
- Cartographic features
- Reasonable limits

Ownership objections may affect the listing of entire properties, but not the identification of boundaries.

In addition, historic districts may have contributing and non-contributing buildings, sites, structures, objects, or open spaces. A contributor adds to the historic associations, historic architectural qualities, or archeological values for which a property is significant because:

- It was present during the period of significance, relates to the documented significance of the property, and possesses historic integrity or is capable of yielding important information about the period; or
- It independently meets the California Register criteria.

A non-contributor does not add to the historic associations, historic architectural qualities, or archeological values for which a property is significant because:

- It was not present during the period of significance or does not relate to the documented significance of the property;
- Due to alterations, disturbances, additions, or other changes, it no longer possesses historic integrity or is capable of yielding important information about the period; or
- It does not independently meet the California Register criteria.

As Sunset Rec comprises a concentration of buildings, structures, and sites that are united historically and architecturally, it is evaluated herein as a historic district. The Sunset Rec Historic

District boundaries are shown on Figure 4.1-1. In summary, the Historic District includes the six core recreation buildings and swimming pools designed by Smith and Williams, as reflected in the "Canyon Recreation Center" drawing set circa 1963-1964. Table 4.1-1 summarizes the eligible Historic District's contributors and non-contributors. The Historic District excludes the Lower Level sitting area (replaced by lawn at an unknown date and later developed with a modular building) and the Upper Level's expansive lawn, amphitheater, and wooded barbeque area, as these were more fully designed in the 1965 "West Campus Utilities & Site Development" project spearheaded by landscape architect Cornell, Bridgers & Troller and were still under construction when Sunset Rec opened in 1966. The Upper Level Plateau was developed even later and is not within the eligible Historic District boundary. Areas that have been significantly altered, such as the circular driveway and concrete paths that replaced a plaza with hexagonal paving at the main entrance, are also excluded.

A description of the six core recreation buildings, support buildings and other contributing features to the Sunset Rec Historic District is provided below, and corresponding photographs are provided in the Historic Resource Report included in Appendix B of this Draft SEIR.

Building A – Vista Room (Unit B)

This is a two-story, post-and-beam-style structure that is the largest and most visible building in the complex (refer to Figure 20 and Figure 21 of Appendix B). On the first floor is an open breezeway that previously served as the main entrance and access control to Sunset Rec (refer to Figure 22 of Appendix B). Former offices, storage, and a reception area (historically called the control room and used for ticketing at the main entrance) are located on the first floor. The second floor has a multipurpose room, known as the Vista Room, with kitchen facilities. An open-air, trellis-covered wood walkway surrounds the Vista Room. As the (former) primary entrance to Sunset Canyon Recreation Center and the largest of the core recreation buildings, Building A – Vista Room (Unit B) anchors the complex both visually and functionally.

The post-and-beam structure frames the building, with exposed beams extending beyond the second-floor Vista Room and walkway perimeter on four sides. A simple vertically oriented wood cladding (called "cabin lining" on the original drawings) wraps the building's exterior walls; similar cabin lining cladding is also on the interior of the Vista Room continuing the exterior to the interior (refer to Figure 23 of Appendix B). Flat redwood plywood cladding is also used in some locations. The building features metal windows in punched openings at the first floor, except at the reception entrance, where a four-bay wide window wall with upper transoms and sliding service windows (from the 1970 alterations) was located. At the second-floor Vista Room, glazed sliding doors are present at the southeast wall, while the northeast wall has fixed glazed windows of the same height as the sliding doors (refer to Figure 24 of Appendix B). Vertical stained-glass windows are in between the sections.

Due to visible signs of deterioration, including dry rot and lightning strike damage, many supporting posts and beams of the building's structure have been reinforced and protected with timber shoring and plywood plates, flashing has been added on the tops of beams and trellis members, and general patching and waterproofing has been undertaken. Numerous individual slats that were part of the overhead trellis at the second-floor exterior walkway have been removed, additional balusters and lattice have been added to the walkway railings for safety purposes, and sections of the wood walkway have been painted. As further discussed in Section 3.2 of this Draft SEIR, in addition to accessibility limitations (e.g., stairs with no elevator or ramp), this building has a UC Seismic Performance Level (or Rating) of VII (deemed unsafe and access should be restricted). This building was "red-tagged" by the Campus Building Official and vacated and fenced-off in 2020 due to its structurally unsound and deteriorated conditions.

The character-defining features of this structure include:

- Anchor location as the primary entrance to Sunset Rec and one of three units situated around Building A2 – Stair Tower/Restroom/Office (Unit E).
- Core recreation building.
- Two-story massing.
- Flat roof, rectilinear form.
- Post-and-beam structure at both stories wrapping building with exterior wood walkways. Excludes walkway decking, which has been altered.
- Recessed first floor below exterior wood walkways.
- Set-back second floor surrounded by the exterior wood walkways and extended roof beams.
- Vertically oriented cabin lining exterior cladding, also used on the interior to continue the indoor-outdoor blending.
- Redwood plywood cladding.
- Glazed sliding doors and walls at the second floor.
- Stained glass at the second-floor Vista Room.

Building C – Santa Fe Room (Unit C)

The Santa Fe Room is a cabin lining-clad, single room building surrounded by elevated wood walkways (refer to Figure 25 of Appendix B). The room and surrounding walkways are supported by an open post-and-beam structure that partially sits atop a board-form concrete base. The room and surrounding walkways are accessed from either the stair tower at Building A2 – Stair Tower/Restroom/Office (Unit E) or from the Middle Level via a dedicated open wood stair southwest of Building C – Santa Fe Room (Unit C). The poured-in-place concrete base is at the Lower Level and has a vertical pattern created by the wood board-form molds (refer to Figure 26 of Appendix B). Horizontal openings between the base and the wood walkway deck frame views from a seating area below the Santa Fe Room looking out to the Park Pool (Unit N) deck. The seating area is accessed from the Middle Level by a set of concrete steps leading down (refer to Figure 27 of Appendix B).

The upper part of Building C – Santa Fe Room (Unit C) is the Santa Fe Room that provides an intimate meeting or conference space with few openings. Like the exterior, the interior is clad with vertical wood cabin lining to continue the exterior to the interior. The wood walkway surrounds all sides of the upper level, except for a centered gap on the southeast side, which prevents the walkway from connecting all the way around. A floor-to-ceiling jalousie window bisects the room's southeast wall above this opening, creating a strong symmetrical orientation. The northeast and southeast corners of the Santa Fe Room on the exterior and interior are curved. Single doors with glazed sidelights are present at both ends of the northwestern wall (refer to Figure 28 of Appendix B). At the northwest wall, transom windows penetrate the center of the facade.

The character-defining features of this structure include:

- Location as one of three units around Building A2 – Stair Tower/Restroom/Office (Unit E).
- Core recreation building.
- One-story room atop a post-and-beam structure sitting on a concrete base.
    - Board formed finish and openings at the concrete base.

- Exterior wood walkway surrounding the one-story room, which does not connect at the southeast side (excludes decking, which has been altered).
- Post-and-beam wood stair with wood railing at the southwest end connecting to the Middle Level.
- One-story room:
  - Flat roof with curved exterior walls extending to form a low parapet.
  - Rectilinear form with round corners.
  - Symmetrical arrangement about a northwest-southeast axis running through the access doors and the jalousie window on the southeast facade.
  - Cabin lining exterior cladding, also used on the interior to continue the indoor-outdoor blending.
- Seating area below one-story room:
  - Framed views to the Park Pool (Unit N) through board-form concrete foundation wall and post-and-beam structure above.
  - Concrete walls.
  - Wood slat benches.
  - Broad concrete steps.

Building A1 – Buenos Aires Room (Unit D)

This is a single room building mainly visible at the Upper Level near the Family Pool (Unit L) (refer to Figure 29 and Figure 30 of Appendix B). Its lower levels are part of the retaining wall that is around Building A2 – Stair Tower/Restroom/Office (Unit E) and visible from the Middle Level (refer to Figure 31 of Appendix B). It has an octagonal floor plan overlain with a rectangular concrete roof, creating voids at three sides that are enclosed by skylights. The corners of the concrete roof extend beyond the plane of the angled walls at four points, creating triangular canopies over doorways. Unlike the other major public multipurpose rooms in the complex, Building A1 – Buenos Aires Room (Unit D) is finished with a rough-textured heavy-dash stucco coat, listed as “Spanish texture stucco” on the original drawings. The interior of the room is finished with a matching stucco coat. This building has a UC Seismic Performance rating of IV (compliant). However, it has non-compliant mobility access due to the entry stairs and lack of accessible connectivity to the other buildings in the complex.

The character-defining features of this structure include:

- Location as one of three units around Building A2 – Stair Tower/Restroom/Office (Unit E).
- Core recreation building.
- One-story room atop a masonry base built into the hillside.
- Octagonal floor plan overlain with rectangular, flat, concrete roof.
  - Corners of the roof extending beyond the angled walls at four corners as triangular canopies.
- Skylights at the northeast, southwest, and northwest sides.
- Rough texture (Spanish texture), heavy dash stucco exterior that is also the finish for the base and interior of the room.
- One-story room:
  - Entrances at all four corner angled walls.

  - Fixed window wall system with glazed transoms at the southeast wall by Building A2 – Star Tower/Restroom/Office (Unit E).
- Interior fireplace with colored concrete hearth, board-form concrete mantle, and clerestory windows below the northwest skylight.

Building A2 – Stair Tower/Restroom/Office (Unit E)

This structure is a three-level central stair tower that serves as a vertical circulation and organizational spine for the site (refer to Figure 32 and Figure 33 of Appendix B). Building A – Vista Room (Unit B), Building C – Santa Fe Room (Unit C), and Building A2 – Buenos Aires Room (Unit D) are organized on different levels around this vertical element, with offshoot stairs, steps, or landings leading to each unit. The tower houses restrooms in the center core on its first and second floors and an office on its third floor. The center core is wrapped by an open stair with pipe railings; non-original lattice panels have been added at the pipe railings for safety purposes.

The entry to the stair tower is positioned at the site's Lower Level, behind Building A – Vista Room (Unit B), with a shallow concrete stairway with irregular ends, similar to the stairways at the cascading stair; upper stairs become open-tread wood steps (refer to Figure 34 of Appendix B). Wood cribbing, typically a decorative finish in front of concrete retaining walls or itself serving as retaining walls, is visible around the tower as part of the site work that formed the Middle and Upper Levels (refer to Figure 35 of Appendix B). Similar wood cribbing is found around the Middle Level, Building A2 – Stair Tower/Restroom/Office (Unit D) and at other retaining walls.

The post-and-beam stair tower was originally topped by a square hipped wood trellis roof, labeled as "trellis hat" roof on the original drawings. The "hat" roof was removed in 2018 after a beam failed and fell on Building C – Santa Fe Room (Unit C). In addition to accessibility limitations, this building has a UC Seismic Performance rating of VI (priority for improvement). Due to its structurally unsound and deteriorated conditions, this structure was red-tagged and subsequently vacated and partially fenced-off in 2020.

The character-defining features of this structure include:

- Core recreation building.
- Multi-level, vertical massing.
- Hexagonal forms at the ground level.
- Spatial relationship with the three core recreation buildings (Units B, C, and D).
- Post-and-beam detailing of the structural frame.
- Open wood stairway wrapping around a central almost square core.
- Exterior plywood board-and-batten cladding at the central core.
- Metal pipe and wood railing at the exterior stairway (excludes lattice paneling at railing).
- Open-tread steps.
- Concrete angled steps at Lower Level with jagged ends for plantings.

Building D – Lookout/Lifeguard Station (Unit F)

This structure was originally built as an open shade structure comprised of a square, flat-topped, hipped wood trellis "hat" roof supported by four posts (refer to Figure 36 of Appendix B). It sits on a curved concrete base/retaining wall that juts out below the structure at the site's Middle Level (refer to Figure 37 of Appendix B). The concrete base has sand-finish exterior plaster, which appears in the historic photograph despite the original drawings calling out heavy-dash plaster here. The open space under the "hat" was enclosed in 2007 to create a first aid station adjacent to the Family Pool (Unit L) at the Upper Level. The enclosure at Building D – Lookout/Lifeguard Station (Unit F) now consists of a band of glazing with a projecting, wood-clad fascia above. To the southeast, the glazing creates a segmented bay that follows the curve of the original concrete base, which juts out below the building at the site's Middle Level). The enclosure is entered from the Upper Level pool deck through a double-glazed door on its northwest facade. Several of the original pendent globe lights have been removed from the "hat" roof rafters, and several decorative rafter-tails, sandwiched between the paired beam ends, have been removed (refer to Figure 38 of Appendix B). This building has a UC Seismic Performance rating of VI (priority for improvement).

The character-defining features of this structure include:

- Core recreation structure.
- Wood open shade structure (referred to as a "hat" in original drawings).
  - Extended rafter tails with decorative ends.
  - Detailing of "hat" and post and beam frame below.
- Curved base/retaining wall with sand-finish exterior plaster.
- Hanging globe lights.

Building E – Office Center (Unit G)

This structure was originally a stand-alone curved cabin lining wall that served as a vending machine enclosure with a shade structure "hat" roof above. Since its 1966 construction, the northeast side has been enclosed with three sliding glass doors to create office space (refer to Figure 39 and Figure 40 of Appendix B). The building sits on a raised hexagonal concrete pad, which is the roof of an electrical equipment room (Building F – Electrical Vault) that is below and screened by wood cribbing at the Lower Level. The sheltering "hat" roof and an adjoining trellis leading from the northeast side of Building E – Office Center (Unit G) toward Building C – Santa Fe Room (Unit C) were removed in 2021/2022 due to severe deterioration for safety reasons (refer to Figure 41 of Appendix B). This building has a UC Seismic Performance rating of VI (priority for improvement). The building was vacated in 2021 due to water intrusion and mold.

The character-defining features of this structure include:

- Location at Middle Level.
- Core recreation building.
- One-story, flat-roof building with curved corners.
- Cabin lining clad walls to the southwest, southeast, and northwest.
- Surrounding hexagonal pad with built-in wood benches and wood railing.

Other Support Buildings

Sunset Rec contains two swimming pools (Park Pool [Unit N] and Family Pool [Unit L/M]) and three original pool facilities structures that support pool operations. On the Lower Level, Building H – Park Pool Locker Rooms (Unit A) has non-original wood cladding and retains its original hexagonal footprint (refer to Figure 42 of Appendix B). Building H.1 – Park Pool Mechanical Room (Unit P) houses pool equipment storage and filtration and maintains its board-form concrete exterior (refer to Figure 43 of Appendix B). It has been expanded to the southwest but generally retains its distinctive hexagonal footprint. On the southwest side of the Upper Level, Building G – Family Pool Restrooms (Unit H) has sand-finish stucco cladding, which appears original based on historic photographs even though the original drawings called for a heavy dash finish. The building occupies its original footprint. The flat-roofed building's entrance is facing the Family Pool (Unit L) and is centered on the northeast façade (refer to Figure 44 of Appendix B). A stand-alone wall with curved corners to shelter vending machines that originally screened the entrance was removed at an unknown date after 1991.

The character-defining features of the support buildings include:

- Park Pool (Unit N):
  - Location at the Lower Level.
  - Approximately L-shape and footprint of the pool, with an angled corner.
- Building H.1 – Park Pool Mechanical Room (Unit P):
  - One-story building.
  - Hexagonal footprint.
  - Board-formed concrete exterior walls.
  - Clock face at northeast façade.

Unifying Landscape and Site Elements

The following Sunset Rec elements are also character-defining features of the eligible Historic District:

- Location at the middle of the Sunset Rec site.
- Orientation as a northeast-southwest axis bridging three levels.
- Hexagonal motif and pattern at ground plane (building and retaining wall footprints).
- Layout and spatial relationships between the various buildings, structures, and circulation elements across three levels.
  - Organization of the three units (Units B, C, and D) around the vertical spine at Building A2 – Stair Tower/Restroom/Office (Unit E).
  - Organization along the horizontal spine at the Middle Level.
- Indoor-outdoor nature of the complex.
- Cascading stairs at the center of the complex accessing the levels.
  - Two trapezoidal sets of cascading concrete stairs offset at the Middle Level.
  - Angled steps with jagged ends at each step for plantings.
- Wood cribbing and concrete retaining walls.
- Wood slat benches.
- Exterior globe pendant lights.

- Brick and concrete paving in hexagonal pattern and hexagonal planters at Lower Level between the Park Pool (Unit N), Building A – Vista Room (Unit B) and Building C – Santa Fe Room (Unit C).

Alterations

Between the facility opening in 1966 and 2000, modifications, updates, and repairs altered aspects of Sunset Rec. The most visually substantial changes expanded Building H.1 – Park Pool Mechanical Room (Unit P) housing pool equipment storage and filtration, to the rear in 1968; reconfigured the Family Pool (Unit L) and deck paving in 1974 at the same site location; carried out dry rot repairs around the wood walkways and decking at the core recreation buildings including replacement of flooring with a differently-dimensioned planking and replacement of assorted beams; added handicapped ramps to the site; and changed the Building H – Park Pool Locker Rooms (Unit A) cladding from stucco to wood in 1991.

Since 2000, the property has been altered by the removal of additional materials due to wood rot. Decay and deterioration have resulted in failing posts, beams, joists, and trellis rafters, some of which have been removed and some repaired or replaced, such as at the underside of Building C – Santa Fe Room (Unit C). Sunset Rec's appearance has been modified by the introduction of wood piles and reinforcing plates to stabilize the post and beam structure at Building A – Vista Room (Unit B). Exterior decks and walkways have been further adjusted to address current code violations, infilling open railings with occasional reinforcing balusters and protective lattice at unknown dates. The open Building D – Lookout/Lifeguard Station (Unit F), which was originally only the "hat" roof structure, was enclosed at the base in 2007 for use as a first-aid station.

In 2018, an arm of the "hat" at Building A2 – Stair Tower/Restroom/Office (Unit E) failed and collapsed onto Building C – Santa Fe Room (Unit C). Following historic building photography documentation of the site, the "hat" was removed from Building A2 – Stair Tower/Restroom/Office (Unit E). The photo-documentation followed guidelines for the Historic American Building Survey guidelines and is housed in the UCLA Special Collections archive.

In 2020, Building A – Vista Room (Unit B), Building C – Santa Fe Room (Unit C), and Building A2 – Stair Tower/Restroom/Office (Unit E) were found structurally deficient and removed from active service. By 2021, they were enclosed behind chain-link construction fencing. A multi-section modular building was installed on the Lower Level lawn to house Sunset Rec staff administration, a multipurpose room, and the support spaces lost in the building closures. The new administration building leaves a fraction of the lawn's original area open for sunbathing and lounging. A new portable site entrance kiosk now lies between Building A – Vista Room (Unit B) and the lawn.

In 2021 to 2022, the "hat" at Building E – Office Center (Unit G) was removed due to safety concerns, as was the trellis connecting it with the Building C – Santa Fe Room (Unit C) wood stairway at the Middle Level. A more detailed alterations chronology is provided in the Historic Resource Report included in Appendix B of this Draft SEIR.

Evaluation of Eligibility for Listing in the National Register and California Register

For a property to be eligible for national or state designation under criteria related to type, period, or method of construction, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character-defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these

features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

For a district to retain integrity, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. The relationships among the district's components also must be substantially unchanged since the period of significance. Intrusions within a district may impact its integrity based on the relative number, size, scale, design, and location of the components. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.

The eligibility of Sunset Rec Historic District for listing in the National Register and California Register is evaluated under the following criteria:

- **Criterion A/1 (Events).** Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

- **Criterion B/2 (Persons).** Resources that are associated with the lives of persons important to local, California, or national history.

- **Criterion C/3 (Design/Construction).** Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master or of an important creative individual, or possess high artistic values.

- **Criterion D/4 (Information Potential).** Resources or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California, or the nation.

Criterion A/1 (Events)

While Sunset Rec is associated with a period of substantial growth at UCLA's Westwood campus, namely the 1960s decade when approximately 50 projects were constructed, it does not appear to be individually significant within this context. In building Sunset Rec, UCLA was following a precedent established by the earlier construction of the Strawberry Canyon Recreation Center in the hills above the Berkeley campus (opened in 1959). The growth of UCLA's campus in the 1960s followed the substantial post-World War II building boom at UCLA that shaped its campus beyond the initial 1920s buildings and main quadrangle. The 1960s construction was a mix of academic and non-academic facilities of varying sizes, scales, and Modern idioms that infilled the campus with more student amenities and expanded educational offerings.

Sunset Rec attracted relatively little notice upon its opening in this period of expansion. It was one among many new additions that characterized UCLA in the 1960s but does not rise to the level of individual significance to meet Criterion A/1 for listing in the National Register or California Register.

Criterion B/2 (Persons)

No associations of Sunset Rec with the lives of persons important in history were discovered. The facility was broadly used by all members of the campus population. For many years, the UCLA men's water polo team utilized the Olympic-sized Park Pool (Unit N) for practice and matches. During the 1984 Olympics, competing aquatics teams used the pool for training and practice. While the UCLA teams and Olympic athletes achieved many successes in water sports, no

individual or groups of individuals have been singled out for particular significance at this site. The subject property does not meet Criterion B/2 for listing in the National Register or California Register.

Criterion C/3 (Design/Construction)

Sunset Rec, or a part of it, does appear to meet Criterion C/3 as representing a significant work by Smith and Williams, a firm recognized as one of the leaders of a variant of regional post-World War II modernism referred to as post-and-beam architecture. Sunset Rec, in particular its core recreation buildings, is a culmination of the firm's signature aesthetic and design approach in a single mature work, most notably in its post-and-beam design with Japanese influences, seamlessly interweaving of indoor and outdoor experiences, and inventive navigation of the difficult topography through integrated built elements.

Smith and Williams approached architecture and planning as problem-solving, with the conviction that the client's expectations for how the space would be used and the site itself should dictate the design. Sunset Rec embodies this approach, with the multi-level placement of the buildings, pavilions, and associated pools and seating areas, efficiently responding to the contours of the land and slope. The University requested an informal setting that would encourage unplanned person-to-person interactions. Smith and Williams responded by letting the human dimension guide the scale of the buildings, and by providing a multitude of nooks and crannies, patios, and non-specific rooms where these exchanges could occur. A component of this approach was an avoidance of what the architects characterized as facadism, feeling there was no one important side to a building. Each building's exterior and interior wall material matched to further blur the lines between interior and exterior spaces. Multisided design elements, such as the hexagonal module and the use of materials, primarily wood, were repeated in both the buildings and landscape to further reinforce the multiple levels of spatial interaction.

Smith and Williams were widely considered masters of the post-and-beam style and exemplars of the "Pasadena-USC School" that borrowed Japanese design principles and translated them for use in a modern Western setting. Their work has been characterized as simple, direct, and clear, elegantly utilizing a simple palette of materials to express structure and frame space. Although post-and-beam design is most closely associated with residential buildings, Smith and Williams expanded the application to commercial, civic, and recreational commissions over the course of their careers. Their style of post-and-beam construction often exaggerated elements, dramatically projecting beams and extending eaves, and using these vertical and horizontal elements to create rhythmic patterns of light and shade, solid and void within the structure. The firm explored roof and overhead trellis forms as a technique for uniting spaces under a single visually lightweight element. The imagery of the Japanese temple in a garden permeated their commissions from the earliest houses. These aesthetic signatures are all present at Sunset Rec's core recreation buildings, anchored by Building A – Vista Room (Unit B).

The firm was known for the integration of landscape and buildings, for placing pavilions or buildings within a green space and connecting them with exterior walkways and decks, as expressed at Sunset Rec's core recreation buildings. Circulation between buildings was almost entirely accomplished via exterior walkways, stair towers, and decks, with the main circulation through the site occurring at the central cascading stairs. Using wood as the primary building material in juxtaposition with the stair's concrete steps – at the cribbing that conceals concrete retaining walls, at the visible post-and-beam structures, at the "hats" and trellis – blends the natural and built worlds.

The organization of the main multipurpose buildings around Building A2 – Stair Tower/Restroom/Office (Unit E) as the vertical spine of the complex, distills this integration into a concentrated area that conveys a feeling of a tree house under the unifying "hat." The occasional masonry features, such as the curved base of Building D – Lookout/Lifeguard Station (Unit F) and the board-formed concrete base of Building C – Santa Fe Room (Unit C), stand out as focal points. Sunset Rec's site planning and integration of landscape elements reflects a collaboration with landscape architects Cornell, Bridges, and Troller that is a hallmark of the Smith and Williams firm, which historically worked with planners and landscape architects to create holistic environments.

Records of the Smith and Williams firm encompass over 850 commissions spanning approximately 33 years. The first exhibit devoted entirely to the firm's output was mounted in 2013 at the Art, Design & Architecture Museum at the University of California, Santa Barbara. The physical exhibit was distilled into a continuing online exhibition, featuring just twelve of the firm's projects, including Sunset Rec. A scholarly monograph on Smith and Williams, published in 2014, also featured Sunset Rec as an example indicating the importance of this project in understanding Smith and Williams' contribution to modern architecture in southern California.

Sunset Rec as initially planned and designed with the core recreation buildings and swimming pools is a notable demonstration of the Smith and Williams architectural oeuvre in the post-and-beam genre, as well as evidence of their ability to execute complex yet cohesive site planning, integration of indoor and outdoor spaces, and careful attention to detail. This includes the accessory buildings associated with the swimming pools with the hexagonal shapes of Building H – Park Pool Locker Rooms (Unit A) and Building H.1 – Park Pool Mechanical Rooms (Unit P) that recall the hexagonal motif and paving pattern at the Lower Level, and the Park Pool's (Unit N) curved corners reminiscent of the same detail at the upper room of Building C – Santa Fe Room (Unit C).

While outdoor recreational facilities were part of the original vision for Sunset Rec, the sitting area at the Lower Level (later altered into a lawn area) and the amphitheater, expansive lawn, and wooded areas (also altered over time) at the Upper Level came slightly later as part of a different project led by landscape architects Cornell, Bridgers & Troller rather than Smith and Williams.

As such, it is the complex of core recreation buildings and swimming pools at Sunset Rec as designed by Smith and Williams as the Executive Architect for the "Canyon Recreation Center" project circa 1963-1964 that meets the criteria for listing in the National Register and California Register under Criterion C/3 as a significant representation of the work of important creative individuals. However, the loss of several significant features as well as incompatible repairs, alterations and deferred maintenance have compromised its integrity of design and feeling to the extent that the Historic District no longer has sufficient integrity for National Register listing. See the Integrity section below for a more detailed discussion. Nonetheless, the Historic District retains sufficient integrity to be eligible for listing in the California Register with its period of significance as 1966 when Sunset Rec first opened. See the Eligible Sunset Recreation Historic District section for further discussion of the district contributors, non-contributors, and boundaries.

Criterion D/4 (Information Potential)

The "potential to yield information important to the prehistory or history of California" typically relates to archeological resources, rather than built resources. When Criterion D/4 (Information Potential) does relate to built resources, it is relevant for cases when the building itself is the principal source of important construction-related information. Evaluation under Criterion D/4 is not applicable here.

Integrity

Since the Sunset Rec Historic District meets Criterion C/3 and is eligible for listing, it is considered an historic resource, and thus the integrity discussion focuses primarily on this specific complex, with additional discussion of Sunset Rec as a whole or other site features as appropriate for context. Refer to Section 4.1.1, Regulatory Framework, for definitions of the seven aspects of integrity and the differences in how the National Register and California Register define integrity.

- **Location.** Sunset Rec has not been moved from its original location at the northwestern area of the UCLA Westwood campus. The contributors within the eligible Historic District also have not been moved from their original locations along a northeast-southwest axis through the middle of the site straddling the Lower, Middle, and Upper Levels. The eligible Historic District has integrity of location.

- **Setting.** The setting at Sunset Rec retains the qualities of isolation and rusticity that it had when originally completed and has only been reinforced with the maturation of the trees planted at the Sunset Rec opening in 1966. It continues to inhabit a rolling open topography with a distinct site organization. The several alterations and additions to the site, such as the conversion of the sitting area at the Lower Level into a passive lawn area (undated) and then the placement of the modular administration building and entry kiosk (2019/2020), additional barbeque pits and picnic benches in the wooded hillside at the Upper Level (1979) and installation of beach volleyball courts (2020), conversion of the area behind the amphitheater seating into student gardens (2015-2017), and modifications to the Upper Level Plateau for the obstacle course (undated), generally maintain the original sense of spaciousness and Sunset Rec's use as a recreation center.

  For the eligible Historic district, the immediate surrounding setting (i.e., within the nine acres of Sunset Rec) has not changed substantially. With the exception of the modular building constructed on the Lower Level in 2019/2020, no significant buildings have been added adjacent to or within the eligible Historic District to alter its setting. The installation of protective fencing following the closure and vacation of Building A – Vista Room (Unit B), Building C – Santa Fe Room (Unit C), and Building A2 – Stair Tower/Restroom/Office (Unit E) in 2020-2021 diminishes the setting somewhat by erecting barriers that interrupt the original openness and multi-point access of the buildings. However, such fencing is considered temporary and does not significantly alter the setting around the eligible Historic District enough to affect its integrity of setting in a permanent manner.

- **Design.** The design of the eligible Historic District and its contributors has been compromised by alterations and deterioration over time. The progressive loss of wood elements, notably the top trellis section above the exterior walkway at Building A – Vista Room (Unit B), the trellis structure at the Middle Level connecting Building C – Santa Fe Room (Unit C) and Building E – Office Center (Unit G), and two of the three "hat" roofs, have had the most impact on the Smith and Williams design. The additive elements, including lattice panels at the originally more open walkway and stair tower railings, structural bracing at the first floor of Building A – Vista Room Unit B), the mechanical screen at the roof of Building C – Santa Fe Room (Unit C), flashing added to the top edge of exposed beams, and the security fencing, further compromise the clarity of the Smith and Williams design.

  However, the eligible Historic District continues to convey the planning and design intent of Smith and Williams through post-and-beam architecture with Japanese influences, interweaving of indoor and outdoor experiences, and inventive navigation of a challenging

site through the use of built elements. The post-and-beam structural system is still clearly visible at Building A – Vista Room (Unit B), Building C – Santa Fe Room (Unit C), and the remaining "hat" roof at Building D – Lookout/Lifeguard Station (Unit F). The indoor-outdoor experiences still remain when moving through the complex (to the extent access is still available), from exterior walkways to the seating areas at the lower level of Building C – Santa Fe Room (Unit C), around Building E – Office Center (Unit G), and at the edge of the Upper Level adjacent to Building D – Lookout/Lifeguard Station (Unit F). The connection of the Lower Level to Upper Level via the Middle Level continues to reflect the firm's site planning and organization skills, with the Middle Level as a horizontal spine and the Building A2 – Stair Tower/Restroom/Office (Unit E) as a vertical spine. The loss of the "hats" over Building E – Office Center (Unit G) and Building A2 – Stair Tower/Restroom/Office (Unit E) and the trellis structure at the Middle Level diminishes the blending of natural and built elements along these circulation spines, but the central cascading stairs and the vertical space around the Building A2 – Stair Tower/Restroom/Office (Unit E) remain distinctive expressions of Smith and Williams' work.

On balance, the loss of wood elements and addition of non-compatible alterations have compromised the Smith and Williams design. However, the eligible Sunset Rec Historic District retains enough of its historic character and appearance to be recognizable as a mature, complete work of Smith and Williams despite the alterations.

- **Materials.** Smith and Williams completed the eligible Historic District with a limited materials palette. Wood is the dominant material that is used in various ways and finishes for the post-and-beam structural systems, cribbing at retaining walls, exterior walkway railings, exterior cabin lining cladding, the "hat" roofs, trellises, and others. Concrete is the secondary, contrasting material, seen in board formed finishes for retaining walls, the base of Building C – Santa Fe Room (Unit C), and the exterior of Building H.1 – Park Pool Mechanical Room (Unit P). Concrete is also the paving materials at the central cascading stairs and Middle Level landing. Additional materials in the built elements include the use of plaster or stucco for building exteriors, such as at Building A1 – Buenos Aires Room (Unit D) and the Middle Level curved base for Building D – Lookout/Lifeguard Station (Unit F) as well as the use of brick to outline the hexagonal pattern paving at the Lower Level).

  These materials are still present throughout the eligible Historic District. In some areas, deterioration, and loss of wood material due to age, environmental damage, and lack of maintenance have occurred. Some wood members have been replaced, typically in-kind. However, others have been removed and not replaced, most notably two of the three wood "hats," the trellis structure at the Middle Level connecting the Building C – Santa Fe Room (Unit C) and Building E – Office Center (Unit G), and the top trellis section above the exterior walkway at Building A – Vista Room (Unit B).

  The loss of these wood elements somewhat impacts the material integrity of the eligible Historic District, but not to the extent where integrity of materials is completely lost. Wood remains a primary material throughout, particularly at the post-and-beam structures, the cribbing at retaining walls, the exterior cladding materials, and the remaining "hat" roof. The concrete elements remain in place with little material loss. Overall, the eligible Historic District has integrity of materials.

- **Workmanship.** Smith and Williams were known for their attention to craftsmanship and for using materials with a direct and simple respect for their character and function. At the eligible Historic District, the firm exposed bolted post-and-beam timber connections,

accentuated the concrete construction process with board-formed surfaces, suggested that building walls were material panels by applying the same cladding material to both interior and exterior room surfaces, and integrated circulation within the site with a flowing network of wood walkways and concrete block pathways. These elements remain to reflect the workmanship in assembly and construction. The eligible Historic District retains integrity of workmanship.

- **Feeling.** The modifications to the setting, design, and materials have similarly impacted the feeling of the Historic District, but also not to the extent where the integrity of feeling has been lost. Some of the openness and free flowing of spaces with access from multiple sides has been hampered by the security fencing. The entirety of Smith and Williams' design is not as clear with the loss of features, alterations over time, and continued deterioration of materials. The treehouse-like effect around Building A2 – Stair Tower/Restroom/Office (Unit E) has been diminished with the loss of its "hat" roof and the addition of the lattice panels at the stair railings. However, enough elements remain that the eligible Historic District continues to represent a mature, complete work of Smith and Williams from the 1960s. Though diminished, the Historic District retains sufficient integrity of feeling.

- **Association.** Some of the core recreation buildings have lost their association with recreational uses, as they have been deemed structurally unsound and closed. However, as Sunset Rec as a whole continues to be associated with university recreational activities and the eligible Historic District remains as part of the site, its integrity of association also remains.

In summary, the eligible Historic District has experienced some material deterioration and the removal of several significant features as well as incompatible repairs, alterations and deferred maintenance that have affected its integrity of design and feeling. However, the original spatial relationships, the post-and-beam design, layout of the buildings across the three levels, interweaving of indoor and outdoor experience in the exterior walkways, landscape elements, benches, paving, and cascading staircase remain to convey the original vision of the architects. Most materials and finishes are also original.

It is possible that resources may not retain sufficient integrity for listing in the National Register but may still be eligible for the California Register. In this case, the eligible Sunset Rec Historic District retains sufficient integrity of location, setting, design, materials, workmanship, feeling, and association to be recognizable and convey its significance as a mature work of Smith and Williams for the California Register. If the eligible Historic District were returned to an earlier appearance, including rebuilding the missing the "hat" roofs and replacing the non-original latticework with a more compatible railing solution, then the eligible Historic District would also retain sufficient integrity for listing in the National Register.

Therefore, the eligible Sunset Rec Historic District is a historical resource as defined in CEQA Guidelines Section 15064.5.

4.1.3 PROJECT IMPACTS

Thresholds of Significance

According to CEQA Guidelines Appendix G, a project will normally have a significant adverse environmental impact on historic resources if it will:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Section 15064.5(b) of the State CEQA Guidelines states "[A] project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

(3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

Campus Programs, Practices, and Procedures Carried Forward from the LRDP MMRP

The following LRDP PP was adopted as part of the LRDP Final SEIR. The required evaluation of eligibility for listing in the California Register and consideration of design modifications, mitigation measures, and/or alternatives has been completed and is presented in the Historic Resource Report provided in Appendix B of this Draft SEIR, and in the Alternatives Analysis provided in Appendix B2, which are summarized in this section and Section 5.0, Alternatives, of this Draft SEIR, respectively. LRDP PP 4.4-1(b) is applicable to historic resources within the Campus Historic Core and is not applicable to the proposed Project.

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).*

Impact Analysis

Threshold 4.1	Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

The LRDP EIRs concluded that, with adherence to LRDP PP 4.4-1(a) and PP 4.4-1(b), implementation of future development on campus would not result in a substantial adverse change in the significance of structures that have been designated as eligible or potentially eligible for listing on the National Register or California Register, thus resulting in a less than significant impact. The LRDP EIRs further acknowledge that, over time, additional campus structures may be eligible for listing in the California Register, and each individual development project must consider historic resources in accordance with CEQA, pursuant to LRDP PP 4.4-1(a).

As required by LRDP PP 4.4-1(a) and as summarized in Section 4.1.2 above, the eligible Sunset Rec Historic District has been evaluated for eligibility for listing in the California Register. Based on this evaluation the Sunset Rec Historic District retains sufficient integrity of location, setting, design, materials, workmanship, feeling, and association to be recognizable and convey its significance as a mature work of Smith and Williams under California Register Criterion 3 (Design/Construction). Therefore, the Historic District is a historic resource pursuant to CEQA. Following is the Project-specific analysis of direct and indirect impacts of the proposed Project on this historic resource.

As described in Section 3.0, Project Description, the proposed Project involves the demolition of the existing seismically deficient, substantially damaged/deteriorated, and non-ADA compliant structures, as well as the removal of improvements that are physically, structurally, or programmatically dependent upon the deficient structures, as summarized below. These buildings would be replaced with a single building offering similar functionality, including three multi-purpose rooms, with a moderately increased floor area and a smaller overall building footprint. The buildings to be removed include:

- **Building A – Vista Room (Unit B).** UC Seismic Performance Rating VII (unsafe and access-restricted); red-tagged by the Campus Building Official and vacated in 2020.
- **Building C – Santa Fe Room (Unit C).** UC Seismic Performance Rating VII (unsafe and access-restricted); red-tagged by the Campus Building Official and vacated in 2020.
- **Building A1 – Buenos Aires Room (Unit D).** UC Seismic Performance Rating IV (compliant); non-compliant ADA access due to entry stairs and lack of accessible connectivity to the other buildings.

- **Building A2 – Stair Tower/Restroom/Office (Unit E).** UC Seismic Performance Rating VI (priority for improvement); red-tagged by the Campus Building Official and vacated in 2020.
- **Building D – Lookout /Lifeguard Station (Unit F).** UC Seismic Performance Rating VI (priority for improvement).
- **Building E – Office Center (Unit G).** UC Seismic Performance Rating VI (priority for improvement); vacated in 2021 due to water intrusion and mold.
- **Building F – Electric Vault.** UC Seismic Performance Rating N/A; not a historic contributor.

With the exception of Building F – Electric Vault, which is an equipment room located below Building E – Office Center (Unit G) and behind a retaining wall (not publicly visible), each of the buildings proposed for removal is a contributor to the Sunset Rec Historic District.

The proposed Project would include flexible, student-oriented multi-purpose spaces on two stories plus a rooftop deck. Similar to the existing facility, the new building would nestle into the hillside and create strong connections between indoor and outdoor spaces, with terraces and outdoor amenity areas, to capitalize on the surrounding natural setting. The new building would be fully ADA-compliant and would provide new ADA access between the Upper and Lower Levels at Sunset Rec with the provision of an elevator.

More specifically, the proposed approximately 11,500 gsf building would include three multi-purpose rooms plus a teaching kitchen and a rooftop deck. These 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. Exterior covered, unenclosed space would be provided similar to existing conditions, in addition to uncovered terrace areas. 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. A total of 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 an area to support gatherings.

The proposed landscape plan 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 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 reference the existing setting. Proposed vegetation would include native and/or drought-tolerant species.

Overall, the proposed Project design takes cues from the Smith and Williams design, particularly in its integration of indoor and outdoor spaces, use of natural materials and overhead trellises, preservation of the surrounding park atmosphere and natural areas, and use of modular hex pavers as a modern variation on the existing hexagonal brick paving pattern.

Direct Impacts

As identified above, the proposed Project involves demolition of six of the 10 contributors in the eligible Sunset Rec Historic District. This includes Building A – Vista Room (Unit B), which is the

largest building and anchors the district as the main entrance to Sunset Rec. It also includes Building A.2 – Stair Tower/Restroom/Office (Unit E) that serves as the vertical circulation and organizational spine for the eligible district, as well as the other buildings around Building A.2 – Stair Tower/Restroom/Office: Building C – Santa Fe Room (Unit C) and Building A.1 – Buenos Aires Room (Unit D), in addition to Building A – Vista Room (Unit B). The last remaining "hat" roof structure at Building D – Lookout/Lifeguard Station (Unit F) would also be demolished, along with the altered but still contributing Building E – Office Center (Unit G). Some of the associated landscape and site elements, including the cascading stairs, portions of the original hexagonal motif, and wood cribbing at the retaining walls, would also be removed. The demolition of these original built, landscape, and site elements, especially the loss of Building A – Vista Room (Unit B), would result in the eligible Sunset Rec Historic District being no longer recognizable or able to convey its significance as the work of Smith and Williams, which is the integrity threshold for California Register eligibility. The remaining contributors to the eligible Historic District – i.e., the Park Pool (Unit N), two swimming pool support buildings, and other aspects of the unifying landscape and site elements – are not sufficient on their own to represent the work of Smith and Williams as important creative individuals. As such, the loss of the California Register-eligible Historic District resulting from implementation of the proposed Project would cause a substantial adverse change in the significance of a historical resource, as defined in CEQA Guidelines Section 15064.5, resulting in a significant impact pursuant to CEQA.

Mitigation measures for impacts to historic resources are typically developed on a case-by-case basis, providing the opportunity to tailor them to the characteristics and the significance of an affected resource and the impacts to it. Common mitigation measures for demolition consist of documentation of the resource, typically to the standards of the Historic American Buildings Survey (HABS), preparation of a salvage plan for significant architectural features and materials, and a commemorative plaque or an interpretive display. Therefore, Project-specific MM Sunset HIST-1 (historic building documentation), MM Sunset HIST-2 (salvage program), MM Sunset HIST-3 (interpretive program) are recommended to reduce the proposed Project's impact to the historic resource, as detailed below.

Indirect Impacts

Based on the CEQA Guidelines, a proposed project can have a significant adverse impact if it changes the immediate surroundings of a historic resource such that the significance of the resource is "materially impaired." A historic resource's significance is materially impaired when it can no longer convey its significance that justifies its eligibility as a historic resource; in other words, when it has lost its integrity. The remainder of Sunset Rec located outside the boundaries of the eligible Historic District is not considered historic. No other historic resources are located in the immediately surrounding area. As previously identified, the nearest eligible historic resource on campus is Pauley Pavilion, which is located approximately 0.3 mile to the southeast. As such, the proposed Project would not change the immediate surroundings of any other historic resource, and therefore, would not result in indirect impacts to historic resources. No mitigation is required.

4.1.4 PROJECT-SPECIFIC MITIGATION MEASURES

MM Sunset HIST-1 Prior to the start of demolition, the UCLA Sunset Canyon Recreation Center Historic Resource Technical Report, prepared by Page & Turnbull (October 2023) and included in Appendix B of this Draft SEIR, shall be submitted to UCLA Library Special Collections to accompany prior photo-documentation of Sunset Rec. Following coordination with UCLA Library Special Collections, the report shall be submitted in their preferred format (e.g., printed on archival paper, in digital format, etc.). The drawing sets associated with the Sunset Canyon Recreation Center in the possession of

UCLA Capital Programs from circa 1963 through 2023 shall also be organized by project and date and submitted digitally to UCLA Library Special Collections in an archival format.

MM Sunset HIST-2 Prior to the start of demolition, the Project sponsor shall create a salvage plan identifying elements and materials that can be saved and re-used. Salvaged elements shall be reused at the Project site, incorporated into an interpretive display, donated to a local historical society or other owners of Smith and Williams works, and/or be given to an architectural salvage company. The plan shall be developed with the assistance of a qualified architectural historian, historic architect, or historic preservation professional who meets the *Secretary of the Interior's Professional Qualifications Standards*. At a minimum, the pendant globe light fixtures, including any intact fixtures previously removed and preserved at the site, shall be salvaged and considered for re-use in the proposed Project or offered to interested parties.

MM Sunset HIST-3 To commemorate the eligible Sunset Canyon Recreation Center Historic District as a work of Smith and Williams, a publicly accessible interpretive program shall be developed. The public in this case shall be the users of Sunset Canyon Recreation Center. The interpretive program shall include descriptions of the architectural design, site planning, and integration of exterior and interior elements, as well as the architects, Smith and Williams.

Creative solutions regarding the medium and format of the interpretive program are encouraged, but all interpretive materials shall be displayed in a manner that is accessible to the public and appropriate within the context of Sunset Canyon Recreation Center. Examples include an exhibit at the UCLA Library Special Collections, a video documentary, an online website, or an on-site display at Sunset Canyon Recreation Center. Interpretive media shall include both text and graphics, which may include historic photographs, maps, architectural drawings, or other imagery. The text shall be sufficient to convey the significance of the core recreational buildings as the work of Smith and Williams.

The interpretative program shall be developed with the assistance of a qualified architectural historian or historic preservation professional who meets the *Secretary of the Interior's Professional Qualifications Standards*. The interpretive program shall be completed and available to the public prior to issuance of a certificate of occupancy.

With respect to MM Sunset HIST-1, much of the eligible historic district and its siting within the context of Sunset Rec was previously photo-documented according to the guidelines of the HABS program in 2018 following the partial collapse of the "hat" at the Building A2 – Stair Tower/Restroom/Office (Unit E) and the "hat's" subsequent removal. Typically, a written description and narrative report following the most recent HABS Guidelines for Historical Reports, Outline Format, would also be recommended. However, much of the information contained within the Historic Resource Report prepared for the proposed Project (included in Appendix B of this Draft SEIR) includes the same information. As such, to complete the historic building documentation, MM Sunset HIST-1 requires that the Historic Resource Report be submitted to the UCLA Library Special Collections to accompany the prior photo-documentation.

With respect to MM Sunset HIST-2, salvage allows for the removal of individual architectural elements for potential reuse. Salvage has the added benefit of landfill and waste diversion. Salvaged elements could be reused at the Project site, incorporated into an interpretive display, donated to a local historical society or other owners of Smith and Williams works, and/or be given to an architectural salvage company.

The interpretive program at Sunset Rec required by MM Sunset HIST-3 would be located within the physical impact area identified for the proposed Project, as evaluated in this Draft SEIR as well as in the Initial Study included in Appendix A of this Draft SEIR, or in an adjacent area that has been previously disturbed. There would be no additional removal of mature trees or historic resources, and negligible construction activities would be required to install the interpretive program. No additional significant environmental impacts would result from implementation of MM Sunset HIST-3.

4.1.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

While in some instances mitigation measures such as those detailed above are judged to reduce adverse impacts to a less than significant level, they often do not sufficiently reduce the loss of community character and collective history. As stated in CEQA Guidelines Section 15126.4(b)(2), "[i]n some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur."

Therefore, even with the implementation of Project-specific MM Sunset HIST-1, MM Sunset HIST-2, and MM Sunset HIST-3, the proposed Project's significant impact to a historic resource (the eligible Sunset Rec Historic District) would not be mitigated to a less than significant level. Accordingly, this impact would be significant and unavoidable. As no significant and unavoidable impacts to historic resources were identified in the LRDP EIRs, a Statement of Overriding Considerations will need to be adopted for this previously unidentified significant impact.

4.1.6 CUMULATIVE IMPACTS

CEQA Guidelines Section 15355 defines cumulative impacts as follows:

> "Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
>
> (a) The individual effects may be changes resulting from a single project or a number of separate projects.
>
> (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The analysis should determine the impact of any related projects and consider the cumulative impacts of the proposed and related projects as they relate to the population of historic resources that would remain. No other eligible historic resources are in the immediate vicinity of Sunset Rec. While eligible historic resources are located in the Bel Air neighborhood to the north of Sunset Rec, those are mostly residential properties designed by various architects that are not similar resource types to the eligible Historic District. As such, the focus of the cumulative impact

discussion is on the population of resources that would remain, which in this case, are those that are representative of the work of Smith and Williams. As discussed in Section 4.1.2 under "Evaluation of Eligibility for Listing in the National Register and California Register," the Smith and Williams firm had over 850 commissions spanning 33 years. Many of their projects, which were primarily located in Southern California and particularly in the Pasadena area, remain. Several are listed in local, state, or national historic registers, or have been identified as eligible for such listing, which would require additional review should they be proposed for demolition or major alterations. For example, the Tea House at Descanso Gardens is a contributor in a National Register-listed resource and the Robert Crowell House in Pasadena has been identified as eligible for listing in the National Register.

No other Smith and Williams example that is significant as representing their work as important creative individuals is known to be proposed for demolition at this time. Research has not uncovered any of their recreational projects or works with similar post-and-beam designs with Japanese influences as proposed for demolition. As such, the demolition of the core recreation buildings at Sunset Rec that constitute the eligible Historic District would not result in cumulative impacts.

SECTION 5.0 ALTERNATIVES TO THE PROPOSED PROJECT

5.1 PURPOSE AND SCOPE

An environmental impact report (EIR) must identify ways to mitigate or avoid the significant effects that a project may have on the environment. In compliance with the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) Section 15126.6(a), an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives." The University of California, serving as the Lead Agency for the Sunset Canyon Replacement Building Project (proposed Project), is responsible for selecting a range of project alternatives. This section identifies potential alternatives to the proposed Project and provides the required evaluation.

Key provisions of the CEQA Guidelines on alternatives (Sections 15126.6[b]–15126.6[f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in this Supplemental EIR (SEIR).

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective or would be more costly (CEQA Guidelines Section 15126.6[b]).
- The specific alternative of 'no project' shall also be evaluated along with its impact (CEQA Guidelines Section 15126.6[e][1]).
- The 'no project' analysis shall discuss the existing conditions at the time the Notice of Preparation is published, or if no Notice of Preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (CEQA Guidelines Section 15126.6[f]).
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6[f][2][A]).

- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR (CEQA Guidelines Section 15126.6[f][2][B]).
- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (CEQA Guidelines Section 15126.6[f][3]).

Pursuant to the CEQA Guidelines stated above, a range of alternatives to the proposed Project is considered and evaluated in this Draft SEIR. These alternatives were developed in the course of project planning and environmental review.

5.2 PROJECT OBJECTIVES

As stated in Section 3.4 of this Draft SEIR and pursuant to CEQA Guidelines Section 15124, the underlying purpose of the proposed Project is to replace or restore the multipurpose spaces at Sunset Rec that are no longer usable in order to correct existing deficiencies and provide, at minimum, an equivalent capacity for recreational programming to that previously available. The following objectives have been established for the proposed Project to support the underlying purpose and to aid decision makers in their review of the proposed Project and its associated impacts:

1. Provide several modern, flexible, multi-use rooms to replace existing deficient spaces used for 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.
2. Continue to co-locate recreational facilities near existing student housing and associated student amenities in the Northwest zone of the campus, which is the zone on campus designated in the UCLA Long Range Development Plan (LRDP) to include residential facilities and support functions for undergraduate students.
3. Address existing structural and existing seismic safety deficiencies to comply with the UC Seismic Safety Policy and to provide an acceptable level of safety for students, employees, and the public.
4. Support inclusive programming and address existing accessibility deficiencies by providing a recreational facility that meets current ADA requirements and improves overall site accessibility, including connectivity between buildings/uses.
5. Concentrate new development within a previously developed area on campus in order to most efficiently use the limited land resources of a mature urban University.
6. Enhance recreational facilities at Sunset Rec while preserving Sunset Canyon's unique, natural setting and related open spaces by minimizing building footprint(s), retaining trees and landscaping, and siting development in a manner that respects the site's varying topography.
7. Design recreational spaces that integrate indoor and outdoor areas and foster a sense of connection with the surrounding landscape.

5.3 SIGNIFICANT AND UNAVOIDABLE IMPACT

As discussed in Section 4.1, Cultural Resources, of this Draft SEIR, according to CEQA Guidelines Section 15064.5(b), a "project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect

on the environment." Substantial adverse change is defined as: "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5[b][1]). The significance of a historical resource is materially impaired when a project "[d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources" (CEQA Guidelines Section 15064.5[b][2]). Thus, a project may cause a change in a historic resource but still not have a significant adverse effect on the environment as defined by CEQA if the impact of the change to the historic resource is determined to be less than significant, negligible, neutral or even beneficial.

The identified Sunset Canyon Recreation Center Historic District (Sunset Rec Historic District or Historic District) currently retains sufficient integrity of location, setting, design, materials, workmanship, feeling, and association to be recognizable and convey its significance as a mature work of Smith and Williams (Sunset Rec architect) for the California Register of Historical Resources (California Register) under Criterion 3 (Architecture). Therefore, the Sunset Rec Historic District is an eligible historic resource pursuant to CEQA. The proposed Project would involve the removal of the following six of the 10 contributors to the identified Historic District, as well as associated landscape and site elements (cascading stairs, portions of the original hexagonal motif, and wood cribbing at the retaining walls).

- Building A – Vista Room
- Building A1 – Buenos Aires Room
- Building A2 – Stair Tower/Restroom/Office
- Building C – Santa Fe Room
- Building D – Lookout/Lifeguard Station (including the last remaining "hat" roof structure)
- Building E – Office Center

These buildings are described in Section 3.2, Environmental Setting, of this Draft SEIR, and are summarized in Table 5-1. The demolition of these six core recreation buildings and structures would render the eligible Historic District no longer recognizable nor able to convey its significance as the work of Smith and Williams, which is the integrity threshold for California Register eligibility. The remaining contributors to the eligible Historic District – the Park Pool, two swimming pool support buildings, and aspects of the unifying landscape and site elements – are not sufficient to represent the work of Smith and Williams as important creative individuals. As such, the remaining buildings and structures collectively would no longer be eligible for listing in the California Register as a historic district. As such, the proposed Project would result in the loss of the California Register-eligible Sunset Rec Historic District and would cause a significant adverse impact to a historic resource, as defined in CEQA Guidelines Section 15064.5. Even with the implementation of Project-specific mitigation measures, the proposed Project's significant impact to a historic resource would not be mitigated to a less than significant level, resulting in a significant and unavoidable impact.

As discussed in Section 2.4, Supplemental EIR Focus, of this Draft SEIR, for all other environmental topics, the proposed Project would result in no impacts, less than significant impacts, or less than significant impacts with implementation of the previously adopted Long

Range Development Plan (LRDP) campus programs, practices, and procedures (PPs) and mitigation measures (MMs).

TABLE 5-1
PROJECT SUMMARY OF EXISTING BUILDINGS TO BE DEMOLISHED

Building ID	Building Name	Floor Area (gsf)	Covered Unenclosed Area (gsf)	Use(s)	2021 Seismic Rating[1]
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
Total Buildings to be Demolished		***6,982***	***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).

As discussed above, an EIR should consider a range of feasible alternatives that would attain most of the project objectives, while reducing one or more of the significant effects of the project. Therefore, the alternatives analysis presented in this section focuses on alternatives that could avoid or reduce the proposed Project's significant impact to a historic resource, based in part on the UCLA Sunset Recreation Center Preservation Alternatives Analysis Report (Alternatives Analysis Report) prepared by Page & Turnbull and included as Appendix B of the Historic Resources Technical Report, which is provided in Appendix B this Draft SEIR (Page & Turnbull, 2023b).

5.4 ALTERNATIVES CONSIDERED AND REJECTED FROM FURTHER CONSIDERATION

CEQA Guidelines Section 15126.6(c) specifies that an EIR should: (i) identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process; and (ii) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts.

The following alternatives were considered during the scoping and planning process but were not selected for detailed analysis in this Draft SEIR. As described below, the main reasons for rejecting these alternatives were that they would not avoid or substantially reduce the proposed Project's significant impact and/or would not substantially fulfill the Project's underlying purpose and objectives.

- No Project/No Development Alternative
- No Project/Demolition of Existing Structurally Deficient Buildings
- On- and Off-Campus Alternative Sites
- Recreational Programming Moved to an Existing Recreational Facility Elsewhere on Campus
- Partial Reuse/Partial Mothball Alternative
- Building Replacement with Reduced Demolition Alternative

5.4.1 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a "no project" alternative to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. CEQA Guidelines Section 15126.6(e)(3) describes the two general types of no project alternative: (1) when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative would be the continuation of that plan; and (2) when the project is other than a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that project is not processed (i.e., no development). Because the proposed Project is a specific development on an identified property, the no project analysis would typically address the condition where the proposed Project does not proceed.

Pursuant to CEQA Guidelines Section 15126.6(e)(3)(B), in certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment. Because there are existing buildings within the Project site that have been red-tagged by the Campus Building Official and are secured by fencing to prevent unauthorized access, it is not reasonable to assume for purposes of this alternatives analysis that the existing red-tagged buildings would remain in their existing state under a No Project and No Build Alternative scenario. While regular maintenance to clean the site of pine needles and other debris may occur, under a No Project/No Development Alternative, no stabilization or repair work to address safety concerns would be conducted, and the buildings would continue to deteriorate over time, which would not be permitted by the Campus Building Official in perpetuity. As such, this alternative is not evaluated further.

Therefore, other No Project Alternatives that include actions to address the red-tagged buildings have been developed for consideration in this Draft SEIR. The No Project/Demolition of Structurally Deficient Buildings Alternative, which also has been rejected from further evaluation, is discussed in Section 5.4.2 below and assumes that the red-tagged buildings, which are contributors to the Sunset Rec Historic District, would be demolished. The No Project/Mothballing Alternative assumes that the red-tagged buildings would be mothballed in accordance with U.S. Department of the Interior, National Park Service (NPS) guidance outlined in Preservation Brief 31 and is analyzed in Section 5.5.1.

5.4.2 NO PROJECT/DEMOLITION OF EXISTING STRUCTURALLY DEFICIENT BUILDINGS

California Building Code Section 116 states "structures containing an unsafe condition shall be taken down and removed or made safe, as the building official deems necessary…". (CBC, 2022) This demolition-only alternative would involve the removal of the following buildings that are structurally unsound, were red-tagged by the Campus Building Official in 2020, and subsequently vacated: Vista Room, Stair Tower/Restroom/Office, and Santa Fe Room. Additionally, the Office Center, which was vacated in 2021 due to water intrusion and mold, would be remediated to allow re-occupancy, with no new development.

The Vista Room, Stair Tower/Restroom/Office, and Santa Fe Room, which would be demolished under this alternative, are contributors to the Sunset Rec Historic District and include the largest and most visible aspects of the Historic District. The Vista Room anchors the Historic District, the Stair Tower/Restroom/Office provides vertical circulation within the Project site and around which three contributing buildings are situated, and the Santa Fe Room incorporates both post-and-beam and board-formed concrete construction. The loss of these three contributors would dramatically alter the Historic District's layout and spatial relationships that is character-defining to the Historic District. The other remaining contributing buildings, including the Office Center, are smaller in scale and do not embody the interweaving of indoor and outdoor experiences as directly as the buildings that would be demolished under this scenario. Collectively, the remnants would no longer be recognizable nor convey the significance of the Sunset Canyon Recreation Center Historic District as a mature work of Smith and Williams.

Therefore, while this alternative would lessen the impacts to historic resources by retaining seven of the 10 contributors, the eligible Historic District would still lose its historic integrity and ability to convey its significance due to the demolition of key contributors. These demolitions would still cause a significant adverse change that would result in the loss of Sunset Canyon Recreation Center's California Register eligibility as a historic district, and therefore, the impact on historic resources would still be significant and unavoidable. Further, this alternative would not meet most of the Project objectives. Therefore, this alternative is eliminated from further evaluation.

5.4.3 ON- AND OFF-CAMPUS ALTERNATIVE SITES

As discussed in Section 3.3, Background and Need for the Project, of this Draft SEIR, due to the inability to use the Vista Room, Santa Fe Room, Stair Tower/Restroom/Office, and Office Center, which have all been red-tagged by the Campus Building Official, 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. Furthermore, given the access constraints at Sunset Rec, the mobility-impaired population is unable to utilize the majority of the existing facilities, resulting in continued inequities that are not consistent with UCLA policy. Therefore, the proposed Project involves the demolition of the existing seismically deficient, substantially damaged/deteriorated, and non-ADA compliant structures, as well as the removal of improvements that are physically, structurally, or programmatically dependent upon the deficient structures. These buildings would be replaced with a single building offering similar functionality, including three multi-purpose rooms, with a moderately increased floor area and a smaller overall building footprint.

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location, which are capable of avoiding or substantially lessening any significant effects of the project and indicates that if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.

As discussed below, a range of options was evaluated to identify alternative sites for a new recreational building with multiple multipurpose rooms and integrated, usable outdoor space. However, key Project objectives are to continue to co-locate recreational facilities near existing student housing and associated student amenities in the Northwest zone of the campus, which is the zone on campus designated in the UCLA LRDP to include residential facilities and support functions for undergraduate students; and to enhance recreational facilities at Sunset Rec. Therefore, any alternative that is not located at Sunset Rec, or at least in the Northwest zone, would not meet these objectives. As discussed below, there are limited locations available in the Northwest zone designated for recreational uses (i.e., Sunset Rec, Easton Stadium and Sycamore Park), and only Sunset Rec and Sycamore Park would have space available for the proposed replacement building). Further, development of the proposed replacement building at an alternative site would preclude operation of Sunset Rec as a robust multipurpose recreation facility, and the synergy of the various recreation facilities and related uses at Sunset Rec would be lost.

As discussed below, while a replacement building could be constructed on a number of hypothetical sites both on and off-campus, long-term retention and use of the existing buildings at Sunset Rec under each of the alternative site options below would still require efforts to address the existing safety concerns, structural and seismic deficiencies, and access limitations. Ultimately, due to the safety concerns, either the red-tagged buildings would need to be removed, thus resulting in the same significant and unavoidable historic impact as the Project, or they would need to be stabilized and mothballed or rehabilitated, as discussed under other alternatives evaluated herein. Mothballing or rehabilitation of the buildings would avoid the proposed Project's significant impact to historic resources; however, it would not meet key Project objectives. Such an approach would result in duplication of efforts at multiple sites and would be costly and inefficient.

Therefore, implementation of the proposed Project at an alternative site on or off campus has been rejected because this would not meet the Project objectives or would not meet the objectives to the same degree as the proposed Project. A summary of alternative locations considered is provided below.

Alternative Site Within Sunset Rec

This alternative would involve construction of the proposed replacement building elsewhere within Sunset Rec, which, to avoid the Sunset Rec Historic District and other amenities at Sunset Rec, would likely be an area on the Upper Level or Upper Level Plateau that is currently undeveloped. Based on the analysis of construction-related impacts provided in the Initial Study included in Appendix A of this Draft SEIR, with the exception of the significant impact to a historic resource, construction impacts resulting from the proposed Project would be less than significant. Construction-related impacts resulting from implementation of the proposed Project at an alternative site within Sunset Rec (e.g., air quality, noise, etc.) would be similar to, if not greater than the proposed Project. Additionally, as discussed above, efforts to address the existing deficient buildings would still be necessary, which would lead to either demolition of the buildings, resulting in a significant and unavoidable impact, or mothballing the buildings. Further, completing construction of the proposed replacement building at an alternate site within Sunset Rec and mothballing the existing red-tagged buildings would not be an efficient use of land or the limited funds available for the proposed Project. This would require the use of existing undeveloped land at Sunset Rec for the new replacement building, while at the same time leaving the existing developed area underutilized with mothballed buildings, resulting in efficiencies and excess costs.

Alternative Recreation Site Elsewhere On Campus

The physical environment, facilities, and the quality of campus life are important factors in attracting the highest caliber students and faculty to UCLA. The LRDP is the comprehensive land use plan that guides physical development of the campus to support its teaching, research, and public service mission. LRDP Figure 3, UCLA Open Space Areas, identifies "open" areas on campus designated for recreational uses. This alternative would involve implementation of the proposed recreational building in an area on campus that is designated in the LRDP as a "Recreational Open Area." In addition to Sunset Rec, this includes the following:

- Drake Track & Field Stadium
- Marshall Field
- Intramural Field
- North Athletic Field
- Spaulding Field
- Easton Stadium
- Sycamore Park

Due to the limited developable area on campus, concentrating new development within a previously developed area to maximize the use of limited land resources within the campus is an objective of the proposed Project. With the exception of a portion of Sycamore Park, which is located north of the Southern Regional Library, each of these areas is currently developed with recreational uses. Redevelopment of these recreational uses with the proposed replacement building would not be feasible without constraining other recreational programming on campus.

Sycamore Park includes the Sycamore Tennis Courts and a multipurpose open grass area adjacent to the tennis courts. While Sycamore Park is within the Northwest zone, the grass area is extensively used for recreation sports, events, club practices, campus and clinics, and by the Geffen Academy. This area is also the only remaining open grass area in the Northwest zone available for these types of activities besides Sunset Rec. Therefore, use of the open grass area for the proposed recreation replacement building would significantly constrain existing recreational programming for Sycamore Park. Additionally, development of the proposed recreation replacement building at this location would preclude operation of Sunset Rec as a robust multipurpose recreation facility, and the synergy of the various recreation facilities and related uses at Sunset Rec would be lost.

In addition, construction impacts (e.g., air quality, noise, etc.) resulting from development of a new recreation building at an alternative recreation area on campus would be similar to and potentially greater than with the proposed Project depending on the characteristics of the site and the proximity to sensitive receptors. Additionally, as discussed above, efforts to address the existing deficient buildings would still be necessary, which could lead to either demolition of the existing buildings that have been red-tagged, resulting in a significant and unavoidable impact to a historic resource, or mothballing the buildings, as discussed under separate alternatives. Construction of a replacement building at an alternate site on campus and mothballing the existing red-tagged buildings would not be an efficient use of limited funds available for the Project.

Alternative Site Located Off Campus

This alternative would involve implementation of the proposed Project at an off-campus location (i.e., not within the UCLA main campus). Because an off-campus location would be physically separated from the main campus, it would not meet most of the Project objectives.

Although an alternative site off campus has not been identified, due to the typical nature of the construction activities associated with the proposed Project (e.g., demolition, grading, building construction, utility installation) it is anticipated that construction-related impacts resulting from implementation of the proposed Project at an alternative site off campus (e.g., air quality, noise, etc.) would be similar to the proposed Project depending on the characteristics of the site and the proximity to sensitive receptors. Additionally, as discussed above, efforts to address the existing deficient buildings would still be necessary, which could lead to either demolition of the existing buildings that have been red-tagged, resulting in a significant and unavoidable impact to a historic resource, or mothballing the buildings, as discussed under separate alternatives.

Further, the University of California does not own property in proximity to the UCLA campus that would readily accommodate the proposed Project and meet the Project objectives. The purchase of an off-campus location for the proposed Project could also make the Project financially infeasible. CEQA does not require the consideration of sites not owned by the project proponent or which could not be reasonably acquired by the project proponent as alternatives to the proposed Project. Even if the University of California did own such property, construction of a replacement building at an alternate site off campus and mothballing the existing red-tagged buildings would not be an efficient use of limited funds available for the Project.

5.4.4 RECREATIONAL PROGRAMMING MOVED TO AN EXISTING RECREATIONAL FACILITY ELSEWHERE ON CAMPUS

This alternative would involve moving some or all of the recreational programs and functions previously accommodated in the Sunset Rec buildings that are no longer usable to another existing recreational facility on the UCLA campus. This includes the Vista Room, Santa Fe Room, Stair Tower/Restroom/Office and Office Center, which were used for various functions including, but not limited to: recreational classes for students and staff, gatherings and meeting for campus groups, and activity space for summer youth camps held in the three main multi-purpose rooms; administrative offices; youth camp offices; and front desk operations. There would be space and scheduling constraints at any other existing facility, timing considerations in light of anticipated seismic repairs at the Wooden Center, as well as logistical and staffing challenges related to operation of Sunset Rec programs across multiple locations. Similar to the alternative site development scenarios, this alternative would still require demolishing the red-tagged buildings to address the safety concerns, mothballing them, or undertaking improvements to address the safety issues and other deficiencies. As such, this alternative is not evaluated further.

5.4.5 PARTIAL REUSE/PARTIAL MOTHBALL ALTERNATIVE

Consideration was given to Project variations that would avoid demolition of the existing buildings, while reusing those spaces most readily rehabilitated and mothballing the spaces requiring more substantial improvements for safe occupancy. Accordingly, the Partial Reuse/Partial Mothball Alternative would involve the structural improvement of some or portions of the existing buildings within Sunset Rec (which would be demolished under the proposed Project) to address safety concerns and meet building and seismic requirements. Accessibility improvements would be implemented to provide access to as many building spaces as possible without major modifications. However, the Santa Fe Room, the upper levels of the Vista Room, and most of the Stair Tower/Restroom/Office would remain permanently closed, due to their deteriorated existing conditions, as well as the physical infeasibility of providing full accessibility per ADA requirements without major alterations or demolition and reconstruction. These closed spaces would be mothballed for long-term protection following the NPS guidance in Preservation Brief 31: Mothballing Historic Buildings. In accordance with NPS guidance in Preservation Brief 31: Mothballing Historic Buildings, the following steps would be taken: (1) documentation of the architectural and historical significance of the buildings and their current conditions; (2) structural

stabilization, pest control/extermination, and protection from moisture penetration; and (3) mothballing actions related to security, ventilation, utilities and mechanical systems, as well as development and implementation of a maintenance and monitoring plan. The NPS indicates that "[m]othballing measures should not result in permanent damage, and so each treatment should be weighed in terms of its reversibility and its overall benefit. (NPS, 1993)

In addition, it is assumed the California Historic Building Code (CHBC) would be applied where possible under the provisions of the code. Where it is not possible, approaches consistent with the Secretary of the Interior (SOI) Standards discussed in Section 4.1, Cultural Resources, of this Draft SEIR, would be implemented. For example, the original design of the wood guardrails and metal pipe handrails (collectively referred to as railing) at the exterior wood stairway of the Stair Tower/Restroom/Office constitute a distinct fall hazard and could not be reinstalled as they were originally designed, even when applying the CHBC. New compatible railings that meet the code requirements for height and maximum width of openings would need to be designed and installed as part of the structure's repair in a manner that complies with the SOI Standards and to replace the existing non-compatible lattice paneling previously added to the railings for safety purposes. Where similar railings exist at areas that will be closed and mothballed, such as the upper levels of the Vista Room and the Santa Fe Room, such code compliance work would not be anticipated since these spaces would be mothballed.

Table 5-2 provides a list of the physical improvements to each building assumed under this alternative. The resulting changes to contributors and the eligible Historic District are described in the Alternatives Analysis Report (included in Appendix B of the Historic Resources Technical Report) and summarized below.

TABLE 5-2
PARTIAL REUSE/PARTIAL MOTHBALL ALTERNATIVE SUMMARY OF PHYSICAL IMPROVEMENTS

Building (1963 Designation)	Structural Retrofit Improvements	Required Accessibility Upgrades/Mothballing
Building A – Vista Room (Unit B)	Undergo structural repair and seismic retrofit to meet acceptable UC Seismic Performance rating: <u>Repair</u> • Remove and replace all deteriorated structural wood members, including posts and beams <u>Retrofit</u> • Remove and replace wall finishes (interior and/or exterior) • Add hold-down hardware at shear wall boundaries • Add plywood sheathing at existing walls • Provide new transfer beams below discontinuous shear walls • Add new shear walls and footings at Level 1, below deck	Meet accessibility requirements at Level 1: • Add accessible restrooms at Level 1 • Widen doorways and install automatic doors at office entrances to accommodate wheelchairs and mobility devices • Relocate all light switches, thermostats, and other controls to accessible heights Level 2: • Mothball following Preservation Brief 31 and remain unoccupied (i.e., the Vista Room would not be available for use)
Building A1 – Buenos Aires Room (Unit D)	N/A	Improve accessibility:

Building (1963 Designation)	Structural Retrofit Improvements	Required Accessibility Upgrades/Mothballing
		• Install ramp at building entrance next to Family Pool • Add tactile strips and handrails to stairs at entrance • Install automatic doors to accommodate wheelchairs and mobility devices • Relocate all light switches, thermostats, and other controls to accessible heights • The existing outdoor ramp behind the Project site buildings would be improved to provide compliant ADA access between the Upper and Lower Levels
Building A2 – Stair Tower/ Restroom/Office (Unit E)	Undergo structural repair and seismic retrofit to meet acceptable UC Seismic Performance rating: <u>Repair</u> • Remove and replace all deteriorated structural wood members, including posts, beams, and stair treads • Install compatible wood and metal railings <u>Retrofit</u> • Remove and replace wall finishes • Add hold-down hardware at shear wall boundaries • Add plywood sheathing at existing walls	Meet accessibility requirements on Level 2: • Renovate restroom to meet accessibility standards • Widen doorways and install automatic doors to accommodate wheelchairs and mobility devices • Add tactile strips where appropriate • Relocate all light switches, thermostats, and other controls to accessible heights Level 1 and 3: Mothball following Preservation Brief 31 and remain unoccupied (i.e., one restroom and the office would not be available for use)
Building C – Santa Fe Room (Unit C)	N/A Building would be mothballed following Preservation Brief 31, protected/secured in place, and remain unoccupied (i.e., the Santa Fe Room would not be available for use)	N/A Building would be mothballed following Preservation Brief 31, protected/secured in place, and remain unoccupied (i.e., the Santa Fe Room would not be available for use)
Building D – Lookout/ Lifeguard Station (Unit F)	Undergo seismic retrofit to meet acceptable UC Seismic Performance rating: • Provide new lateral resisting system (e.g., timber braces, steel braces, cantilever, steel columns, etc.) at non-historic enclosure • Repair or replace in kind the deteriorated wood canopy (i.e., historic "hat" structure)	Meet accessibility requirements: • Install automatic door to accommodate wheelchairs and mobility devices • Add tactile strips where necessary • Relocate all light switches, thermostats, and other controls to accessible heights
Building E – Office Center (Unit G)	If building is used for storage, undergo seismic retrofit to meet acceptable UC Seismic Performance rating:	If building is used for storage, meet certain accessibility requirements, although an accessible path of travel would not be available:

Building (1963 Designation)	Structural Retrofit Improvements	Required Accessibility Upgrades/Mothballing
	• Add hold-down hardware at shear wall boundaries. • Add plywood sheathing on three walls. • Remove and replace wall finishes. If not used for storage, N/A: Building would be mothballed following Preservation Brief 31, protected/secured in place, and remain unoccupied (i.e., the Office Center would not be available for use)	• Install automatic door to accommodate wheelchairs and mobility devices • Add tactile strips where necessary • Relocate all light switches, thermostats, and other controls to accessible heights If not used for storage, building would be mothballed following Preservation Brief 31, protected/secured in place, and remain unoccupied (i.e., the Office Center would not be available for use)
Building F – Electric Vault (N/A)	N/A Retain and renovate space as needed to accommodate replacement electrical equipment to serve the buildings	N/A Retain and renovate space as needed to accommodate replacement electrical equipment to serve the buildings

Source: (Page & Turnbull, 2023b); Safdie Rabines Architects and Nabih Youssef Associates.

Under this alternative, all ten contributors to the Sunset Rec Historic District would remain, and the structural and accessibility work at the contributors within Sunset Rec generally would be minor and likely could be accomplished following the SOI Standards. Therefore, the Partial Reuse/Partial Mothball Alternative would avoid the proposed Project's significant impact to a historic resource by retaining the eligibility and sufficient level of integrity of the Sunset Rec Historic District for listing in the California Register under Criterion 3 (Design/Construction). However, many of the interior and exterior spaces, including two of the three existing multipurpose rooms, would remain unavailable for use, and thus this alternative would not fulfill the underlying purpose of the proposed Project, which is to replace or restore the multipurpose spaces at Sunset Rec that are no longer usable in order to correct existing deficiencies and provide, at minimum, an equivalent capacity for recreational programming to that previously available. Therefore, this alternative is not being carried forward for further evaluation. Nonetheless, the Alternatives Analysis Report (included in Appendix B of the Historic Resources Technical Report) provides a full analysis of the changes to the contributors and non-contributors of the eligible Historic District under the Partial Reuse/Partial Mothball Alternative.

5.4.6 BUILDING REPLACEMENT WITH REDUCED DEMOLITION ALTERNATIVE

Consideration was also given to Project variations involving a reduced level of demolition in order to retain some of the contributors to the eligible Historic District. The Building Replacement with Reduced Demolition Alternative would involve the removal of the buildings that have been red-tagged or otherwise vacated. This includes the Vista Room, the Stair Tower/Restroom/Office, the Santa Fe Room, and the Office Center. Wood cribbing and concrete retaining walls around the Vista Room and the Stair Tower/Restroom/Office would be demolished as well, along with hexagonal motif, pattern, and paving at the ground plan of both buildings that are part of the unifying landscape and site elements contributor. Similarly, the cascading stairs and Middle Level may need to be altered to accommodate new utilities. The Electric Vault, a non-contributor, would be demolished as well. A replacement recreation building with a smaller footprint than the proposed Project would be constructed in place of the buildings to be removed under this alternative.

The Buenos Aires Room would be retained, and accessibility improvements made. The Lookout/Lifeguard Station would also be retained. The non-historic building (enclosure) would undergo seismic retrofit and accessibility upgrades, similar to the Partial Reuse/Partial Mothball Alternative described above. The historic "hat" roof structure at the Lookout/Lifeguard Station, which is a contributor but has not been red-tagged, would be repaired, or replaced in kind following the SOI Standards.

Table 5-3 provides a list of the physical improvements to each building assumed under this alternative. The resulting changes to contributors and the eligible Historic District are described in the Alternatives Analysis Report (included in Appendix B of the Historic Resources Technical Report) and summarized below.

The Building Replacement with Reduced Demolition Alternative would demolish four contributors, instead of the six under the proposed Project. It would also demolish or alter several aspects of the unifying landscape and site elements to the extent that they would no longer be a contributor to the Historic District, similar to the proposed Project. As evaluated in the Alternatives Analysis Report (included in Appendix B of the Historic Resources Technical Report), while this alternative would lessen the impacts to historic resources by retaining five of the ten contributors, the eligible Historic District would still lose its historic integrity and ability to convey its significance due to the demolition of several key contributors. The loss of the key contributors and their replacement with a single new building would substantially change the spatial and functional relationships between the district's components that date from the period of significance. As with the proposed Project, the demolition and new construction under this alternative would cause a significant adverse change that would result in the loss of California Register eligibility of Sunset Rec as a historic district, and therefore, the impact on historic resources would still be significant and unavoidable. Therefore, this alternative is not being carried forward for further evaluation.

5.5 ANALYSIS OF ALTERNATIVES UNDER CONSIDERATION

The discussion in this section provides a description of alternatives considered, followed by a comparative analysis of the alternatives and the proposed Project. The focus of this analysis is to determine whether the alternatives are capable of eliminating or reducing the proposed Project's significant and unavoidable historic resource impact to a less than significant level. This alternatives analysis addresses the potential physical changes to the buildings within the Sunset Rec Historic District but does not discuss the issues of feasibility, including cost or approval by the Campus Building Official. For each alternative, an analysis of whether the alternative meets the proposed Project objectives (as presented in Section 5.2 above) also is provided.

The following alternatives have been determined to represent a reasonable range of alternatives to the proposed Project and are fully evaluated herein, as well as in the Alternatives Analysis Report presented in Appendix B of this Draft SEIR:

- **Alternative 1:** No Project/Mothballing Alternative
- **Alternative 2:** Secretary of the Interior Standards Compliant Alternative
- **Alternative 3:** Partial Preservation and Code Compliant Alternative

TABLE 5-3
BUILDING REPLACEMENT WITH REDUCED DEMOLITION ALTERNATIVE SUMMARY OF PHYSICAL IMPROVEMENTS

SCRC Building (1963 Designation)	Structural Retrofit Improvements	Required Accessibility Upgrades
Building A – Vista Room (Unit B)	N/A Demolish	N/A Demolish
Building A1 – Buenos Aires Room (Unit D)	N/A	Improve accessibility: • Install ramp at building entrance next to Family Pool • Add tactile strips and handrails to stairs at entrance • Install automatic doors to accommodate wheelchairs and mobility devices • Relocate all light switches, thermostats, and other controls to accessible heights • The existing outdoor ramp behind the Project Site buildings would be improved to provide compliant ADA access between the Upper and Lower Levels
Building A2 – Stair Tower/ Restroom/Office (Unit E)	N/A Demolish	N/A Demolish
Building C – Santa Fe Room (Unit C)	N/A Demolish	N/A Demolish
Building D – Lookout/Lifeguard Station (Unit F)	Undergo seismic retrofit to meet acceptable UC Seismic Performance rating: • Provide new lateral resisting system (e.g., timber braces, steel braces, cantilever, steel columns, etc.) at non-historic enclosure Repair or replace in kind the deteriorated wood canopy (i.e., historic "hat" structure)	Meet accessibility requirements: • Install automatic door to accommodate wheelchairs and mobility devices • Add tactile strips where necessary • Relocate all light switches, thermostats, and other controls to accessible heights
Building E – Office Center (Unit G)	N/A Demolish	N/A Demolish
Building F – Electric Vault (N/A)	N/A Demolish	N/A Demolish

Source: (Page & Turnbull, 2023b); Safdie Rabines Architects and Nabih Youssef Associates.

5.5.2 ALTERNATIVE 1: NO PROJECT/MOTHBALLING ALTERNATIVE

As discussed in Section 5.4.1 above, CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a "no project" alternative to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. Because the proposed Project is a specific development on an identified property, this "No Project" analysis appropriately addresses the condition where the proposed Project does not proceed. Leaving the red-tagged buildings (i.e., the Vista Room, Stair Tower/Restroom/Office, and Santa Fe Room) in their current state in perpetuity is not a reasonable assumption for analysis purposes due to continued deterioration and code compliance/safety issues that would need to be addressed, and demolition of these buildings would not avoid the proposed Project's significant impact to a historic resource. Therefore, those No Project Alternative scenarios have been rejected from further consideration, as discussed above in Section 5.4.1 and Section 5.4.2, respectively. The CEQA-required No Project Alternative evaluated below is the No Project/Mothballing Alternative.

Description of the Alternative

With the No Project/Mothballing Alternative, all buildings within the Project site, including the contributors to the Historic District, would remain. As noted above, CBC Section 116 states "structures containing an unsafe condition shall be taken down and removed or made safe, as the building official deems necessary…". Thus, assuming approval by the Campus Building Official to retain the existing red-tagged or otherwise vacated buildings without major improvements, these structures would also remain in place and remain unoccupied. The historic "hat" roof structure at the Lookout/Lifeguard Station, which is a contributor but has not been red-tagged, would be repaired or replaced in kind following Standard 6 of the SOI Standards. Standard 6 calls for deteriorated historic features to be repaired but allows for in-kind replacement matching the old in design, color, texture, and where possible, materials, when the severity of deterioration is such that repair is no longer possible.

Since vacant buildings cannot survive indefinitely without some degree of ongoing maintenance, and since historic buildings in particular may be prone to deterioration without proper care, "mothballing" would be undertaken to deactivate the red-tagged or otherwise vacated buildings, which are all contributors to the Historic District for an extended period. These include the Vista Room, Stair Tower/Restroom/Office, Santa Fe Room, and Office Center. As discussed in the Alternatives Analysis Report included in Appendix B of this Draft SEIR, guidance from the NPS indicates that [i]f a vacant property has been declared unsafe by building officials, stabilization and mothballing may be the only way to protect it from demolition. As such, under this alternative, the red-tagged or otherwise vacated buildings and structures in the eligible Historic District would be mothballed in accordance with NPS guidance in Preservation Brief 31: Mothballing Historic Buildings, described previously.

Comparative Analysis of Environmental Impacts

The No Project/Mothballing Alternative would retain all contributors in the eligible Historic District. The contributing buildings and structures that have been red-tagged or otherwise vacated would be mothballed following the guidance in NPS Preservation Brief 31, which is intended both to protect against further damage while the buildings and structures are vacant, while also ensuring that mothballing measures should not result in permanent damage, and so each treatment should be weighed in terms of its reversibility and its overall benefit. As such, mothballing the contributing buildings and structures that have been red-tagged or otherwise vacated following the NPS guidance outlined in Preservation Brief 31 would not significantly change their historic character, nor affect the eligible Historic District as a whole.

The contributing "hat" structure at the Lookout/Lifeguard Station would be repaired or replaced in-kind following SOI Standard 6. Repair or in-kind replacement following Standard 6 would not significantly change the contributor. As the No Project/Mothballing Alternative would repair and replace in kind or retain all contributors and mothball them according to preservation best practices, the Sunset Rec Historic District would remain in place and retain its eligibility and level of integrity for listing in the California Register under Criterion 3 (Design/Construction). Therefore, this alternative would avoid the Project's significant impacts to a historic resource under CEQA.

Ability to Meet the Project Objectives

This alternative would not fulfill the underlying purpose of the proposed Project, which is to replace or restore the multipurpose spaces at Sunset Rec that are no longer usable in order to correct existing deficiencies and provide, at minimum, an equivalent capacity for recreational programming to that previously available. Additionally, this alternative would not meet six of the seven Project objectives since the largest buildings that provide space, particularly multipurpose space, for recreational programming at Sunset Rec would be unavailable, and none of the proposed Project improvements to address seismic and ADA deficiencies would be implemented. Following is a discussion of the No Project/Mothballing Alternative's ability to attain the Project objectives.

- Provide several modern, flexible, multi-use rooms to replace existing deficient spaces used for 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.

  This alternative would not involve the development of any new recreational facilities and conversely would reduce the amount of area available for recreational programming. Therefore, this objective would not be met.

- Continue to co-locate recreational facilities near existing student housing and associated student amenities in the Northwest zone of the campus, which is the zone on campus designated in the UCLA Long Range Development Plan (LRDP) to include residential facilities and support functions for undergraduate students.

  This objective would be met but not to the same degree as the proposed Project. While all of the existing buildings at Sunset Rec, which is located in the Northwest zone of the campus, would be retained, not all of the buildings would continue to be available for recreational programming under this alternative.

- Address existing structural and existing seismic safety deficiencies to comply with the UC Seismic Safety Policy and to provide an acceptable level of safety for students, employees, and the public.

  This alternative would involve structural stabilization only as necessary for the purpose of mothballing the existing buildings and would not involve the completion of structural improvements necessary to fully comply with the UC Seismic Safety Policy. Therefore, this objective would not be met.

- Support inclusive programming and address existing accessibility deficiencies by providing a recreational facility that meets current ADA requirements and improves overall site accessibility, including connectivity between buildings/uses.

  Sunset Rec opened in 1966 and does not meet current ADA requirements. Under this alternative accessibility improvements included as part of the proposed Project would not be implemented. Therefore, this objective would not be met.

- Concentrate new development within a previously developed area on campus in order to most efficiently use the limited land resources of a mature urban University.

  This alternative would not involve any new development. Mothballing several of the existing buildings, making them unavailable for recreational programming, would not be an efficient use of the University's limited land resources. Therefore, this objective would not be met.

- Enhance recreational facilities at Sunset Rec while preserving Sunset Canyon's unique, natural setting and related open spaces by minimizing building footprint(s), retaining trees and landscaping, and siting development in a manner that respects the site's varying topography.

  This alternative would not enhance the recreational facilities at Sunset Rec, rather it would result in key buildings not being available for recreational programming in the future. Therefore, this objective would not be met.

- Design recreational spaces that integrate indoor and outdoor areas and foster a sense of connection with the surrounding landscape.

  This alternative would retain the existing Sunset Rec facilities, but the mothballing of the Vista Room, Stair Tower/Restroom/Office, Santa Fe Room, and Office Center would limit the connectivity between indoor and outdoor areas available for use. Certain outdoor spaces surrounding the mothballed buildings that facilitate connectivity would also be unavailable for use. Therefore, this objective would not be met.

5.5.3 ALTERNATIVE 2: SECRETARY OF THE INTERIOR STANDARDS COMPLIANT ALTERNATIVE

Description of the Alternative

The intent of the SOI Standards Compliant Alternative is to avoid significant adverse impacts to historic resources resulting from the proposed Project by ensuring the eligible Historic District remains eligible for listing in the California Register with its existing level of integrity. It is also to determine if an SOI Standards compliant project could be accomplished while addressing the various structural, accessibility, and other code compliance issues.

The SOI Standards Compliant Alternative would retain and rehabilitate all Sunset Rec Historic District contributors within the Project site according to the SOI Standards and SOI Guidelines, and in particular, the Rehabilitation Standards (discussed further in the Alternatives Analysis Report presented in Appendix B of this Draft SEIR). There would be no changes to the Family Pool Restrooms or the Park Pool Mechanical Room; these contributors are not within the Project site boundaries. Structural improvements would be implemented to address seismic deficiencies and other structural issues caused by deterioration to the extent that such improvements would comply with the SOI Standards. Similarly, improvements to address ADA compliance would be made only to the extent they would comply with the SOI Standards. As such, more invasive changes would not be part of the alternative, and non-compliance with certain ADA requirements would remain in some areas.

In addition, it is assumed the CHBC would be applied were possible under the provisions of the code. Where it is not possible, approaches consistent with the SOI Standards would be implemented. For example, the original railings at exterior wood walkways and stairs, with their open design, constitute a distinct fall hazard and could not be reinstalled as they were originally designed, even when applying the CHBC. New compatible railings that meet the code

requirements for height and maximum width of openings would need to be designed and installed in a manner that complies with the SOI Standards, in order to replace the non-compatible lattice paneling at the existing railings. Table 5-4 provides a summary of the proposed physical improvements to each building.

TABLE 5-4
SECRETARY OF THE INTERIORS STANDARDS COMPLIANT ALTERNTIVE SUMMARY OF PHYSICAL IMPROVEMENTS

Sunset Canyon Rec Center Building (1963 Designation)	Structural Retrofit Improvements	Accessibility Upgrades / Code Required Work
Building A – Vista Room (Unit B)	Undergo structural repair and seismic retrofit to meet acceptable UC Seismic Performance rating: <u>Repair</u> • Remove and replace all deteriorated structural wood members, including posts and beams <u>Retrofit</u> • Remove and replace wall finishes (interior and/or exterior) • Add hold-down hardware at shear wall boundaries • Add plywood sheathing at existing walls • Provide new transfer beams below discontinuous shear walls • Add moment frame or other SOI Standards compliant approach instead of shear walls if permitted by Campus Building Official.	Meet accessibility requirements at Levels 1 and 2: • Add accessible restrooms at Level 1 • Widen doorways and install automatic doors at all entrances to accommodate wheelchairs and mobility devices • Relocate all light switches, thermostats, and other controls to accessible heights • Modify kitchen and other Level 2 spaces as needed Install elevator or platform lift on interior or exterior in conformance with the SOI Standards. Install new compatible railings at Level 2 exterior wood walkway.
Building A1 – Buenos Aires Room (Unit D)	N/A	Improve accessibility: • Install ramp at building entrance next to Family Pool • Add tactile strips and handrails to stairs at entrance • Install automatic doors to accommodate wheelchairs and mobility devices • Relocate all light switches, thermostats, and other controls to accessible heights • The existing outdoor ramp behind the Project site buildings would be improved to provide compliant ADA access between the Upper and Lower Levels
Building A2 – Stair Tower/Restroom/Office (Unit E)	Undergo structural repair and seismic retrofit to meet acceptable UC Seismic Performance rating: <u>Repair</u>	Meet accessibility requirements on Level 2: • Renovate restroom to meet accessibility standards

Sunset Canyon Rec Center Building (1963 Designation)	Structural Retrofit Improvements	Accessibility Upgrades / Code Required Work
	• Remove and replace all deteriorated structural wood members, including posts, beams, and stair treads • Repair or replace in kind other exterior wood elements, such as stair landings <u>Retrofit</u> • Remove and replace wall finishes • Add hold-down hardware at shear wall boundaries • Add plywood sheathing at existing walls	• Widen doorways and install automatic doors to accommodate wheelchairs and mobility devices • Add tactile strips where appropriate • Relocate all light switches, thermostats, and other controls to accessible heights Levels 1 and 3: • Renovate interiors to meet accessibility standards and rehabilitate to restroom and office uses • Spaces would not have accessible routes, as adding an elevator or lift system on the interior or exterior of the building would not be SOI Standards compliant Exterior Wood Stairway: • Repair or replace in kind through structural repair work • Install compatible wood and metal railings
Building C – Santa Fe Room (Unit C)	Undergo structural repair and seismic retrofit to meet acceptable UC Seismic Performance rating: <u>Repair</u> • Remove and replace all deteriorated structural wood members, including posts and beams <u>Retrofit</u> • Remove and replace wall finishes (interior and exterior) • Add hold-down hardware at shear wall boundaries • Add plywood sheathing at existing walls	Install exterior elevator or platform lift in conformance with the SOI Standards to access Level 2 (Santa Fe Room) and seating area below Santa Fe Room. Meet accessibility requirements at Level 2 (Santa Fe Room): • Widen doorways and install automatic doors at all entrances to accommodate wheelchairs and mobility devices • Relocate all light switches, thermostats, and other controls to accessible heights Meet accessibility requirements at seating area: • Additional ramps, paving, or other modifications may be necessary Install new compatible railings at Level 2 exterior wood walkway.
Building D – Lookout/ Lifeguard Station (Unit F)	Undergo seismic retrofit to meet acceptable UC Seismic Performance rating: • Provide new lateral resisting system (e.g., timber braces, steel braces, cantilever, steel columns, etc.) at non-historic enclosure	Meet accessibility requirements: • Install automatic door to accommodate wheelchairs and mobility devices • Add tactile strips where necessary.

Sunset Canyon Rec Center Building (1963 Designation)	Structural Retrofit Improvements	Accessibility Upgrades / Code Required Work
	• Repair or replace in kind the deteriorated wood canopy (i.e., historic "hat" structure	• Relocate all light switches, thermostats, and other controls to accessible heights
Building E – Office Center (Unit G)	Undergo seismic retrofit to meet acceptable UC Seismic Performance rating: • Add hold-down hardware at shear wall boundaries • Add plywood sheathing on three walls • Remove and replace wall finishes	Meet accessibility requirements: • Install automatic doors to accommodate wheelchairs and mobility devices • Add tactile strips where appropriate • Relocate all light switches, thermostats, and other controls to accessible heights Remediate for water/mold damage.
Building F – Electric Vault (N/A)	N/A Retain and renovate space as needed to accommodate replacement electrical equipment to serve the buildings.	N/A Retain and renovate space as needed to accommodate replacement electrical equipment to serve the buildings.

Source: (Page & Turnbull, 2023b); Safdie Rabines Architects and Nabih Youssef Associates.

Comparative Analysis of Environmental Impacts

The changes to contributors and the eligible Historic District resulting from the SOI Standards Compliant Alternative are described below and summarized in Table 8 of the Alternatives Analysis Report in Appendix B of this Draft SEIR.

- **Vista Room (Building A).** The structural repair of the Vista Room would involve removing and replacing all deteriorated structural wood members, including posts and beams. The Vista Room and exterior wood walkway at Level 2 should be able to be temporarily shored, reinforced, and lifted up (likely by hydronic jacks) to allow for replacement of deteriorated post and beam members between Level 1 and Level 2 without significantly damaging their historic (character-defining) features or fabric. Any damage would be repaired in kind following the SOI Standards.

  The seismic retrofit work could be invasive with removal of the character-defining exterior cabin lining cladding to install hold-down hardware and plywood sheathing, but reinstalling the removed cladding or replacing in kind to match would meet the SOI Standards. This assumes that the added hold-down hardware and plywood sheathing would not add substantial depth to the walls. A new transfer beam likely can be accomplished with minimal impacts. However, the addition of shear walls and foundation footings below the wood walkway at Level 1 where no existing walls currently exist to transfer the load from the Level 2 walls may significantly change the character of the building. The building's spatial relationships would be altered if new shear walls enclose the entrance breezeway or create the appearance of a much more solid lower level that no longer appears recessed. Also, adding foundation footing for the new shear walls would require removing and disturbing the hexagonal motif and pattern at the ground plane of the Vista Room, which is visible due to the open nature of Level 1.

  Rather than installing new shear walls at Level 1 where no existing walls currently exist to transfer the load from Level 2 walls, another approach that would avoid altering the building's spatial relationships and thus its historic character would be pursued, if

permitted by the Campus Building Official. This may include installing moment frames, which may still be visible but would be less solid than shear walls to allow the lower level to remain mostly open. In addition, the foundation footings for moment frames may be less invasive at the ground plane than new shear walls. The goal and assumption would be that an SOI Standards compliant approach to seismic retrofits for the building would be possible to meet minimum code requirements and UC Seismic Performance standards, and to allow the building to be re-occupied.

The improvements necessary to create accessible restrooms at or near Level 1, widen the existing exterior doorways, and install automatic doors should be able to be accomplished following the SOI Standards and preservation best practices without significantly altering the character of the building. The interior work would not change the building's historic character, as no interior spaces at Level 1 have been identified as character-defining. Under this alternative, it may be possible to install an elevator or platform lift inside or on the exterior of the Vista Room in an inconspicuous location to access Level 2 and still comply with the SOI Standards. The access would serve only the upper-level Vista Room and wood walkway, and not other buildings within the eligible Historic District. Assuming Level 2 would be accessible, other accessibility modifications would be needed, including in the kitchen, at doorways, and relocating all light switches, thermostats, and other controls to accessible heights. These may start to affect some of interior features of the Vista Room that are character-defining. At the Level 2 exterior wood walkway, new code-compliant guardrails designed in a manner that is compatible with the building's historic character and following the SOI Standards would also be needed. This may somewhat change the historic character of the building but should be more visually compatible than the latticework that has been added previously at the guardrails.

Under the SOI Standards Compliant Alternative, the Vista Room likely could be rehabilitated according to the SOI Standards for Rehabilitation. The work would be sensitive to the historic character even as visible changes would occur – with seismic retrofits at Level 1, potential addition of an elevator or platform lift, and new code-compliant guardrails at the Level 2 wood walkways. Rehabilitating the Vista Room in compliance with the SOI Standards would have no significant change to this historic resource.

- **Buenos Aires Room (Building A1).** No structural repair or seismic retrofit work is proposed under the alternative, as the building does not have deteriorated structural members. It also has a seismic rating of IV, which is considered acceptable and compliant with the UC Seismic Safety Policy. This building has one existing access ramp to the Buenos Aires Room at the northeast door. The accessibility work of adding another accessible ramp at the southwest door, near the Family Pool entrance, or modifying the existing ramp to provide access to both doors should be able to be installed following the SOI Standards and without significantly altering the historic character of the building. Access to the building from the Lower Level can continue to be from the existing ramp along the northern hillside that is located outside the Project site and the eligible Historic District. This ramp would need to be modified to meet current accessibility requirements. Under the SOI Standards Compliant Alternative, the changes to the Buenos Aires Room would be minimal, and the improvements likely can be compliant with the SOI Standards.

- **Stair Tower/Restroom/Office (Building A2).** The structural repair work at the Stair Tower/Restroom/Office would involve removal and replacement of all deteriorated structural wood members, including post, beams, and stair treads. This likely also involves repairing or replacing in kind the other wood elements of the exterior stairs, such as the landings. The seismic retrofit involves removing the board-and-batten exterior wall finishes to install plywood sheathing at existing walls and hold-down hardware at shear wall

boundaries. An additional aspect of the repairs would be the requirement to install code-compliant railing at the exterior stairway, as the original metal pipe handrail at the steps and the wood guardrails at the landings had wide openings that would be considered a distinct hazard.

As with the Vista Room, repair and retrofit work would be invasive, but can meet the SOI Standards if deteriorated wood members are replaced in kind and assuming the added hold-down hardware and plywood sheathing would not add substantial width to the walls. New railings meeting code requirements should be able to be designed to be compatible with the building's historic character in adherence to the SOI Standards. This may somewhat change the historic character of the building but should be more visually compatible than the latticework that has been added previously at the exterior stairway.

The accessibility work would involve renovation of the existing women's restroom at Level 2, which is at the same level as the Buenos Aires Room and would have an accessible path. Only the restroom at Level 2 has an accessible path, and the proposed modifications to widen the restroom doorway and install automatic doors would be accomplished in compliance with the SOI Standards. Interior improvements to the Level 2 restroom, as well as the Level 1 restroom and Level 3 office interiors could also be renovated without changing historic elements, as the interiors of these spaces are not character-defining. The exterior stairway would be rehabilitated as part of the structural improvements, with new code-compliant railing designed in a manner that is compatible with the building's architecture and following the SOI Standards. This may somewhat change the historic character of the building but should be more visually compatible than the latticework that has been added previously at the exterior stairway. In terms of effects to historic resources, the SOI Standards Compliant Alternative would have no significant change to the Stair Tower/Restroom/Office, though not all spaces would be made accessible (i.e., code requirements could not be fully met).

- **Santa Fe Room (Building C).** Under this alternative, the Santa Fe Room would undergo structural repair similar to that for the Vista Room. The deteriorated structural wood members, including beams and posts, would be removed and replaced. This likely means the Santa Fe Room and exterior wood walkway at Level 2 would be temporarily shored, reinforced, and lifted up (by hydraulic jacks or by a crane) to allow for the replacement of the deteriorated post and beam members between Level 1 and Level 2. Such work should be able to be accomplished without significantly damaging the building's character-defining features or historic fabric. Any damage would be repaired in kind following the SOI Standards.

  The structural retrofit would involve adding hold-down hardware at shear wall boundaries and plywood sheathing at existing Level 2 walls. To install these retrofits, the character-defining cabin lining wall finish on the Santa Fe Room's interior, exterior, or both would need to be removed. Removing the character-defining exterior cabin lining cladding could be invasive, but reinstalling the removed cladding or replacing in kind to match would meet the SOI Standards. This assumes that the added plywood sheathing and hold-down hardware would not add substantial depth to the walls.

  To achieve an accessible route to the Santa Fe Room at Level 2, an exterior elevator or platform lift would need to be installed at the building. It may be possible to install such an addition in compliance with the SOI Standards. For example, it could be placed between this building and the Vista Room with stops at the Santa Fe Room and at the seating area under the room. If the Santa Fe Room is accessible, it is assumed renovations at the exterior wood walkways, at doorways, and on the interior to relocate all light switches,

thermostats, and other controls to accessibility heights would be conducted. Similarly, if the seating area becomes accessible, some additional site work, such as adding paved paths, may be required. While collectively somewhat invasive, the accessibility work generally appears to be possible while complying with the SOI Standards. However, the accessible route would serve only to access the Santa Fe Room, wood walkway, and the seating area, but not other buildings within the eligible Historic District.

Another code required element that would need to be included is new guardrails at the exterior wood walkway at Level 2, since the original style wood guardrails, with their open design, constitute a distinct hazard and could not be reinstalled as originally designed even when applying the CHBC. New compatible guardrails that meet the code requirements for height and maximum width of openings would be designed and installed following the SOI Standards. This may somewhat affect the historic character of the building but should be more visually compatible than the latticework that was added previously at the guardrails.

Under the SOI Standards Compliant Alternative, the Santa Fe Room would be rehabilitated according to the SOI Standards for Rehabilitation. The work would be sensitive to the historic character even as visible changes would occur, with the potential addition of an exterior elevator or platform lift and new code-compliant guardrails at the Level 2 wood walkways. On balance, rehabilitating the Santa Fe Room in compliance with the SOI Standards would result in a significant change to historic resources, although visual changes would be apparent.

- **Lookout/Lifeguard Station (Building D).** The seismic retrofit and accessibility work would only be at the non-historic building (enclosure), which would not affect historic features and would have no effect on historic resources. The structural repair following the SOI Standards would involve repairing or replacing in kind the historic “hat” structure. Standard 6 of the SOI Standards allows for in-kind replacement of deteriorated features when the severity of deterioration is such that repair is no longer possible. Replacing the historic “hat” roof structure in kind following the SOI Standards, matching the design, color, texture, and material, would have no significant change to the contributor or the eligible Historic District.

- **Office Center (Building E).** Under this alternative, the Office Center would be rehabilitated with seismic retrofits and limited accessibility work, and then used for storage. While adding chair lifts at multiple locations at the lower and upper cascading concrete stairs was considered to provide an accessible path of travel, such improvements would pose broader circulation restrictions at the landings and would require substantial modifications to the existing site elements (e.g., the cascading stairs, certain areas of hex paving, wood cribbing or retaining walls) to support the lifts. To be used for storage, the building would be seismically retrofitted with hold-down hardware at shear wall boundaries and with added plywood sheathing on the three solid exterior walls. Removing the character-defining exterior cabin lining cladding to install these components can be invasive, but reinstalling the removed cladding or replacing in kind to match would meet the SOI Standards. This assumes that the added plywood sheathing and hold-down hardware would not add substantial depth to the walls. If used for storage, the accessibility work would involve installing automatic doors to accommodate wheelchairs and mobility devices and adding tactile strips where necessary.

  Rehabilitation of the Office Center in compliance with the SOI Standards would have no significant change to historic resources. However, use of the building would be limited to storage due to a non-accessible path of travel to the Middle Level.

- **Electric Vault (Building F).** The vault below the Office Center would be retained and renovated on the interior to accommodate replacement electrical equipment to serve the nearby buildings. No structural or accessibility work would be proposed. As the Electric Vault is a non-contributor to the eligible Historic District, and as the proposed renovation would be on its interior, the work would not have any effect on historic resources.

In summary, all contributors within the Project site could be rehabilitated and retained following the SOI Standards while addressing most, but not all, structural repair, seismic retrofits, and accessibility and other code requirements, with the notable exception of the Stair Tower/Restroom/Office.

Additions, exterior alterations, and related new construction would be visible, but generally would be able to be constructed with minimal effect following the SOI Standards. The most visible changes to the overall eligible Historic District would be those necessary to address accessibility, particularly in providing accessible paths to building interiors. Under the SOI Standards Compliant Alternative, the approach would be piecemeal in that ADA access would be provided at each individual building or site feature, rather than implementing an integrated approach that connects the buildings and site areas, such as a central elevator (as proposed under the Project). Thus, accessible connectivity among the buildings and levels would remain lacking since there would not be direct ADA-compliant paths to connect all site and building levels. Additionally, at the Stair Tower/Restroom/Office, full accessibility could not be achieved for its Level 1 restroom and Level 3 office while complying with the SOI Standards. This piecemeal approach to accessibility may not ultimately be permitted by the Campus Building Official.

Overall, the SOI Standards Complaint Alternative would avoid the proposed Project's significant impact to a historic resource by retaining the eligibility and a sufficient level of integrity of the Sunset Rec Historic District for listing in the California Register under Criterion 3 (Design/Construction). However, accessibility challenges would persist, certain spaces may be restricted in terms of use, and it is uncertain whether such an approach would be permitted by the Campus Building Official due to these constraints.

Ability to Meet the Project Objectives

The SOI Standards Complaint Alternative would not fulfill the underlying purpose of the proposed Project to the same extent as the proposed Project. While the multipurpose spaces at Sunset Rec that are no longer usable would be restored, due to inaccessibility of certain areas and restrictions in use for specific structures, there would not be an equivalent capacity for recreational programming to that previously available. Following is a discussion of the Secretary of the Interiors Standards Compliant Alternative's ability to attain the Project objectives.

- Provide several modern, flexible, multi-use rooms to replace existing deficient spaces used for 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.

  This objective would not be met since there would be no new facilities constructed, including modern, flexible, multi-use rooms.

- Continue to co-locate recreational facilities near existing student housing and associated student amenities in the Northwest zone of the campus, which is the zone on campus designated in the UCLA Long Range Development Plan (LRDP) to include residential facilities and support functions for undergraduate students.

This objective would be met, but not to the same degree as the proposed Project, since most but not all of the existing recreational facilities at Sunset Rec, which is located in the Northwest zone of the campus, would continue to be available for recreational programming under this alternative.

- Address existing structural and existing seismic safety deficiencies to comply with the UC Seismic Safety Policy and to provide an acceptable level of safety for students, employees, and the public.

  This objective would be met since the existing buildings would be structurally improved to address safety concerns and meet building and seismic requirements.

- Support inclusive programming and address existing accessibility deficiencies by providing a recreational facility that meets current ADA requirements and improves overall site accessibility, including connectivity between buildings/uses.

  This objective would not be met to the same degree as the proposed Project since the existing buildings would be improved to substantially meet current ADA requirements on a building-by-building basis, rather than implementing a cohesive, site-level accessibility plan to provide connectivity between the various facilities and topographic levels within Sunset Rec. Additionally, certain facilities that cannot fully meet ADA requirements and be SOI compliant would remain inaccessible. Site accessibility overall would not be improved to the same degree as the proposed Project.

- Concentrate new development within a previously developed area on campus in order to most efficiently use the limited land resources of a mature urban University.

  This objective would not be met to the same degree as the proposed Project. There would be no new development or increase in building area as anticipated by this objective, and the proposed improvements would occur within the previously developed area. However, the proposed Project more efficiently uses limited land resources by reducing the overall development footprint while increasing the overall building floor area available for recreational programming.

- Enhance recreational facilities at Sunset Rec while preserving Sunset Canyon's unique, natural setting and related open spaces by minimizing building footprint(s), retaining trees and landscaping, and siting development in a manner that respects the site's varying topography.

  This objective would not be met to the same degree as the proposed Project. Existing buildings that are red-tagged or otherwise not currently occupiable would be available for recreational programming, which would enhance the recreational facilities at Sunset Rec compared to existing conditions. However, the building footprint would not be minimized and overall recreational programming at Sunset Rec would not be enhanced to the same level that would be accomplished with implementation of the proposed Project, since site connectivity would be restricted and certain facilities would remain limited in use.

- Design recreational spaces that integrate indoor and outdoor areas and foster a sense of connection with the surrounding landscape.

  This objective would not be met to the same degree as the proposed Project. Rather than construction of a new recreational building, existing buildings would be improved to individually meet current ADA requirements while still meeting SOI Standards, and certain areas would remain inaccessible. Further, to meet ADA requirements and provide access to existing buildings and spaces, the accessibility improvements would lack continuity. Site

accessibility overall would not be improved to the same degree as the proposed Project, and the integration of indoor and outdoor areas would be hindered.

5.5.4 ALTERNATIVE 3: PARTIAL PRESERVATION AND CODE COMPLIANT ALTERNATIVE

Description of the Alternative

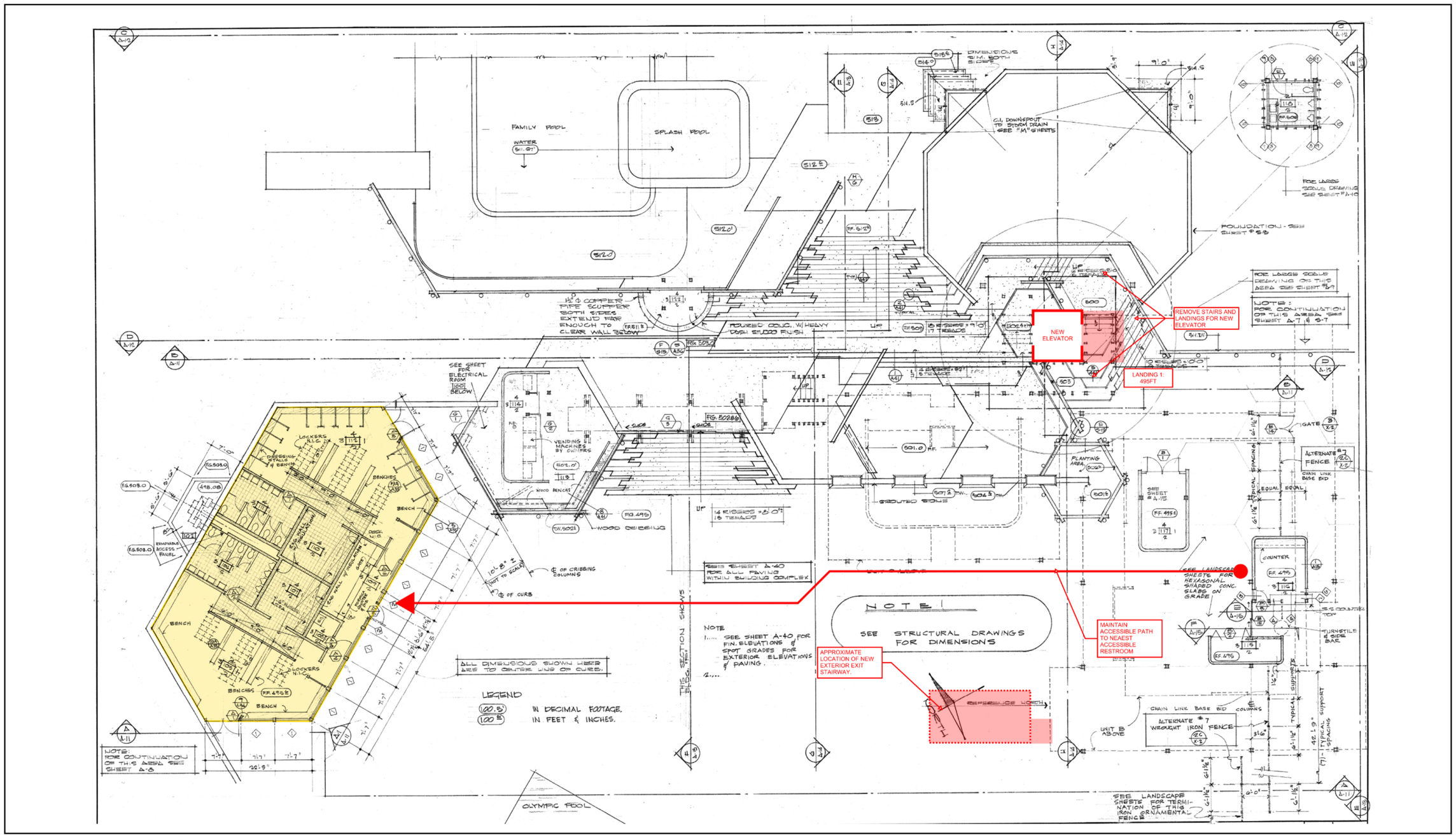
The Partial Preservation and Code Compliant Alternative would rehabilitate most of the existing buildings proposed for demolition as part of the proposed Project to address the safety issues while meeting most of the seismic and accessibility requirements. It is assumed the CHBC would be applied where possible under the provisions of the code. Where it is not possible, approaches consistent with the SOI Standards would be implemented, such as designing and installing code-compliant and SOI Standards-compatible guardrails where needed.

This alternative would involve demolition of the Stair Tower/Restroom/Office and its replacement with a new elevator tower to provide accessible routes and connectivity among the Vista Room, the Buenos Aires Room, and the Santa Fe Room (refer to Figure 5-1 and Figure 5-2). Landings on opposite sides of the elevator shaft would be provided at a total of four levels, with ramps connecting to the three adjacent buildings:

- Landing 1: Lower Level (at 495 ft, the finished grade shown on the original 1963-1964 drawings)
- Landing 2: Vista Room Level 2 (505 ft)
- Landing 3: Santa Fe Room Level 2 (510 ft)
- Landing 4: Buenos Aires Room at the Upper Level (515 ft)

No landing at the Middle Level (503 ft) would be included, as insufficient height exists to allow for two stacked stops to access the Middle Level and the Santa Fe Room (510 ft). Accordingly, access to the Office Center would be limited due to the lack of an ADA-compliant accessible path. Therefore, it is assumed under this alternative that use of the building would be restricted to storage.

The exterior stairway of the Stair Tower/Restroom/Office could not be replaced in-kind due to space constraints and new elevator landings. Therefore, a new exterior stairway would be needed at the Vista Room to provide secondary emergency access. A new exterior stairway is shown on Figure 5-1 at the southwest corner of the Vista Room, closest to the Park Pool, which would allow for the entrance sequence and path at Level 1 of the building. A new accessible restroom would also be constructed within the Buenos Aires Room to replace restrooms that would be removed in the Stair Tower/Restroom/Office. Table 5-5 provides a summary of the proposed physical improvements at each building.

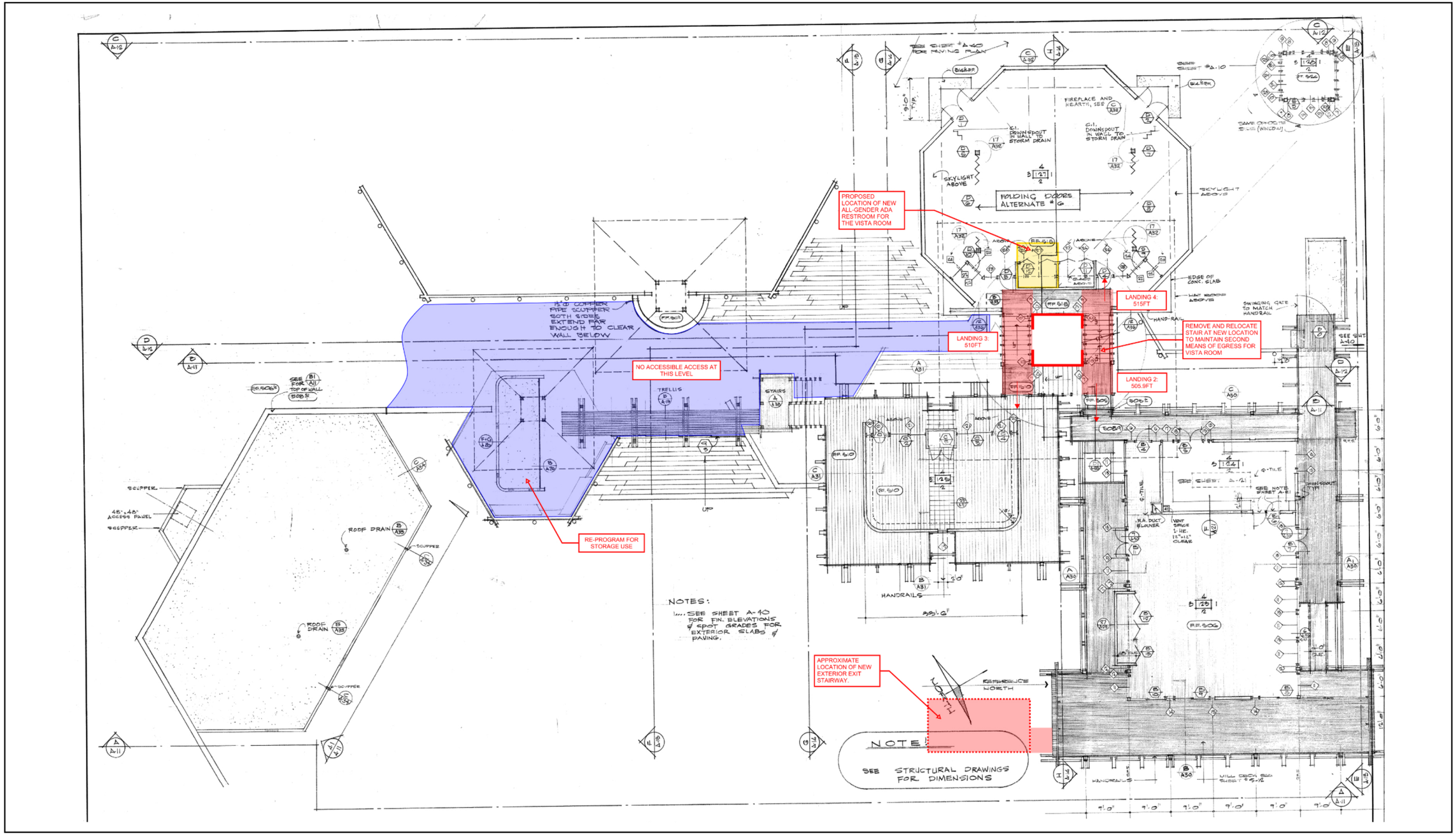


Source(s): Smith & Williams; Safdie Rabines Architects

Figure 5-1

Not to Scale

Building A2 (Stair Tower/Restroom/Office) Elevator Tower Replacement – Level 1



Source(s): Smith & Williams; Safdie Rabines Architects

Figure 5-2

Not to Scale

Building A2 (Stair Tower/Restroom/Office) Elevator Tower Replacement – Level 2

TABLE 5-5
PARTIAL PRESERVATION AND CODE COMPLIANT ALTERNATIVE SUMMARY OF PHYSICAL IMPROVEMENTS

Sunset Canyon Rec Center Building (1963 Designation)	Structural Retrofit Improvements	Accessibility Upgrades / Code Required Work
Building A – Vista Room (Unit B)	Undergo structural repair and seismic retrofit to meet acceptable UC Seismic Performance rating: <u>Repair</u> • Remove and replace all deteriorated structural wood members, including posts and beams <u>Retrofit</u> • Remove and replace wall finishes (interior and/or exterior) • Add hold-down hardware at shear wall boundaries • Add plywood sheathing at existing walls • Provide new transfer beams below discontinuous shear walls • Add moment frame or other SOI Standards compliant approach instead of shear walls, if permitted by Campus Building Official.	Meet accessibility requirements at Levels 1 and 2: • Add accessible restrooms at Level 1 • Add ramp from new elevator to Vista Room at Level 2 • Widen doorways and install automatic doors at all entrances to accommodate wheelchairs and mobility devices • Relocate all light switches, thermostats, and other controls to accessible heights Install new compatible railings at Level 2 exterior wood walkway Install new exterior stairway for a second means of egress
Building A1 – Buenos Aires Room (Unit D)	N/A	Improve accessibility: • Install ramp at building entrance next to Family Pool • Add ramp from new elevator to Buenos Aires Room • Add tactile strips and handrails to stairs at entrance • Install automatic doors to accommodate wheelchairs and mobility devices • Relocate all light switches, thermostats, and other controls to accessible heights • Construct new accessible restroom within the Buenos Aires Room.
Building A2 – Stair Tower/Restroom/Office (Unit E)	N/A Demolish existing building and replace with new elevator tower that would meet current structural codes.	N/A Demolish existing building and replace with new elevator tower with openings on two sides for the elevator, four new landings, and ramps from the landings to access Vista Room, Buenos Aires Room, Santa Fe Room. Exterior stairway would not be replaced, as space constraints and elevator landings would not allow for stair replacement.

Sunset Canyon Rec Center Building (1963 Designation)	Structural Retrofit Improvements	Accessibility Upgrades / Code Required Work
Building C – Santa Fe Room (Unit C)	Undergo structural repair and seismic retrofit to meet acceptable UC Seismic Performance rating: <u>Repair</u> • Remove and replace all deteriorated structural wood members, including posts and beams <u>Retrofit</u> • Remove and replace wall finishes (interior and exterior) • Add hold-down hardware at shear wall boundaries • Add plywood sheathing at existing walls	Meet accessibility requirements at Level 2 (Santa Fe Room): • Add ramp from new elevator to Santa Fe Room • Install automatic doors to accommodate wheelchairs and mobility devices • Add tactile strips where necessary • Relocate all light switches, thermostats, and other controls to accessible heights Meet accessibility requirements at seating area: • Additional ramps, paving, or other modifications may be necessary Install new compatible railings at Level 2 exterior wood walkway.
Building D – Lookout/ Lifeguard Station (Unit F)	Undergo seismic retrofit to meet acceptable UC Seismic Performance rating: Provide new lateral resisting system (e.g., timber braces, steel braces, cantilever, steel columns, etc.) at non-historic enclosure Repair or replace in kind the deteriorated wood canopy (i.e., historic "hat" structure)	Meet accessibility requirements: • Install automatic door to accommodate wheelchairs and mobility devices • Add tactile strips where necessary. • Relocate all light switches, thermostats, and other controls to accessible heights
Building E – Office Center (Unit G)	Undergo seismic retrofit to meet acceptable UC Seismic Performance rating to use the building for storage: • Add hold-down hardware at shear wall boundaries • Add plywood sheathing on three walls • Remove and replace wall finishes	Meet certain accessibility requirements: • Install automatic doors to accommodate wheelchairs and mobility devices • Add tactile strips where appropriate • Relocate all light switches, thermostats, and other controls to accessible heights
Building F – Electric Vault (N/A)	N/A Retain and renovate space as needed to accommodate replacement electrical equipment to serve the buildings.	N/A Retain and renovate space as needed to accommodate replacement electrical equipment to serve the buildings.

Source: (Page & Turnbull, 2023b); Safdie Rabines Architects and Nabih Youssef Associates.

Comparative Analysis of Environmental Impacts

The changes to contributors and the eligible Historic District resulting from the Partial Preservation and Code Compliant Alternative are described below and summarized in Table 10 of the Alternatives Analysis Report in Appendix B of this Draft SEIR.

- **Vista Room (Building A).** The Vista Room would be retained and rehabilitated. The structural repair and seismic retrofit work would be the same as proposed under the SOI Standards Compliant Alternative, with an assumption that a SOI Standards compliant approach such as moment frames would meet UC Seismic Performance requirements and would be permitted by the Campus Building Official. If moment frames cannot provide the same or better level of retrofit as shear walls at Level 1, then the shear walls would have the same potential to significantly change the building's historic character as the SOI Standards Compliant Alternative.

  The accessible upgrades at Level 1 and Level 2 would also be similar to the SOI Standards Compliant Alternative, though instead of an elevator or platform lift on the interior or exterior of the building, the accessible route to Level 2 would be provided by the central elevator at the Stair Tower/Restroom/Office.

  The exterior wood walkway at Level 2 would also require new code-compliant railings designed in a manner that is compatible with the building's historic character and following the SOI Standards. This may somewhat change the historic character of the building but should be more visually compatible than the latticework that has been added previously at the guardrails.

  The new exterior stairway for the second means of egress for Level 2 would be highly visible and has the potential to change the building's historic character if a SOI Standards-compliant design could not be achieved. However, the relatively small stair addition would not be so intrusive as to result in the loss of integrity for the building or for it to lose its status as a district contributor.

  Under the Partial Preservation and Code Compliant Alternative, the Vista Room would still retain its eligibility as a contributor despite the visible alterations.

- **Buenos Aires Room (Building A1).** The scope of work for the Buenos Aires Room would generally be the same as under the SOI Standards Compliant Alternative, with the added construction of an accessible restroom within the building. The new restroom would replace a closet but would not result in a significant change to the building. Overall, the effect of the alterations under this alternative would be minimal and likely compliant with the SOI Standards. In addition, the new elevator at the Stair Tower/Restroom/Office would provide an accessible route directly to the Buenos Aires Room from the Lower Level. Under the Partial Preservation and Code Compliant Alternative, the effect on the Buenos Aires Room would be minimal and can be SOI Standards compliant.

- **Stair Tower/Restroom/Office (Building A2).** The Stair Tower/Restroom/Office would be demolished and replaced with a new elevator tower. While the design of a new elevator tower may attempt to replicate the original architectural style, the wraparound staircase could not be replicated due to space constraints, and ultimately removal of the existing structure would represent the loss of a contributor to the eligible Historic District. Additionally, portions of the nearest cascading concrete steps at the Middle Level, paving, and associated site context would be modified and/or removed, thus affecting a portion of the unifying landscape and site elements contributor.

- **Santa Fe Room (Building C).** Structural repair and seismic retrofit to the Santa Fe Room would be similar to the SOI Standards Compliant Alternative. An accessible route to the Santa Fe Room at Level 2 would be accomplished by the new elevator, and the other accessibility and code requirements would be addressed in the same manner as under the SOI Standards Compliant Alternative. This includes new code-compliant guardrails at the Level 2 exterior wood walkway designed in a manner that is compatible with the building's historic character and following the SOI Standards. This may somewhat change the historic character of the building but should be more visually compatible than the latticework that has been added previously at the guardrails. Under the Partial Preservation and Code Compliant Alternative, the changes to the Santa Fe Room would be minimal and SOI Standards compliant.

- **Lookout/Lifeguard Station (Building D).** The seismic retrofit and accessibility work would affect the non-historic building (enclosure), which would not affect historic features and would have no effect on historic resources. The structural repair involves repairing or replacing in-kind the historic "hat" roof structure at the Lookout/Lifeguard Station, as its wood structural members are deteriorated. This would be accomplished following the SOI Standards, specifically Standard 6 that allows for in-kind replacement of deteriorated features when the severity of deterioration is such that repair is no longer possible. Replacing the historic "hat" roof structure in kind following the SOI Standards, matching the design, color, texture, and material, would not have a significant effect on the contributor or the eligible Historic District.

- **Office Center (Building E).** Because an accessible route to the Middle Level and this building would not be accomplished by the new elevator, the Office Center would be used for storage only. The building would be seismically retrofitted with hold-down hardware at shear wall boundaries and with added plywood sheathing on the three solid exterior walls. Removing the character-defining exterior cabin lining cladding to install these components can be invasive, but reinstalling the removed cladding or replacing it in kind to match would meet the SOI Standards. This assumes that the added plywood sheathing and hold-down hardware would not add substantial depth to the walls. The accessibility work if used for storage would involve installing automatic doors to accommodate wheelchairs and mobility devices and adding tactile strips where necessary. These should be able to be accomplished following the SOI Standards and preservation best practices without significantly altering the character of the building. Under the Partial Preservation and Code Compliant Alternative, the changes to the Office Center would be minimal and likely can be SOI Standards compliant. However, its use would be restricted to storage due to non-compliance with full accessibility requirements.

- **Electric Vault (Building F).** The vault below the Office Center would be retained and renovated on the interior to accommodate replacement electrical equipment to serve the nearby buildings. No structural or accessibility work would be proposed. As the Electric Vault is a non-contributor to the eligible Historic District, and the proposed renovation would be on its interior, the work would not have any effect on historic resources.

In summary, under the Partial Preservation and Code Compliant Alternative only one contributor would be lost, instead of the six under the proposed Project, and a new central elevator would be constructed in the place of the Stair Tower/Restroom/Office. The five remaining contributors within the Project site boundary would be rehabilitated to address structural repair, seismic retrofits, and accessibility and other code requirements while likely complying with the SOI Standards.

Therefore, the Partial Preservation and Code Compliant Alternative would lessen impacts to historic resources compared to the proposed Project. Furthermore, the Partial Preservation and Code Compliant Alternative is not expected to render ineligible the Historic District, despite the losses. Losing the Stair Tower/Restroom/Office as a contributor would further erode the eligible Historic District's integrity, but the retention of the Vista Room, the Buenos Aires Room and the Santa Fe Room in their existing locations with their spatial relationships to each other and the rest of the site would still render the district as recognizable and convey its significance as a mature work of Smith and Williams. The new elevator tower would be in approximately the same location as the Stair Tower/Restroom/Office and would not be highly intrusive within the district.

The addition of a new exterior stairway at the Vista Room may be highly visible and affect the building's historic character, but likely not to the point where it would no longer be considered a contributor. The structural and accessibility work at the other contributors would generally be minor and likely can be accomplished following the SOI Standards. The proposed work at the lone non-contributor, the Electric Vault, would be on the interior and would have no effect on the eligible Historic District.

Overall, the Partial Preservation and Code Compliant Alternative would avoid the Project's significant impact to a historic resource by retaining the eligibility and sufficient level of integrity of the Sunset Rec Historic District for listing in the California Register under Criterion 3 (Design/Construction). It should be noted that under this alternative, the Middle Level and the Office Center would not have an accessible route from the new elevator, and thus use of that building would be restricted.

Ability to Meet the Project Objectives

The Partial Preservation and Code Compliant Alternative would not fulfill the underlying purpose of the proposed Project to the same extent as the proposed Project. While the multipurpose spaces at Sunset Rec that are no longer usable would be restored, due to the inaccessibility of certain areas and restrictions in use for specific structures, there would not be an equivalent capacity for recreational programming to that previously available. Following is a discussion of the Partial Preservation and Code Compliant Alternative's ability to attain the Project objectives.

- Provide several modern, flexible, multi-use rooms to replace existing deficient spaces used for 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.

  While the existing multipurpose rooms would be made available under this alternative, this objective would not be met since there would be no new facilities constructed, including modern, flexible, multi-use rooms.

- Continue to co-locate recreational facilities near existing student housing and associated student amenities in the Northwest zone of the campus, which is the zone on campus designated in the UCLA Long Range Development Plan (LRDP) to include residential facilities and support functions for undergraduate students.

  This objective would be met since the existing recreational facilities at Sunset Rec, which is located in the Northwest zone of the campus, would continue to be used for recreational programming under this alternative.

- Address existing structural and existing seismic safety deficiencies to comply with the UC Seismic Safety Policy and to provide an acceptable level of safety for students, employees, and the public.

This objective would be met since buildings would be improved to meet UC seismic performance requirements and currently vacant buildings would be re-occupied.

- Support inclusive programming and address existing accessibility deficiencies by providing a recreational facility that meets current ADA requirements and improves overall site accessibility, including connectivity between buildings/uses.

  This objective would not be met to the same degree as the proposed Project since the existing buildings would be improved to each individually meet current ADA requirements, but connectivity between the various facilities would occur via the new elevator tower rather than via direct paths of travel between buildings. Additionally, certain areas of the site would remain inaccessible and/or limited in use. Specifically, no landing at the Middle Level would be included, as insufficient height exists to allow for two stacked stops to access the Middle Level and the Santa Fe Room. Thus, the Office Center could not be fully used. Further, to meet ADA requirements and provide access to existing buildings and spaces, various additional accessibility improvements and facilities would need to be constructed under this alternative (e.g., new exterior ramps, new restroom, new exterior stairway) based on existing site constraints. These accessibility improvements would lack sitewide continuity, and while they would provide access to most of the building spaces, site accessibility overall would not be improved to the same degree as under the proposed Project.

- Concentrate new development within a previously developed area on campus in order to most efficiently use the limited land resources of a mature urban University.

  This objective would not be met to the same degree as the proposed Project. The proposed improvements would occur within the previously developed area; however, there would be no new development or increase in building area as anticipated by this objective. Additionally, the proposed Project more efficiently uses limited land resources and preserves more open space by reducing the overall development footprint while increasing the overall building floor area available for recreational programming.

- Enhance recreational facilities at Sunset Rec while preserving Sunset Canyon's unique, natural setting and related open spaces by minimizing building footprint(s), retaining trees and landscaping, and siting development in a manner that respects the site's varying topography.

  The proposed Project, with increased building area compared to existing conditions, would occur within a reduced development footprint compared to existing conditions. Therefore, it would enhance recreational facilities and minimize the building footprint while preserving Sunset Canyon's unique, natural setting and related open spaces. Under the Partial Preservation and Code Compliant Alternative, this objective would not be met to the same degree as the proposed Project since the enhancements to recreational facilities would not be as extensive as with the proposed Project. Re-occupation of existing buildings for recreational programming would be accomplished, but there would be no increase in areas available for recreational programming, and certain areas would remain inaccessible, as described previously above.

- Design recreational spaces that integrate indoor and outdoor areas and foster a sense of connection with the surrounding landscape.

  This objective would be met but not to the same degree as the proposed Project. The Stair Tower/Restroom/Office would be demolished and replaced with an elevator, and there would be no landing at the Middle Level, thus reducing the access and connectivity within Sunset Rec, as well as the ability to integrate indoor and outdoor areas.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. As evaluated in Section 5.5.1 above, the No Project/Mothballing Alternative would retain all of the eligible Historic District's contributors with minimal work to stabilize and secure the buildings and would retain the Sunset Rec Historic District's eligibility for the California Register. Therefore, the No Project/Mothballing Alternative would avoid the proposed Project's significant and unavoidable impact to a historic resource and would be the environmentally superior alternative. However, CEQA Guidelines Section 15126.6(e)(2) states that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

As evaluated in Sections 5.5.2 and 5.5.3 above, each of the "build" alternatives under consideration would also retain the Sunset Rec Historic District's eligibility for the California Register and would avoid the proposed Project's significant and unavoidable impact to a historic resource. This includes the following alternatives, both of which would be environmentally superior to the proposed Project:

- Alternative 2: Secretary of the Interior Standards Compliant Alternative
- Alternative 3: Partial Preservation and Code Compliant Alternative

The Partial Preservation and Code Compliant Alternative would involve the demolition of one of the 10 contributors to the Sunset Rec Historic District (Stair Tower/Restroom/Office) and its replacement with a new elevator tower in approximately the same location. The retained contributors would be mostly rehabilitated in compliance with the SOI Standards for structural repairs, seismic retrofits, and other code-required work, including accessibility upgrades where the spaces would be accessible. However, the Middle Level would not have an accessible route even with a new central elevator, and thus use of the Office Center would be restricted.

The SOI Standards Compliant Alternative would retain all of the contributors and rehabilitate those within the Project site in compliance with the SOI Standards. Most of the structural repairs and seismic retrofit would be able to be accomplished, along with other code-required work, but providing accessible routes would not be possible to all contributors. In addition, the accessible routes that could be provided in compliance with the SOI Standards would not offer a connected or continuous accessible path through the site. Nonetheless, because it would retain all of the contributors to the Sunset Rec Historic District, the SOI Standards Compliant Alternative is considered environmentally superior to the proposed Project and the Partial Preservation and Code Compliant Alternative.

While the SOI Standards Compliant Alternative would be the environmentally superior alternative, as discussed in Section 5.5.5, it would not fulfill the underlying purpose of the proposed Project to the same extent as the Project and would only fully meet one of the Project's objectives. The remaining objectives would not be met or would not be met to the same extent as the proposed Project.

SECTION 6.0 OTHER CEQA CONSIDERATIONS

6.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

The California Environmental Quality Act (CEQA) Guidelines Section 15128 requires that an environment impact report (EIR) "…contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of the Initial Study." The Initial Study prepared for the proposed Sunset Canyon Recreation Replacement Building Project (proposed Project), which includes this information, is included in Appendix A of this Draft Supplemental EIR (SEIR).

The Initial Study, which is tiered from the Long Range Development Plan (LRDP) EIRs,[1] identifies environmental issues for which the proposed Project would result in no impacts, less than significant impacts, or less than significant impacts with implementation of the previously adopted campus programs, practices, and procedures (PPs) and mitigation measures (MMs) included in in the UCLA LRDP Mitigation Monitoring and Report Program (MMRP) (collectively, the LRDP PPs and MMs). Based on the Project-level analysis included in the Initial Study, the University of California has determined that: (1) the analysis results for the following environmental issues identified in CEQA Guidelines Appendix G do not alter the conclusions of the impact analysis in the LRDP EIRs; (2) these issues are adequately addressed in the LRDP EIRs; and (3) further evaluation of these issues in this Draft SEIR is not required. A summary of the impact conclusion for each environmental issue is provided below, and the detailed analysis is included in the Initial Study provided in Appendix A of this Draft SEIR.

- **Aesthetics (Initial Study Section V.1).** The redevelopment of the Project site with the proposed replacement building would not have substantial adverse effect on a scenic vista because the proposed Project would not impact panoramic views and would not impact a focal view as defined in the LRDP EIRs.

  There are no State scenic highways located near the UCLA campus; therefore, the proposed Project would not damage scenic resources within a State scenic highway.

  While there would be a visual change as a result of the proposed Project, the proposed Project incorporates applicable LRDP PPs and MMs and would not conflict with regulations governing scenic quality at the UCLA campus, including the UCLA Physical Design Framework and LRDP PPs related to design. This impact would be less than significant.

  With incorporation of applicable LRDP MMs, the proposed Project, which would replace existing buildings at Sunset Rec with one new building, would not result in a substantial new source of light or glare, and this impact would be less than significant.

[1] The UCLA LRDP Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (LRDP Final Subsequent EIR) (State Clearinghouse [SCH] No. 2017051024) (UCLA, 2018) was certified by the University of California Board of Regents (The Regents) in January 2018. The LRDP Final Subsequent EIR 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) (UCLA, 2009), 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 anticipated when the 2009 LRDP EIR was prepared. As the LRDP Final Subsequent EIR incorporates the 2009 LRDP EIR by reference, they collectively serve as the CEQA documentation for construction and operation of development at the UCLA main campus and are referred to herein as the "LRDP EIRs."

- **Agricultural and Forestry Resources (Initial Study Section V.2).** No impact to agricultural or forestry resources would result from implementation of the proposed Project because no farmland, agricultural activity, forest land, or timberland exist on the campus, including the Project site; no portion of the campus is zoned for agricultural, forest land, or timberland; and the campus is not under a Williamson Act Contract.

- **Air Quality (Initial Study Section V.3).** The proposed Project would not conflict with or obstruct implementation of the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) because: (1) construction and operation of the proposed Project would not exceed established thresholds of significance and therefore would not increase the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP; and (2) the proposed Project would not result in new students, faculty, or staff at UCLA and would not conflict with or exceed the growth assumptions in the AQMP.

  With incorporation of the LRDP PPs and MMs, regional criteria pollutant emissions resulting from construction of the proposed Project would not exceed the thresholds of significance established by the SCAQMD. Operational emissions from the proposed Project would be less than operational emissions from the existing buildings. Therefore, 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.

  Construction and operation of the proposed Project would not exceed SCAQMD's localized significance thresholds (LSTs) at the nearest receptor location. Additionally, the proposed Project, which would not increase daily vehicle trips, would not increase vehicular delays at any intersections and there would be no potential for a carbon monoxide (CO) hotspot resulting from the proposed Project. Occupants of the nearby on-campus residences and nearby buildings would not be exposed to substantial toxic air pollutants from construction equipment exhaust, and the proposed recreational building does not involve any uses or activities that would generate toxic air contaminants (TACs) during operations. Therefore, potential impacts to sensitive receptors associated with exposure to substantial pollutant concentrations would be less than significant.

  Additionally, construction and operation of the proposed Project would not generate any other emissions, such as those leading to odors, that would impact a substantial number of people, thus resulting in a less than significant impact.

- **Biological Resources (Initial Study Section V.4).** 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 onsite. Therefore, the proposed Project does not have the potential to impact special status plant or wildlife species.

  The Project site does not support riparian habitat, sensitive natural communities, or wetlands; therefore, the proposed Project would have no impact to these resources.

  The campus, including the Project site, does not contain suitable habitat that could be used as a wildlife corridor and does not facilitate regional connectivity to core wildlife habitat, and there are no established wildlife corridors on the campus. Therefore, no impacts to wildlife movement would occur. The proposed Project would involve the removal of existing ornamental vegetation and 12 mature trees (including one protected tree) within the Project site. If removal of trees and vegetation occurs during the breeding season, construction of the proposed Project could directly and/or indirectly impact nesting

birds, including nesting raptors. However, the proposed Project incorporates applicable LRDP MMs that require tree replacement and protection, as well as the protection of nesting birds and raptors. Therefore, impacts to nesting birds and raptors would be less than significant, and the proposed Project would not conflict with policies protecting biological resources.

The campus is not located within an area governed by a Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP); therefore, the proposed Project would not conflict with such plans and no impact would result.

- **Cultural Resources – Archaeological Resources and Human Remains (Initial Study Section V.5).** Excavations of up to approximately 25 feet below the ground surface (bgs) would be required for construction of the proposed Project and would encroach into native alluvial sediments. Therefore, there is a potential for previously unidentified subsurface archaeological resources to be encountered during construction. The proposed Project incorporates applicable LRDP MMs that would ensure the protection of archaeological resources, should they be present, and this impact would be less than significant.

  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 on campus, including at the Project site, is extremely low. The proposed Project incorporates the applicable LRDP PP that identifies actions to take in the unlikely event human remains are discovered, and this impact would be less than significant.

- **Energy (Initial Study Section V.6).** The proposed Project would incorporate applicable LRDP PPs and MMs addressing energy conservation and 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, and this impact would be less than significant.

  The proposed Project would replace existing buildings that do not meet current University of California or State energy conservation requirements. The proposed Project would meet or exceed the requirements and intent of the UC Policy on Sustainable Practices (last revised July 13, 2023),[2] the UCLA Sustainability Plan, and State requirements 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 not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Accordingly, all impacts related to consistency with energy plans and policies would be less than significant.

- **Geology and Soils (Initial Study Section V.7).** The campus, including the Project site, is not within an Alquist-Priolo Earthquake Fault Zone or a City-designated Preliminary Fault Rupture Study Area, and there would be no impact related to surface rupture of a

[2] On July 13, 2023, subsequent to the publication and public review of the NOP and Initial Study, the University of California adopted revisions to the University of California Policy on Sustainable Practices (UC, 2023). Among other requirements, the revised Policy on Sustainable Practices requires that new buildings on UC property achieve a minimum standard of a Leadership in Energy and Environmental Design (LEED) Gold rating. As identified in Section 3.0, Project Description, of this SEIR, the proposed Project has been designed to achieve a minimum LEED Gold rating consistent with the updated Policy on Sustainable Practices, and the proposed Project design would strive to achieve a LEED Platinum rating.

known earthquake fault. However, as with all development on campus and in southern California, including the existing buildings at Sunset Rec (including several buildings that are seismically deficient), the proposed replacement building would be susceptible to moderate to strong, seismically induced ground shaking. The removal of buildings that are deemed seismically or structurally deficient, and/or that do not meet current California Building Code (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 would reduce the exposure of people or structures to potential substantial adverse effects from strong seismic groundshaking. Based on existing site conditions, the potential for seismically induced landslides is considered low, and the potential for seismically induced liquefaction is considered very low. Further, with incorporation of applicable LRDP PPs and Project-level MM Sunset GEO-1, which requires implementation of recommendations from the site-specific Geotechnical Investigation, potential Project impacts associated with seismic hazards would be less than significant.

During construction activities, soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. Construction-related erosion impacts would be less than significant with adherence to existing regulations and incorporation of LRDP PPs and MMs, including implementation of a Storm Water Pollution Prevention Plan (SWPPP). 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.

The Project site is underlain by artificial fill materials from past grading and construction activities and Pleistocene age older alluvial fan deposits. Due to existing groundwater levels (greater than a depth of 40 feet bgs), the Project site is not subject to liquefaction. Additionally, there is a low potential for ground subsidence, and the on-site soils have a very low expansion potential. Laboratory testing of soil materials indicates the on-site soils are corrosive to buried ferrous metals on-site. Because the proposed Project incorporates applicable LRDP PPs addressing geology and soils, there would be a less than significant impact related to unstable or expansive soils. Additionally, MM Sunset GEO-1 would ensure implementation of the Project-specific recommendations from the Geotechnical Investigation.

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.

Although no unique geologic features exist at the Project site, the rock units underlying the campus, including the Project site, are considered paleontologically sensitive. Excavations of up to approximately 25 feet bgs would be required for construction of the proposed Project and would encroach into native alluvial sediments. Therefore, there is a potential for previously unidentified subsurface paleontological resources to be encountered during construction. Accordingly, the proposed Project incorporates applicable LRDP MMs that would ensure the protection of paleontological resources, should they be present, and this impact would be less than significant.

- **Greenhouse Gas Emissions (Initial Study Section V.8).** When taking into consideration the greenhouse gas (GHG) emissions from the existing buildings that would be demolished with implementation of the proposed Project, there would be a net reduction in GHG emissions. The proposed Project's net (as well as gross) GHG emissions would be less than the SCAQMD-recommended Tier 3 thresholds 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.

The proposed Project would not increase vehicular trips and would involve the replacement of existing buildings that do not meet current requirements for energy conservation. The proposed Project would incorporate applicable LRDP PPs and MMs that require compliance with the UC Policy on Sustainable Practices and implementation of measures that serve to reduce GHG emissions. In addition to the UC Policy on Sustainable Practices, the proposed Project would comply with the UCLA Climate Action Plan, UCLA Sustainability Plan, and relevant State and regional plans, policies and regulations adopted for the purpose of reducing GHG emissions. Impacts related to consistency with applicable plans and policies would be less than significant.

- **Hazards and Hazardous Materials (Initial Study Section V.9).** The existing buildings at Sunset Rec to be demolished include asbestos-containing materials (ACMs), asbestos-containing construction materials (ACCMs), lead-based paint (LBP), and other environmentally regulated materials (e.g., polychlorinated biphenyls [PCBs], and diethylhexl phthalate [DEHPs]). 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. Adherence to federal and state health and safety laws and regulations, as well as applicable LRDP PPs would ensure a less than significant impact associated with the potential release of hazardous building materials during demolition activities and the transport, use, and handling of hazardous materials.

  Groundwater is not anticipated to be encountered during excavation activities; however, if any contaminated soil and/or groundwater is discovered, the proposed Project incorporates applicable LRDP PPs, which require compliance with federal and State regulations, and would ensure that impacts associated with the potential exposure to contaminated soil or groundwater are less than significant.

  Hazardous materials may be used during operations at the Project site for cleaning and landscape maintenance; however, there would 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 during operation would not increase. Operation of the proposed Project would also comply with applicable federal, state, and local laws and regulations and with the existing LRDP PPs, and this impact would be less than significant.

  Consistent with the existing uses at Sunset Rec, the proposed Project 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 nearby existing schools. With continued compliance with federal, state, and local regulations pertaining to hazardous materials and incorporation of the applicable LRDP PPs, this impact would be less than significant.

  The Project site is not included on the list of known hazardous materials sites identified on campus pursuant to Section 65962.5 of the California Government Code (i.e., the Cortese List).

  The Ronald Reagan UCLA Medical Center (RRUMC) helistop is located approximately 0.6 mile southeast of the Project site. Based on the Project site elevations and the proposed building height, the proposed Project would not penetrate the established 8:1 approach/departure surface for the helistop, consistent with the requirements of the California Department of Transportation (Caltrans) Aeronautics Heliport Permit. Further, the Project site is located outside the 65-dBA helicopter noise level contour, and the noise

levels experienced at the Project site from a limited number of daily helicopter flights would not be excessive. Impacts related to the RRUMC helistop would be less than significant.

Sunset Rec serves as a regional evacuation area for the campus Northwest zone. In compliance with LRDP PPs, construction activities 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. This impact would be less than significant.

The Project site is not located in a City of Los Angeles Wildfire Severity Zone, and there would be no impact related to wildland fires from implementation of the proposed Project.

- **Hydrology and Water Quality (Initial Study Section V.10).** The proposed Project incorporates LRDP PPs and MMs and would be required to adhere to applicable requirements at the time of construction to ensure that discharges of construction-related and post-construction pollutants remain less than significant. This includes implementation of best management practices (BMPs) during construction and operation. As discussed previously, based on the depth of groundwater and proposed depth of excavation, groundwater is not anticipated to be encountered during excavation activities. Therefore, the proposed Project would not degrade surface water or groundwater quality, and this impact would be less than significant.

  Because the proposed Project would result in an overall increase in pervious surface coverage as compared to existing conditions and given the relatively small size of the Project site (approximately 0.86 acre), the proposed Project would not result in a notable change in the associated recharge capability of the Santa Monica Groundwater Basin as a whole. Additionally, the proposed Project would not involve direct withdrawal of groundwater. Therefore, the proposed Project would not substantially decrease groundwater supplies and would not conflict with a groundwater sustainability plan. Groundwater impacts would be less than significant.

  There are no existing natural drainages at the Project site, and the proposed Project would not substantially alter the existing drainage pattern of the Project site or area. Stormwater runoff would continue to be conveyed to the existing storm drain system and as required by the applicable LRDP PP and MM, 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 to identify Project-specific BMPs to reduce the runoff rate and volume to appropriate levels. This impact would be less than significant.

  The Project site is not located within a flood zone or within an area subject to inundation from a tsunami, seiche or other water feature. No impact from the release of pollutants due to inundation would occur.

  As discussed above, the proposed Project would be implemented in accordance with applicable water quality regulations and would not impact groundwater resources. Therefore, 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.

- **Land Use and Planning (Initial Study Section V.11).** 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. No impact would occur.

  The proposed Project would improve recreational facilities at Sunset Rec, would incorporate applicable LRDP PPs and MMs, and would not conflict with the applicable

academic, physical, and operational development objectives identified in the LRDP or any other local or regional plan or policy. This impact would be less than significant.

- **Mineral Resources (Initial Study Section V.12).** The campus is not in an area classified as having locally important or known mineral resources, and the proposed Project would not result in the loss of availability of a known mineral resource.
- **Noise (Initial Study Section V.13).** 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 site during construction, and this impact would be less than significant. Notwithstanding, LRDP PPs and MMs that serve to reduce construction-related noise impacts would be incorporated into the proposed Project.

  Project operations, which would maintain the same hours of operations as existing conditions, 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. Furthermore, 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. Pursuant to the applicable LRDP PP, new stationary noise sources (e.g., HVAC system) located in proximity to noise-sensitive buildings and uses would be shielded and would not create significant noise impacts to nearby noise-sensitive uses. Additionally, 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. Operational noise impacts would be less than significant.

  The nearest structures to the Project site are within Sunset Rec and not considered vibration-sensitive uses. With adherence to the applicable LRDP MM, potential construction-related vibration impacts would be less than significant. Additionally, the construction access routes for the proposed Project include paved, generally smooth roads. Therefore, groundborne vibration from traffic would be rarely perceptible. As such, the proposed Project would not expose occupants of buildings adjacent to construction access routes to excessive groundborne vibration levels, and this impact would be less than significant.

  As previously discussed, 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 associated with the RRUMC helistop. Accordingly, as with existing conditions at Sunset Rec, the helicopter noise levels experienced by people at the proposed replacement building would not be excessive, and this impact would be less than significant.
- **Population and Housing (Initial Study Section V.14).** The proposed Project involves the removal and replacement of seven existing Sunset Rec buildings with one new building. There would not be a change in the overall recreational programming at Sunset Rec, and 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. No impact would occur.
- **Public Services (Initial Study Section V.15).** The proposed Project involves the removal and replacement of seven existing Sunset Rec buildings with one new building. The proposed Project would incorporate LRDP PPs and MMs addressing fire and police protection; would not change the programming at Sunset Rec; and would not increase the campus population. As such, the Project would not result in an increase in demand for public services (i.e., fire, police, schools, parks, or other public services) such that new or physically altered public service facilities would be required to serve the proposed Project

or to maintain acceptable service levels or response times. No physical environmental impacts would result, and impacts would be less than significant.

- **Recreation (Initial Study Section V.16).** The proposed Project involves the removal and replacement of seven existing Sunset Rec buildings with one new building to support existing recreational programming at Sunset Rec. The proposed Project would not 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. The potential environmental impacts resulting from construction and operation of the proposed Project, which is a recreational facility, have been fully evaluated in the Initial Study included in Appendix A and this Draft SEIR.

- **Transportation (Initial Study Section V.17).** The proposed Project incorporates applicable LRDP PPs and MMs that limit the number of average daily trips (ADT) and parking spaces on campus; require implementation of a Transportation Demand Management (TDM) program; and identify actions to be taken during construction to ensure construction activities do not impede vehicular and non-vehicular modes of transportation and emergency access. The proposed Project would not increase trips generated by Sunset Rec operations and would enhance pedestrian circulation within Sunset Rec. Therefore, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be less than significant.

  Because 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, the proposed Project would not generate a net increase of daily vehicle trips and would not generate an increase in daily vehicle miles traveled (VMT), resulting in a less than significant VMT impact.

  The proposed Project would incorporate LRDP PPs that outline requirements for maintaining vehicular and non-vehicular modes of transportation during construction, would replace existing recreational facilities with a new building, would improve on-site pedestrian circulation, and would not change the off-site circulation system. Therefore, the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use or result in inadequate emergency access. These impacts would be less than significant.

- **Tribal Cultural Resources (Initial Study Section V.18).** The Project site is currently developed and has been subject to previous ground disturbance. No tribal cultural resources, including those listed or eligible for listing in the California Register of Historical Resources (California Register) or in a local register of historical resources, have ever been recovered or recorded on or near the Project site, and no tribal cultural resources are known to exist. Potential impacts to unknown tribal cultural resources, should such resources be encountered during subsurface excavation, would be less than significant with incorporation of the LRDP MM requirements.

- **Utilities and Service Systems (Initial Study Section V.19).** The proposed Project would result in a net increase of 4,518 gross square feet (gsf) of development within Sunset Rec and a net increase of 693 gsf of covered, unenclosed space. The net increase in development resulting from the proposed Project is consistent with the remaining development allocation for the campus and the Northwest zone under the LRDP and is therefore within the established demand projections for the campus. Additionally, LRDP PPs and MMs that include requirements for water and energy conservation and solid waste reduction would be incorporated into the proposed Project. Existing utility

infrastructure onsite would be removed and new infrastructure would be installed as necessary to serve the proposed replacement building, and the physical impacts associated with these utility improvements have been evaluated in the Initial Study included in Appendix A and this Draft SEIR. The proposed Project would not require the installation of new or expanded utility infrastructure offsite. Impacts would be less than significant.

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 presented in the Initial Study conservatively assumes no change in overall water consumption at Sunset Rec. Additionally, with no net increase in water demand resulting from the proposed Project, there would be sufficient water supplies for implementation of the proposed Project and particularly in light of improved water conservation and efficiency with implementation of the proposed Project. A less than significant impact related to water supply would occur.

Because wastewater generation is correlated with water usage, continued water conservation practices required by the LRPD PPs would reduce the volume of wastewater generated at Sunset Rec. However, 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 City of Los Angeles Hyperion Water Reclamation Plant. There would be a less than significant impact related to adequate wastewater treatment capacity to serve the proposed Project's projected demand in addition to the provider's existing commitments.

The proposed Project incorporates LRDP PPs and MMs related to solid waste management and would be constructed and operated in compliance with applicable University of California and State requirements related to solid waste generation from construction and operation. The proposed Project would not increase the amount of solid waste generated from operations at Sunset Rec and therefore would not generate solid waste in excess of State or local standards, or in excess of the capacity of the local infrastructure. Additionally, the proposed Project would comply with applicable federal, State, and local management and reduction statutes and regulations related to solid waste. Therefore, this impact would be less than significant.

- **Wildfire (Initial Study Section V.20).** 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. Additionally, the Project site is not located in a very high fire hazard severity zone. Therefore, the proposed Project would have no impacts related to wildfires.

6.2 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. As discussed in Section 4.1, Cultural Resources, of this Draft SEIR, even with implementation of Project-specific MMs, the proposed Project would result in a significant impact to a historic resource due the removal of core recreation buildings, landscape and site elements, and associated character defining features that represent six of the 10 contributors to the identified Sunset Canyon Recreation Center Historic District, which is eligible for listing in the California Register. There is no feasible mitigation to reduce this impact to a less than significant level, and this would be considered a significant and unavoidable impact. As further discussed in Section 5.0, Alternatives, of this Draft SEIR, this impact could be avoided with implementation of the following alternatives

to the proposed Project: No Project/Mothballing Alternative, Secretary of the Interior Standards Compliant Alternative, and Partial Preservation and Code Compliant Alternative. However, these alternatives would require modifications to the proposed Project that would not fulfill the underlying purpose or meet key Project objectives or would not meet the key Project objectives to the same degree as the proposed Project. Notably, these alternatives would preclude use of much of the existing floor area and multipurpose space, thus constraining Sunset Rec programming and/or would not provide cohesive access and connectivity throughout the Sunset Rec site and facilities. Adoption of a Statement of Overriding Considerations is required for the proposed Project.

In addition, CEQA Guidelines Section 15126.2(c) requires that an EIR describe the reasons why the project is proposed, notwithstanding the effects of the identified significant and unavoidable impact(s). As described in detail in Section 3.0, Project Description, of this Draft SEIR, the proposed Project is intended to replace several existing deficient buildings in order to enhance the recreational facilities at Sunset Rec while preserving Sunset Canyon's unique, natural setting. Under existing conditions, due to the inability to use the Vista Room, Santa Fe Room, Stair Tower/Restroom/Office, and Office Center at Sunset Rec, combined with access constraints associated with the current design and the resulting limitations in space available for recreational programming, the existing main building complex can no longer meet the needs of the campus population. The proposed Project would specifically address the existing structural and seismic safety deficiencies to comply with the UC Seismic Safety Policy and provide an acceptable level of safety, as well as existing accessibility deficiencies by providing a recreational building that meets current ADA requirements and supports inclusive programming. Moreover, the proposed Project would allow for the continued co-location of recreational facilities near existing student housing and associated student amenities in the Northwest zone, which is the area on campus designated in the UCLA LRDP to include residential facilities and support functions for undergraduate students. Refer to Section 3.3, Background and Need for the Project, for further discussion of the need for the proposed Project.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(d) requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Specifically, Section 15126.2(d) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or

- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy) (further discussed in Section 6.5, below).

The environmental effects related to the implementation of the proposed Project are discussed in the Initial Study included in Appendix A, and in Section 4.1, Cultural Resources, of this Draft SEIR. The proposed Project involves 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. Therefore, the proposed Project would result in a net increase of 4,518 gsf of development within Sunset Rec in the Northwest zone of the campus, as well as a net increase of 693 gsf of covered, unenclosed space. As described in Section 3.4, Environmental Setting, of this Draft SEIR, the Project site is currently developed with various uses supporting UCLA Recreation operations. The long-term commitment of land resources within Sunset Rec to site development and supporting recreational uses occurred with the original development of the site in the 1960s. Therefore, the proposed building replacement at Sunset Rec would not change the commitment of land resources on campus; rather, the proposed Project would commit UCLA to continue providing recreational opportunities in the Northwest zone of campus. The University of California's ownership of the campus represents a long-term commitment of the land to the University's education, research, and community service mission. As with the existing buildings, after the lifespan of the proposed building is reached, restoration of the Project site to pre-developed conditions would not be likely given the degree of disturbance, the urbanization of the surrounding area, and the level of capital investment.

Construction and long-term operation of the proposed Project would require the commitment and reduction of nonrenewable and/or slowly renewable resources, including but not limited to: (1) petroleum fuels and natural gas (e.g., for vehicle emissions and construction activities): and (2) lumber, sand/gravel, steel, copper, lead, and other metals (for use in construction). Other resources that are slow to renew and/or recover from environmental stressors would continue to be impacted by implementation of the proposed Project, similar to existing operations at Sunset Rec. These include air quality through the combustion of fossil fuels; production of GHGs; and water supply through the continued potable water demands for drinking, cleaning, landscaping, and general maintenance needs. Therefore, as with existing conditions, implementation of the proposed Project represents an irreversible commitment of the land and energy resources. However, it is noted that the rooftop solar photovoltaic (PV) canopy would fully offset the proposed Project's electricity demand, and since natural gas service at the Project site would be discontinued, there would be a net reduction in energy demand compared to the existing buildings.

With respect to operational activities on campus, continued compliance with all applicable building codes, as well as applicable previously adopted LRDP PPs and MMs would ensure that all natural resources are conserved to the maximum extent possible. Additionally, the amount and rate of consumption of resources during operation would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources. It is also possible that new technologies or systems will emerge or will become more cost-effective or user-friendly to further reduce the campus reliance upon nonrenewable natural resources.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with a project. While the campus uses, transports, stores, and disposes of hazardous wastes, as described in Section V.9, Hazards and Hazardous Materials, of the Initial Study included in Appendix A of this Draft SEIR, the campus complies with all applicable federal and State laws, industry best practices, and adopted LRDP PPs related to hazardous materials, which reduces the likelihood and severity of accidents that could result in irreversible environmental damage. In addition, the campus office of Environment, Health and

Safety (EH&S) administers and monitors compliance with UCLA's health and safety plans and procedures related to hazardous materials, as well as applicable regulations, to ensure that all campus practices with respect to hazardous materials use are adequate. Further, the proposed Project would not change the recreational programming at Sunset Rec or the types of hazardous materials used during construction and operation. Thus, the potential for the proposed Project to cause irreversible environmental damage from an accident or upset of hazardous materials would be less than significant.

6.4 GROWTH-INDUCING IMPACTS

Pursuant to CEQA Guidelines Section 15126.2(e), an EIR must include a discussion of the ways in which a proposed project could directly or indirectly foster economic development or population growth or the construction of additional housing, either directly or indirectly, and how that growth would, in turn, affect the surrounding environment. Growth can be induced in a number of ways, including the elimination of obstacles to growth or through the stimulation of economic activity within the region. The discussion of removal of obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval.

In general, a project may foster spatial, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project removes an obstacle to population growth.
- The project results in an increase in population that requires the need to expand or construct new public service facilities to maintain desired levels of service that could result in significant environmental effects.
- Economic expansion or growth occurs in an area in response to the project that could result in other activities that could significantly affect the environment (e.g., changes in revenue base, employment expansion).
- The project establishes a precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment (e.g., a change in zoning or general plan amendment approval).

If a project meets any one of these criteria, it may be considered growth-inducing. Growth-inducing projects are typically located in either isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways or encouraging premature or unplanned growth. Growth-inducing effects are not necessarily beneficial, detrimental, or of little significance to the environment (CEQA Guidelines Section 15126.2[e]). This analysis is presented to provide additional information on ways in which the proposed Project could contribute to significant changes in the environment beyond the direct consequences of implementing the proposed Project, as examined in the Initial Study included in Appendix A and this Draft SEIR.

1. **Would this project remove obstacles to population growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?** The proposed Project represents a continuation of the use of the UCLA campus for University purposes and would be consistent with objectives for the campus as outlined in the current LRDP. Specifically, the proposed Project would replace existing buildings at Sunset Rec with one new building and would continue the current operational programming at Sunset Rec. Additionally, as discussed above, the proposed

Project would be constructed and operated in compliance with all applicable building codes and the applicable previously adopted LRDP PPs and MMs. Therefore, the proposed Project would not result in a change in the operation of the campus and would not remove an impediment or obstacle to growth. While the proposed Project would slightly increase the total amount of building area within Sunset Rec (a net increase of 4,518 gsf), this increase is within the LRDP development allocation remaining for the Northwest zone.

The proposed Project would not require the installation of new roadways or utility infrastructure serving the campus and would not encourage growth through the provision of such infrastructure, nor would it result in urbanization of land in a remote location. The UCLA campus is located in a highly urbanized area that is served by an extensive network of electricity, water, sewer, storm drain, communications, roadways, and other infrastructure. With the exception of installation of on-site utility infrastructure to connect to existing facilities, no new utility infrastructure would be required. The utility infrastructure installed as part of the proposed Project would be sized and located expressly to serve the proposed replacement building, and would not, therefore, induce growth in the Project vicinity. Further, the area surrounding the campus consists of dense urban development with limited opportunities for substantial growth. Growth would be limited primarily to redevelopment of existing land uses.

2. **Would this project result in the need to expand one or more public services to maintain desired levels of service?** As discussed in Section V.15, Public Services, of the Initial Study included in Appendix A of this Draft SEIR, the proposed Project would incorporate the LRDP PPs and MMs addressing fire and police protection; would not change the programming at Sunset Rec; and would not increase the campus population. As such, the Project would not result in an increase in demand for public services (i.e., fire, police, school, parks, or other public services) such that new or physically altered public service facilities would be required to serve the proposed Project or to maintain acceptable levels of service. No physical environmental impacts would result.

3. **Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?** During Project construction, a number of design, engineering, and construction-related jobs would be created. This would last until Project construction is completed. This would be a temporary, indirect, growth-inducing effect of the Project.

   The operation of the proposed Project would not result in growth inducement as a result of economic expansion or population growth. The addition of population in an area has the potential to increase the amount of spending, thereby stimulating the economic activity of the area. Increased future employment generated by spending can ultimately result in the physical development of space or the need for services to accommodate additional employees to serve the new population. It is the provision of this physical space and its specific location that will determine the magnitude of environmental impacts of the additional economic activity. The proposed Project would not result in an increase in the campus population or indirectly generate other population growth or related economic effects that would result in other activities that could significantly affect the environment.

4. **Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?** A decision by the University of California to approve the design and funding for the proposed Project is not a precedent-setting action. Projects on campus are considered on a case-by-case basis and the approval of one project does not necessarily lead to or influence other development approvals in the future. Notably, the proposed actions would not increase the amount of anticipated development on campus, would not

change recreational programming at Sunset Rec or elsewhere on campus, and would not increase the campus population. The proposed Project does not include any actions that would encourage and/or facilitate other activities that could significantly affect the environment.

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