UCLA Health Sports Medicine Institute Project
(5210 Pacific Concourse Tenant Improvements)

Draft Initial Study/Mitigated Negative Declaration

Lead Agency: University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607

Prepared By: T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, California 92602

November 2025

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UCLA HEALTH SPORTS MEDICINE INSTITUTE PROJECT
(5210 Pacific Concourse Tenant Improvements)
UNIVERSITY OF CALIFORNIA, LOS ANGELES

Project No. 906021.01

Initial Study and Environmental Checklist Form

I. PROJECT INFORMATION

1. PROJECT TITLE

UCLA Health Sports Medicine Institute Project

2. LEAD AGENCY NAME AND ADDRESS

University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607

3. CONTACT PERSON AND PHONE NUMBER

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4. PROJECT LOCATION

5210 Pacific Concourse Drive
Los Angeles, California 90045
(Refer to Figure 1)

5. PROJECT SPONSOR'S NAME AND ADDRESS

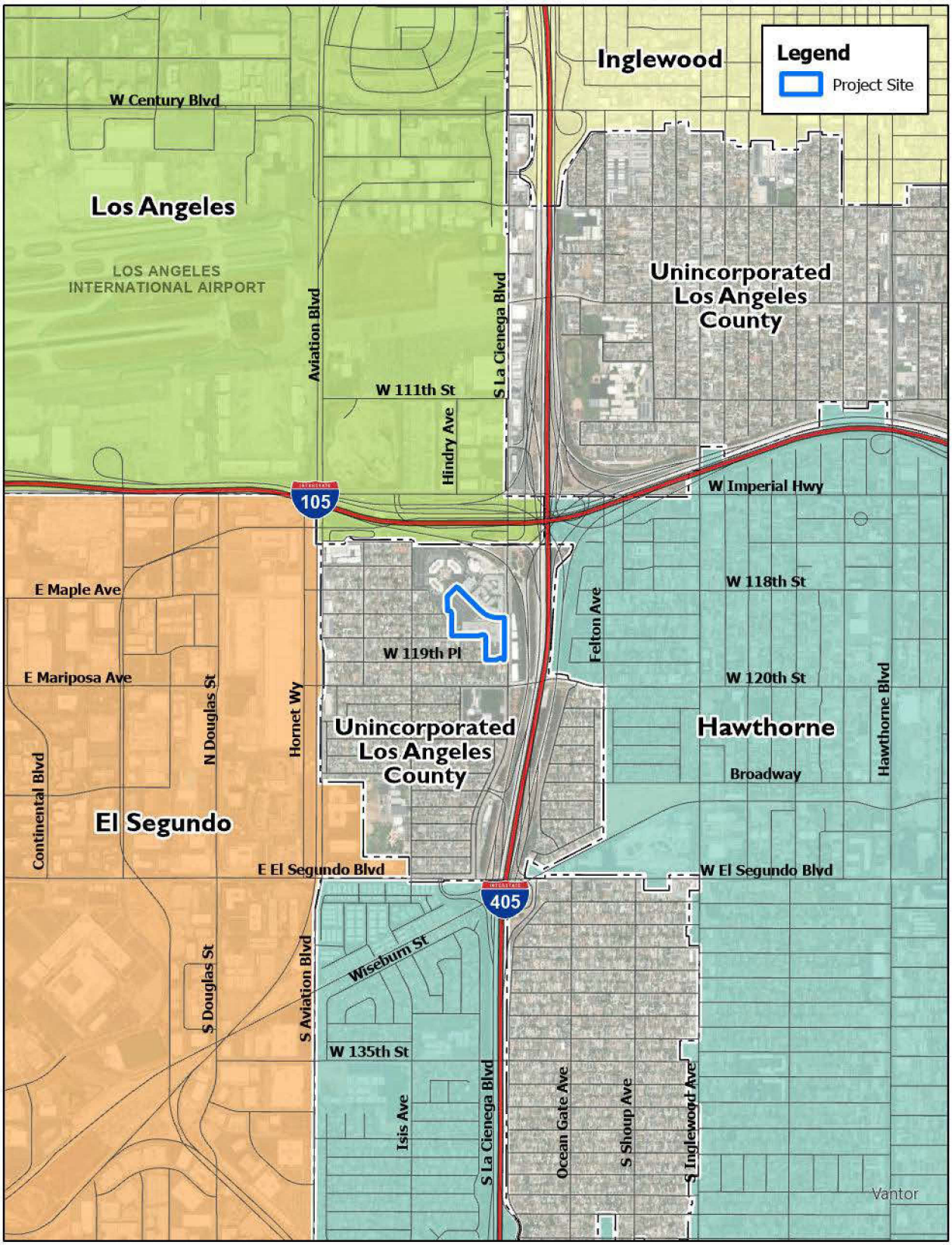
Amy Kraft, AIA
Senior Director
UCLA Health – Real Estate | Planning, Design and Construction
10924 Le Conte Avenue
Los Angeles, CA 90095-7095

6. CUSTODIAN OF THE ADMINISTRATIVE RECORD FOR THIS PROJECT

Same as listed under No. 3 above.

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

Because the Project site is located off campus, this Initial Study/Mitigated Negative Declaration is not tiered from the UCLA Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (referred to herein as the "LRDP Final SEIR") (State Clearinghouse [SCH] No. 2017051024).



Source(s): Esri, LA County (2025)

Figure 1

0 500 1,000 2,000 Feet

Regional and Local Vicinity Map

The LRDP Final SEIR was certified by the University of California Board of Regents (The Regents) in January 2018 (UCLA 2018).[1] However, pursuant to Section 15150 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines), the LRDP Final SEIR is hereby incorporated by reference, primarily for the discussion of regional environmental setting and relevant planning documents, as well as with regard to previously adopted programs, practices, and procedures (PPs) and mitigation measures (MMs) which may be applied to this Project, as appropriate, as discussed further below. The LRDP Final SEIR is available for inspection at the address listed under No. 3 above and at https://www.capitalprograms.ucla.edu/Planning/LongRangeDevelopmentPlan.

Introduction

The California Environmental Quality Act (CEQA) requires that government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. Therefore, in accordance with CEQA (Public Resources Code [PRC] Sections 21000 et seq.), the CEQA Guidelines (14, California Code of Regulations [CCR], Sections 15000 et seq.), and the Amended University Procedures for the Implementation of CEQA, effective March 17, 1989, this Initial Study has been prepared to support a Mitigated Negative Declaration (MND) and analyzes the potential environmental effects of the proposed UCLA Health Sports Medicine Institute Project (proposed Project; also known as the 5210 Pacific Concourse Tenant Improvements). This Initial Study includes a description of the proposed Project and location of the Project site, evaluation of the potential environmental impacts of Project implementation, a proposed finding that the proposed Project will not have a significant effect on the environment, and recommended mitigation measures to lessen or avoid impacts on the environment.

As noted above, pursuant to Section 15150 of the CEQA Guidelines, the LRDP Final SEIR is hereby incorporated by reference. In conjunction with certification of the LRDP Final SEIR and approval of the LRDP Amendment (2017) and Student Housing Projects, The Regents adopted a Mitigation Monitoring and Reporting Program (LRDP MMRP). The LRDP MMRP ensures that mitigation measures (MMs) that are the responsibility of the University of California are implemented in a timely manner. Although the Project site is not located within the UCLA campus which is subject to the LRDP, this Initial Study identifies relevant programs, practices, and procedures (PPs) and MMs from the LRDP MMRP that would reduce any potentially significant impacts of the proposed Project and includes new MMs identified to reduce Project-specific environmental impacts to a less than significant level, where applicable. The relevant LRDP PPs and MMs have been incorporated into the proposed Project and will be reflected in the Project-specific MMRP. Throughout the Initial Study, where applicable LRDP PPs or MMs have been identified, the PPs and/or MMs are referenced verbatim from the LRDP Final SEIR. This numbering system enables the public and other users of this document to cross reference these procedures and measures with the LRDP Final SEIR and align the mitigation monitoring procedures for the proposed Project with the previously adopted LRDP MMRP.

Following review of the proposed Project, it has been determined that it qualifies as a "project" under CEQA, and the University of California proposes to adopt an MND. In accordance with the CEQA Guidelines, an MND is the appropriate environmental document for the proposed Project

[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.

because, after incorporation of applicable LRDP PPs and MMs and Project-specific MMs, the proposed Project would not result in any significant and unavoidable impacts. All Project impacts that are potentially significant even with incorporation of LRDP PPs and MMs, can be mitigated to a level that is considered less than significant with Project-specific MMs. Specifically, this Initial Study identifies and proposes adoption of Project-specific mitigation to reduce operational noise associated with rooftop mechanical equipment. Additionally, although not required to reduce impacts to a less than significant level, Project-specific mitigation would be implemented to minimize potential impacts to tribal cultural resources. In addition to addressing the potential environmental impacts that would result from the proposed Project, this Initial Study serves as the primary environmental document for all future activities associated with the proposed Project, including all discretionary approvals requested or required to implement the proposed Project.

This Initial Study, along with a Notice of Intent to Adopt an MND, has been posted on the State Office of Planning and Research (State Clearinghouse) CEQAnet Web Portal for review by state agencies and has been circulated to any responsible agencies, trustee agencies, and interested parties, as required by CEQA, for a 30-day public review. Following receipt and evaluation of any comments from agencies, organizations, and/or individuals, the University of California will determine whether any substantial new environmental issues have been raised. It is anticipated that the proposed Project will subsequently be considered by The Regents at their meeting in January 2026.

II. PROJECT DESCRIPTION

UCLA Health proposes the adaptive reuse of an existing approximately 170,000-gross-square-foot (gsf) two-story life sciences building located at 5210 Pacific Concourse Drive in unincorporated Los Angeles County (County). The proposed Project would create a new Sports Medicine Institute, relocate an off-campus UCLA Health Clinical Microbiology Laboratory, and include a community fill pharmacy and specialty pharmacy. In addition to the adaptive reuse of the existing building for these uses, the proposed Project includes improvements to the building utility systems, accessibility improvements, safety and security upgrades, utility infrastructure upgrades, and minor modifications to the existing landscaping and surface parking.

The Project site encompasses approximately 9.2 acres, including the existing building and adjacent surface parking areas. The majority of the proposed improvements would be associated with the existing building. The exterior physical impact areas encompass approximately 40,774 square feet (sf) (less than one acre). More detailed information regarding the Project Description is provided in Section II.1.-i.5 , Proposed Project Components, below.

1. PROJECT LOCATION

The proposed Project is located at 5210 Pacific Concourse Drive within the community of Del Aire, in the County of Los Angeles.[2] The Project site is located southwest of the Interstate (I) 105 and I-405 interchange, less than one mile southeast of the Los Angeles International Airport (LAX), and approximately 0.3 mile southeast of the Los Angeles Metro C Line Aviation/Imperial Station (refer to Figure 1, which depicts the regional location and local vicinity). The Pacific Ocean is located approximately 3.75 miles west of the Project site.

[2] Assessor Parcel Number (APN) 4140016164.

2. ENVIRONMENTAL SETTING

As shown on the aerial photograph provided on Figure 2 and the existing site plan provided on Figure 3, the Project site is developed with the existing approximately 170,000-gsf building and surface parking. There is also ornamental landscaping (consisting primarily of trees and turf) located throughout the site. The existing tilt-up concrete building includes two levels with 15-foot ceilings. The building was partially renovated in 2020 and has been vacant since late 2024. There are former laboratory, office, and cafe uses on the first level and primarily vacated office space on the second level.

On-site equipment associated with the existing building includes but is not limited to a hydraulic trash compactor and one 500 horsepower (hp) diesel emergency generator located south of the building; plus two natural gas boilers with rated heat input capacities of 990 thousands of British thermal units per hour (MBH) and 1,530 MBH, respectively, and six direct expansion air conditioning units, all of which are located on the existing roof. There is a detached steel building (approximately 400 gsf), previously used for the storage of hazardous materials and waste, located on the west side of the building.

The Project site is accessed from the north via a gated driveway along Pacific Concourse Drive and from the southeast via a gated driveway along La Cienega Boulevard. Both driveways are used for emergency vehicle, delivery truck, and visitor access.

The Project site is relatively flat and gradually slopes from northwest to southeast; the site elevation is approximately 90 feet above mean sea level (AMSL). There are some localized low points in the parking lot to capture stormwater runoff. There are currently three utility access easements crossing the Project site near the building: a 14-foot storm drain easement north of the building, and a 10-foot sanitary sewer easement and 10-foot storm drain easement south of the building. As further discussed in Section II.5 under “Utilities/Infrastructure” below, there is existing utility infrastructure within the Project site to serve the existing building.

There is no natural vegetation and there are no stream channels or otherwise sensitive hydrologic or biological resources within or near the Project site. However, as further discussed in Section V.4, Biological Resources, of this Initial Study, there are 191 mature trees within the Project site limits. The trees are generally in good health, except for some of the London plane trees (*Platanus X hispanica*) that occur within the tree wells in the surface parking areas.

The Project site is surrounded by multi-family residential uses, parking, the Los Angeles County Courthouse, National University and UCLA Health uses to the north (north of Pacific Concourse Drive) and northwest; single-family residential uses to the west and south; and commercial and light-industrial uses to the east (east of La Cienega Boulevard). There is an existing eight-foot concrete masonry unit (CMU) wall along the western and southern boundaries of the Project site that provides a physical barrier between the Project site and the adjacent residential community. Existing conditions of the site and surrounding area are depicted on the site photographs provided on **Error! Reference source not found.**a and Figure 4b.

Due to its constitutional autonomy, the University of California is not subject to local land use regulations. However, for contextual purposes, the Project site has a County of Los Angeles General Plan land use designation of Light Industrial (IL) and is zoned Manufacturing-Industrial Planned Development (MPD) (LA County, 2025a). Further, the Project site is located in the South Bay Planning Area within the community of Del Aire.

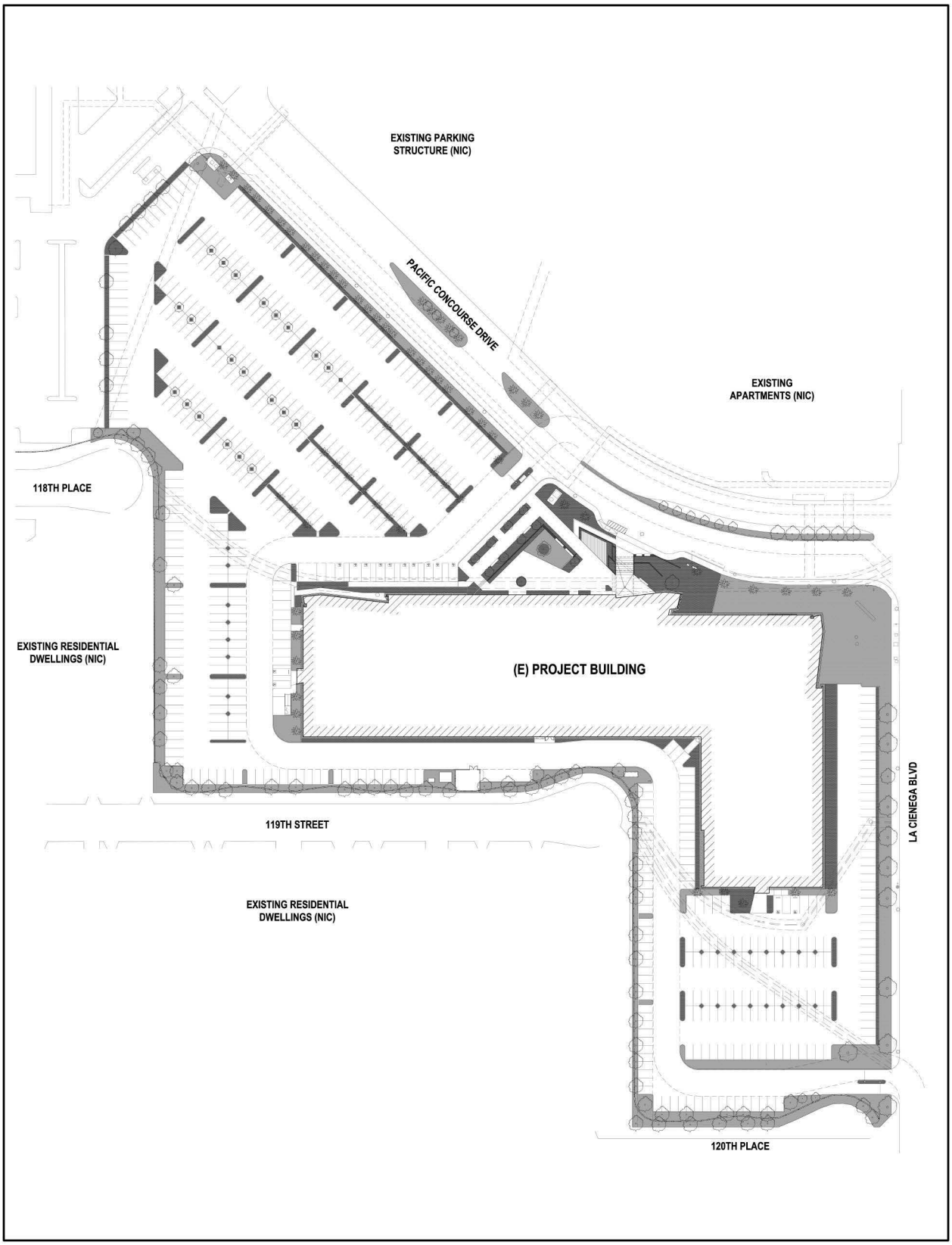


Source(s): Esri, LA County (2025), Nearmap Imagery (April 2025)

Figure 2

0 50 100 200
Feet

Aerial Photograph



Source(s): HDR (07-25-2025)

Figure 3

Not to Scale

Existing Site Plan

Source(s): Esri, Nearmap Imagery (April 2025)

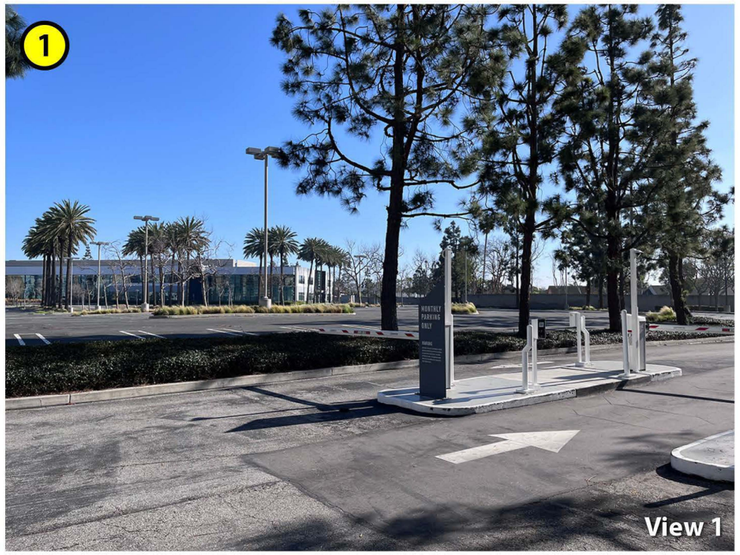










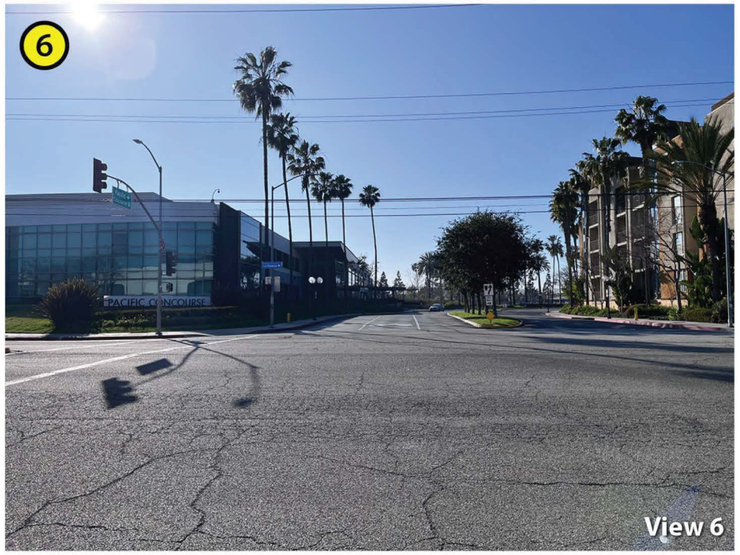


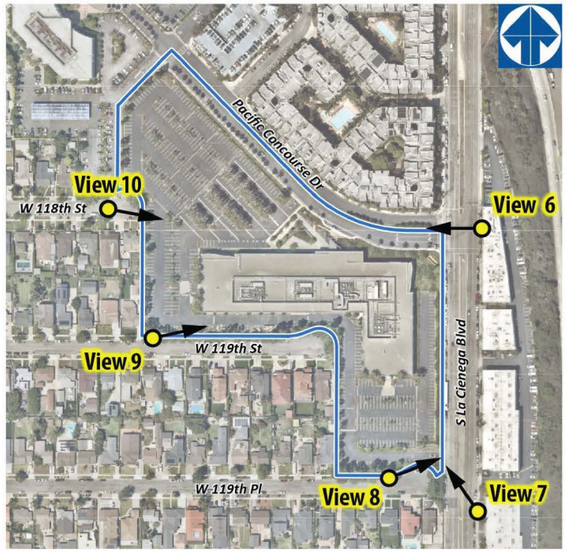
Figure 4a

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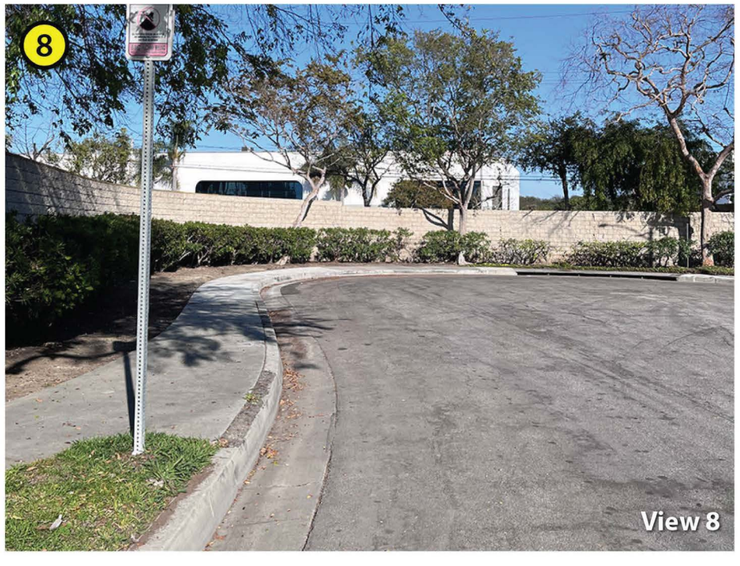
Site Photographs

Source(s): Esri, Nearmap Imagery (April 2025)









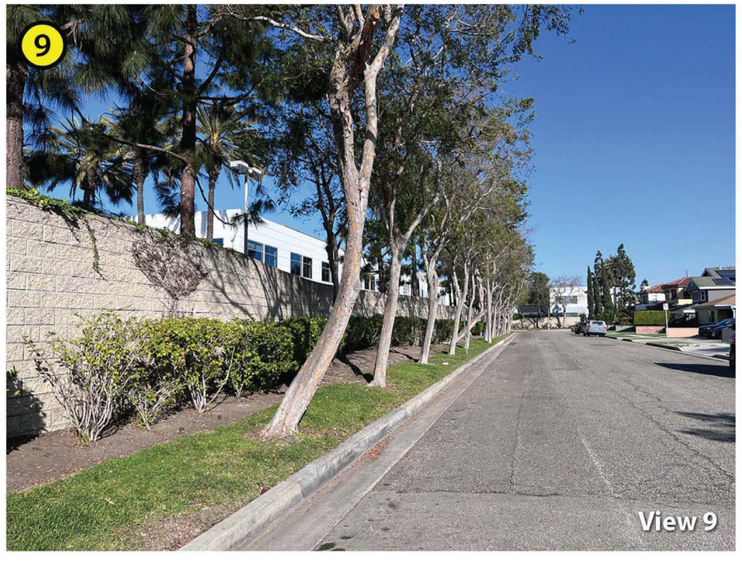




Figure 4b

Not to Scale

Site Photographs

3. BACKGROUND AND NEED FOR THE PROPOSED PROJECT

In October 2024, UCLA Health acquired the existing approximately 170,000-gsf life sciences building located at the Project site. The two-story building was constructed in 2002 and used for research and development (R&D) and laboratory purposes by Siemens Healthcare Diagnostics Inc. (Siemens), which conducted light manufacturing and fabrication, research, product development, and recycling of products and equipment specifically for the healthcare industry. Some of the common areas in the building were renovated in 2020. Siemens subsequently sold the property to UCLA Health in 2024 and gradually vacated the site through late 2024.

The proposed Project involves renovation of the existing building interior to address both the immediate and future needs of various units within UCLA Health. The Project supports UCLA Health's commitment to serving marginalized populations in the community by expanding outpatient bed capacity and providing equitable access for Medi-Cal and Medicare patients. As of January 1, 2022, UCLA Health has established itself formally as an anchor institution by joining the Healthcare Anchor Network.[3] Accordingly, the proposed Project furthers UCLA Health's commitment to proactively promoting the elimination of health inequities and addressing social and structural determinants of health across all patient populations.

To support this vision, the proposed Project would help meet the rising demand for orthopedic and pharmacy services while achieving cost efficiency compared to building a new facility on the UCLA campus. The renovated building would serve as the new UCLA Health South Bay hub for three primary functions:

- **UCLA Health Sports Medicine Institute.** By bringing together a multidisciplinary team of musculoskeletal care experts, including sports medicine, orthopedic surgery, radiologists, anesthesiologists, and therapists, the UCLA Health Sports Medicine Institute would offer patients comprehensive care for all musculoskeletal needs. The institute would enable UCLA Health to improve access to orthopedic services in an outpatient setting and would relieve demand at UCLA's Santa Monica and Ronald Reagan Medical Centers.
- **UCLA Health Clinical Microbiology Laboratory.** The existing The UCLA Health Clinical Microbiology Laboratory, also known as the Brentwood Laboratory, provides comprehensive testing for infectious agents and select autoimmune disorders, and hosts an accredited Clinical Microbiology Postdoctoral Training Program. The proposed Project would provide for the relocation of the Brentwood Lab and would consolidate several off-campus laboratories currently housed in older, leased buildings.
- **Community Fill Pharmacy with Specialty Pharmacy.** With the Medical Plaza 200 (Peter Morton Medical Building) on the UCLA Westwood campus nearing capacity, the UCLA Health Pharmacy Department needs additional space to meet rising demand throughout the health system. Currently serving both inpatient and outpatient needs, the department is also preparing to provide for new prescription volume from UCLA's employee health plans and from local employer plans. The proposed Project would become a centralized fulfillment center for UCLA Health's retail and specialty pharmacy services.

The proposed Project includes modifications to the existing building systems to accommodate the new uses, as well as accessibility upgrades, site security improvements, emergency power

[3] The national Healthcare Anchor Network (HAN) is a collaboration of over 70 health care systems sharing best practices to improve community health and wellbeing by addressing racial and socioeconomic inequities.

equipment replacement, etc., as necessary to convert the existing medical research building from non-clinical to clinical uses, as discussed further below.

4. PROJECT OBJECTIVES

The objectives of the proposed UCLA Health Sports Medicine Institute Project are to:

- Improve access to comprehensive orthopedic services in a state-of-the-art, multidisciplinary outpatient facility.
- Alleviate increasing demand for musculoskeletal care at UCLA's Ronald Reagan and Santa Monica Medical Centers.
- Consolidate existing off-campus clinical microbiology laboratory space into a modern facility to support patient care as well as UCLA's broader education, research, and service missions.
- Create a centralized fulfillment center for UCLA Health's retail and specialty pharmacy services to relieve capacity constraints at 200 Medical Plaza (Peter Morton Medical Building) on campus.
- Facilitate interdisciplinary collaboration among medical practitioners, faculty, and students.
- Adaptively reuse an existing life science research building to achieve cost and space efficiencies for UCLA Health and to sustainably repurpose an existing building in lieu of new construction.

5. PROPOSED PROJECT COMPONENTS

Provided in this section is a description of the following proposed Project components evaluated in this Initial Study:

- Building and System Improvements
- Circulation and Parking
- Utilities and Infrastructure
- Landscaping, Lighting and Signage
- Sustainable Features
- Operations
- Construction Activities

Building and System Improvements

The proposed Project, which is classified minor renovation pursuant to the University of California (UC) Policy on Sustainable Practices,[4] includes interior tenant improvements, limited exterior building improvements, and building system improvements as necessary to accommodate the new uses. These proposed Project components are further described below. The existing building is compliant with the UC Seismic Safety Policy, and the proposed renovations would comply with both the Americans with Disabilities Act (ADA) and the UC Policy on Sustainable Practices.

[4] The proposed Project does not meet the definition of a "major renovation" since it involves replacement of less than 100 percent of building systems. See UC Policy on Sustainable Practices, Section III.A.2.c (UC, 2024a).

Programs and Tenant Improvements

The proposed Project involves the conversion of the existing two-story approximately 170,000-gsf laboratory and office building into an orthopedic outpatient treatment facility, with associated outpatient diagnostic and treatment services and related functions. As previously discussed, the renovated building would serve as the new UCLA Health South Bay hub for three primary functions, described further below: UCLA Health Sports Medicine Institute, UCLA Health Clinical Microbiology Laboratory, and Specialty Pharmacy.

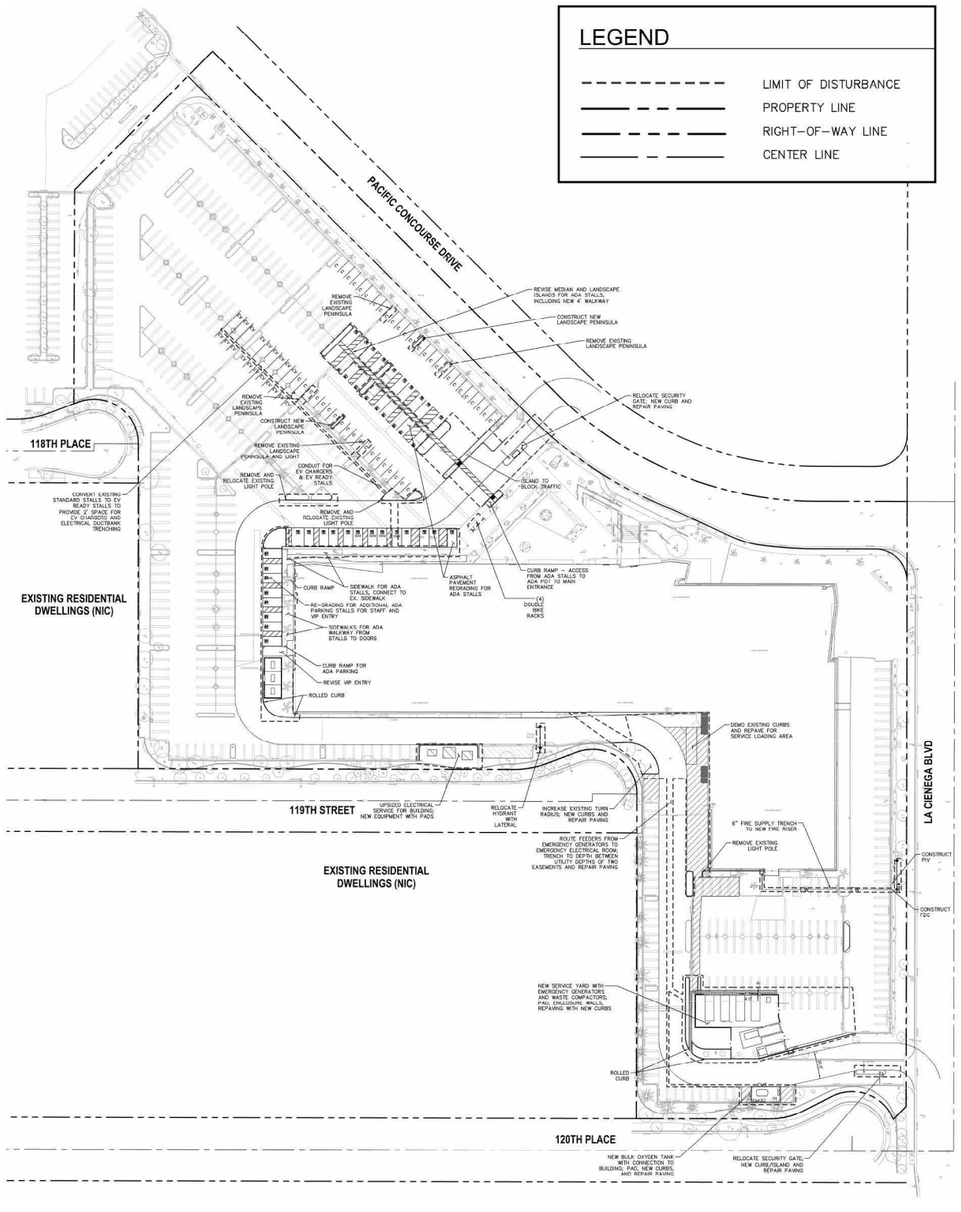
The proposed program is summarized in Table 1 and described below. The proposed conceptual site plan is provided on

Figure 5, and the proposed floor plans are provided on Figure 6 and Figure 7. Operational details are discussed further below.

TABLE 1 PROPOSED SPACE ALLOCATION

Department or Use	GSF	Total GSF[1]	Percentage
Sports Medicine Institute		71,300	41.9%
Ambulatory Surgery Center (8 to 12 Operating Rooms)	21,200		
Patient Prep and Recovery	10,400		
Sterile Processing Department	5,500		
Medical Clinic (30 Exam Rooms)	13,900		
Advanced Imaging[2]	13,000		
Physical Therapy	5,950		
ASC Pharmacy	1,350		
Clinical Microbiology Laboratory		35,850	21.1%
Specialty Pharmacy[2]		38,400	22.6%
Amenities (Café, Conference Room)		3,050	1.8%
General Services (Administrative Offices, Storage, Medical Support)		7,400	4.4%
Support Space (Lobby, Security, Common Restrooms, Utility Areas, Building Circulation)		14,000	8.2%
Total		**170,000**	**100%[3]**

[1] All floor areas include circulation space located within each department, with the exception of security and conference uses. Floor areas for the clinic, imaging, and physical therapy also include their respective patient waiting areas.
[2] Within the Sports Medicine Institute, equipment areas for one MRI and two X-ray machines would be shelled for future installation. Similarly, within the Specialty Pharmacy, approximately 5,000 gsf of floor area would be shelled space, to be built out in the future.
[3] Percentages may not tally precisely due to rounding.



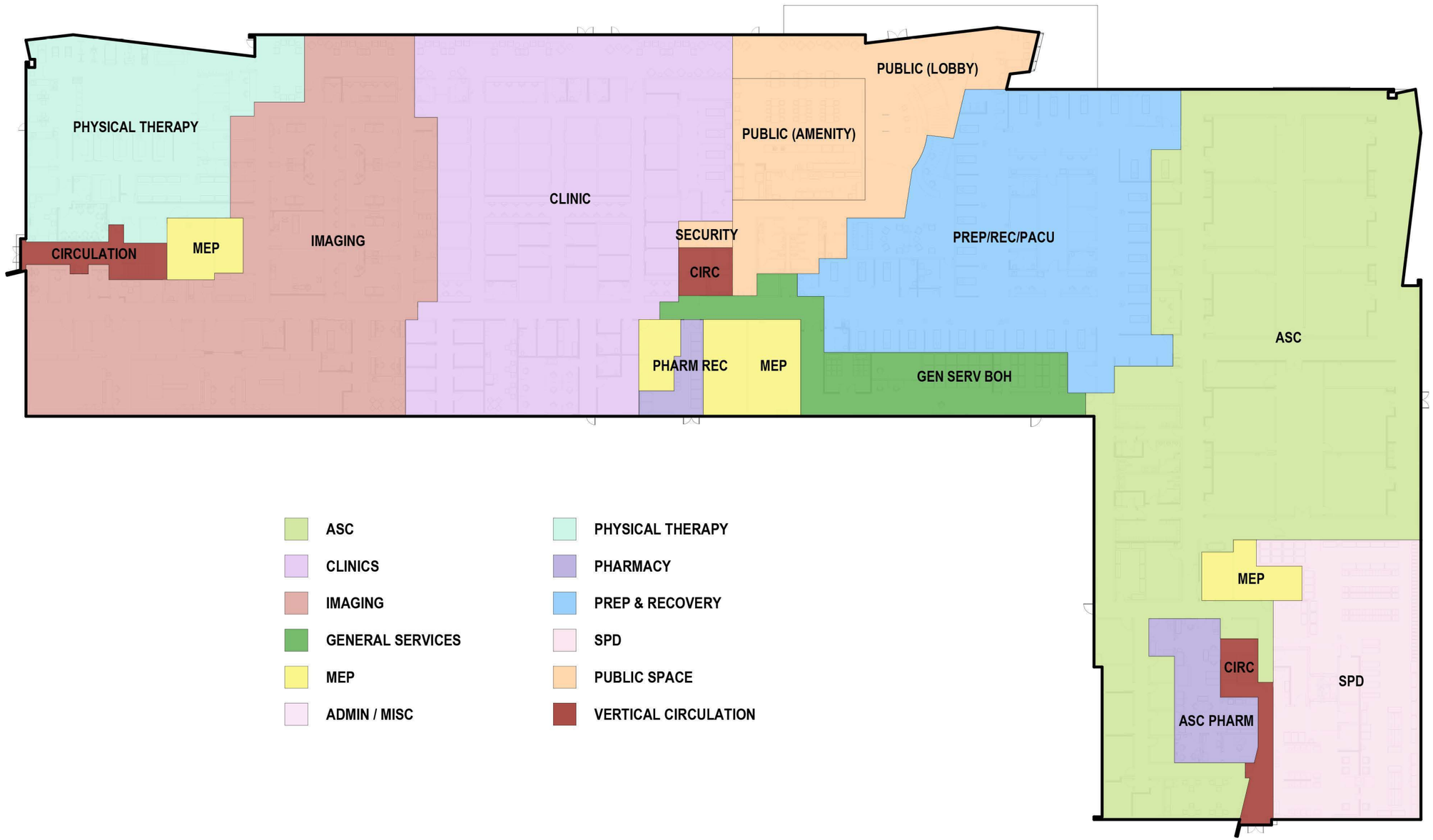


Source(s): HDR (10-27-2025), Kimley-Horn (08-14-2025)

Figure 5

Not to Scale

Conceptual Site Plan

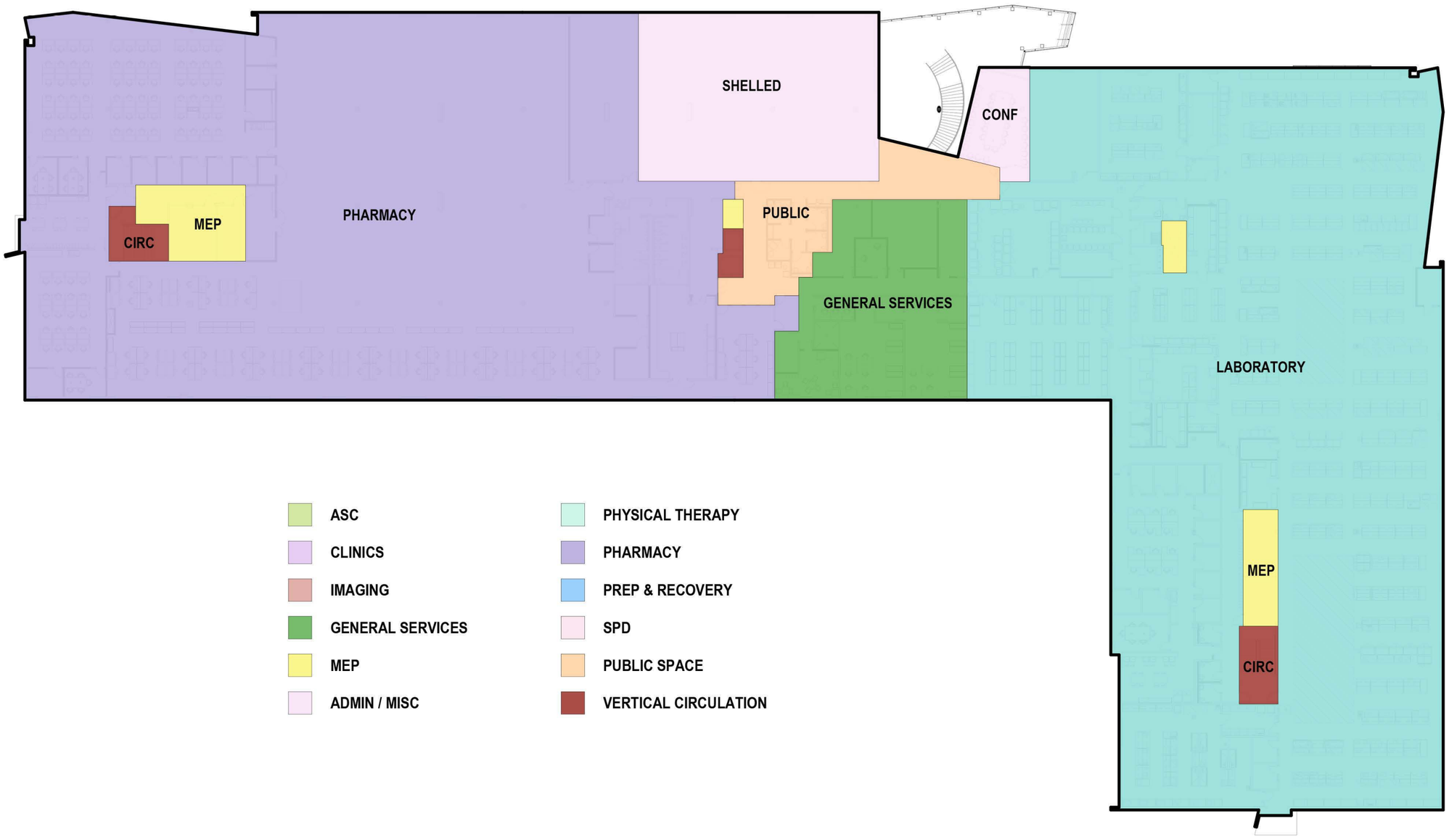


Source(s): HDR (07-30-2025)

Figure 6

Not to Scale

Level 1 Uses



Source(s): HDR (07-30-2025)

Figure 7

Not to Scale

Level 2 Uses

- **UCLA Health Sports Medicine Institute.** This new institute would be a state-of-the-art facility designed to serve local patients and athletes and would occupy approximately 71,300 gsf of the building. Operations would include an ambulatory surgery center (ASC), outpatient clinic, advanced imaging, and rehabilitation facilities for comprehensive musculoskeletal care, as well as a small pharmacy for ASC patients. As shown on Figure 6, these uses would be located on Level 1 of the building. Renovation of the existing building to accommodate an orthopedic outpatient treatment facility would involve licensing of this department through the Department of Healthcare Access and Information (HCAI).[5] Specifically, the proposed ASC department would be an OSHPD 3-compliant facility and thus, would need to meet specific requirements for licensed clinics outlined in the California Building Standards Code (Title 24).[6]
- **UCLA Health Clinical Microbiology Laboratory.** The microbiology laboratory would utilize approximately 35,850 gsf of the building and would be located on Level 2 (refer to Figure 7). As previously indicated, UCLA's off-campus Brentwood Lab would be relocated to this new facility.
- **Specialty Pharmacy.** The specialty pharmacy would occupy approximately 38,400 gsf of the building on Level 2 (refer to Figure 7). The specialty pharmacy would include an automated fulfillment system, a manual fill component, and a call center. This pharmacy would primarily serve remote order prescriptions and renewals and would include two windows to serve the clinic and ASC. Approximately 5,000 gsf would be shelled space to be built out in the future.
- **Amenities.** Proposed amenities would comprise approximately 3,050 gsf and would include the existing café on Level 1 and a conference room on Level 2 (refer to Figure 6 and Figure 7).
- **General Services.** General services include administrative offices, storage, and medical support uses which would utilize a total of approximately 7,400 gsf on Level 1 and Level 2 (refer to Figure 6 and Figure 7).
- **Support Space.** Support spaces include the lobby, security office, common restrooms, utility areas, and building circulation and would comprise approximately 14,000 gsf of the building on both Level 1 and Level 2 (refer to Figure 6 and Figure 7).

Interior building improvements would also include architectural finishes as needed for the respective spaces including new paint, replacement of ceiling tiles and flooring, upgraded wall finishes, and replacement of lighting.

Building System Improvements and Equipment

The proposed Project would include a variety of medical and non-medical uses and departments such as clinics, operating rooms, diagnostic imaging, sterile processing, clinical lab, pharmacy, and support services. A portion of the building, including the ambulatory surgery, sterile processing, and compounding pharmacy departments, would be licensed as OSHPD 3 facilities, with specific regulatory requirements including regarding the building infrastructure. Accordingly, the building's heating, ventilation and air conditioning (HVAC) system would be improved and

[5] HCAI is the current name for the former California Office of Statewide Health Planning and Development (OSHPD), which regulates licensed medical clinics.

[6] OSHPD 3 requirements apply to clinics that are licensed pursuant to Health and Safety Code (HSC) Section 1200 (which includes primary care clinics and specialty clinics) or outpatient services of a hospital licensed pursuant to HSC Section 1250. Among other requirements, an OSHPD 3-compliant facility is required to have a nurse call system, hazardous waste storage, and provisions for medical gas tank storage and/or distribution.

sized to support the OSHPD 3 spaces and accommodate the loads generated by the building envelope, ventilation, lighting, occupants, and equipment, as required to serve the proposed Project.

The building air systems would include fully ducted supply, return, and exhaust systems with multiple custom air handling units (AHUs) and exhaust fans. Recirculating type AHUs would be used for most spaces, except for laboratory and Biosafety Level 3 (BSL-3) spaces which would be served by AHUs using 100 percent outside air with associated lab and BSL-3 exhaust fans.[7] Humidification would be provided to AHUs serving spaces with minimum humidity requirements and operating rooms by using an electric humidifier located on the roof. Portions of the building would also be served by general exhaust air systems (e.g., for toilet rooms, janitor closets, locker rooms, etc.). In general, the mechanical systems would be designed with a level of redundancy to ensure uninterrupted operations.

A Magnetic Resonance Imaging (MRI) purge exhaust fan would be provided for the MRI rooms to operate in an emergency condition in the event of a helium leak. Additionally, any fume hoods or biosafety cabinets would be provided with a dedicated exhaust system. All laboratory, laboratory support, and office/administrative spaces within the laboratory program would be served by a single laboratory exhaust air system. The system would combine snorkel/point exhaust (as applicable) with general lab exhaust into a single exhaust system. Additional exhaust systems such as central sterile exhaust would be provided to serve the appropriate spaces within the building.

As the existing mechanical cooling and direct expansion (DX) air handling systems are more than 20 years old and nearing the end of their useful life, this equipment would be replaced. Chilled water would be produced via air cooled chillers with a total capacity of 750 tons and chilled water pumps located on the roof, to serve the AHU cooling coils and fan coil units. The three MRIs would have dedicated chillers located in an enclosure at grade on the west side of the building. A connection to the building cold water system would be provided as a backup means of cooling each MRI machine.

It is anticipated that the two existing natural gas boilers (with rated heat input capacities of 990 MBH and 1,530 MBH, respectively) would be retained, and two new 1,000 MBH rated heat input gas condensing boilers would be installed, along with new pumps and piping accessories required to support the heating plant. Additionally, a new 650 MBH gas water heater with a backup gas water heater would be installed to meet the building's hot water needs. This heating configuration is considered worst-case from an impact perspective; should electrification of these HVAC components ultimately be incorporated into the proposed Project, impacts would generally be less than disclosed herein.

An alternative scenario involving full electrification of the building mechanical systems has also been evaluated, specifically with regard to potential air quality, GHG, and noise impacts. This option would include a 375-ton air cooled chiller and two 200-ton air source heat pumps for building cooling; two 2,000-MBH air source heat pumps for building heating; and three 200-MBH domestic water air source heat pumps with an 1,800-gallon storage tank for hot water. Implementation of this all-electric option is dependent upon the availability of funding.

[7] BSL-3 safety standards address facility design and engineering systems for laboratories that conduct infectious disease research involving pathogenic and aerosol transmissible agents, in order to provide the best possible physical containment of such agents. Source: University of California Biosafety Level 3 (BSL-3) Laboratory Design Standards, January 2020.

Other System and Equipment Improvements

The existing emergency generator would be removed, and four new 500 kW emergency generators and associated support equipment would be installed for use during power outages. The new emergency generators would be co-located with the trash compactors in the new service yard to the south of the building in the southeastern parking lot. The service yard would be enclosed by a 12-foot-tall enclosure that would include a zone for waste operations with one bay for a recyclables waste compactor, and one bay for an autoclave sterilizer/compactor.

A new bulk oxygen tank with a connection to the building would be installed south of the building (a minimum distance of 50 feet from the building). The system would require an adjacent concrete pad for refill truck staging and below grade connection lines feeding from the bulk tank to the building.

The existing on-site HAZMAT storage container used by Siemens would be removed. Limited medical waste would be generated by the proposed Project which would be sterilized using a self-contained, closed, San-I-Pak unit, and stored on-site until it is transported and treated off-site. There is no on-site waste treatment included in the proposed Project.

Exterior Building Improvements

The proposed exterior building improvements would be limited to entry and exit modifications per the new floor plans, new building-mounted site surveillance devices, repair of the existing roof (including enclosure of rooftop equipment), and incidental repairs of the building façade. The proposed Project would resolve and repair existing moisture damage from adjacent landscaping that has infiltrated the foundation in the northeast and southeast corners of Level 1. Additionally, ADA accessible/assist systems would be added to the public entries.

Circulation and Parking

The Project site is accessed from the north via a gated driveway along Pacific Concourse Drive and from the southeast via a gated driveway along La Cienega Boulevard. Both driveways are used for staff, visitor, delivery, and fire access. As described below, the proposed Project involves minor changes to improve site access.

- **Pacific Concourse Drive.** The northeastern edge of the driveway would be widened to accommodate a 42-foot delivery truck to access the site. The existing security gate arms would be relocated to improve queueing and to allow for truck access.
- **La Cienega Boulevard.** The northern edge of the drive access would be widened to accommodate a 42-foot delivery truck to access the site. The existing security gate arms would be relocated to improve queueing and to allow for truck access.

Minor modifications to the on-site circulation would be implemented to accommodate vehicle and pedestrian access: the service access area would be reconfigured to better accommodate service vehicles; curb ramps would be replaced and added at the west staff/VIP entry and a new curb ramp would be added at the south staff entry; and pedestrian pathways adjacent to the building and within the parking areas would be installed and/or modified to connect to existing sidewalks and to comply with ADA requirements. A new loading/unloading area for service trucks would be provided near the service access area in order to keep such operations clear of the fire lane.

As further discussed in Section V.17, Transportation, of this IS, to encourage the use of transit and facilitate walking and biking between the nearby Metro C Line Aviation/Imperial Station and

the Project site, proposed Project employees and visitors would have daytime access via a gate behind 5230 Pacific Concourse Drive, at W. 116th Street and S. Isis Avenue, and a code would be provided to Project employees for after-hours access. Employees would be eligible for UCLA Health's Transportation Demand Management (TDM) programs, including subsidized transit passes, carpool planning support, and potentially vanpooling services. Further, carpool groups would be able to apply for a Staff Carpool Permit to reduce parking costs at the Project site. To encourage bicycle travel, eight short-term bicycle parking spaces would also be provided on-site.

The proposed Project involves modifications to the existing surface parking area to accommodate the proposed uses, changes in circulation, and relocation of equipment as described above. This would require the removal and reconfiguration of a limited number of existing parking spaces; however, the proposed parking supply would meet or exceed the 2022 California Building Code (CBC) and California Green Building Standards Code (CALGreen) requirements, including requirements for ADA and electric vehicle parking. As required by CBC and CALGreen, a total of 540 parking spaces would be provided, including 39 accessible standard stalls. In exceedance of CBC and CALGreen requirements, 24 electric vehicle (EV) stalls (including four accessible EV stalls) would be provided for general use, and an additional four EV chargers would be provided for UCLA Health fleet vehicles in a no parking/service zone.

Utilities and Infrastructure

There is existing utility infrastructure on-site to serve the existing building. The existing domestic water, sanitary sewer, and natural gas lines serving the building have sufficient capacity to accommodate the demands associated with the proposed uses, and no modifications to these systems are proposed. Utility infrastructure within the building would be replaced, as needed, to serve the proposed uses. Additionally, the existing public storm drain and sewer easements located within the Project site would be protected.

The proposed Project would involve modifications to the on-site water system for fire protection, the storm drainage system, and the electric system, as described below.

- **Water for Fire Protection.** The existing local water system has sufficient capacity to meet the fire flow requirements for the proposed Project. However, the existing fire hydrant near the existing maintenance enclosure would be relocated slightly to the west to avoid conflict with proposed fire lane access modifications. A new 6-inch lateral and valve for this hydrant would be provided. Additionally, a new 6-inch underground fire protection line would be extended from the existing east public fire hydrant to serve the building standpipe risers, along with a new service connection east of the building footprint.
- **Drainage.** No modifications to the existing storm drain that captures surface and roof runoff are proposed, as drainage patterns would not be modified and the on-site storm drain has sufficient capacity to accommodate runoff from the Project site. Roof drains may be replaced as part of the roof repair. Additionally, modifications to the ground-level surface areas may result in the addition of drain inlets to connect to the on-site storm drain. No changes to the on-site water quality treatment facilities are required.
- **Electricity.** The existing building power service is provided by Southern California Edison (SCE) to an on-site pad-mounted 1500 kilovolt-ampere (kVA) transformer. To support the increased electric demands from the proposed Project, the transformer would be upsized to a 2,500 kVA transformer.[8] The new transformer would be located in the existing

[8] The Project as planned could be served by a 2,500 kVA transformer. However, a 3,750 kVA transformer has been requested and is pending h SCE's determination.

transformer location, and the existing point of entry into the building would be maintained. New normal power distribution would be required in the building. The upgraded utility service would be extended underground from the exterior pad mounted transformer to the main switchboard in the Main Electrical Room, which would be located on Level 1 close to the utility service entrance. Additionally, the proposed Project would use 100 percent green (renewable) electricity through SCE's participation in the Clean Power Alliance.

Landscaping and Signage

As shown on the aerial photograph provided on Figure 2, there is ornamental landscaping within the Project site consisting primarily of trees and landscaped peninsulas within the parking areas; trees along the perimeter of the Project site; a turf area at the southwest corner of La Cienga Boulevard and Pacific Concourse Drive that also includes a monument sign; and turf along Pacific Concourse Drive and La Cienga Boulevard adjacent to the Project site, including at the driveways.

The exterior equipment, circulation, parking, and access improvements required to support the proposed uses would require modifications to portions of the existing surface parking areas and driveways. These modifications would result in the removal of some of the existing trees and landscaped peninsulas within the area of work in the parking areas, as well as the removal of turf near the driveways. It is estimated that up to 13 mature trees would be removed as part of the Project and would therefore require replacement. Additionally, the landscape groundcover for the fire access rollover width at the gated entrance would be replaced with an appropriately rated paver system. The existing irrigation system would also be repaired, as necessary.

The existing monument sign would be updated to reflect the proposed Project name. Wayfinding signage would also be installed. The existing exterior lighting on-site would be retained, and/or replaced in kind with current code-compliant fixtures.

Sustainability Features

The proposed Project would meet the University of California Policy on Sustainable Practices, which establishes goals for green building, clean energy, transportation, climate protection, facilities operations, zero waste, procurement, food service, and water systems. A minimum Certified rating pursuant to the Leadership in Energy and Environmental Design (LEED™) for Interior Design and Construction (ID+C) has been established for the proposed Project, which qualifies as a minor renovation of an existing building. However, the proposed Project would strive to achieve a Gold LEED 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 the LEED rating, a full range of sustainability practices related to building design and operations would be included in the Project, such as those set forth in UCLA Health's Practice Greenhealth, the Buy Clean California Act, and compliance with the campus's environmental standards for programming and design. More specifically, the proposed Project incorporates a series of green building strategies including, but not limited to, the following:

- Adaptive reuse of an existing building on a developed site that is connected to existing utilities, public services, transit and alternative transportation, and other urban infrastructure;

- Striving to achieve Practice Greenhealth's award "Greenhealth Partner for Change;"[9] Committing to the use of 100 percent green (renewable) electricity through SCE's participation in the Clean Power Alliance;
- Encouraging alternative transportation by providing pedestrian access improvements, bicycle racks, subsidized transit passes, and carpool/vanpool assistance (refer to Section V.17, Transportation, of this IS for further discussion);
- Supporting zero-emissions vehicle (ZEV) commuting by providing 24 EV chargers for general use, plus four EV chargers for UCLA Health fleet vehicles;
- Selecting construction materials in accordance with the Buy Clean California Act (Assembly Bill [AB] 262, codified in California Public Contract Code [PCC] Section 3500 et seq.) in an effort to reduce greenhouse gas emissions associated with the manufacture and transport of such materials;
- Diverting a minimum of 65 percent of construction waste from landfills in order to reduce solid waste disposal.
- Using low, ultra-low, and zero volatile organic compound (VOC)-emitting adhesives, sealants, paints, coatings, and carpets in order to reduce air quality emissions, at minimum consistent with South Coast Air Quality Management District (SCAQMD) Rule 1113;
- Selecting energy- and water-efficient equipment and fixtures;
- Providing on-site solid waste compaction and sterilization of biohazardous waste, both of which reduce the transportation and emissions associated with waste disposal; and
- Implementing a reusable sharps container program which reduces waste generation associated with disposable sharps containers.

Operations

As summarized below, the proposed Project facilities would have varying hours of operations, and an estimated total of 593 employees would be located at the Project site. At least 152 of these employees would be relocated from other UCLA facilities.

- The UCLA Health Sports Medicine Institute component of the Project, which would generate patients,[10] would operate seven days per week with hours of operations ranging from 5:30 a.m. to 11:00 p.m. There would be approximately 271 employees associated with this component of the proposed Project.
- The specialty pharmacy uses would operate from 8:00 a.m. to 5:00 p.m. five days per week (Monday through Friday) and would have an estimated 159 employees.
- The laboratory uses would operate 24 hours per day, five days per week (Monday through Friday) and would have approximately 136 employees.
- The café, general services, and support uses would have varying hours of operations with a total of up to 23 employees.

[9] Practice Greenhealth is the leading membership and networking organization for sustainable healthcare, delivering environmental solutions to hospitals and health systems across the United States. UCLA Health is a member of Practice Greenhealth.

[10] Trip generation rates for the Project were selected based on whether the proposed uses are patient-generating or non-patient-generating. See Section V,17 of this Initial Study for additional information about the proposed Project's trip generation.

Construction Activities

For purposes of analysis in this Initial Study, construction of the proposed Project is anticipated to begin in 2026 and be complete in 2028. As described above, the proposed Project includes interior tenant improvements, limited exterior site improvements, and building system upgrades to accommodate the proposed uses. While the majority of work would occur within the building interior, the physical impact area for the exterior improvements would encompass approximately 40,774 sf (less than one acre), as shown on Figure 8.

The proposed Project's construction stages are generally as follows, portions of which would overlap:

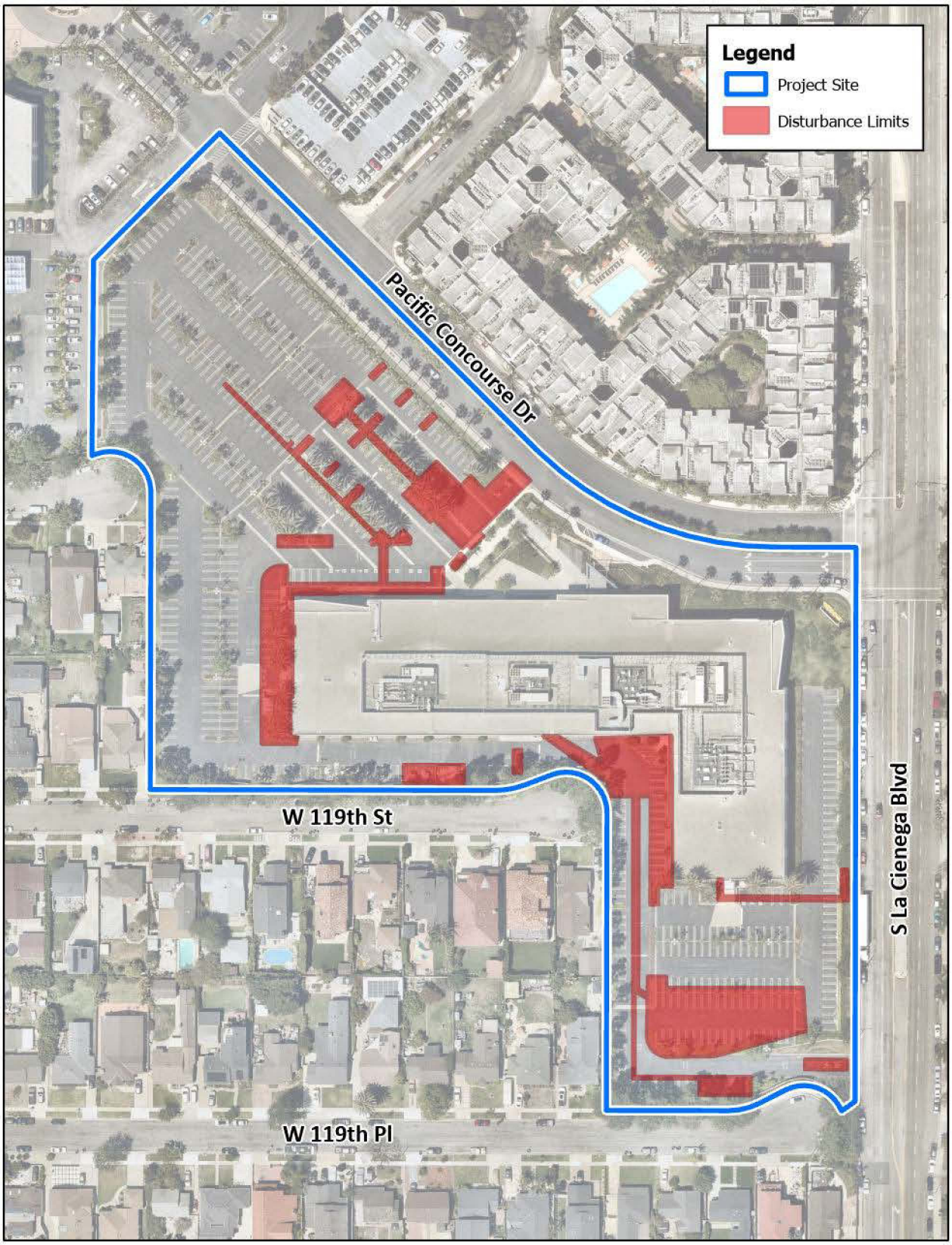
- Demolition—approximately 15 weeks;
- Site preparation and grading (concurrent with building construction)—approximately 4 weeks;
- Trenching (to modify existing underground utilities, occurring concurrently with building construction)—approximately 10 weeks;
- Building (primarily interior) construction—approximately 81 weeks; and
- Paving—approximately 4 weeks.

It is estimated that grading and soil handling activities would be minimal requiring approximately 150 cubic yards of soil export. A maximum of 20 daily truck trips would occur when the building construction and paving stages overlap; all other phases of construction would require fewer daily truck trips.

Depending on the construction phase, implementation of the proposed Project would require common construction equipment. However, because no mass grading is required, there would be no use of graders, dozers, or crawler tractors. Because of the limited scope of the construction activities, which primarily involve interior building renovations, the number of pieces of equipment on-site at any given time would also be limited (one to two pieces of equipment for each activity). Construction equipment assumptions are outlined in the air quality analysis included in Appendix A of this Initial Study.

Limited trenching would be required within portions of the surface parking areas for utility and EV conduit installations, and minor grading would occur during relocation of the emergency generators to the new emergency power and trash service enclosure in the southeast parking area. Grading depths would be on the order of a few inches, while the required exterior trenching would not be deeper than approximately six feet below the finished surface (above the location of other existing utilities). Additionally, utility trenching beneath the existing building (i.e., inside the building footprint) would be required for plumbing improvements to serve the proposed uses. The depth of interior trenching would be two to five feet in most locations and a maximum of 7.3 feet at the service connection point, all occurring within areas that were previously excavated and recompacted during construction of the existing building. Grading and trenching activities are not expected to encroach into native soils or groundwater.[11]

[11] Groundwater is estimated to occur at a depth exceeding 45 feet below the ground surface (bgs). Refer to Section V.10, Hydrology and Water Quality, of this Initial Study, for further discussion.



Source(s): Esri, LA County (2025), Nearmap Imagery (April 2025), Psomas (August 2025)

Figure 8

0 37.5 75 150
Feet

Disturbance Limits

All construction staging and construction worker parking would occur within the Project site, with staging concentrated on the north side of the building away from the nearest residential uses. A flag person would be provided at Project site driveways to facilitate the ingress/egress of large trucks and construction equipment. Although off-site public circulation is not anticipated to be affected, any lane closures and related pedestrian rerouting, if needed, would be coordinated with the County in accordance with applicable requirements.

It is expected that construction debris and limited soil export would be transported to the Azusa Land Reclamation Landfill located at 1211 W. Gladstone Street in the City of Azusa. It is anticipated that construction traffic would travel along Pacific Concourse Drive and head north on La Cienega Boulevard to Imperial Highway and then to the regional transportation facilities providing access to the landfill.

6. ANTICIPATED DISCRETIONARY APPROVALS

The Regents or its designee, and the responsible agencies identified below, are expected to use the information contained in this Initial Study for consideration of approvals related to and involved in the implementation of the proposed UCLA Health Sports Medicine Institute Project. This Initial Study has been prepared to 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 Board of Regents

- Adoption of the Final Initial Study and MND
- Approval of the UCLA Health Sports Medicine Institute Project

Responsible Agencies

- **South Coast Air Quality Management District.** UCLA, or its designee, shall obtain any required permits to construct and/or operate new stationary sources of equipment that emit or control air contaminants (e.g., heating, ventilation, and air conditioning units and diesel generators).
- **County of Los Angeles.** Coordination and compliance with applicable requirements for encroachment into the County rights-of-way for construction activities.

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

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

On the basis of this initial evaluation:

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

Ashley Rogers

Signature

November 19, 2025

Date

Ashley Rogers, Director, Environmental Planning

UCLA Capital Programs

V. EVALUATION OF ENVIRONMENTAL IMPACTS

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

A) "**Potentially Significant Impact**" is appropriate if there is substantial evidence that the project's effect may be significant even with the incorporation of LRDP PPs and MMs identified in the LRDP Final SEIR. If there are one or more "Potentially Significant Impacts" a Project EIR will be prepared.

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

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

D) "**No Impact**" applies where a project would not result in any impact in the category or the category does not apply. "No Impact" answers need to be adequately supported by the information sources cited, which show that the impact does not apply to projects like the one involved. A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards.

IMPACT QUESTIONS AND RESPONSES

1. AESTHETICS

The Project site is currently developed with an existing approximately 170,000- gsf two-story life sciences building. Relevant elements of the proposed Project related to aesthetics/visual character involve limited exterior improvements to the existing building, including primarily entry and exit modifications per new floor plans, new building-mounted site surveillance devices, repair of the existing roof (including screening of rooftop equipment), and incidental repairs of the building façade. A new small service yard, which would be screened, would be constructed in the southeastern parking area and would house new emergency generators and trash compactors. The existing emergency generator would be removed. A new bulk oxygen tank would also be installed in the southeastern parking area, and an enclosure for new chiller equipment would be constructed on the site of the existing hazardous materials structure immediately west of the building. The Project site also includes exterior lighting, such as pole lights in the parking areas, which would be maintained.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), and although the proposed Project consists of tenant improvements with few changes to existing site conditions, the following adopted MMs from the LRDP MMRP have been incorporated into the Project, to the extent relevant, and are assumed in the analysis presented in this section.

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

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

Discussion

Views of scenic vistas may be generally described in two ways: panoramic views (visual access to a large geographic area for which the field of view can be wide and extend into the distance) and focal views (visual access to an object, scene, setting, or feature of interest). Examples of panoramic views include urban skylines, valleys, mountain ranges, or large bodies of water. The Project site is located within a densely developed urban area, and long-range panoramic views are largely obstructed by surrounding development. The Project site is not within the viewshed of a scenic vista and the proposed Project, which involves renovation of an existing building, would not obstruct or have an adverse effect on a panoramic view.

Focal views include views of natural landforms, public art/signs, and visually important structures, such as historic buildings. There are no natural landforms or public art fixtures within the viewshed of the Project site. As further discussed in Section V.5, Cultural Resources, of this Initial Study, there are no historic resources in the vicinity of the Project site. Therefore, the proposed Project would not have a substantial adverse effect on a focal view.

Therefore, implementation of the proposed Project would not have a substantial adverse effect on a scenic vista.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would not have a substantial adverse effect on a scenic vista.

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

Discussion

There are no State scenic highways located near the Project site; the nearest officially designated State scenic highway to the Project site is a portion of State Route (SR) 27 (Topanga Canyon Boulevard) located approximately 14.8 miles to the northwest (Caltrans, 2025). The proposed Project would not be visible from this roadway due to distance. Therefore, the proposed Project would not substantially damage scenic resources within a state scenic highway and there would be no impact.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would not have a substantial adverse effect on scenic resources within a state scenic highway.

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

Discussion

The Project site located in an urbanized area and is within the boundaries of the Census-defined Los Angeles-Long Beach-Anaheim urban area (Census Bureau, 2023). However, UCLA is part of the University of California, a constitutionally created entity of the State of California. As a constitutional entity, the University of California is not subject to municipal regulations, including general plans, specific plans, and zoning regulations. Notwithstanding, as discussed below, the proposed Project would not result in substantial changes to the existing exterior building design or site conditions that are related to the scenic quality of the Project site and typically governed by local agency development standards.

Public views of the Project site are available from adjacent public roadways and sidewalks along Pacific Concourse Drive and La Cienega Boulevard. As described in Section II, Project Description, of this Initial Study, the proposed Project includes interior tenant improvements, limited exterior building improvements, and building system improvements as necessary to accommodate the new uses. The proposed exterior building improvements would be limited to entry and exit modifications per the new floor plans, new building-mounted site surveillance devices, repair of the existing roof (including enclosure of rooftop equipment), and incidental repairs of the building façade. The proposed Project would resolve and repair existing moisture damage from adjacent landscaping that has infiltrated the foundation in the northeast and southeast corners of Level 1. Additionally, ADA accessible/assist systems would be added to the public entries. Additionally, the exterior equipment, circulation, parking, and access improvements required to support the proposed uses would require modifications to portions of the existing surface parking areas and driveways. These modifications would result in the removal of 13 mature trees, and landscaped peninsulas within the area of work in the parking areas, as well as the removal of turf near the driveways. The mature trees would be replaced, and the landscape groundcover for the fire access rollover width at the gated entrance would be replaced with an appropriately rated paver system.

The limited exterior improvements that would be implemented as part of the proposed Project would not degrade the existing visual character or quality of public views of the site and its surroundings. This impact would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

There are no applicable zoning and other regulations governing scenic quality that are applicable to the proposed Project and the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. This impact would be less than significant.

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

Discussion

The Project site is located in an urbanized area. The Project site and surrounding areas are currently developed with urban uses, including residential and non-residential development, and adjacent roadways, that emit nighttime lighting and have the potential to create daytime glare. Existing light sources include street and parking lot lights, exterior building lights, and lights for safety and security. The proposed Project would retain the existing lighting at the Project site. Further, the proposed Project incorporates LRDP MM 4.1-3(b), which requires that outdoor lighting be directed to the specific location intended for illumination to limit stray light spillover onto adjacent residential areas, and that all lighting be shielded to minimize the production of glare and

light spill onto adjacent uses. The proposed Project would not create a new source of substantial light which would adversely affect nighttime views in the area resulting in a less than significant impact.

Glare can be caused by the reflection of sun off highly reflective surfaces during the day, and the reflection of artificial light sources. The proposed Project would not involve modifications to the exterior of the existing building that would create a new source of substantial glare. The proposed Project also incorporate LRDP MM 4.1-3(a), which requires the use of textured non-reflective exterior surfaces and non-reflective glass. This impact would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to the creation of a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

2. AGRICULTURAL RESOURCES

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use?	☐	☐	☐	☒

Discussion

The Project site is within an area that is mapped as Urban and Built-Up Land by the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP), as confirmed by review of the most recent 2018 FMMP Important Farmland Map for Los Angeles County (DOC, 2025a). No farmland, agricultural activity, forest land, or timberland exists on or in the vicinity of the Project site. Although the University is not subject to local land use regulations due to its constitutional autonomy, the Project site is not designated in the County of Los Angeles Zoning Code for agricultural, forest land, or timberland use; and the Project site is not under a Williamson Act Contract. Therefore, there would be no impact to agricultural or forest land resources with implementation of the proposed Project, and the proposed Project would not result in the conversion of agricultural or forest land.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

3. AIR QUALITY

Relevant elements of the proposed Project related to air quality include the adaptive reuse of an existing approximately 170,000-gsf two-story life sciences building on the approximately 9.2-acre Project site. Interior demolition and renovation would be performed to adapt the building for the proposed uses. The use of diesel-powered construction equipment would contribute to local and regional emissions. Long-term operational emissions of the proposed Project would primarily include emissions from vehicles, consumer products, energy, and stationary sources. As described in Section II.5, Proposed Project Components, within the Project Description of this Initial Study, many of the existing building systems and equipment would be replaced. The proposed Project would achieve a minimum LEED ID+C Certified rating and would strive for a Gold rating. To achieve this, a full range of sustainability practices related to building design and operations would be included in the proposed Project as outlined in Section II.5, Proposed Project Components. The sustainability features for which emission reductions have been quantified in this analysis include the purchase of 100 percent renewable energy and the addition of 28 EV charging spaces to the existing parking lots.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project, which would not involve the use of any unpaved roads.

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

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

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

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

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

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

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

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

In addition, LRDP PP 4.15-1 included in the Greenhouse Gas Emissions analysis (Section V.8) requires UCLA to continue to implement provisions of the UC Policy on Sustainability Practices, as applicable to the Project, which would also reduce associated air pollutant emissions.

Air Quality Background

The Project site is located within the 6,745-square-mile South Coast Air Basins (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD is the air pollution control agency for the Basin and is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [O_3]).

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point sources and area sources. Point sources are usually subject to a permit to operate from the SCAQMD, to occur or operate at a specific identified location, and are often characterized by an exhaust vent. Point sources requiring SCAQMD permits include combustion equipment that produces heat or electricity, such as boilers and emergency generators. Area sources are widely distributed, produce many small emissions, and do not require permits from the SCAQMD to operate. Examples of area sources include residential water heaters, painting operations, lawn mowers, and consumer products such as cleaning solutions and hair spray. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road sources. On-road sources are those that are legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, racecars, and construction vehicles and equipment. Mobile sources account for the majority of the air pollutant emissions within the Basin. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Regulatory Framework

A discussion of the regulatory framework for assessing air quality impacts is provided in Appendix AQ-1 of the Air Quality and Greenhouse Gas Technical Report (Air Quality and GHG Report) prepared by Eyestone Environmental, LLC (Eyestone, 2025), which is included in Appendix A of this Initial Study. A summary of key regulations is provided below.

The federal Clean Air Act (CAA) (42 U.S.C. Section 7401) requires the adoption of National Ambient Air Quality Standards (NAAQS) to protect the public health, safety, and welfare from known or anticipated effects of air pollution. These pollutants are called criteria pollutants. The State of California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS) for the federal criteria pollutants that are generally more restrictive than the NAAQS plus additional standards for atmospheric sulfates, vinyl chloride, hydrogen sulfide, and visibility. Specific geographic areas are classified as either “attainment” or “nonattainment” areas for each pollutant based on the comparison of measured data with federal and state standards.

The NAAQS and CAAQS currently in effect and the associated attainment status for the Basin are presented in the Air Quality and Greenhouse Gas Emissions Analysis included in Appendix A of this Initial Study and summarized below. The criteria pollutants for which federal standards have been promulgated and that are most relevant to this air quality impact analysis are discussed below and include: O_3, carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter (PM_{10} and $PM_{2.5}$), and sulfur oxides (SO_X). O_3 is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NOx)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Thus, VOCs and NO_x are O_3 precursors.

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

The SCAQMD is principally responsible for air pollution control in the Basin and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. Currently, several of the state and federal air quality standards are exceeded in most parts of the Basin. To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner.

In December 2022, the SCAQMD released the *Final 2022 AQMP* (2022 AQMP) (SCAQMD, 2022). The 2022 AQMP includes strategies to ensure that attainment deadlines for O_3 and $PM_{2.5}$ are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Basin is to reduce NO_X emissions sufficiently to meet the O_3 standard deadlines as NO_X plays a critical role in the creation of O_3. Since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards. The 2022 AQMP is focused on attaining the 2015 8-hour O_3 standard of 70 parts per billion. The 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional strategies, such as regulation, accelerated development of available clean technologies, incentives and other CAA measures to achieve this standard. The 2022 AQMP also incorporates the transportation strategy and transportation control measures from the SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG, 2020).

Criteria Pollutants and Health Effects

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

- **O_3** is a highly reactive and unstable gas that is formed when VOCs and NO_X undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in Southern California can result in

breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects.

- **PM_{10}** consists of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles, about 0.0004 inches or less, allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Particulate matter pollution is a major cause of reduced visibility (i.e., haze) which is caused by the scattering of light and consequently reductions in air clarity.
- **$PM_{2.5}$** is a subgroup of PM_{10} that consists of smaller particles that have an aerodynamic diameter of 2.5 micrometers or less. $PM_{2.5}$ is also formed in the atmosphere from gaseous emissions from power plants, industrial facilities, automobiles and other combustion sources. A consistent correlation between elevated ambient fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children and to school absences.
- **NO_2** is typically created during combustion processes and is a major contributor to smog formation and acid deposition. NO_2 absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. The strongest health evidence, and the health basis for the ambient air quality standard for NO_2, results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.
- **CO** is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or from wildfires. Because CO is emitted directly from internal combustion engines, motor vehicles operating at slow speeds are the primary source of CO in the urban environment. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. The most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects.

Related Pollutants

- **VOCs** are hydrocarbon compounds (i.e., any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic

carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The SCAQMD uses the terms VOC and Reactive Organic Gas (ROG) interchangeably.

- **NOx** includes nitric oxide (NO), nitrogen dioxide (NO_2) and nitrous oxide (N_2O), which are formed when nitrogen (N_2) combines with oxygen (O_2). The lifespan in the atmosphere ranges from one to seven days for NO and NO_2, to 170 years for N_2O. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition.

Existing Air Quality Setting

As previously indicated, specific geographic areas are classified as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with federal and state standards. The USEPA and California Environmental Protection Agency (CalEPA) have established NAAQS and CAAQS, respectively, for six of the most common criteria air pollutants: CO, Pb, O_3, particulate matter (PM_{10} and $PM_{2.5}$), NO_2, and SO_2. The attainment designations for the Basin are presented in Table 2.

TABLE 2 ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE AIR BASIN[1]

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--[2]
O_3 – 8-hour standard	Nonattainment	Nonattainment (Extreme)[3]
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment (Serious)[4]
CO	Attainment	Attainment
NO_2	Attainment	Unclassified/Attainment
SO_2	Attainment	Unclassified/Attainment
Pb[5]	Attainment	Partial Nonattainment

[1] "Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made. California and Federal standard attainment status based on SCAQMD's 2022 AQMP.
[2] No standard.
[3] Extreme nonattainment classification is defined as an area with a design value (ambient concentration) exceeding 0.163 ppm. Areas classified as "extreme" nonattainment have the longest timeframe to achieve NAAQS for ozone.
[4] Under a Serious nonattainment classification, the USEPA has determined that a particular air basin (South Coast Air Basin) cannot practicably attain the $PM_{2.5}$ NAAQS by the applicable Moderate area attainment date.
[5] An attainment redesignation request is pending.
Source: (Eyestone, 2025)

The Project site is occupied by an existing approximately 170,000-gsf life science building. The criteria pollutant emissions associated with operation of the existing building are discussed in the analysis of Threshold (b) below.

Sensitive Receptors

As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) childcare centers; and (9) athletic fields. The nearest sensitive receptors with respect to air quality are residential uses located approximately 70 feet (20 meters) south and west of the Project site.

Project Impact Analysis

The following analysis is based on the Air Quality and GHG Report (Eyestone, 2025) included in Appendix A of this Initial Study.

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

Discussion

As identified above, the applicable AQMP for the proposed Project is the SCAQMD 2022 AQMP, which is informed in part by regional planning efforts. SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.[12] With regard to future growth, SCAG prepared the 2020–2045 RTP/SCS which provides population, housing, and employment projections for cities under its jurisdiction.[13] The growth projections in the 2020–2045 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2022 AQMP. The 2022 AQMP was adopted by the SCAQMD as a program to lead the Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided in SCAG's 2020–2045 RTP/SCS. SCAG is charged by California law to prepare and approve the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies. Projects whose growth is included in the projections used in the formulation of the AQMP are considered consistent with the plan and would not interfere with its attainment. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the

[12] Although the UC is not subject to the regional planning process, discussion of SCAG efforts and the RTP/SCS is provided for context related to other applicable plans, such as the AQMP.

[13] On April 4, 2024, SCAG adopted an updated 2024–2050 RTP/SCS. Similar to the 2020–2045 RTP/SCS, the 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the existing and future needs of the region through projects, investments, policies and strategies. However, the 2020–2045 RTP/SCS forecasts for population, housing, and employment growth were used to characterize regional growth in the 2022 AQMP. As such, this air quality analysis uses data from SCAG's 2020–2045 RTP/SCS for consistency with the 2022 AQMP.

demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

As described in Section II, Project Description, the proposed Project involves adaptive reuse of an existing approximately 170,000-gsf life sciences building and would have approximately 593 employees. This represents a gross (not net new) number of employees and conservatively does not take into consideration the number of workers who would be relocated from other existing UCLA Health facilities in the region (at least 152 existing employees), or the number of employees who previously occupied the Project building prior to Siemens vacating the site in 2024. The total number of Project employees would represent approximately 0.3 percent of the employment increase projected for Los Angeles County in the 2020–2045 RTP/SCS for the period between 2020 and 2030.[14] As UCLA acquired the property several years after planning efforts for and publication of the 2020–2045 RTP/SCS, the proposed Project's population would not have been accounted for therein; however, the anticipated level of growth associated with the proposed Project would represent a minimal proportion of the employment projections for the region included in the 2020–2045 RTP/SCS. Furthermore, while the proposed Project would generate jobs associated with construction of the proposed Project, these employment opportunities would be short term in nature during construction and comprised of positions that circulate throughout the region based on the location of each construction site. Overall, the proposed Project would be consistent with the demographic projections set forth in SCAG's 2020–2045 RTP/SCS, which were used as the basis for the 2022 AQMP.

As presented in the analysis for Threshold (b) below, implementation of the proposed Project would not exceed the SCAQMD thresholds of significance for criteria pollutants and therefore would not exceed established CAAQS of NAAQS. As the proposed Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$, the proposed Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2022 AQMP.

Therefore, the proposed Project would not conflict with or obstruct implementation of the SCAQMD's AQMP, and this impact would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant.

[14] According to the Demographic & Growth Forecast technical report included in SCAG's 2020–2045 RTP/SCS, the number of employees in Los Angeles County is estimated to increase from approximately 4,838,000 in 2020 to 5,060,000 in 2030 (an increase of approximately 222,000 employees) (SCAG, 2020).

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

Discussion

As discussed in the Air Quality and GHG Report, land uses such as the proposed Project affect air quality through construction-source and operational-source emissions. As discussed in the Regulatory Framework section above, the Basin is a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The proposed Project would generate PM_{10}, $PM_{2.5}$, and O_3 precursors (NO_X and VOC) during short-term construction and long-term operations. As such, the proposed Project would have an incremental, cumulative contribution to O_3, PM_{10}, and $PM_{2.5}$ levels in the region. SCAQMD's policy with respect to cumulative impacts associated with criteria pollutants and their precursors is that Project-specific impacts which are less than significant would also be cumulatively less than significant. UCLA utilizes the SCAQMD recommended thresholds that are in place at the time development projects are proposed to assess the significance of quantifiable emissions. The current SCAQMD thresholds for regional emissions are identified in Table 3.

TABLE 3 SCAQMD MAXIMUM MASS DAILY REGIONAL EMISSIONS THRESHOLDS

Mass Daily Thresholds (lbs/day)		
Pollutant	**Construction**	**Operation**
VOC	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Source: (Eyestone, 2025)		

Regional Construction Impacts

Construction of the proposed Project has the potential to create regional air quality impacts from heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project site. In addition, fugitive dust emissions would result from minor earthwork and, to a lesser extent, interior construction activities. Mobile source emissions, primarily particulate matter and NO_X, would result from the use of construction equipment such as loaders, backhoes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Construction activities associated with the proposed Project would include interior demolition, limited trenching, minor repaving of portions of the existing parking lot, interior construction, and architectural coatings.

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD-recommended California Emissions Estimator Model (CalEEMod) Version 2022.1. Model results are provided in Appendix AQ-3 of the Air Quality and GHG Report included in Appendix A of this Initial Study. The emissions estimates include reductions associated with adherence to SCAQMD Rule 403 (refer to LRDP PP 4.2-2[a]), and use of low VOC architectural coatings (refer to LRDP PP 4.2-2[d]). Compliance with LRDP PPs 4.2-2(b), 4.2-2(c), and LRDP MMs 4.2-2(a), 4.2-2(b), and 4.2-2(c) would further reduce construction-related emissions; however, these reductions were not quantified. As shown in **Error! Reference source not found.**, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the established thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or PM. Therefore, the proposed Project would result in a less than significant impact with regard to regional construction emissions, and no mitigation is required.

TABLE 4 ESTIMATED DAILY REGIONAL CONSTRUCTION EMISSIONS[1] (POUNDS PER DAY)

Construction Year	VOC[2]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Construction Emissions Winter						
Year 2026	1	10	12	<1	3	<1
Year 2027	14	13	19	<1	2	<1
Year 2028	13	8	13	<1	1	<1
Maximum Unmitigated Construction Emissions	**14**	**13**	**19**	**<1**	**3**	**<1**
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under) Threshold	**(62)**	**(87)**	**(531)**	**(150)**	**(147)**	**(54)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Regional Construction Emissions Summer						
Year 2026	1	12	18	<1	3	1
Year 2027	13	8	14	<1	1	1
Year 2028	-	-	-	-	-	-
Maximum Unmitigated Construction Emissions	**13**	**12**	**18**	**<1**	**3**	**1**
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under) Threshold	**(62)**	**(88)**	**(532)**	**(150)**	**(147)**	**(54)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not sum exactly due to rounding.
[1] Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix AQ-3. CalEEMod modeling outputs are also provided in Appendix AQ-3.
[2] Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.
Source: (Eyestone, 2025)

Regional Operational Impacts

Regional emissions associated with operation of the existing building with the former R&D use and under the proposed Project were calculated using CalEEMod. Inputs into the CalEEMod model include vehicle trips, as well as land uses and square footages to determine energy use, water usage, and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the trip generation estimates provided by Fehr & Peers. In addition, operations would involve emissions generated by energy sources (e.g., natural gas combustion) and area sources (e.g., landscape equipment fuel combustion, consumer products, and architectural

coatings). The proposed Project would also add two new gas-fueled boilers, gas water heaters, and four emergency generators as part of the utility upgrades.[15] Emissions for boilers and emergency generators were calculated for the proposed Project's operational emissions inventory based on EPA AP-42 emission factors for boilers and SCAQMD Rule 1470 limits for emergency generators.

The results of the modeled emissions calculations are provided in Table 5, and the CalEEMod model output files are provided in Appendix AQ-3 of the Air Quality and GHG Report included in Appendix A of this Initial Study. As identified in Table 5, the proposed Project would result in a net increase in criteria pollutant (VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$) emissions, which would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

As shown in Table 4 and Table 5, the proposed Project's construction and operational emissions would not exceed the applicable SCAQMD regional thresholds for emissions of any criteria pollutant; therefore, impacts would be less than significant. Consistent with SCAQMD policy, the cumulative construction and operational impacts of the proposed Project would also be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

[15] An alternative scenario involving full electrification of the building mechanical systems has also been evaluated with regard to potential air quality impacts. Refer to Appendix AQ-4 of the AQ and GHG Report, provided in Appendix A of this Initial Study, for further discussion.

TABLE 5 ESTIMATED REGIONAL OPERATIONAL EMISSIONS – PROJECT BUILDOUT (2028) (POUNDS PER DAY)[A]

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Winter						
Area	4	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	2	1	<1	<1	<1
Mobile	5	4	42	<1	11	3
Stationary (Emergency Generator)	<1	2	2	<1	<1	<1
Total	**10**	**8**	**45**	**<1**	**12**	**3**
Buildout Winter						
Area	4	<1	<1	<1	<1	<1
Energy (Natural Gas)[b]	<1	3	2	<1	<1	<1
Mobile	11	10	97	<1	26	7
Stationary (Emergency Generator)	1	6	3	<1	<1	<1
Total	**17**	**18**	**103**	**<1**	**27**	**7**
Project (Buildout less Existing) Winter						
Area	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)[b]	<1	1	<1	<1	<1	<1
Mobile	6	5	56	<1	15	4
Stationary (Emergency Generator)	<1	3	1	<1	<1	<1
Total Proposed Uses Net Emissions	**7**	**10**	**58**	**<1**	**15**	**4**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under) Threshold	**(48)**	**(45)**	**(492)**	**(150)**	**(135)**	**(51)**
Exceed Threshold?	No	No	No	No	No	No
Existing Summer						
Area	5	<1	7	<1	<1	<1
Energy (Natural Gas)	<1	3	2	<1	<1	<1
Mobile	11	9	106	<1	26	7
Stationary (Emergency Generator)	<1	2	2	<1	<1	<1
Total	**11**	**8**	**57**	**<1**	**12**	**3**
Buildout Summer						
Area	5	<1	7	<1	<1	<1
Energy (Natural Gas)[b]	<1	3	2	<1	<1	<1
Mobile	11	9	106	<1	26	7
Stationary (Emergency Generator)	1	6	3	<1	<1	<1
Total	**18**	**17**	**119**	**<1**	**27**	**7**
Project (Buildout less Existing) Summer						
Area	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)[b]	<1	<1	<1	<1	<1	<1
Mobile	6	5	60	<1	15	4
Stationary (Emergency Generator)	<1	3	1	<1	<1	<1
Total Proposed Uses Net Emissions	**7**	**9**	**63**	**<1**	**15**	**4**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under) Threshold	**(48)**	**(46)**	**(488)**	**(150)**	**(135)**	**(51)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not sum exactly due to rounding.
[a] The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix AQ-3 (CalEEMod Output).
[b] Includes natural gas usage from boilers.
Source: (Eyestone, 2025)

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

Discussion

Localized Impacts

The localized effects from the on-site portion of daily construction emissions were evaluated at sensitive receptor locations potentially impacted by the proposed Project according to SCAQMD's localized significant threshold (LST) methodology, which uses on-site mass emissions rate look-up tables and project-specific modeling, where appropriate, to assess whether a project's local emissions would exceed SCAQMD's significance thresholds. SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. SCAQMD developed mass rate look-up tables for each source receptor area in order to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. The SCAQMD methodology is further described in the Air Quality and GHG Report provided in Appendix A of this Initial Study.

While the Project site is approximately 9.2 acres in size, the majority of construction activities would occur within the building interior (an approximately two-acre footprint) plus approximately one acre of exterior disturbance surrounding the building. Estimates of maximum construction-related localized (on-site) daily emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ are presented in Table 6. Based on the construction site acreage and distance to the closest off-site sensitive receptors, localized construction emissions thresholds were obtained from the LST look-up tables and are also listed in Table 6. As previously identified, the nearest residential uses are located adjacent to the Project site along the southern and western boundaries, approximately 70 feet (20 meters) from the building footprint. Minor construction activities such as equipment staging and vehicle travel may occur at or near the Project site boundary, adjacent to sensitive receptors. The SCAQMD LST mass rate look-up tables provide a minimum receptor distance of 25 meters for evaluating localized air quality impacts. Based on SCAQMD LST methodology, projects with activities located closer than 25 meters to the nearest receptor (such as the Project) should use the LSTs for receptors located at 25 meters. Therefore, LSTs based on a 25-meter receptor distance were used as a close approximation of actual conditions. As presented in Table 6, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO_X, CO, PM_{10}, or $PM_{2.5}$. Therefore, localized construction emissions associated with the proposed Project would result in less than significant impacts, and no mitigation measures are required.

TABLE 6 ESTIMATE OF LOCALIZED PROJECT CONSTRUCTION EMISSIONS (POUNDS PER DAY)[A]

Construction Year	NO_X	CO	PM_{10}[b]	$PM_{2.5}$[b]
Winter				
Year 2026	7	10	2	<1
Year 2027	11	15	<1	<1
Year 2028	7	9	<1	<1
Maximum Unmitigated Daily Localized Emissions	**11**	**15**	**2**	**<1**
SCAQMD Localized Significance Thresholds[c]	**110**	**967**	**8**	**5**
Over/(Under) Threshold	**(99)**	**(952)**	**(6)**	**(5)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Summer				
Year 2026	11	13	2	<1
Year 2027	7	9	<1	<1
Year 2028	—	—	—	—
Maximum Unmitigated Daily Localized Emissions	**11**	**13**	**2**	**<1**
SCAQMD Localized Significance Thresholds[c]	**110**	**967**	**8**	**5**
Over/(Under) Threshold	**(100)**	**(954)**	**(6)**	**(5)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not sum exactly due to rounding.
[a] Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix AQ-3 of the Air Quality and GHG Report provided in Appendix A of this Initial Study. CalEEMod modeling outputs are also provided in Appendix AQ-3.
[b] PM_{10} and $PM_{2.5}$ emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.
[c] SCAQMD LSTs are based on Source Receptor Area No. 3 (Southwest Los Angeles County Coastal) for a 2-acre site with a 25-meter receptor distance. The closest sensitive receptors are residential uses located approximately 70 feet (20 meters) west of the Project site. Refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.
Source: (Eyestone, 2025)

Operation of the proposed Project would not introduce any major new sources of air pollution within the Project site. Localized emissions estimates for criteria air pollutants from on-site sources are presented in Table 7. The SCAQMD LST mass rate look-up tables were also used to evaluate potential operational localized impacts. As shown in Table 7, on-site localized operational emissions would not exceed any of the LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. Therefore, localized on-site operational emissions resulting from the proposed Project would be less than significant, and no mitigation measures are required.

TABLE 7 ESTIMATE OF LOCALIZED PROJECT OPERATIONAL EMISSIONS (NET INCREASE) – PROJECT BUILDOUT (2028) (POUNDS PER DAY)[A]

Emission Source	NO_X	CO	PM_{10}	$PM_{2.5}$
Winter				
Area[b]	<1	<1	<1	<1
Energy (Natural Gas)	1	<1	<1	<1
Emergency Generators	3	1	<1	<1
Project Emissions[c]	**4**	**2**	**<1**	**<1**
SCAQMD Significance Threshold[d]	**110**	**967**	**2**	**1**
Over/(Under) Threshold	**(106)**	**(965)**	**(2)**	**(1)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Summer				
Area[b]	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Emergency Generators	3	1	<1	<1
Project Emissions	**4**	**2**	**<1**	**<1**
SCAQMD Significance Threshold[c]	**110**	**967**	**2**	**1**
Over/(Under) Threshold	**(106)**	**(965)**	**(2)**	**(1)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not sum exactly due to rounding.
[a] Compiled using the CalEEMod emissions model. Worksheets and CalEEMod modeling outputs are also provided in Appendix AQ-3 of the Air Quality and GHG Report provided in Appendix A of this Initial Study.
[b] Area sources include consumer products, architectural coatings and landscaping activities. During winter, CalEEMod assumes minimal landscaping activities. However, worst-case emissions during the summer are used to evaluate impacts.
[c] Localized emissions include area, energy and stationary sources including emergency generators and boilers.
[d] SCAQMD LSTs are based on Source Receptor Area No. 3 (Southwest Los Angeles County Coastal) for a 2-acre site with a 25-meter receptor distance. The closest sensitive receptors are residential uses located approximately 70 feet (20 meters) west of the Project site. Refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.
Source: (Eyestone, 2025)

CO Hotspot Analysis

Under existing conditions, CO levels in the Project area are substantially below the federal and state standards. No exceedances of CO have been recorded at monitoring stations in the Basin for some time, and the Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Air quality data from the SCAQMD Central LA monitoring station between years 2022-2024 indicate that the maximum CO levels in recent years are 2.0 ppm (1-hour average) and 1.6 ppm (8-hour average) compared to the thresholds of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).

Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. The potential for the proposed Project to cause or contribute to CO hotspots was evaluated by comparing nearby intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMP. This comparison provides evidence that the proposed Project would not cause or contribute to the formation of CO hotspots, that CO

concentrations at nearby intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

As discussed in the Air Quality and GHG Report, SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. At buildout of the Project, the proposed Project is projected to have a net increase of 2,048 daily trips. The addition of these trips to any of the nearest intersections would not result in an average daily traffic volume anywhere near the volumes analyzed in the 2003 AQMP. Therefore, the proposed Project would not trigger the need for CO hotspots modeling and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant, and no mitigation measures are required.

Toxic Air Contaminant (TAC) Emissions

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with CARB's Air Quality and Land Use Handbook: A Community Health Perspective (CARB's Handbook), which provides recommendations regarding the siting of new sensitive land uses near potential sources of toxic air emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. The SCAQMD guidance states that "the potential for public health impacts remains unchanged when siting sensitive receptors near a pollution source or a pollution source near a sensitive receptor," and has adopted similar siting distances as the CARB Handbook for evaluating health risk impacts from TAC sources on sensitive uses. The proposed Project has been reviewed to identify any new or modified TAC emissions sources and the potential for such sources to cause significant TAC impacts. This evaluation also takes into account the proposed Project's potential source of TAC emissions and distance to sensitive receptors based on CARB siting distances.

The greatest potential for TAC emissions from the proposed Project would involve diesel particulate emissions associated with heavy equipment operations during trenching activities. According to SCAQMD methodology, health effects from carcinogenic air toxins are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events; thus, construction activities would not result in a long-term substantial source of TAC emissions. Additionally, SCAQMD's CEQA Air Quality Handbook and SCAQMD's supplemental online guidance/information do not require an HRA for short-term construction emissions. It is, therefore, not required or meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. Particularly in the case of the proposed Project, the entire construction duration would be approximately 22 months, with specific construction activities lasting 4 to 10 weeks and the majority of activities occurring within the building interior. As such, given the short-term nature of these activities, TAC emission impacts during construction would be less than significant.

With regard to operational TAC emissions, the proposed Project would not include sources of TACs such as large boilers (>2 million British thermal units [MMBTU]/hr) or any other non-emergency combustion sources. As the proposed Project would not contain substantial TAC

sources and is consistent with the CARB and SCAQMD guidelines, the proposed Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The proposed Project would retain the two existing 1.23-MMBTU/hr natural gas-fired boilers and add two 1-MMBTU/hr natural gas-fired boilers. As the proposed Project is located in an existing building, the zero emissions limits on boilers set forth in SCAQMD Rule 1146.2 would not be required until Year 2031, after Project buildout. Gas-fired boilers and other equipment installed before the zero emissions compliance date can remain operational for up to 25 years. Any replacement boilers or similar equipment installed after 2031 would be required to generate zero emissions (i.e., electric units), consistent with Rule 1146.2.

The Project site currently has one emergency generator which would be replaced with four 500-kw diesel emergency generators. The new emergency generators would be located in the southern parking lot of the Project site, approximately 30 meters from the closest residential uses. SCAQMD Rule 1470 establishes emissions limits for emergency generators and provides for more stringent emissions limits when three or more generators are located within 50 meters of sensitive uses (i.e., residences). As the new generators would be located within this distance, the proposed Project would be required to comply with the more stringent Rule 1470 limits. Based on compliance with Rule 1470, TAC emissions would be limited. The existing generator emits approximately 0.12 lbs/day of diesel particulate matter (DPM) during testing operations, while the new generators would each emit an estimated 0.02 lbs/day during testing (conducted one at a time), resulting in a reduction of 0.1 lbs/day of DPM (83 percent reduction of DPM) due to the Project. Testing would only be performed monthly, with engines running for 15 minutes to an hour. As such, Project-related TAC impacts during construction and operations would be less than significant, and no mitigation is required.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

No objectionable odors are anticipated because of either construction or operation of the proposed Project. Specifically, construction of the proposed Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would

not be sufficient to affect a substantial number of people. With respect to operations, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project would include a trash compactor within a small enclosed service yard, and medical waste would be sterilized using a self-contained, closed San-I-Pak unit. These facilities would be located and maintained in a manner that promotes odor control and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations. SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Therefore, construction and operation of the proposed Project would not result in other emissions that would be objectionable and would affect a substantial number of people. This impact would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

4. BIOLOGICAL RESOURCES

Relevant elements of the proposed Project related to biological resources include the removal of a limited number of existing mature trees and ornamental vegetation located at the Project site. Mature trees to be removed would be replaced, as described below. None of the trees located at the Project site are considered protected species (i.e., coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel), as defined in the LRDP Final SEIR.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project. Additionally, the Arborist's site-specific recommendations to implement the LRDP PPs and MMs, as identified in the Tree Inventory Report included in Appendix B of this Initial Study (Psomas, 2025), are identified.

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

Arborist's recommendation: All trees that are to be retained within the Project site whose drip-lines are within five feet of Project construction activity should be protected in this manner.

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

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

Arborist's recommendation: Regular watering for the trees to be retained should occur on an approximately monthly basis, with enough water to percolate to a depth between 18 and 36 inches.

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

Arborist's recommendation: This measure would apply to all retained trees at the drip-line, regardless of the use of protective fencing. Care should be taken to avoid damaging any trees overhanging the work area.

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

Arborist's recommendation: Roots measuring two inches or greater in diameter should not be cut without the review of a Certified Arborist.

MM 4.3-1(a) *Prior to the onset of construction activities that occur between March and mid-August (February 1 through June 30 for raptors), surveys for nesting special status avian species and raptors shall be conducted ~~on the affected portion of the campus~~ following USFWS and/or CDFW guidelines. If no active avian nests are identified on or within 250 feet of the construction site, no further mitigation is necessary*.

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

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

Project Impact Analysis

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

Discussion

The Project site is within an urbanized area and is fully developed with the exception of limited unpaved/undeveloped ground surfaces associated with on-site landscaped areas. Vegetation within the Project site includes ornamental landscaping consisting primarily of trees (discussed under Threshold (e) below) and turf located throughout the site (refer to the aerial photograph provided on Figure 2). The level of human activity and lack of natural habitat on the Project site and surrounding area results in a wildlife population typical of that found in an urban environment. No sensitive plant or wildlife species are known or suspected to exist on the Project site. No impact would result, and no mitigation is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would not directly or indirectly impact candidate, sensitive, or special status plant or wildlife species.

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

Discussion

The Project site is in an urban area and is fully developed with the exception of limited ground surfaces associated with on-site landscaped areas. The Project site does not contain any riparian

habitat, sensitive natural community, or wetlands. Therefore, there would be no impact and no mitigation is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact on any riparian habitat or other sensitive natural community, nor would it have any impact on state or federally protected wetlands.

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

Discussion

The Project site and surrounding area consist of developed land uses with primarily ornamental vegetation. Given the high-density, highly urbanized nature of the Project area, the Project site does not provide a connection between any open space areas, does not contain suitable habitat that could be used as a wildlife corridor, and does not facilitate regional connectivity to core wildlife habitat. There are no established wildlife corridors on or near the Project site. The Project site also does not include any marshes, wetlands, or tidal zones that could function as wildlife nursery sites.

However, as further discussed under Threshold (e), below, the proposed Project would require the removal of existing mature trees and ornamental vegetation in limited areas within the Project site. Common species of bird and raptors that occur in the general Project area may nest in these trees and vegetation. Nesting birds and raptors are protected by the Migratory Bird Treaty Act (MBTA); raptors are also protected by the California Fish and Game Code. Pursuant to the MBTA of 1918, as amended in 1972, federal law prohibits the taking of migratory birds, their nests, or their eggs (16 United States Code [U.S.C.] Section 703), except as allowed by permit (pursuant to 50 CFR Section 21). Also, Section 3503.5 of the California Fish and Game Code specifically protects birds of prey and states:

> *It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.*

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

> *It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules*

and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

The removal or pruning of trees and shrubs to allow for construction of the proposed Project could have the potential to directly impact nesting birds, including nesting raptors. In addition, the dust, noise, and/or increased human presence associated with Project construction could indirectly impact nesting birds, including nesting raptors. The loss of an occupied nest, if any are present, as a result of construction or demolition activities would constitute a substantial adverse effect (i.e., "take" or "destruction" under Section 3513 of the California Fish and Game Code and, in the case of raptors, would constitute the "take" or "destruction" of the nest or egg under Section 3503.5 of the California Fish and Game Code). Should construction activities begin during the nesting season for avian species or raptors, the contractor would comply with the requirements outlined in LRDP MM 4.3-1(a) and MM 4.3-1(b), which require pre-construction nesting bird surveys and identify protection measures to be implemented if nests are present. With adherence to the requirements established by the MBTA and the California Fish and Game Code, and with incorporation of LRDP MM 4.3-1(a) and MM 4.3-1(b) into the proposed Project, impacts would be less than significant, and no additional mitigation is required.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

As noted in the LRDP Final SEIR, the University of California is not subject to local zoning and planning ordinances. This includes the County of Los Angeles Oak Tree Ordinance (CLAOTO) which regulates oak tree removals in the County.[16] Accordingly, UCLA mitigates the loss of trees

[16] The Los Angeles County Oak Tree Ordinance (Section 22.174 of the Los Angeles County Code) protects oak trees (any species in the genus *Quercus*) whose trunks measure at least 8 inches in diameter (or, for trees with multiple trunks, having two trunks with a combined diameter of at least 12 inches), as measured 4.5 feet above natural grade. Heritage oak trees, as defined by CLAOTO, include trees that either measure 36 inches or more in trunk diameter or have a significant historical or cultural importance. The CLAOTO requires the replacement of oak tree removals at a minimum 2:1 ratio with at least 15-gallon size specimens. The CLAOTO also specifies ongoing care and maintenance requirements.

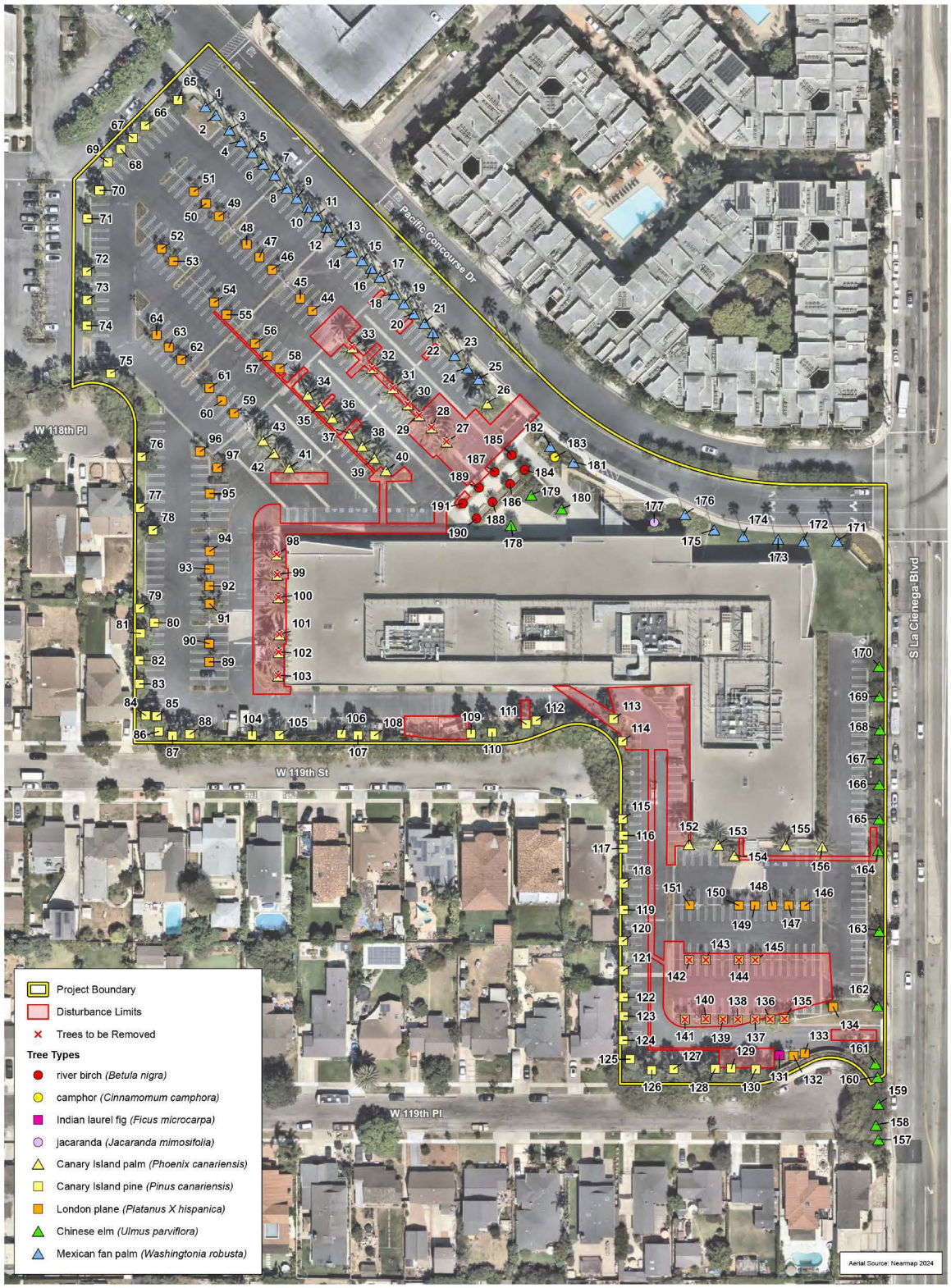
consistent with the campus' LRDP. However, UCLA's adopted tree replacement mitigation is consistent with the CLAOTO although not subject to it.[17]

As identified in the Tree Inventory Report provided in Appendix B of this Initial Study (Psomas, 2025), a tree survey was conducted at the Project site by Certified Arborist David Hughes (International Society of Arboriculture Certificate No. WE-7752A) on September 20, 2024. Trees documented during the field survey included all trees located within the Project site. The LRDP Final SEIR identifies "mature" trees as those with a trunk diameter at breast height (dbh) measuring at least 12 inches and requires the replacement of any mature non-protected trees that are removed at a 1:1 ratio (refer to LRDP MM 4.3-1[c]). The LRDP Final SEIR also identifies various protected tree species (coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel), which must be replaced at a 2:1 ratio (refer to LRDP MM 4.3-4). For purposes of the tree inventory conducted for the proposed Project and for consistency with the current CLAOTO, all trees measuring at least eight inches dbh were surveyed. During the tree survey, the following data were recorded: tree species, trunk circumference, tree height, and canopy width. The health and aesthetic quality of each tree was also assessed on a scale of 1 (very poor) to 5 (excellent).

A total of 191 individual trees were documented on the Project site, consisting of eight birch trees (*Betula* sp.), one camphor (*Cinnamomum camphora*), one Indian laurel fig (*Ficus microcarpa*), one jacaranda (*Jacaranda mimosifolia*), 29 Canary Island palms (*Phoenix canariensis*), 51 Canary Island pines (*Pinus canariensis*), 50 London plane trees (*Platanus X hispanica*), 17 Chinese elms (*Ulmus parviflora*), and 33 Mexican fan palms (*Washingtonia robusta*). The locations of these trees are provided on Figure 9, and a summary of tree species and quantities is provided in Table 8.

As shown on Figure 9 and summarized in Table 8, the proposed Project would result in the removal of 24 trees, of which 13 are considered mature trees per the LRDP. These 13 mature trees consist of 13 Canary Island palms. Additional non-mature trees to be removed include 11 London plane trees. Based on the LRDP's tree replacement ratio of 1:1 for mature, non-protected species, proposed Project impacts would be offset through the planting of 13 replacement trees. It is noted that none of the tree species at the Project site are native species, and none are considered protected species by UCLA.

[17] At the time the LRDP Final SEIR was certified, UCLA's adopted tree replacement mitigation was consistent with requirements in the City of Los Angeles pursuant to Ordinance No. 177404. Since that time, the City of Los Angeles Native Tree Protection Ordinance (LANTPO; Ordinance No. 186873) became effective on February 4, 2021, although it does not apply to properties within the unincorporated County.



Source(s): Psomas (August 2025)

Figure 9

Not to Scale

Tree Impacts

TABLE 8 ANTICIPATED TREE REMOVAL AND REPLACEMENT SUMMARY

Tree Species		Total Existing	Tree Removals		Replacement Ratio	Replacement Quantity
Common Name	**Scientific Name**		**Total**	**Mature**		
Birch	*Betula* sp.	8	0	0	1:1	0
camphor	*Cinnamomum camphora*	1	0	0	1:1	0
Indian laurel fig	*Ficus microcarpa*	1	0	0	1:1	0
Jacaranda	*Jacaranda mimosifolia*	1	0	0	1:1	0
Canary Island palm	*Phoenix canariensis*	29	13	13	1:1	13
Canary Island pine	*Pinus canariensis*	51	0	0	1:1	0
London plane	*Platanus X hispanica*	50	11	0	1:1	0
Chinese elm	*Ulmus parviflora*	17	0	0	1:1	0
Mexican fan palm	*Washingtonia robusta*	33	0	0	1:1	0
Total		**191**	**24**	**13**		**13**
Source: (Psomas, 2025)						

Based on the anticipated impacts, 13 trees would be replaced within the Project site. The tree replacement plan required by LRDP MM 4.3-1(c) would include the planting of trees or native shrubs in order to provide nesting, foraging or roosting habitat for birds such that the replacement number of trees and shrubs would result in a 1:1 replacement ratio.

In addition to the trees that would be removed in the course of site renovations, 13 additional trees may experience encroachment (i.e., ground disturbance within the root zone). These encroachment trees would include four Canary Island palms, eight Canary Island pines, and one Indian laurel fig (tree numbers 37, 40, 41, 109, 111, 112, 113, 114, 128, 129, 130, 131, and 152). All but two of these trees are considered mature per the LRDP Final SEIR (one Canary Island pine [No. 112] and one Indian laurel fig [No. 131] are too small to be considered mature). Based on the Arborist's review of Project plans, the extent of disturbance is not likely to endanger the trees, and the effects of the encroachments would be minimized through construction phase protective measures and ongoing tree care required by the LRDP PPs. Specifically, to ensure that these are not impacted, the proposed Project incorporates LRDP PP 4.3-1(a) (fencing at the drip line); PP 4.3-1(b) (examination and trimming of trees prior to construction); PP 4.3-1(c) (temporary irrigation and feeding); PP 4.3-1(d) (no storing or construction equipment or vehicles in the fence line of any tree); and PP 4.3-1(e) (monthly examination of trees). As noted above, the Arborist's site-specific recommendations have been incorporated into these LRDP PPs and MMs as necessary to facilitate implementation. Should the encroached trees be significantly impacted during or after construction and ultimately require removal, replacement requirements under LRDP MM 4.3-1(c) would apply.

With implementation of the required tree replacements per LRDP MM 4.3-1(c) and with incorporation of required protection measures (PPs 4.3-1[a] through 4.3-1[e]) for the trees to remain, impacts to trees would be less than significant and no additional mitigation is required.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

With the incorporation of the LRDP MMs and PPs, the proposed Project would not conflict with any applicable policies protecting biological resources.

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

Discussion

The Project site is not located within an area governed by a Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). Therefore, implementation of the proposed Project would not conflict with such plans, and there would be no impact.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

5. CULTURAL RESOURCES

Relevant elements of the proposed Project related to cultural resources include limited trenching for utility installation within the surface parking areas and below the existing building, and minor grading primarily in the southeast parking area for a service yard where new emergency generators and trash compactors would be located. While most grading depths would be on the order of a few inches, the required trenching below the building would not be deeper than approximately seven feet, and exterior trenching would not be deeper than approximately six feet below the finished surface (above the location of existing utilities and the building foundation) and therefore is not expected to encroach into native sediment. The total exterior disturbance area would be less than an acre spread throughout the existing parking areas.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

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

implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of archaeological resources is prohibited.

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

If the Archaeologist determines that the archaeological resource is not a "unique archaeological resource" or "historical resource," s/he may record the site and submit the recordation form to the California Historic Resources Information System at the South Central Coastal Information Center.

The Archaeologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the University and to the California Historic Resources Information System at the South Central Coastal Information Center.

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

Project Impact Analysis

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

Discussion

The existing building on-site (5210 Pacific Concourse Drive) was constructed in 2002 and is less than 50 years old (22 years old). Properties less than 50 years old are generally not considered eligible for listing on the National Register of Historic Places (National Register) or the California Register of Historical Resources (California Register), and there is no indication that the property exhibits architectural or historic significance. Additionally, based on the records search conducted by the South Central Coastal Information Center (SCCIC) for the proposed Project and included in Appendix C of this Initial Study, there are no historic resources listed on the California Register or National Register within 0.25 mile of the Project site (SCCIC, 2025). Therefore, the proposed

Project would not directly or indirectly impact a historic resource pursuant to CEQA Guidelines Section 15064.5.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

The proposed Project primarily involves interior renovations to an existing building and minor exterior and site improvements. Further, based on the records search conducted by the SCCIC for the proposed Project included in Appendix C of this Initial Study, there are no known archaeological resources within the Project site, and one archaeological resource site within a 0.25-mile radius of the Project site (SCCIC, 2025). Ground disturbing activities would be limited to shallow utility trenching and minor grading during construction of equipment pads and the service yard in the southeast parking area. The required trenching within previously developed areas would not be deeper than approximately seven feet and is not expected to encroach into native sediment. Therefore, it is not expected that previously unknown archaeological resources would be discovered during construction. Notwithstanding, in the unlikely event that archaeological resources are discovered, the proposed Project incorporates LRDP MM 4.4 2(a), which requires an instructional program to assist construction personnel in identifying archaeological resources; and LRDP MM 4.4-2(b), which describes procedures to be followed in case of an inadvertent discovery. With incorporation of these LRDP MMs, the proposed Project would result in a less than significant impact.

Refer to Section V.18, Tribal Cultural Resources, of this Initial Study for a discussion of potential impacts to tribal cultural resources.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment set forth in Section 5097 of the California Public Resources Code. Disturbing human remains could violate the health code, potentially destroy the resource, and would be considered a significant impact. As discussed under Threshold (b) above, ground disturbing activities associated with the proposed Project would be limited to shallow utility trenching and minor grading primarily in the southeast parking area, which would not involve excavation into native sediment. Therefore, it is not likely that human remains would be discovered during construction. Notwithstanding, in the unlikely event that human remains are discovered during construction, LRDP PP 4.4-5 identifies procedures for UCLA to follow, including compliance with state law. With incorporation of LRDP PP 4.4-5 into the Project, potential impacts related to disturbance of human remains would be less than significant.

Additionally, as discussed in Section V.18, Tribal Cultural Resources, of this Initial Study, as a result of the tribal consultation conducted pursuant to AB 52, Project-specific MM SMI TCR-3 has been included to further outline the state laws pertaining to the protection of human remains, to identify preservation of human remains in place as the preferred manner of treatment, and to establish a requirement that any discovery of human remains be kept confidential.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

With the incorporation of the LRDP PP, the proposed Project would have a less than significant potential to disturb any human remains, including those interred outside of formal cemeteries.

6. ENERGY

Relevant elements of the proposed Project related to energy include the use of construction equipment to complete interior and exterior improvements to the existing building, and other site improvements to accommodate the proposed uses. Additionally, as described in Section II.5, Proposed Project Components, within the Project Description of this Initial Study, many of the existing building systems and equipment would be replaced. The proposed Project would add two new gas-fueled boilers, gas water heaters, and four emergency generators as part of the utility upgrades.[18] The proposed Project would comply with the UC Policy on Sustainable Practices for a minor renovation project, including the requirement to achieve a minimum LEED ID+C Certified

[18] An alternative scenario involving full electrification of the building mechanical systems is also under consideration and would further improve energy efficiency on-site. Refer to Appendix AQ-4 of the AQ and GHG Report, provided in Appendix A of this Initial Study, for further discussion.

rating.[19] However, the proposed Project would strive for a Gold LEED rating. To achieve this, a full range of sustainability features related to building design and operations would be included in the proposed Project as outlined in Section II.5, Proposed Project Components, of this Initial Study.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section: LRDP MM 4.2-2(a), MM 4.2-2(b), and MM 4.2-2(c) from the Air Quality section, which address requirements for construction equipment; and PP 4.15-1 from the Greenhouse Gas Emissions section, which addresses compliance with the UC Policy on Sustainable Practices.

In addition, LRDP PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), 4.14-2(e), 4.14-3, and 4.14-9 included in Section V.19, Utilities and Service Systems, of this Initial Study have been incorporated into the proposed Project, as applicable, and require that the University continue to implement energy and water conservation measures and reduce solid waste generation which would, in turn, reduce associated energy consumption.

Project Impact Analysis

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

Discussion

Construction

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

Construction equipment used for the proposed Project would result in single event consumption of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and proposed Project construction equipment would conform to the

[19] The proposed Project does not meet the definition of a "major renovation" since it involves replacement of less than 100 percent of building systems. See University of California Policy on Sustainable Practices, Section III.A.2.c (UC, 2024a).

applicable CARB emissions standards, which promote equipment fuel efficiencies. CCR Title 13, Motor Vehicles, Section 2449(d)(3), Idling, limits idling times of construction vehicles to no more than five minutes (as identified in LRDP MM 4.2-2[a]), thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Idling limitations are enforced through periodic site inspections conducted by the UCLA Office of the Environment, Health & Safety (EH&S).

UCLA Health would select construction materials in accordance with the Buy Clean California Act (AB 262, codified in California Public Contract Code [PCC] Section 3500 et seq.) in an effort to reduce energy consumption and greenhouse gas emissions associated with the manufacture and transport of such materials. Additionally, a minimum of 65 percent of construction waste would be diverted from landfills in order to reduce solid waste disposal and the need to manufacture new products from raw materials (recycling requires less energy than producing items from virgin resources).

Therefore, it is concluded that with the implementation of the aforementioned LRDP PPs and MMs and compliance with applicable regulatory requirements, construction-related energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, resulting in a less than significant impact.

Operations

The proposed Project would involve the direct use of electricity for the operation of medical, lab and office equipment; certain HVAC system components such as heat pumps for building cooling; lighting; and appliances. The proposed Project also would entail the direct use of natural gas for building heating and hot water, specifically for existing and new boilers and new water heaters.[20] Indirect energy use would be associated with the processing and distribution of water and wastewater and fossil-fueled and electric-powered vehicles used by employees and patients. There are no aspects of the proposed Project that would contribute to wasteful, inefficient, or unnecessary energy consumption. Conversely, the proposed Project would involve interior and exterior building improvements, making use of existing infrastructure and improving energy efficiency. Specifically, the existing building was constructed in 2002 and renovated in 2020 and, thus, certain building components do not meet all of the current energy conservation requirements, nor the more stringent energy conservation requirements of the UC Policy on Sustainable Practices. The proposed building improvements would achieve a minimum LEED ID+C Certified rating and strive for a Gold rating. To achieve the LEED rating, the design, construction, and operation of the proposed Project would incorporate a series of green building strategies including, but not limited to, the following, which would serve to reduce energy demand:

- Adaptive reuse of an existing building on a developed site that is connected to existing utilities, public services, transit and alternative transportation, and other urban infrastructure;
- Striving to achieve Practice Greenhealth's award "Greenhealth Partner for Change;"[21]
- Committing to the use of 100 percent green (renewable) electricity through SCE's participation in the Clean Power Alliance;

[20] This analysis conservatively assumes the use of natural gas for most HVAC components other than the cooling plant; any electrification beyond that assumed herein would result in reduced natural gas demand and a corresponding reduction in emissions.

[21] Practice Greenhealth is the leading membership and networking organization for sustainable healthcare, delivering environmental solutions to hospitals and health systems across the United States. UCLA Health is a member of Practice Greenhealth.

- Selecting construction materials in accordance with the Buy Clean California Act (AB 262, codified in California Public Contract Code [PCC] Section 3500 et seq.) in an effort to reduce greenhouse gas emissions associated with the manufacture and transport of such materials;
- Diverting a minimum of 65 percent of construction waste from landfills in order to reduce solid waste disposal.
- Selecting energy- and water-efficient equipment and fixtures;
- Providing on-site solid waste compaction and sterilization of biohazardous waste, both of which reduce the transportation and emissions associated with waste disposal; and
- Implementing a reusable sharps container program which reduces waste generation associated with disposable sharps containers.

Relative to vehicular energy use, as described in Section V.17, Transportation, of this Initial Study, the Project site is located within 0.5 mile of the Metro C Line Aviation/Imperial Station, which would facilitate use of transit. Additionally, various transportation demand management strategies would be implemented as part of the proposed Project to reduce vehicle trips including but not limited to providing pedestrian access improvements, bicycle racks, subsidized transit passes, and carpool/vanpool assistance. Further, the proposed Project would support the use of ZEV commuting by providing 28 EV chargers in exceedance of CBC and CALGreen requirements.

In summary, the proposed Project would conserve energy through the provision of efficient building and mechanical systems designed to reduce direct and indirect electricity and gas use and via redevelopment of a site located near transit facilities, thus resulting in reduced energy use. Further, LRDP PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), 4.14-2(e), 4.14-3, and 4.14-9 included in Section V.19, Utilities and Service Systems, of this Initial Study have been incorporated into the proposed Project, as applicable, and require that the University continue to implement energy and water conservation measures and reduce solid waste generation which would, in turn, reduce associated energy consumption.

The Project's operational energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, thus resulting in a less than significant impact.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

With the incorporation of LRDP MMs and PPs, the proposed Project would result in a less than significant environmental impact related to the wasteful, inefficient, or unnecessary consumption of energy resources during both construction and operation.

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

Discussion

Plans for Renewable Energy or Energy Efficiency

A detailed discussion of the regulatory framework related to energy is addressed in Section 6.7, Energy Conservation, and Section 4.6, Greenhouse Gas Emissions, of the LRDP Final SEIR, which is incorporated by reference; and the Air Quality and GHG Report included in Appendix A of this Initial Study. Various state and/or University regulations, plans, and policies aimed at GHG emissions reduction focus on energy efficiency and renewable energy. State and University regulations related to energy that are particularly relevant to the proposed Project include the following (updated, as appropriate):

- **UC Policy on Sustainable Practices.** In June 2004, the UC developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the University as a leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, it has been revised several times with the most recent version becoming effective in April 2024. The UC Policy on Sustainable Practices calls for collective action across the UC system to address the climate crisis by establishing goals in 13 areas of sustainable practices including, but not limited to, green building design, clean energy, and sustainable transportation. Particularly relevant to the proposed Project, the UC Policy on Sustainable Practices, under the category of Green Building Design, requires that minor building renovation projects meet a minimum rating of LEED ID+C Certified (although the proposed Project would strive for a Gold rating). Additionally, the UC Policy on Sustainable Practices requires that health locations achieve Practice Greenhealth's award level of "Greenhealth Partner for Change." (UC, 2024a).

- **Executive Order B-30-15.** On April 29, 2015, Governor Edmund Brown signed EO B-30-15, which orders "A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050." Three of the five key goals for reducing GHG emissions through 2030 relate to energy: (1) increasing renewable electricity to 50 percent; (2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; and (3) reducing petroleum use in cars and trucks by up to 50 percent.

- **Senate Bill 350.** SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 increased the State Renewables Portfolio Standard (RPS)[22] RPS to 50 percent by 2030. The legislation also included interim targets of 40

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

percent by 2024 and 45 percent by 2027. SB 350 also requires the State to double Statewide energy efficiency savings in electricity and natural gas end uses by 2030 in comparison to 2015. On September 10, 2018, SB 100 provided updated RPS targets of 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030, and instructed that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by 2045.

- **California Code of Regulations Title 24.** CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Energy Code), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption.

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

  Refer to Section V.8, Greenhouse Gas Emissions, of this Initial Study for further discussion of Title 24 and CALGreen requirements.

Consistency Analysis

Similar to existing conditions at the Project site, the proposed Project would receive electricity from Southern California Edison (SCE), which has committed to diversifying their portfolio of energy sources to meet established requirements by increasing energy from wind and solar sources. The SCE 2023 power mix reflects renewable energy of 37.6 percent (SCE, 2023) and does not conflict with the renewable energy elements of EO B-30-15, SB 350, or SB 100. Additionally, UCLA Health would use 100 percent green (renewable) electricity for operation of the proposed Project through SCE's participation in the Clean Power Alliance.

As discussed in Section II.5, Proposed Project Components, and further discussed in Section V.8, Greenhouse Gas Emissions, of this Initial Study, the proposed Project would meet the requirements and intent of the UC Policy on Sustainable Practices including but not limited to requirements pertaining to energy efficiency, green building design, sustainable transportation, waste management, and UCLA Health facilities and operations. The proposed Project, which is considered a minor renovation under the UC Policy on Sustainable Practices, would involve improvements to an existing building including building systems and equipment and would achieve a minimum LEED ID+C Certified rating (although the Project would strive for a Gold rating).[23] Further, the proposed Project would comply with or exceed CALGreen Code Mandatory Measures and would incorporate LRDP MMs and PPs that serve to reduce energy demand. Notable features of the proposed Project to address improving energy efficiency are described in the response to Threshold (a) above. The proposed Project would be implemented in compliance

[23] Gas-fueled mechanical systems are permitted for minor renovation projects per the UC Policy on Sustainable Practices.

with applicable provisions of the UC Policy on Sustainable Practices, Title 24 Energy Efficiency Standards, and the CALGreen Code.

In summary, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact related to conflict with or obstruction of a state or local plan for renewable energy or energy efficiency.

7. GEOLOGY AND SOILS

The Project site is currently developed with an existing approximately 170,000-gsf two-story building constructed in 2002. The existing building complies with the UC Seismic Safety Policy last updated in November 2024 (UC, 2024b). The existing building would be retained, and the proposed Project involves interior and exterior improvements to accommodate the proposed uses. There would be limited utility trenching on-site and limited grading primarily in the southeast parking area for the new service yard, where the relocated emergency generators and new trash compactors would be located.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

PP 4.5-1(c) *The ~~campus~~ **University** shall continue to comply with the University Policy on Seismic Safety effective May 19, 2017 or with any subsequent revision to the policy that provides an equivalent or higher level of protection with respect to seismic hazards.*[24]

PP 4.5-1(d) *Development projects ~~under the LRDP Amendment~~ shall continue to be subject to structural peer review; following this review, any ~~site-specific geotechnical study recommendations, including any~~ recommendations added as a result of the peer review, shall be incorporated in the project design as appropriate.*

In addition, LRDP PP 4.7-1 and MM 4.7-1 presented in Section V.10, Hydrology and Water Quality, of this Initial Study, which address water quality protection, would be incorporated into the proposed Project.

Section 4.5, Geology and Soils, of the LRDP Final SEIR, includes a detailed discussion of the federal, state, and University regulatory framework related to geology and soils and is hereby incorporated by reference. As identified, the national model code standards (i.e., the International Building Code) adopted into Title 24, Part 2, apply to all occupancies in California except for

[24] The UC Seismic Safety Policy was updated on November 12, 2024.

modifications adopted by state agencies and local governing bodies. The version of the California Building Code (CBC) applicable to the proposed Project is the 2022 edition.

Project Impact Analysis

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

Discussion

Based on review of information published by the California Department of Conservation (DOC), California Geological Survey (CGS), the Project site is not within an Alquist-Priolo Earthquake Fault Zone, is not within a liquefaction zone, and is not within a landslide zone (DOC, 2025b). The Project site and surrounding areas are developed and relatively flat. Therefore, the proposed Project, which involves interior and exterior renovations of an existing building, would not directly or indirectly cause potential substantial adverse effects related to these seismic hazards.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact related to directly or indirectly causing potential substantial adverse effects from a known earthquake fault, seismic-related liquefaction, and seismic-related landslides.

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

Discussion

The Project site is in the seismically active Southern California region, thus consistent with existing conditions, the existing building could be subjected to moderate to strong ground shaking in the event of an earthquake occurring at one of the many active Southern California faults. The nearest fault to the Project site is the Portrero Fault associated with the Newport-Inglewood-Rose Canyon Fault Zone, which is approximately 2.8 miles to the northeast (DOC, 2025b). The existing building on the Project site, which was constructed in 2002 and renovated in 2020, meets the requirements of the UC Seismic Safety Policy.[25] Further, building improvements associated with proposed Project as described in Section II.5, Project Description, of this Initial Study, would adhere to applicable CBC requirements. Accordingly, potential impacts related to strong seismic ground shaking would be less than significant with: (1) adherence to the CBC; (2) incorporation of LRDP PP 4.5-1(c), which requires compliance with the current UC Policy on Seismic Safety; and (3) incorporation of LRDP PP 4.5-1(d), which requires structural peer review and incorporation of peer review recommendations into project design.[26] With incorporation of identified LRDP PPs, impacts would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

With the incorporation of LRDP PPs, the Project would have a less than significant impact related to seismic ground shaking.

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

Discussion

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

The Project site is developed with an existing building and surface parking. There are limited areas of exposed soils associated with existing landscaped areas. During construction activities, limited areas of soil would be exposed, and there would be an increased potential for soil erosion compared to existing conditions. Vegetation removal in landscaped (pervious) areas could reduce soil cohesion and reduce the protection from wind, water, and surface disturbance, which could render exposed soils more susceptible to erosive forces. Additionally, during a storm event, soil erosion could occur at an accelerated rate.

[25] Seismic evaluation of the building determined a Seismic Performance Rating (SPR) of IV, defined as meeting or exceeding the requirements of CEBC Part 10, Chapter 3 for Risk Category I-III performance criteria.

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

Construction activities would comply with all provisions of the CBC related to grading activities, erosion control, and construction of equipment pads to minimize or eliminate soil erosion. In addition, the Project would minimize or eliminate soil erosion through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) as required by LRDP PP 4.7-1 and incorporation of LRDP MM 4.7-1, which requires implementation of structural, nonstructural, and treatment control BMPs. LRDP PP 4.7-1 and MM 4.7-1 are included in Section V.10, Hydrology and Water Quality, of this Initial Study and incorporated into the proposed Project. Although the SWPPP would be specifically focused on water quality, it would incorporate erosion control BMPs. When these required construction-level BMPs are applied, they significantly reduce the erosion potential of any project development to negligible amounts. Incorporation of LRDP PP 4.7-1 and MM 4.7-1, as identified in Section V.10, Hydrology and Water Quality, would ensure that no potential erosion impacts occur during construction.

In the long term, the Project site would have a roughly similar amount of landscaped (pervious) area as existing conditions, and the potential for soil to be transported off-site by wind or water erosion would be similar due to the continued presence of development and landscaping. Consistent with existing conditions, areas of exposed soils would be minimal following construction of the proposed Project, and no potential, substantial erosion impacts would occur during operation.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

With the incorporation of the LRDP MMs and PPs, the proposed Project would result in no impact related to substantial soil erosion or loss of topsoil.

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

Discussion

The Project site is developed with an existing building. As previously discussed under Threshold (a), the Project site is not located in an area subject to landslides or liquefaction. Prior to UCLA's acquisition of the property, previous site preparation, grading, and building construction was conducted in accordance with applicable CBC and County of Los Angeles requirements, including requirements to incorporate recommendations from any required site-specific geotechnical studies into the building design to address geology and soil conditions, including expansive soils. The proposed Project, which would involve interior and exterior improvements to the existing building, minor site circulation improvements, utility installation, and construction of a new service

yard for the relocated generators and new trash compactors, would not involve any construction activities that would result in unstable soils. With adherence to applicable CBC regulations, the proposed Project would have a less than significant impact related to unstable geologic units or expansive soils.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to unstable geologic units or soils and expansive soils.

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

Discussion

The Los Angeles County Sanitation Districts (Sanitation Districts) provides sewer service to the Project site, and existing sewer infrastructure serves the Project site. Because no septic tanks or alternative wastewater systems are proposed, there would be no impact related to the presence of soils incapable of adequately supporting these systems.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

The Project site is developed and does not contain unique geological features. The proposed Project involves interior and exterior improvements to an existing building. Ground disturbing activities would primarily be limited to shallow utility trenching and minor grading primarily for construction of the service yard in the southeast parking area. While most grading depths would

be on the order of a few inches, the required trenching would not be deeper than approximately seven feet below the finished surface (above the location of existing utilities and the building foundation) and therefore is not expected to encroach into native sediment. Although the discovery of a unique paleontological resource or site or unique geologic feature is not anticipated, the proposed Project would incorporate LRDP MM 4.4-3(a), which requires an instructional program to assist construction personnel in identifying paleontological resources, and LRDP MM 4.4-3(b), which defines the requirements for review and recordation by a qualified Paleontologist of any paleontological resources encountered on a site. With implementation of LRDP MM 4.4-3(a) and MM 4.4-3(b), potential impacts related to paleontological resources would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

With the incorporation of LRDP MMs, the proposed Project would have no impact related to the direct or indirect destruction of a unique paleontological resource or site or unique geologic feature.

8. GREENHOUSE GAS EMISSIONS

Relevant elements of the proposed Project related to GHG emissions include the adaptive reuse of an existing approximately 170,000-gsf two-story life sciences building on the approximately 9.2-acre Project site. Interior demolition and renovation would be performed to adapt the building for the proposed uses. As described in Section II.5, Proposed Project Components, within the Project Description of this Initial Study, many of the existing building systems and equipment would be replaced. The proposed Project's primary contributors of operational GHG emissions would be mobile emissions associated with vehicle trips and operation of the emergency generators. As previously indicated, the proposed Project would achieve a minimum LEED ID+C Certified rating and would strive for a Gold rating. To achieve this, a full range of sustainability features related to building design and operations would be included in the proposed Project as outlined in Section II.5, Proposed Project Components, of this Initial Study. The sustainability features for which emission reductions have been quantified in this analysis include the purchase of 100 percent renewable energy and the addition of 28 EV charging spaces to the existing parking lots.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PP from the LRDP MMRP has been incorporated into the proposed Project and is assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

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

In addition, LRDP PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), 4.14-2(g), 4.14-3, and 4.14-9 included in Section V.19, Utilities and Service Systems, of this Initial Study have been incorporated into the proposed Project, as applicable, and require that UCLA continue to implement energy and water conservation measures and reduce solid waste generation which would, in turn, reduce associated GHG emissions.

Greenhouse Gas Background

Increasing GHG emissions have led to an anthropogenic warming trend of the earth's average temperature, which is causing changes in the Earth's climate.[27] GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other operational activities; (2) deforestation; (3) agricultural activities; and (4) solid waste decomposition. The increasing temperature phenomenon is known as "global warming," and the climatic effect is known as "climate change" or "global climate change."

GHGs are comprised of atmospheric gases and clouds in the atmosphere that influence the Earth's temperature by absorbing most of the infrared radiation that rises from the sun-warmed surface and that would otherwise escape into space. GHGs, as defined under the California Global Warming Solutions Act of 2006 (AB 32), include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). General discussions on climate change often include water vapor, atmospheric ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not formed directly in the construction or operation of development projects, nor can they be controlled by individual development projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies (such as CARB) or climate change groups (such as the California Climate Action Registry [CCAR]) as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided.

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

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

State CEQA Guidelines Regarding Greenhouse Gas Emissions

In August 2007, the California State Legislature adopted SB 97 (Chapter 185, Statutes of 2007), requiring the Office of Planning and Research (OPR)[28] to prepare and transmit new CEQA Guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, OPR adopted the new guidelines that became effective on March 18, 2010. In late 2018, OPR finalized amendments to the CEQA Guidelines,

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

[28] Now referred to as the Governor's Office of Land Use and Climate Innovation (LCI).

including changes to CEQA Guidelines Section 15064.4, which addresses the analysis of GHG emissions. The amendments became effective on December 28, 2018. However, neither a threshold of significance nor any specific mitigation measures are included or provided in the CEQA Guidelines. The CEQA Guidelines require a lead agency to make a good-faith effort, to the extent possible based on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the amendments to the CEQA Guidelines clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."

Project Impact Analysis

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

Discussion

The SCAQMD is the agency responsible for air quality planning and regulation in the Basin. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permitting as a lead agency if they are the only agency having discretionary approval for the project; and acts as a responsible agency when a land use agency must also approve discretionary permits for the project.

The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emissions thresholds that can be used to address GHG emissions. In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the Basin. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold (Guidance Document), that could be applied by lead agencies. The Working Group has not provided additional guidance since the release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to determine the

significance of GHG emissions that can be considered by a lead agency in adopting its own threshold.

As a state entity, the UC is not subject to municipal plans, policies, and regulations, including those related to GHG. However, UCLA may elect to utilize relevant standards established by other agencies for purposes of analysis. Because the proposed Project is located off-campus and the Project's environmental analysis is not tiered from the LRDP EIR, and since the Project site is located in an unincorporated area of Los Angeles County within the Basin, for purposes of this analysis, UCLA has determined based on its sole discretion that the SCAQMD Guidance Document is appropriate for determining whether the proposed Project would result in a significant impact related to GHG emissions.

At Tier 1 within the Guidance Document, GHG emissions impacts would be less than significant if a project qualifies under a categorical or statutory CEQA exemption. At Tier 2, for projects that do not meet the Tier 1 criteria, the GHG emissions impact would be less than significant if the project is consistent with a previously adopted GHG reduction plan that meets specific requirements. At Tier 3, the following screening values are identified: either (1) a single 3,000 $MTCO_2e$/yr threshold for all residential and commercial uses; or (2) separate thresholds of 3,500 $MTCO_2e$/yr for residential projects, 1,400 $MTCO_2e$/yr for commercial projects, and 3,000 $MTCO_2e$/yr for mixed-use projects. The screening thresholds are based on estimates that projects with emissions greater than the thresholds emit 90 percent of the region's GHGs. Therefore, a project with emissions less than the applicable screening value would be presumed to have less than significant GHG emissions. SCAQMD's interim thresholds used the Executive Order S-3-05 year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate change. UCLA has opted to use the SCAQMD Tier 3 screening threshold of 3,000 $MTCO_2e$/yr for all land use types.

GHG Emissions Impacts

Construction-related GHG emissions were calculated using the SCAQMD-recommended CalEEMod Version 2022.1, as described in the Air Quality and GHG Report included in Appendix A of this Initial Study. Details of the modeling assumptions and emission factors are provided in Appendix AQ-2 of Air Quality and GHG Report. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecast based on the construction assumptions included in Appendix AQ-3 of the Air Quality and GHG Report and applying the mobile-source emissions factors derived from CalEEMod.

The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to perform interior demolition, renovation of interior spaces, minor earthwork and trenching, and repaving of limited surfaces within the Project site. In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) a 30-year lifetime of the proposed Project.

CalEEMod was also used to calculate potential GHG emissions generated by the existing R&D uses (Siemens) and the proposed land uses at the Project site. The proposed Project would result in direct and indirect GHG emissions generated by the increase in vehicular trips, as well as operations associated with the proposed uses, including: (1) building operations (emissions

associated with space heating and cooling, water heating, and lighting);[29] (2) water (emissions associated with energy used to pump, convey, treat, deliver, and re-treat water); and (3) solid waste (emissions associated with waste streams [embodied energy of materials]). Detailed information about the modeling assumptions is provided in the Air Quality and GHG Report.

As previously identified, as part of the proposed Project, UCLA Health has incorporated various features to support and promote environmental sustainability by complying with applicable State and local regulatory requirements, including the provisions set forth in the UC Policy on Sustainable Practices. Notably, UCLA Health would achieve a minimum LEED ID+C Certified rating and would strive for a Gold rating. Refer to the analysis under Threshold (b) below for a discussion of sustainability features incorporated into the proposed Project. The sustainability features for which emission reductions have been quantified in CalEEMod include: the use of 100 percent renewable energy and the addition of 28 EV charging spaces to the existing parking lots. The provision of EV charging stations would facilitate and encourage use of alternative fueled vehicles. The proposed Project would also implement energy- and water-efficiency measures that would result in increased energy and water efficiency; these measures are described in LRDP PPs 4.14-2(a) through 4.14-2(d), PP 4.14-2(g), PP 4.14-3, and PP 4.14-9 in Section V.19, Utilities and Service Systems, of this Initial Study.

The estimated net increase in GHG emissions for the proposed Project, taking into consideration emissions from operation of the existing building, are shown in Table 9. As shown, the proposed Project's estimated annual net GHG emissions are approximately 2,357 $MTCO_2e$/yr.

As discussed above, a numeric threshold for determining the significance of GHG emissions in the Basin has not been established by the SCAQMD for projects where it is not the lead agency. UCLA has opted to use the SCAQMD's Tier 3 screening threshold of 3,000 $MTCO_2e$/yr for all land use types. The proposed Project's annual net GHG emissions would not exceed this threshold. 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.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project's estimated annual GHG emissions would be below the SCAQMD Tier 3 screening threshold of 3,000 $MTCO_2e$/yr for all land use types and would therefore result in a less than significant impact.

[29] An alternative scenario involving full electrification of the building mechanical systems has also been evaluated with regard to potential GHG impacts. Refer to Appendix AQ-4 of the AQ and GHG Report, provided in Appendix A of this Initial Study, for further discussion.

TABLE 9 ANNUAL GHG EMISSIONS SUMMARY – NET INCREASE[A]

Emissions Source	Net Project Emissions ($MTCO_2e$)
Mobile	2,589
Area[b]	0
Energy[c]	(228)
Water/Wastewater[e]	(102)
Solid Waste[d]	84
Refrigerant	0
Emergency Generators	195
Electric Vehicle Charging Credit	(207)
Construction	27
Total Emissions	**2,357**
SCAQMD Project Threshold	**3,000**
Exceed Threshold?	**No**

[a] CO2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix AQ-3 of the AQ and GHG Report. Emissions represent net increase (Project minus Existing uses to be removed).
[b] Area source emissions are from landscape equipment. Landscaping activities under the Project would be similar or the same as under the existing uses. Therefore, the net increase in landscaping emissions would be zero.
[c] Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.
[d] Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.
[e] Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.
Source: (Eyestone, 2025)

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

Discussion

Regulatory Framework

A detailed discussion of the regulatory framework for GHGs is provided in Appendix AQ-1 of the Air Quality and GHG Report included in Appendix A of this Initial Study. As identified, there are a number of plans, regulations, programs, and agencies that provide policies, requirements, and guidelines regarding GHG emissions at the federal, State, regional, and local levels. A summary of key regulations is provided below followed by an assessment of the proposed Project's consistency.

University of California

- **University of California Policy on Sustainable Practices.** In June 2004, the University of California developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the University as a

leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, the policy has been revised several times, most recently in April 2024, and has expanded to cover the areas of climate action, sustainable transportation, sustainable building and laboratory operations for campuses, zero waste, sustainable procurement, sustainable food services, sustainable water systems, sustainability at UC Health, general sustainability performance assessment, and health and well-being (UC, 2024a). The UC Policy on Sustainable Practices includes climate change goals for the 10 UC campuses, five academic health centers, UC Agriculture and Natural Resources locations, Lawrence Berkeley National Laboratory, and the UC Office of the President.

The 2024 update on the Policy on Sustainable Practices reflects climate change goals for all UC campuses that are consistent with or exceed the objectives set by AB 1279 and the 2022 Scoping Plan. It supersedes prior reduction targets developed under the Carbon Neutrality Initiative (CNI) adopted in 2013, and requires, among other actions, each campus to reduce GHG emissions from all scopes by 90 percent (compared to 2019 emissions) by 2045 and to neutralize any remaining emissions through carbon removal. The Policy on Sustainable Practices reflects a desire to prioritize direct, total emissions reductions without the reliance on carbon offsets and commits the UC system to implementing actions to minimize its impact on the environment and reduce its dependence on nonrenewable energy.

State

- **AB 32**, the California Global Warming Solutions Act of 2006, is the primary state regulation relative to GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020.

- **Executive Order (EO) S-3-05** establishes a goal of reducing GHG emissions to the year 2000 level by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

- **SB 375** provides for a planning process to coordinate land use planning and regional transportation plans and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 requires Metropolitan Planning Organizations (MPOs), including SCAG, to incorporate a Sustainable Communities Strategy in their RTPs that will achieve GHG emission reduction targets set by CARB. There are two mutually important facets to SB 375: reducing VMT and encouraging more compact, complete, and efficient communities for the future. Pursuant to SB 375, SCAG adopted the 2024-2050 RTP/SCS (also referred to as Connect SoCal 2024) in April 2024. Connect SoCal 2024 represents the vision for Southern California's future, including policies, strategies, and projects for advancing the region's mobility, economy, and sustainability through 2050. Although the UC is not subject to the regional planning process, discussion of SB 375 and Connect SoCal 2024 is provided herein for informational purposes.

- **EO B-30-15** orders an interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 be established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. EO B-30-15 also directs CARB to update the *Climate Change Scoping Plan* to express the 2030 target in terms of million metric tons of carbon dioxide equivalent ($MMTCO_2e$).

- **SB 350** is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of EO B-30-15. The text of SB 350 sets a December 31, 2030 target for 50 percent of electricity to be generated from renewable sources.

- **SB 32 and AB 197** amend Health and Safety Code Division 25.5, establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of State climate policies reach disadvantaged communities. The new goals outlined in SB 32 update the scoping plan requirement of AB 32 and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. AB 197 adds two members to the CARB and requires measures to increase transparency about GHG emissions, climate policies, and GHG reduction actions.

- **AB 1279.** In September 2022, Governor Newsom signed into law AB 1279, or the California Climate Crisis Act.[30] AB 1279 requires the State to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter.[31] The bill requires California to reduce statewide GHG emissions by 85 percent below 1990 levels by 2045 and directs CARB to work with relevant state agencies to achieve these goals and update its Scoping Plan to reflect the 2045 target.[32] In its latest 2022 Scoping Plan Update, discussed below, CARB set carbon removal/capture targets of 20 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) by 2030 and 100 $MMTCO_2e$ by 2045 (CARB, 2022).[33] Before the passage of AB 1279, California had already indicated it was headed in the direction of net-zero emissions by 2045 after Governor Brown signed Executive Order (EO) B-55-18 in 2018, which established an additional statewide goal of achieving carbon neutrality by 2045 (State of California, 2018).

- **SB 100** requires renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045.

- **EO B-55-18** sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045, and achieve net negative emissions thereafter.

- **California Code of Regulations Title 24.** CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Energy Code), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption. On August 11, 2021, the CEC adopted the 2022 Title 24 Energy Code, which was approved by the California Building Standards Commission (CBSC) in December 2021. The 2022 Title 24 Energy Code includes the 2022 Building Energy

[30] California Health and Safety Code Section 38562.2
[31] *Id.*
[32] *Id.*
[33] CARB's Scoping Plans translated the reduction targets established in AB 32 and SB 32 to emissions levels in $MMTCO_2e$. However, CARB's Scoping Plan provides a carbon removal/capture metric, rather than an emission reduction metric.

Efficiency Standards, which became effective on January 1, 2023. Updates for the 2025 standards are set to take effect on January 1, 2026.

CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission (CBSC). CALGreen improves public health, safety, and general welfare through enhanced design and sustainable construction of buildings while conserving natural resources. The CBC provides the minimum standard that buildings must meet in order to be certified for occupancy. The 2022 CALGreen went into effect on January 1, 2023. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2025 CALGreen that goes into effect on January 1, 2026.

- **Buy Clean California Act.** The Buy Clean California Act (BCCA) (California Public Contract Code Sections 3500-3505) states the Department of General Services (DGS), in consultation with CARB, is required to establish and publish the maximum acceptable Global Warming Potential (GWP) limit for four eligible construction materials. The BCCA targets carbon emissions associated with the production of structural steel (hot-rolled sections, hollow structural sections, and plate), concrete reinforcing steel, flat glass, and mineral wool board insulation. When used in public works projects, which includes UC facilities, these eligible materials must have a GWP that does not exceed the limit set by DGS.

- **The CARB Scoping Plan**, required by AB 32, is a GHG reduction roadmap developed and updated by CARB at least once every five years, as required by AB 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB adopted the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) in December 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan Update shifted the focus to the newer SB 32 goal of a 40-percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress toward achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

  The 2022 Scoping Plan is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The estimated statewide GHG emissions with and without reduction measures in the 2022 Scoping Plan are provided in Appendix AQ-1 of the Air Quality and GHG Report included in Appendix A of this Initial Study. The 2022 Scoping Plan reflects existing and recent direction in the Governor's Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. A summary of major climate

legislation and executive orders issued since the adoption of the 2017 Scoping Plan is also provided in Appendix A.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements, and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority.

Appendix D, Local Actions, of the 2022 Scoping Plan includes recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies and approval of new land use development projects, including through environmental review under CEQA.

Regional

- **SCAG RTP/SCS.** To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS in September 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality, and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 with respect to meeting the State's GHG emission reduction goals.

  Similar to the 2020–2045 RTP/SCS, the updated 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the existing and future needs of the region through projects, investments, policies and strategies. The 2024–2050 RTP/SCS remains focused on comprehensive regional transportation planning integrated with the development of sustainable communities, while reflecting a holistic approach to supportive programs and strategies such as workforce development, broadband, and mobility hubs. The primary goal of the 2024–2050 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options. To accomplish this goal, the 2024–2050 RTP/SCS identifies various strategies to reduce per capita VMT. The 2024–2050 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.

As previously indicated, while the UC is not subject to the regional planning process, discussion of SB 375 and the RTP/SCS, including the 2024–2050 RTP/SCS, is provided herein for informational purposes.

Consistency Analysis

Pursuant to Section 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the proposed Project's consistency with the UC Policy on Sustainable Practices, CARB 2022 Scoping Plan, and SCAG's 2024–2050 RTP/SCS is discussed below. It should be noted that the proposed Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary since both of these plans have been superseded by the 2022 Scoping Plan.

The analysis below describes the extent to which the proposed Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the proposed Project would be consistent with the applicable GHG reduction plans and policies.

Consistency with the UC Policy on Sustainable Practices

The proposed Project incorporates previously adopted LRDP PP 4.15-1, which ensures implementation of applicable provisions of the UC Policy on Sustainable Practices. The majority of the sustainable practices policies are applicable at the UC-wide or campus-wide level and do not necessarily apply to individual projects. Examples include systemwide targets for emissions reductions, procedures for the purchase of campus fleet vehicles, preparation of Climate Action Plans (CAPs), campus and health system procurements, and campus outreach programs. Following is a discussion of the proposed Project's consistency with those requirements of the UC Policy on Sustainable Practices that apply to individual projects.

The policies and procedures regarding Green Building Design include the following goals applicable to projects that involve a minor renovation of an existing building, such as the proposed Project:

- At a minimum achieve a LEED-ID+C Certified rating and register with the utilities' energy efficiency program, if eligible.
- By 2025, each health location will obtain 100 percent clean electricity.

The proposed Project would be subject to the 2022 Title 24 standards and would be designed to achieve LEED ID+C certification at minimum, while striving for a Gold rating. As identified in Section II.5, Proposed Project Components, of this Initial Study, the sustainability features to be incorporated into the proposed Project would include but not be limited to: electrification of certain HVAC system components to reduce natural gas usage and associated emissions; the use of 100% renewable electricity through SCE's Clean Power Alliance; enhanced commissioning of building mechanical systems to maximize efficiencies; and new efficient emergency generators. Additionally, the proposed Project would incorporate previously adopted water conservation measures (LRDP PP 4.14-2[a] through PP 4.14-2[d]), solid waste conservation measures (LRDP PP 4.14-3), and energy conservation measures (LRDP PP 4.14-9) as identified above. Therefore, the proposed Project would comply with relevant UC requirements related to Green Building Design.

Also relevant to the Project, the Sustainable Transportation section of the UC Policy on Sustainable Practices includes strategies for reducing commute emissions. The Sustainable Transportation policy includes goals to:

- Reduce GHG emissions from each location fleet by requiring (after 2023) zero-emission vehicles, plug-in hybrid or dedicated clean transportation fueled vehicles to account for at least 50 percent of all vehicle acquisitions. Additionally, this would be accomplished by the acquisition and/or use of zero-emission or plug-in hybrid vehicles.
- Reduce the percentage of employees and students commuting by single-occupancy vehicles (SOV) by 10 percent relative to the 2015 SOV commute rates by 2025; and (2) have no more than 40 percent of employees and no more than 30 percent of all employees and students commuting to each location by SOV by 2050.

While these goals are typically measured for each academic or health campus rather than individual projects, the proposed Project would support these reduction goals with the addition of 28 EV charging stations, including four for UCLA Health's zero-emission fleet vehicles, within the existing parking lots on-site, which would exceed CALGreen requirements. The proposed Project's convenient access to public transit, TDM measures such as discounted transit passes and carpool planning support, as well as the provision of bicycle parking would result in a reduction of SOVs and thus vehicle trips, VMT, and associated GHG emissions. Therefore, the proposed Project would support Sustainable Transportation goals set forth in the UC Policy on Sustainable Practices.

Sustainability policies specific to UC Health are also established and include the following requirements applicable to the Project:

- Health locations will achieve Practice Greenhealth's award "Greenhealth Partner for Change."
- Health locations will achieve a target of 25 pounds (lbs) of total waste as defined by Practice Greenhealth per Adjusted Patient Day by 2025 and strive for 20 lbs of total waste per Adjusted Patient Day by 2030. In meeting these goals, Health locations will follow the provisions outlined in Section F of UC Policy on Sustainable Practices (Policy on Zero Waste), including limiting combustion and reducing the use of foam and single-use products.
- Health locations will reduce growth-adjusted potable water consumption 20% by 2020 and 36% by 2025, when compared to a three-year average baseline of FY2005/06, FY2006/07, and FY2007/08.[34]

UCLA Health is a member of Practice Greenhealth, and the proposed Project would comply with applicable requirements to achieve the "Greenhealth Partner for Change" award. The proposed Project would implement UCLA Health's existing programs that reduce the amount of solid waste diverted to landfills during operation, including those detailed in UCLA's Zero Waste Plan. Practice Greenhealth defines total waste as municipal solid waste plus all forms of regulated waste, including but not limited to, regulated medical waste, biohazardous waste, pharmaceutical waste, and universal waste. UCLA's extensive multi-stream waste diversion is accomplished through various recycling and waste management programs, including but not limited to programs for food and beverage containers, plastics, paper, metals, green waste, food waste, construction waste, and electronics. Additional sustainability features incorporated into the proposed Project include

[34] While this requirement is not measurable for the proposed Project given the lack of appropriate baseline data, it is included herein to convey the water conservation efforts required by the UC Policy on Sustainable Practices.

the provision of on-site solid waste compaction and sterilization of biohazardous waste, both of which reduce the transportation and associated emissions associated with waste disposal, as well as a reusable sharps container program to reduce waste generation associated with disposable sharps containers. UCLA is able to monitor and enforce compliance with established diversion requirements through review of waste hauler data. Additionally, a minimum of 65 percent of construction waste would be diverted from landfills in order to reduce solid waste disposal, as specified in UCLA's standard design specifications and construction documents.

With respect to water conservation, LRDP PPs 4.14-2(a) through 4.14-(d) are incorporated into the proposed Project and require using low-flow water fixtures, reducing irrigation needs, promptly detecting and repairing water and irrigation pipe leaks, and minimizing the use of water to clean walkways and other hardscape, which would serve to reduce water demands. Additionally, as required by LRDP PP 4.14-2(g), building occupants would be educated on the importance of water conservation measures. As such, the proposed Project would support both the waste reduction and water conservation goals established for UC Health.

In summary, the proposed Project would not conflict with UC Policy on Sustainable Practices and would support achievement of UC's sustainability goals.

Consistency with CARB's 2022 Climate Change Scoping Plan

As discussed above, the Scoping Plan is a strategy that CARB develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, the third update to the original plan adopted in 2008.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." Jurisdictions that want to take meaningful climate action aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also consider the three priority areas: transportation electrification, VMT reduction, and building decarbonization. To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas.[35] An evaluation of the goals, plans, and policies implemented by UCLA Health as part of the proposed Project to support the GHG reduction strategies in the Scoping Plan's three priority areas is provided below.

- **Transportation Electrification.** As identified above, the proposed Project would include the addition of 28 EV charging stations to the existing parking lots, including four chargers for UCLA Health's zero-emission fleet vehicles. While not specific to the proposed Project, the UC Policy on Sustainable Practices also establishes requirements for the conversion of fleets to zero-emission vehicles, and UCLA Health is required to comply with these requirements.

- **VMT Reduction.** The Project area is well served by transit, and the proposed Project incorporates various strategies to reduce SOV travel, vehicular trips, and associated VMT,

[35] Refer to the Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas listed in Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.

including pedestrian access improvements, subsidized transit passes, and assistance with carpooling and vanpooling. The proposed Project would also include eight short-term bicycle parking spaces. Further, based on the Project-specific VMT analysis prepared by Fehr & Peers (included in Appendix F of this Initial study), the Project site is located within a low VMT area, and the proposed Project would have a less than significant VMT impact.

- **Building Decarbonization.** The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan). California's transition away from fossil fuel–based energy sources will bring the GHG emissions associated with building energy use down to zero as the electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

  As previously discussed, the UC Policy on Sustainable Practices requires each campus and health location to obtain 100 percent clean electricity (defined as having carbon intensity factor of less than 150 lbs CO_2e per MWh). The proposed Project would purchase 100 percent renewable electricity for proposed Project operations. In future years, the SCE will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the UC policies and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas. Although the proposed Project would include new natural gas fired boilers, any future replacements would be zero-emissions consistent with SCAQMD Rule 1146.2.[36]

  The proposed Project would further support these decarbonization strategies by achieving LEED ID+C certification and striving to achieve a Gold rating. LEED measures incorporated into the Project include water conservation, enhanced insulation, and energy efficiency measures. Additionally, the proposed Project would replace existing fixtures with energy-efficient LED lighting, thus reducing overall energy usage compared to baseline conditions.

In summary, the proposed Project would incorporate a variety of GHG reduction strategies that reflect the Scoping Plan's three priority areas (transportation electrification, VMT reduction, and building decarbonization). As such, the proposed Project would not conflict with CARB's 2022 Climate Change Scoping Plan.

Consistency with the SCAG 2024–2050 RTP/SCS

The 2024–2050 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Successful implementation of the

[36] An alternative scenario involving full electrification of the building mechanical systems has also been evaluated with regard to potential GHG impacts. Refer to Appendix AQ-4 of the Air Quality and GHG Report included in Appendix A of this Initial Study for further discussion.

2024–2050 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments like the proposed Project, relevant strategies and policies set forth in the 2024–2050 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency. Although the proposed Project is not a regional project requiring consistency with the RTP/SCS (and the UC, as a constitutionally autonomous entity does not participate in the RTP/SCS regional planning framework), these strategies and policies and the proposed Project's consistency are addressed below for informational purposes.

- **Integrated Growth Forecast.** The RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to a specific area; these are used by SCAG in all phases of implementation and review. As discussed earlier under Air Quality Threshold (a), the proposed Project's increase in employees (conservatively assumed to be all employees) is well within the employment projections for Los Angeles County, as set forth in the 2020–2045 RTP/SCS. Similarly, the proposed Project is consistent with the regional growth projections in the 2024–2050 RTP/SCS. Specifically, the total number of proposed Project employees would represent approximately 0.4 percent of the employment increase projected for Los Angeles County in the 2024–2050 RTP/SCS for the period between 2025 and 2030.[37]

- **VMT Reduction Strategies and Policies.** The proposed Project is designed and would be constructed to incorporate features to support and promote environmental sustainability. The proposed Project represents an adaptive reuse of an existing building in an area well served by public transportation. Additionally, the proposed Project incorporates strategies to reduce the number of single occupancy vehicle trips to the Project site, as discussed previously. Notably, to encourage the use of transit, direct pedestrian access from the nearby Metro C Line Aviation/LAX Station to the Pacific Concourse business park would be provided to facilitate the 'last mile' connection to the Project site, and discounted transit passes would be available to proposed Project employees as part of UCLA Health's standard TDM program. The proposed Project would also be consistent with the following key GHG reduction strategies in SCAG's 2024–2050 RTP/SCS, which are based on changing the region's land use and travel patterns:[38]

    - New job growth focused in High Quality Transit Areas (HQTAs); and
    - Limit total acreage of greenfield or otherwise rural land uses converted to urban use.

    As discussed above, the proposed Project represents an adaptive reuse of an existing building and involves increased employment within an HQTA that is well served by public transportation.[39] This concentration of development in a highly urbanized area would avoid impacts to greenfield or rural areas and is consistent with the overall growth pattern encouraged in the RTP/SCS. In addition, the proposed Project would incorporate various strategies identified above to reduce SOV trips. These strategies would promote a

[37] According to the Demographic & Growth Forecast technical report included in SCAG's 2024–2050 RTP/SCS, the number of employees in Los Angeles County is estimated to increase from approximately 5,131,000 in 2025 to 5,277,000 in 2030 (an increase of approximately 146,000 employees).
[38] SCAG, 2024–2050 RTP/SCS, Table 5.1, Connect SoCal 2024 Performance Measures.
[39] SCAG, 2024–2050 RTP/SCS, Map 3.4, Priority Development Areas.

reduction in VMT and a related reduction in GHG emissions, which would be consistent with the goals of SCAG's 2024–2050 RTP/SCS.

- **Increased Use of Alternative Fueled Vehicles Policy Initiative.** The second category of strategies and policies of the 2024–2050 RTP/SCS, with regard to individual development projects like the proposed Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2024–2050 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. As previously discussed, the proposed Project would provide EV charging stations for both general use and UCLA Health fleet vehicles, exceeding CALGreen requirements.

- **Energy Efficiency Strategies and Policies.** The third category of strategies and policies within the 2024–2050 RTP/SCS applicable to individual developments, such as the proposed Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2024–2050 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. As discussed above, the proposed Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the UC Policy on Sustainable Practices. Additionally, the proposed Project would comply with the CALGreen Code. These standards would reduce energy and water usage and waste generation and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure.

- **Land Use Assumptions.** At the regional level, the 2024–2050 RTP/SCS is a plan adopted for the purpose of reducing GHGs.[40] In order to assess the proposed Project's consistency with the 2024–2050 RTP/SCS, the proposed Project's land use characteristics are also analyzed for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and policies of applicable regional land use plans and regulations, such as the 2024–2050 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. In sum, the proposed Project is the type of land use development that is encouraged by the 2024–2050 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.[41] By furthering implementation of SB 375, the proposed Project supports regional land use and transportation GHG reductions consistent with State regulatory requirements. Therefore, the proposed Project would not conflict with the 2024–2050 RTP/SCS.

Based on this analysis, the proposed Project would be consistent with the UC Policy on Sustainable Practices, CARB's 2022 Scoping Plan, and SCAG's 2024–2050 RTP/SCS and, therefore, would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. As such, the proposed Project's impact under Threshold (b) would be less than significant.

[40] As part of the State's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2024–2050 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates practices to achieve the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled.

[41] As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

9. HAZARDS AND HAZARDOUS MATERIALS

Relevant elements of the proposed Project related to hazards and hazardous materials include typical construction activities, proposed operations, and minor access driveway improvements. Construction would involve demolition of certain components of the existing building to accommodate the proposed upgraded building systems, equipment, and the proposed uses. The proposed Project would convert a portion of the existing building space from non-clinical use into a licensed medical-use facility with an ambulatory surgery center, imaging, physical therapy, and clinic spaces. The proposed Project would require the use and storage of hazardous materials typical of medical uses and would also generate biohazardous and hazardous waste.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

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

PP 4.6-4 *While not expected to occur ~~on-campus~~, if contaminated soil and/or groundwater is encountered during the removal of on-site debris or during excavation and/or grading activities, the construction contractor(s) shall stop work and immediately inform the EH&S. An on-site assessment shall be conducted to determine if the discovered materials pose a significant risk to the public or construction workers. If the materials are determined to pose such a risk, a remediation plan shall be prepared and submitted to the EH&S to comply with all federal and State regulations necessary to clean and/or remove the contaminated soil and/or groundwater. Soil remediation methods could include, but are not necessarily limited to, excavation and on-site treatment, excavation and off-site treatment or*

disposal, and/or treatment without excavation. Remediation alternatives for cleanup of contaminated groundwater could include, but are not necessarily limited to, on-site treatment, extraction and off-site treatment, and/or disposal. The construction schedule shall be modified or delayed to ensure that construction will not inhibit remediation activities and will not expose the public or construction workers to significant risks associated with hazardous conditions.

Project Impact Analysis

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

Discussion

Construction-Related Hazards

Building Materials

In 1978, the Consumer Products Safety Commission banned paint and other surface coating materials that contain lead, and the use of asbestos, for the most part, has been voluntarily discontinued since the late 1970s. However, some non-friable materials (e.g., wall materials and stucco, roofing material, floor tile and mastic), may have been manufactured with asbestos-containing materials (ACMs) and used into the early 1980s. As identified in the Phase I Environmental Site Assessment (Phase I ESA) for the Project site prepared by Environmental Audit, Inc. (EAI, 2020) and included in Appendix D of this Initial Study, based on the age of the existing building, which was constructed in 2002, no hazardous building materials, such as lead-based paint (LBP) and/or ACMs are anticipated to be present. Notwithstanding, the proposed building renovation activities would be conducted in accordance with applicable regulations and programs, summarized below.

The Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the SCAQMD under its Rule 1403. The California Division of Occupational Safety and Health (Cal/OSHA) also regulates asbestos as a potential worker safety hazard. Any activity that involves cutting, grinding, or drilling during building renovation or demolition or that involves relocation of underground utilities could release friable asbestos fibers, if present, unless proper precautions are taken. Lead, a naturally occurring metallic element with toxic properties, is regulated as a hazardous material. Lead is also regulated as a toxic air contaminant. Lead may pose a hazard if it is disturbed during demolition or other construction activities and not properly contained or removed.

Because exposure to such materials can result in adverse health effects in uncontrolled situations, several regulations pertaining to abatement, handling, and disposal of ACMs and LBP have been

developed. Per LRDP PP 4.6-1, the UCLA's EH&S procedures require that all applicable federal, State, and local regulations as well as UCLA's Asbestos Management Program and Lead Compliance Program, be implemented during construction activities.

The UCLA Asbestos Management Program is an ongoing activity that involves coordinating construction and maintenance activities with safe work practices involving asbestos. All asbestos removal operations shall be performed by a Cal/OSHA-DOSH-registered and California-licensed asbestos contractor. All disturbances of ACMs, and/or abatement operations, shall be performed under the surveillance of a third-party Cal/OSHA Certified Asbestos Consultant. Asbestos abatement must also be performed in accordance with SCAQMD Rule 1403. Finally, notification of the presence and location of asbestos-containing materials shall be made to all employees and vendors who work within the subject structure, in accordance with California Health and Safety Code, Section 25915, et seq. (also known as Connolley Notification Bills). Further, ACMs and asbestos-containing construction materials (ACCMs) not to be disturbed are managed in place in accordance with the UCLA's Operations and Maintenance (O&M) Program which addresses building cleaning, maintenance, renovation, and general operational procedures to minimize exposure to asbestos. Similarly, UCLA's Lead Compliance Program is directed at reducing lead exposure to a less than significant level through education, inspection, testing, and removal by State-certified contractors in compliance with applicable health and safety and hazardous materials regulations.

Polychlorinated biphenyls (PCBs) were used as coolants and insulators in electrical transformers beginning in 1929; however, exposure to PCBs was found to be hazardous to humans and the use of PCBs has been regulated since 1977. Products made before 1977 that may contain PCBs include old fluorescent lighting fixtures and electrical devices. Based on the date of construction of the existing building, the light ballasts within the existing building may contain small quantities of PCBs. In small quantities, these ballasts may be disposed of in a municipal solid waste landfill. However, the USEPA advises that an accumulation of a large number of ballasts for disposal should be handled as a PCB waste and disposed of properly in accordance with local, state, and federal regulations.

Compliance with UCLA, as well as federal and state health and safety laws and regulations would ensure a less than significant impact associated with the potential release of hazardous building materials during renovation activities. Therefore, there would be a less than significant impact.

Construction Activities

The transport, use, and handling of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk than would occur on any other similar construction site. Materials such as paints, adhesives, solvents, and other substances typically used in building construction would be present on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. Construction contractors would be required to comply with all applicable federal, state, and local laws and regulations regarding the use, storage, and transport of hazardous construction-related materials, including but not limited to requirements imposed by the USEPA, California Department of Toxic Substances Control (DTSC), SCAQMD, Regional Water Quality Control Board (RWQCB), and University of California. With mandatory adherence to applicable hazardous materials regulations, the proposed Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

Contaminated Soil and/or Groundwater

Based on the Phase I ESA prepared for the Project site, there are no known recognized environmental conditions (REC), controlled RECs, or historical RECs associated with the Project site, including operations previously conducted by Siemens. Oil stains on paved areas used for parking and the prior use of the Project site for agricultural activities (prior to the mid-1940s when the site was initially developed) were identified as de minimis conditions. The Project site was not identified on any of the database lists reviewed by EDR as known or suspected to be contaminated but was identified as a site known to generate hazardous waste and wastewater due to operations conducted by Siemens. (EAI, 2020)

Because there are no known current or historical hazardous materials spills at the Project site, no hazardous materials are anticipated to be encountered in the soils underlying the site during the limited excavation activities primarily associated with the installation of utility infrastructure and minor grading primarily in the southeast parking area. Based on information for a property located at 5201 W. Imperial Highway (approximately 1,300 to 1,400 feet north of the Project site), in April 2020 the depth to groundwater ranged from approximately 47 to 52 feet below the ground surface (bgs) with a north-northwest groundwater flow direction (EAI, 2020). The historic depth to groundwater in the area is estimated to be approximately 40 feet deep (DOC, 1998). Therefore, groundwater is not anticipated to be encountered during the proposed shallow excavation (trenching) activities, which are expected to a maximum depth of approximately seven feet bgs. However, if any contaminated soil and/or groundwater is discovered, all construction activities shall stop, and an assessment would be made regarding the nature and extent of contamination and the type (if any) of remediation that would be required. The primary purpose of LRDP PP 4.6-4 is to ensure that any encounter with contaminated soil and/or groundwater or related remediation activities, if necessary, would not expose the public or construction workers to hazardous conditions. Continued compliance with all applicable federal, state, and local laws and regulations, as well as incorporation of LRDP PPs 4.6-1 and 4.6-4, would ensure that impacts associated with the potential exposure of contaminated soil or groundwater are less than significant, and no additional mitigation is required.

Operational Hazards

As described in Section II, Project Description, the proposed Project would convert a portion of the existing building from non-clinical use into a licensed medical-use facility with an ambulatory surgery center, imaging, physical therapy, and clinic spaces. The proposed medical as well as laboratory land uses would require the use and storage of hazardous materials and would also generate biohazardous and hazardous waste, as described below. Additionally, the existing on-site HAZMAT storage container used by Siemens would be removed.

The UCLA Health Clinical Microbiology Laboratory, also known as the Brentwood Laboratory, provides comprehensive testing for infectious agents and select autoimmune disorders, and hosts an accredited Clinical Microbiology Postdoctoral Training Program. The proposed Project would allow for the relocation and consolidation of the UCLA Health Clinical Microbiology Laboratory to the Project site. These laboratories would store limited amounts of biohazardous materials (e.g., blood and other potentially infectious materials), hazardous materials (e.g., alcohols, acids, bases and other materials with varying levels of toxicity), compressed gas, and waste (hazardous waste

and medical waste) at the Project site.[42] A portion of the new lab would include Biosafety Level 3 (BSL-3) spaces, offering the highest level of safety and containment.[43]

The ambulatory surgery center would store compressed gas and limited amounts of pharmaceutical and medical waste. The sterile processing department would store hazardous disinfection/sterilization agents and hazardous waste, and the imaging center would store compressed gas as well. The compressed gas manifold systems would be located in separate secure rooms.

As at other UCLA facilities, regulated medical waste and universal hazardous waste would be processed at a transfer station and transported out of state for incineration. Biohazardous waste generated by the proposed Project would be sterilized using a self-contained, closed, San-I-Pak unit and stored on-site until it is transported and treated off-site prior to landfill disposal. No on-site waste treatment would occur.

The U.S. Department of Health and Human Services (DHHS), the Centers for Disease Control and Prevention, and the National Institutes of Health prescribe containment and handling practices for use in microbiological, biomedical, and animal laboratories. Biohazardous medical waste is generally regulated in the same manner as hazardous waste, except that special provisions apply to storage, disinfection, containment, and transportation. The California Department of Public Health (CDPH) Medical Waste Management Program enforces the Medical Waste Management Act and related regulations. All UCLA laboratories follow mandated hygienic practices, and UCLA has developed programs, practices, and procedures for monitoring, routinely inspecting, reporting, and managing waste to reduce community and worker exposure to potential hazards associated with medical wastes and biological hazards. UCLA follows guidelines promulgated by the DHHS, which determine the level of safety precautions that must be used for four tiers of relative hazards.

With adherence to UCLA's standard procedures for handling hazardous materials as required by LRDP PP 4.6-1, and compliance with applicable regulations and industry safety protocols, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material, or reasonably foreseeable upset and accident conditions involving the release of hazardous materials. There would be a less than significant impact during operation.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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[42] According to the LRDP, by statutory definition, biohazardous materials include biohazardous laboratory wastes and biologic specimens such as human or animal tissue, as defined by Section 117635 of the *California Health and Safety Code.* Medical wastes must be managed as biohazardous material.

[43] BSL-3 safety standards address facility design and engineering systems for laboratories that conduct infectious disease research involving pathogenic and aerosol transmissible agents, in order to provide the best possible physical containment of such agents. Source: University of California Biosafety Level 3 (BSL-3) Laboratory Design Standards, January 2020.

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

Discussion

The Project site is located approximately 0.1-mile north of Del Aire Elementary School. Accordingly, the proposed Project has the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes within 0.25 mile of an existing or proposed school. As described above under the analysis for Thresholds (a) and (b), the use and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, state, and local regulations, and with existing (or equivalent) University programs and procedures, as required by LRDP PP 4.6-1, which would preclude substantial public safety hazards. Accordingly, there would be a negligible potential for individuals at the school to be exposed to substantial safety hazards associated with the emission, handling, or routine transport of hazardous substances or materials to and from the Project site, and impacts would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

With the incorporation of the LRDP PP, the proposed Project would have a less than significant impact related to emitting hazardous emissions or handling hazardous materials within 0.25-mile of a school.

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

Discussion

Based on review of the CalEPA Cortese List Data Resources (DTSC, 2025), the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur, and no mitigation is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would not create a significant hazard to the public or the environment related to listing of the site pursuant to Government Code Section 65962.5. Therefore, no impact would result.

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

Discussion

The Project site is located approximately 0.5-mile southeast of the Los Angeles International Airport; however, it is located outside of the Airport Influence Area and outside the 65 CNEL noise contour for the airport (LA County, 2004). Accordingly, the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Impacts would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

There would be a less than significant safety impact to people residing or working in the Project area, and a less than noise exposure impact from noise levels associated with nearby airport uses.

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

Discussion

The Office of Emergency Management (OEM) is responsible for organizing and directing the preparedness efforts of the Emergency Management Organization of Los Angeles County. The emergency response plan for the unincorporated areas of Los Angeles County, including the Project site, is the Operational Area Emergency Operations Plan (OAEOP), which is prepared by

OEM (County of Los Angeles, 2023). The OAEOP establishes the coordinated emergency management system within the Los Angeles County Operational Area (OA). The OAEOP also provides guidance and procedures for the County to prepare for, respond to, and recover from the effects of large scale emergencies. The Project site is within Disaster Management Area (DMA) G established in the OAEOP. Each DMA has a Disaster Management Area Coordinator (DMAC) who works with every city within their area to coordinate throughout all phases of emergency management.

Based on review of the Los Angeles County General Plan Safety Element, Figure 12.9, Evacuation Routes Map, La Cienega Boulevard, which is adjacent to the Project site to the east, can serve as an evacuation route (LA County, 2025b). Other nearby evacuation routes are Aviation Boulevard to the west, W. 120th Street to the south, I-405 to the east, and I-105 to the north. La Cienega Boulevard is accessed from the Project site via Pacific Concourse Drive and an existing driveway at the southeast corner of the Project site. As described in Section II.5, Proposed Project Components, the proposed Project involves minor changes to the two Project site driveways to improve access for trucks. These limited improvements would primarily occur within the Project site and would not hinder evacuation from the area along Pacific Concourse Drive or La Cienega Boulevard during construction, if necessary. Therefore, the proposed Project would not impair implementation of or physically interfere with implementation of the OAEIOP or emergency evacuation. This impact would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

As shown on the aerial photograph provided on Figure 2, the Project site is located in a developed urban area, and there are no undeveloped wildland areas in the vicinity. Based on review of the Los Angeles County General Plan Safety Element, Figure 12.5, Fire Hazards Severity Zones Policy Map, the Project site is not located within or near a very high, high or moderate fire hazard severity zone (LA County, 2025b). Additionally, according to the California Department of Forestry and Fire Protection (CalFire), the Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ); the nearest VHFHZA is approximately 4.8 miles to the north (CAL FIRE, 2025). Accordingly, implementation of the proposed Project would not expose people or structures to wildland fires. No impact would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would result in no impact related to wildland fires.

10. HYDROLOGY AND WATER QUALITY

Relevant elements of the proposed Project related to hydrology and water quality include replacement of existing roof drains, as well as minimal changes to the ground-level surface associated with improvements to site circulation and limited trenching and grading for utility installation and construction of the service yard, respectively. The proposed improvements would result in a negligible change in the amount of pervious surface and associated storm water runoff from the Project site. The modifications to the ground-level surface areas may result in the addition of new drain inlets that would connect to the on-site storm drain. However, existing drainage patterns would be maintained. No changes to the on-site water quality treatment facilities are required or proposed.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Any changes in the text from the LRDP Final SEIR are signified by strikeout (~~strikeout~~) where non-applicable text has been removed. Such changes have been made so the stated requirement better applies to the proposed Project.

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

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

Non-Structural/Structural:

- *Landscape Maintenance*
- *Catch Basin Stenciling and Clean-out*
- *Efficient Irrigation Practices*
- *Litter Control*
- *Fertilizer Management*
- *Public Education*

- *Efficient Irrigation*
- *Permanent Vegetative Controls*
- *Runoff – Minimizing Landscape Design*

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

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

Project Impact Analysis

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

Discussion

Surface Water

Section 4.8, Hydrology and Water Quality, of the LRDP Final SEIR, includes a detailed discussion of the regulatory framework for hydrology and water quality, which is relevant to the Project site, and is incorporated by reference. In summary, the State Water Resources Control Board (SWRCB) and the nine RWQCBs are responsible for the protection of water quality in California; the Project site is within the Los Angeles Regional Water Quality Control Board (LARWQCB). The SWRCB establishes statewide policies and regulations for implementing water quality control programs mandated by federal and state water quality statutes and regulations. The RWQCBs develop and implement Water Quality Control Plans (Basin Plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which is further discussed under Threshold (e) below, implements a number of federal and state laws for the proposed Project area, the most important of which are the State Porter-Cologne Water Quality Control Act and the Federal Clean Water Act (CWA).

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

discharges or to be covered by the Construction General Permit. The physical impact area for the proposed exterior improvements is shown on Figure 8 and encompasses approximately 40,774 sf (less than one acre). Therefore, the proposed Project would not be required to comply with requirements and water quality standards set forth in the current NPDES permit regulations (i.e., processing through the SWRCB is not required). However, as required by LRDP PP 4.7-1, it would comply with the University's Municipal Separate Storm Sewer System Permits (MS4) permit, which requires the contractor to prepare a Storm Water Pollution Prevention Plan (SWPPP), and would implement a variety of BMPs per UCLA's standard practices, which generally align with NPDES requirements.

As described in Section II.5, Proposed Project Components, of this Initial Study, the proposed Project includes interior and exterior building improvements, including replacement of roof drains. Additionally, there would be minor modifications to the ground-level surface areas (e.g., for site circulation, relocation of equipment, utility installation, etc.). The types of urban pollutants generated from operations at the Project site would not change. The existing storm water quality system at the Project site (dry wells) was designed in 2019 and complies with the current County of Los Angeles Low Impact Development (LID) requirements. The proposed minor site modifications would result in a negligible change in the impervious surface area on-site and would not change current drainage patterns. The Project site would continue to drain to inlets discharging to the dry wells. Therefore, no modification to the current water quality system would be required. Notwithstanding, Project-specific BMPs (structural and non-structural), including the BMPs listed in LRDP MM 4.7-1, would be implemented. As such, the proposed Project would not degrade surface water quality in receiving waters or groundwater quality.

The proposed Project would be implemented in accordance with applicable regulations, would not violate any water quality standards or waste discharge requirements (WDRs), or otherwise substantially degrade surface water quality. Further, the proposed Project would not conflict water quality control requirements outlined in the Basin Plan. Accordingly, surface water quality impacts during construction and operation would be less than significant.

Groundwater

As previously discussed in Section V.7, Geology and Soils, of this Initial Study, based on information for a property located approximately 1,300 to 1,400 feet north of the Project site, the depth to groundwater ranges from approximately 47 to 52 feet bgs with a north-northwest groundwater flow direction. The historic depth to groundwater in the area is estimated to be approximately 40 feet deep. Therefore, groundwater would not be encountered during the proposed shallow excavation (trenching) activities, which are expected to a maximum depth of approximately seven feet bgs, and the proposed Project would not degrade groundwater quality. No impact would result.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

With the incorporation of the LRDP PP and MM, the proposed Project would have no impact related to violation of waste discharge requirements and the potential to substantially degrade groundwater quality, and a less than significant impact related to violation of water quality standards or an otherwise substantial degradation of surface water quality.

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

Discussion

As discussed under Threshold (a) above, the proposed Project would not involve any construction activities with the potential to encounter groundwater. Additionally, there would be a negligible change in the amount of impervious surface area at the Project site, there would be no extraction of groundwater associated with the proposed Project, and the potential for groundwater recharge at the developed Project site would be limited to recharge associated with on-site landscaped areas, consistent with existing conditions. The Project site is not within a groundwater recharge area. Therefore, the proposed Project would not impede sustainable groundwater management of the basin, and no impact would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact related to a substantial decrease of groundwater supplies or interference with groundwater recharge such that the proposed Project may impede sustainable groundwater management of the basin.

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

Discussion

There are no natural drainage courses or streams on or near the Project site. Further, the proposed Project would result in a negligible change in the amount of impervious surface area at the Project site and the associated rate and amount of surface runoff. The proposed Project would not change the existing drainage patterns on the Project site, including through the alteration of the course of a stream or river or through the addition of impervious surfaces. Further, there would continue to be limited erosion potential due to the developed nature of the Project site. Because there would be a negligible change, if any, in the amount and rate of runoff from the Project site, implementation of the proposed Project would not exceed the capacity of the storm drain system or result in flooding on- or off-site. As discussed under Threshold (d) below, the Project site is not within a flood zone; therefore, the proposed Project would not impede or redirect flood flows. Further, the proposed Project would not generate additional sources of polluted runoff. No impacts would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impacts related to: (1) substantial erosion or siltation on or off the site; (2) a substantial increase in the rate or amount of surface runoff in a manner that would result in flooding on or off the site; (3) creation or contribution to runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; and (4) impeding or redirecting flood flows.

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

Discussion

The Project site is within Federal Emergency Management Agency (FEMA) Zone X, which is identified as an area of minimal flood hazard (FEMA, 2008). As such, the proposed Project would not risk the release of pollutants due to inundation resulting from a flood. Based on review of the Los Angeles County General Plan Safety Element, Figure 12.3, Tsunami Hazard Areas, the Project site is not within a mapped tsunami hazard/inundation area (LA County, 2025b). Further, the Project site is not near a body of water and would not be subject to a seiche. Therefore, the proposed Project would have no impact related to the release of pollutants due to inundation.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact related to the release of pollutants due to inundation.

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

Discussion

The Project site is located within the jurisdiction of the Los Angeles RWQCB (LARWQCB). The LARWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface water. The LARWQCB has developed a Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which was most recently updated in September 2014 (LARWQCB, 2014). The Basin Plan establishes water quality standards for the ground and surface waters of the region and describes the actions by the LARWQCB and others that are necessary to achieve and maintain the water quality standards. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. The LARWQCB ensures compliance with the Basin Plan through its issuance of NPDES permits, issuance of WDRs, and Water Quality Certifications pursuant to Section 401 of the CWA. The proposed Project would be implemented in accordance with applicable water quality regulations.

The 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in "high-" and "medium-priority" basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long-term sustainability. The California Department of Water Resources (DWR) currently categorizes the Coastal Plain of Los Angeles West Coast Basin as a "very low-priority" basin; therefore, the West Coast Basin is not subject to the requirements of the SGMA. As previously discussed, the proposed Project would not entail contact with or the extraction of groundwater located beneath the site, the proposed Project would not impact groundwater quality, and the Project site is not within a groundwater recharge area. Therefore, the proposed Project would not obstruct or conflict with a sustainable groundwater management plan.

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

11. LAND USE AND PLANNING

Relevant elements of the proposed Project related to land use include the interior and exterior building improvements, including improvements to the building systems, mechanical equipment, and site circulation, to accommodate the proposed uses. The proposed Project would convert a portion of the existing building space from a non-clinical use into a licensed medical-use facility with an ambulatory surgery center, imaging, physical therapy, and clinic spaces.

There are no PPs or MMs related to land use and planning adopted as part of the LRDP Final SEIR that are applicable to the proposed Project.

Project Impact Analysis

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

Discussion

As shown on the aerial photograph provided in Figure 2, the Project site and surrounding area are fully developed and urbanized. The existing building would be retained, and interior and minor exterior improvements would be made to accommodate the proposed uses. An existing residential community is located immediately west and south of the Project site, separated by an eight-foot-tall perimeter wall. Additionally, multi-family uses are located to the north across Pacific Concourse Drive. The proposed Project does not include any changes to the perimeter wall or the interface with adjacent uses and would not involve any components that would divide an established community. Accordingly, no impact would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

Section 4.9, Land Use and Planning, of the LRDP Final SEIR, discusses various regional and local plans applicable to UCLA development projects, and is incorporated by reference.

Regional Planning Programs

The proposed Project, which involves renovation of an existing approximately 170,000-gsf building and would accommodate an estimated 593 employees, would not be considered regionally significant by SCAG based on the established criteria in Section 15206 of the State CEQA Guidelines, which is applied by SCAG to determine regional significance. Additionally, as previously discussed, the UC is not subject to SCAG's regional planning process. Therefore, further evaluation of the proposed Project's consistency with SCAG's Connect SoCal 2024 is not required.

The proposed Project's consistency with other regional plans and programs that address specific topical issues are discussed in the respective sections of this Initial Study. This includes, but is not limited to, the SCAQMD AQMP (Air Quality section), the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Hydrology and Water Quality section), energy plans and regulations (Energy section), and GHG reduction plans (Greenhouse Gas Emissions section). As indicated in the analysis presented in this Initial Study, the proposed Project would be consistent with the requirements outlined in these regional plans, including requirements in place to avoid or mitigate environmental effects.

UCLA Plans

The UCLA 2002 LRDP, as amended through 2018, guides the physical development of the UCLA campus to serve its teaching, research, and public service mission. The Project site is not located on campus and therefore is not considered in relation to the remaining building square footage allocation for campus uses or parking and trip generation limits identified in the LRDP. Nonetheless, the proposed Project would support patient care as well as UCLA's broader education, research, and service missions and would not conflict with the provisions of the UCLA LRDP. The proposed Project's consistency with UC policies adopted for the purposes of avoiding or mitigating an environmental effect is discussed in the respective sections of this Initial Study. Notably, the UC Policy on Sustainable Practices is discussed in Section IV.5, Energy, and Section IV.8, Greenhouse Gas Emissions. The University Policy on Seismic Safety is discussed in Section IV.7, Geology and Soils. As identified, the proposed Project does not conflict with these policies.

County of Los Angeles Plans

UCLA is part of the University of California, a constitutionally created entity of the State of California. As a constitutional entity, the University of California is not subject to municipal regulations, including general plans, specific plans, and zoning regulations. The Project site is located in an unincorporated area of the County of Los Angeles, within the community of Del Aire. Although this jurisdictional separation provides no formal mechanism for joint planning or the exchange of ideas, UCLA may consider, for coordination purposes, aspects of local plans and policies governing the communities surrounding the campus, but it is not bound by those plans and policies in its planning efforts. The campus seeks to maintain an ongoing exchange of ideas and information and to pursue mutually acceptable solutions for issues that confront both the University and the broader community. To foster this process, UCLA participates in, and communicates with, local jurisdictions and community organizations and sponsors various

meetings and briefings to keep local organizations, associations, and elected representatives apprised of ongoing planning efforts.

Although as a UC-owned property, the Project site is no longer subject to municipal land use and zoning regulations, for contextual purposes it is noted that the Project site has an IL (Light Industrial) land use designation and is zoned Manufacturing-Industrial Planned Development (MPD) (LA County, 2025a). The proposed uses are consistent with those permitted by the County's designations, and the proposed Project would not alter the existing building characteristics originally established pursuant to the County's development standards.

As a highly urbanized area, there are no natural resources on or near the Project site; therefore, the proposed Project would not conflict with goals or policies adopted for the purpose of avoiding or mitigating an environmental effect to a natural resource.

In summary, the proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This impact would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would result in a less than significant impact related to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed Project.

12. MINERAL RESOURCES

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

Project Impact Analysis

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

Discussion

The Project site and surrounding area are fully developed and urbanized, and are not located in an area where mineral resources of regional or statewide significance are considered to be present or likely to be present, and are not located on a locally-important resource recovery site

(LA County, 2015). There would be no impact to mineral resources resulting from implementation of the proposed Project.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

13. NOISE

Relevant elements of the proposed Project related to noise and vibration include limited outdoor construction activities and long-term operations. The use of diesel-powered construction equipment would contribute to temporary noise. Operation of building equipment and vehicle traffic also would generate noise.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed; and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project and to ensure implementation of the mitigation.

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

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

Project-Specific Implementing Measure: Exterior construction activities Monday through Friday shall be limited to 7:00 AM to 7:00 PM.

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

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

PP 4.9-8 *The ~~campus~~ **University** shall continue to conduct meetings, as needed, with off-campus constituents that are affected by ~~campus~~ construction to provide*

advance notice of construction activities and ensure that the mutual needs of the particular construction project and of those impacted by construction noise are met~~, to the extent feasible~~.

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

MM 4.9-7 *A solid noise barrier that would break the line of sight between the construction site and a sensitive use area would reduce construction noise by at least 5 dBA. ~~Therefore, when detailed construction plans are complete, the campus shall review the locations of sensitive receptor areas in relation to the construction site. If it is determined that a 12-foot-high barrier would break the line of sight between an 11-foot-high noise source and adjacent sensitive use areas, a~~ **A** temporary **12-foot-high** barrier shall be erected **along the southwestern property line between the construction areas and existing residential uses to the west (receptor location R3) and to the south (receptor location R4).** ~~to the extent practicable~~. The barrier shall be solid from the ground to the top with no openings~~, and shall have a weight of at least 3 pounds per square foot, such as plywood that is ½-inch thick~~.*

Fundamentals of Sound and Environmental Noise

A detailed discussion of the fundamentals of sound and environmental noise is presented in Section 2.1 of the Noise Technical Report (Noise Report) for the proposed Project prepared by Acoustical Engineering Services, Inc. (AES) (AES, 2025a) and included in Appendix E of this Initial Study. Noise is commonly defined as sound that is undesirable because it interferes with speech communication and hearing, causes sleep disturbance, or is otherwise annoying (unwanted sound). The decibel (dB) is a conventional unit for measuring the amplitude of sound because it accounts for the large variations in sound pressure amplitude and reflects the way people perceive changes in sound amplitude. The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human frequency-dependent response, the A-weighted filtering system is used to adjust measured sound levels (dBA). The term "A-weighted" refers to filtering the noise signal in a manner that corresponds to the way the human ear perceives sound. Examples of various sound levels in different environments are provided in Table 1 of the Noise Report. To a person with normal hearing, a change in sound level of 3 dB is considered "just perceptible," a change in sound level of 5 dB is considered "clearly noticeable," and a change (i.e., increase) of 10 dB is generally recognized as "twice as loud" as the original sound.

In an outdoor environment, sound levels attenuate (reduce) through the air as a function of distance. Such attenuation is commonly referred to as "distance loss" or "geometric spreading," and is based on the noise source configuration (e.g., point source or line source). For a point source, such as a piece of mechanical/electrical/construction equipment (e.g., air conditioner, electrical transformer, or bulldozer), the rate of sound attenuation is about 6 dB per doubling of distance from the noise source. For a line source, such as a constant flow of traffic on a roadway, the rate of sound attenuation is about 3 dB per doubling of distance.

In addition, structures (e.g., buildings and solid walls) and natural topography (e.g., hills) that obstruct the acoustics line-of-sight between a noise source and a receptor further reduce the noise level at the receptor if the receptor is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as "barrier insertion loss." If a receptor is located behind the wall but still has a view of the source (i.e., line-of-sight is not fully blocked), some barrier insertion loss would still occur; however, to a lesser extent. Additionally, a receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall reflects noise back to the receptor, thereby compounding the noise. Outdoor noise barriers can provide noise level reductions ranging from approximately 5 dBA (where a barrier just breaks the acoustic line-of-sight between the noise source and receiver) to an upper range of 20 dBA with a more substantial barrier.

Several rating scales have been developed to analyze the adverse effect of environmental noise on people. Since environmental noise fluctuates over time, these scales consider the total acoustical energy content, as well as the time and duration of occurrence. The most frequently used noise descriptors are summarized below.

- **Equivalent Sound Level (L_{eq})**. L_{eq} is a measurement of the acoustic energy content of noise averaged over a specified time period. Thus, the L_{eq} of a time-varying sound and that of a steady sound are the same if they deliver the same amount of energy to the receptor's ear during exposure. L_{eq} for one-hour periods, during the daytime or nighttime hours, and 24 hours are commonly used in environmental noise assessments. L_{eq} can be measured for any time period, but is typically measured for an increment of no less than 15 minutes for environmental studies.

- **Statistical Sound Level (Ln)**. Ln is a statistical description of the sound level that is exceeded over some fraction of a given period of time. For example, the L50 noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L8 and L25 represent the noise levels that are exceeded 8 and 25 percent of the time, respectively, or for 5 and 15 minutes during a 1-hour period, respectively. The County of Los Angeles noise limits are provided in terms of statistical sound levels.

- **Community Noise Equivalent Level (CNEL)**. CNEL is the time average of all A-weighted sound levels for a 24-hour day period with a 10 dBA adjustment (increase) added to the sound levels that occur in the nighttime hours (10:00 P.M. to 7:00 A.M.) and a 5 dBA adjustment (increase) added to the sound levels that occur in the evening hours (7:00 P.M. to 10:00 P.M.). These adjustments attempt to account for increased human sensitivity to noise during the quieter nighttime periods, when the ambient background noise is lower and where sleep is the most probable activity. CNEL has been adopted by the State of California as the rating scale to be used to define the community noise environment for development of the community noise element of a General Plan and is also used by the County of Los Angeles for its land use planning.

Groundborne Vibration

Vibration is commonly defined as an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The peak particle velocity (PPV) or the root-mean square (RMS) velocity is usually used to describe vibration amplitudes. PPV is defined as the maximum instantaneous peak of the vibration signal and is typically used for evaluating potential building damage. The RMS velocity is defined as the

square-root of the average of the squared amplitude of the vibration signal and is used for evaluating human response to ground-borne vibration. Decibel notation (VdB) is commonly used to express RMS vibration velocity amplitude. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to 6 times greater than RMS vibration velocity; the Federal Transit Administration (FTA) uses a crest factor of 4. Ground-borne vibration generated by man-made activities (e.g., road traffic, construction operations) typically weakens with greater horizontal distance away from the source of the vibration. The vibration impact studies show in most circumstances common ground-induced vibrations related to roadway traffic and construction activities pose no threat to buildings or structures.

Noise-Sensitive Receptors

Some land uses are considered more sensitive to intrusive noise than others based on the types of activities typically engaged in at those land uses. For purposes of analysis, the County of Los Angeles General Plan Noise Element defines noise-sensitive land uses as residences, hospitals, schools, childcare facilities, and places of assembly, which are especially vulnerable to excessive noises generated by airports, rail, freeways and primary arterials, heavy industry, and warehousing facilities. Based on a review of the land uses in the vicinity of the Project site, four noise receptor locations were selected to represent existing noise-sensitive uses within 500 feet of the Project site: receptor locations R1 through R4 shown on Figure 10. These locations represent areas with land uses that qualify as noise-sensitive uses.

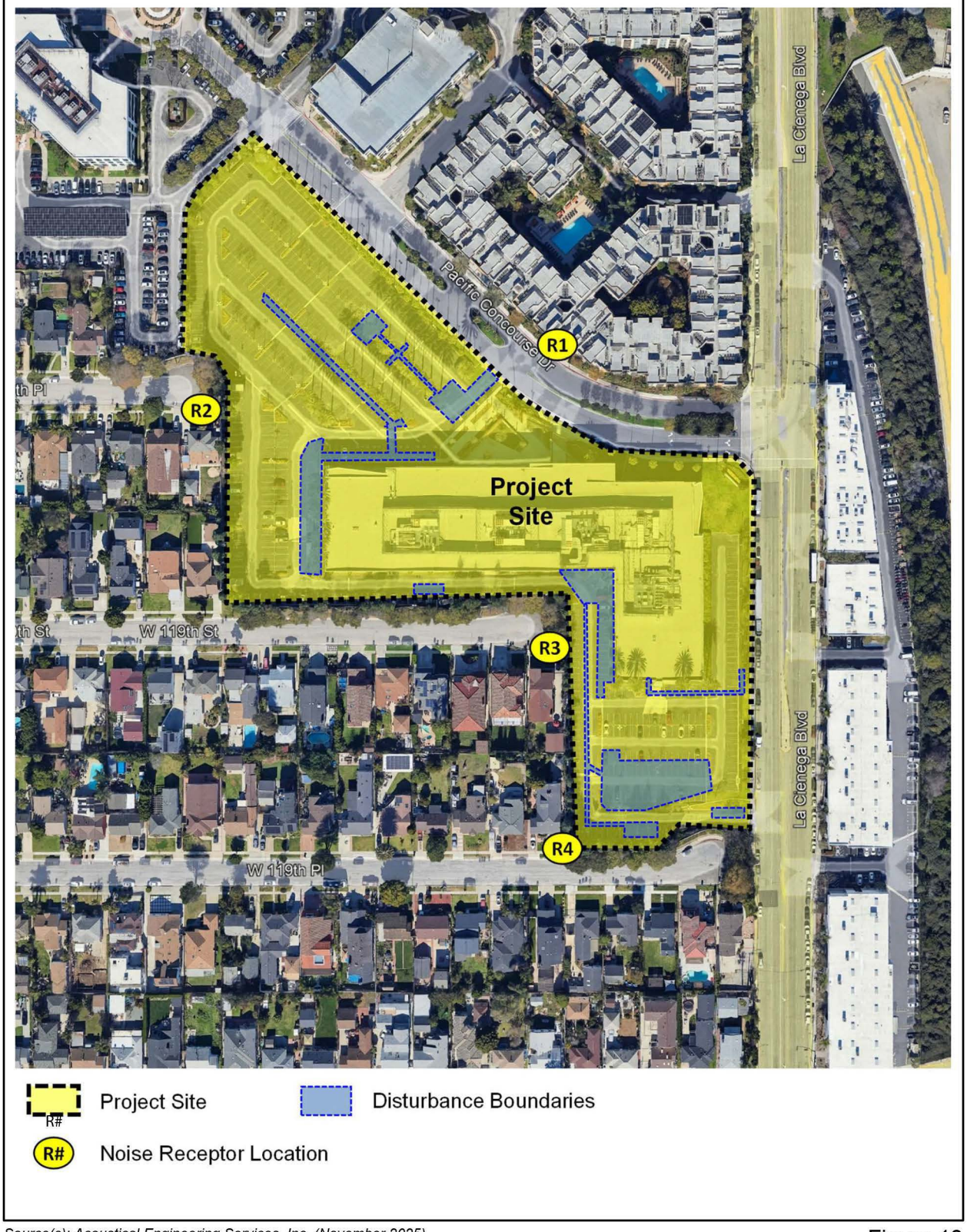
Existing Ambient Daytime Noise Levels

Noise measurements were conducted at the four off-site receptor locations on July 10, 2025 to establish baseline noise conditions in the vicinity of the Project site. In addition, the measurement locations provide an adequate basis to evaluate potential noise impacts at other sensitive receptors located beyond each measurement location in the same direction from the Project site. The results of the ambient sound measurements are summarized in Table 10.

TABLE 10 EXISTING AMBIENT NOISE LEVELS

Receptor Location	Approximate Distance to Project Site	Measured Ambient Noise Levels (dBA L_{eq})	
		Daytime Hours (7 a.m. to 10 p.m.)	Nighttime Hours (10 p.m. to 7 a.m.)
R1 – Multi-family residential use on the north side of Pacific Concourse Drive, north of the Project site	70 feet[a]	56.7	55.4
R2 – Single-family residential use located at the cul-de-sac of W 118th Place, west of the Project site	Adjacent to the Project site	49.4	50.7[b]
R3 – Single-family residential use located at the cul-de-sac of W 119th Street, west of the Project site	Adjacent to the Project site	50.7	50.1
R4 – Single-family residential use located at the cul-de-sac of W 119th Place, west of the Project site	Adjacent to the Project site	56.5	52.7

[a] Distances are estimated based on Google Earth map and are referenced to the Project site's nearest boundary.
[b] Nighttime ambient noise at receptor location R2 was influenced by nearby residential mechanical equipment in operation at the time ambient measurements were taken.
Source: (AES, 2025a); Detailed measurement data is provided in Appendix A of the Noise Report included in Appendix E of this Initial Study.



Source(s): Acoustical Engineering Services, Inc. (November 2025)

Figure 10

Not to Scale

Noise Measurement Locations

Based on field observations, the current ambient noise at the measurement locations is dominated by local traffic and, to a lesser extent, aircraft flyovers and other typical urban noises. As indicated in Table 10, the existing daytime ambient noise levels at the off-site noise receptor locations range from 49.4 dBA (L_{eq}) at receptor location R2 to 56.7 dBA (L_{eq}) at receptor location R1. The measured nighttime ambient noise levels range from 50.1 dBA (L_{eq}) at receptor location R3 to 55.4 dBA (L_{eq}) at receptor location R1. Thus, the existing ambient noise levels at all off-site locations are above the County's presumed daytime and nighttime ambient noise levels of 50 dBA (L_{eq}) and 45 dBA (L_{eq}), respectively, for residential uses. Therefore, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining the proposed Project's potential noise impacts.

Existing Groundborne Vibration Levels

Based on field observations, the primary source of existing ground-borne vibration in the vicinity of the Project site is vehicular travel (e.g., standard cars, refuse trucks, delivery trucks, construction trucks, school buses, and buses) on local roadways. According to the Federal Transit Administration (FTA) technical study (Federal Transit Administration: Transit Noise and Vibration Impacts Assessments), typical road traffic-induced vibration levels are unlikely to be perceptible by people. Specifically, the FTA study reports that "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Trucks and buses typically generate ground-borne vibration velocity levels of around 63 VdB (at 50 feet distance), and these levels could reach 72 VdB when trucks and buses pass over bumps in the road. Per the FTA, 75 VdB is the dividing line between barely perceptible (with regards to ground vibration) and distinctly perceptible. Therefore, existing ground vibration in the vicinity of the Project site is assumed to be generally below the perceptible level. However, ground vibration associated with heavy trucks traveling on road surfaces with irregularities, such as speed bumps and potholes, could reach the perceptible threshold.

Project Impact Analysis

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

Discussion

UCLA is not subject to municipal regulations, such as the County and City General Plans or ordinances. However, in the absence of established noise standards, UCLA may elect to utilize relevant standards established by other agencies for purposes of analysis. Based on the location of the Project site within an unincorporated area of the County of Los Angeles, for purposes of this analysis, a significant construction noise impact could occur if off-site sensitive receptors would be subjected to Project-related construction noise levels in excess of the County's Noise Ordinance standards, which are further discussed in Section 2.3, Regulatory Framework, of the Noise Report included in Appendix E of this Initial Study. Accordingly, the following thresholds apply to construction-related noise impacts:

- For mobile source equipment, including intermittent and short-term use (less than 10 days), the significance thresholds are 75 dBA for single-family residences and 80 dBA for multi-family residences between the hours of 7:00 A.M. to 8:00 P.M., every day, except Sundays and legal holidays. At all other times, the construction noise thresholds for these uses are 60 dBA for single-family residences and 64 dBA for multi-family residences.

- For stationary source equipment, including repetitively scheduled and relatively long-term operation (10 days or more), the thresholds are 60 dBA for single-family residences and 65 dBA for multi-family residences between the hours of 7:00 A.M. to 8:00 P.M. every day, except Sundays and legal holidays. At all other times, the construction noise thresholds for these uses are 50 dBA for single-family residences and 55 dBA for multi-family residences.

The thresholds of significance for the proposed Project's on-site (stationary) and off-site (mobile) operational noise sources are also based on the County's Noise Ordinance (i.e., not to exceed ambient levels). Therefore, potential operational noise impacts would be considered significant if:

- The proposed Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (see Figure 2 of the Noise Report, Guidelines for Noise Compatibility by Land Use for a description of these categories); or

- The proposed Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 5 dBA in CNEL or greater and remain within the "normally acceptable" or "conditionally acceptable" category; or

- Proposed Project-related on-site and off-site operational noise sources, such as outdoor building mechanical, loading docks and trash compactors, or off-site roadway traffic, exceed the ambient noise level (hourly Leq) at noise-sensitive uses.

Construction-related Noise Impacts

Construction of the proposed Project would commence with removal of portions of the existing surface parking lots, followed by limited earthwork and utility trenching, construction of interior tenant improvements and limited exterior equipment pads/enclosures, and paving. While not required to comply with County requirements, as identified in LRDP PP 4.9-7(a) and the associated implementing measure presented previously, construction activities would generally occur Monday through Friday from 7:00 AM to 7:00 PM and Saturday from 8:00 AM to 6:00 PM, consistent with the County Noise Ordinance. Construction delivery/haul trucks would travel on approved truck routes between the Project site and I-105 and/or I-405. Trucks leaving the Project site are anticipated to exit on Pacific Concourse Drive, heading east to La Cienega Boulevard, north to Imperial Highway, and then to the regional transportation facilities.

Noise impacts from Project-related construction activities occurring within or adjacent to the Project site would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Each stage of construction would involve the use of various types of construction equipment and would, therefore, have its own distinct noise characteristics. Noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the Project site. In addition, certain Project construction phases would have the potential to overlap. Therefore, overlapping construction noise activities were evaluated to determine the full extent of potential impacts.

Individual pieces of construction equipment that would typically be used for construction produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the construction equipment, as shown in Table 6 of the Noise Technical Report. The construction equipment noise levels produced at the 50-foot distance (Reference Maximum Noise Levels at 50 Feet) shown in Table 6 are taken from the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide, which is a technical report containing actual measured noise data for construction equipment. These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine operating at maximum speed). However, equipment used on construction sites often operates under less than full power conditions, or partial power. To characterize construction-period noise levels more accurately, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

Table 11 provides the estimated construction noise levels for the proposed Project's construction phases, including potential overlapping construction activities, at the four off-site noise-sensitive receptor locations. As shown, the estimated noise levels would be below the significance threshold at all off-site receptor locations. No additional noise mitigation measures are required. However, in accordance with previously adopted LRDP MM 4.9-7, which would be incorporated into the proposed Project (with minor modifications to reflect site conditions), solid temporary noise barriers would be constructed along the southern and western site boundaries to reduce the construction-related noise levels at the nearest receptors.

Noise attenuation would also be provided with the proposed Project's incorporation of LRDP PP 4.9-7(b), which requires the muffling or shielding of equipment; and LRDP PP 4.9-7(c), which requires that stationary construction equipment material and vehicle staging be placed away from sensitive receptors. Nonetheless, even with the required noise attenuation measures, construction activities would be heard at neighboring residences above the existing noise levels and would create temporary annoyance. Therefore, the proposed Project also incorporates LRDP PP 4.9-8, which requires the campus to contact off-campus constituents to provide notice of construction activities. With adherence to established construction hours and incorporation of LRPD PPs and MMs described above, the construction activities associated with the proposed Project would not conflict with standards established to reduce construction-related noise and would be less than significant.

Operational Noise Impacts

Operation of the proposed Project would generate noise from: (a) on-site stationary noise sources, including outdoor-mounted mechanical equipment (e.g., HVAC equipment), loading areas, trash compactors, and emergency generators; and (b) off-site mobile (roadway traffic) noise sources. Potential operational noise impacts are evaluated below.

TABLE 11 ON-SITE CONSTRUCTION NOISE IMPACTS BY CONSTRUCTION PHASE

Off-Site Receptor Location	Estimated Noise Levels by Construction Phase[a] dBA (L_{eq})						Significance Criteria[e] dBA (L_{eq})	Maximum Noise Exceedance Above Criteria dBA (L_{eq})	Significant Impact Without Mitigation?
	Demolition[a]	Building Construction[b]	Paving	Trenching	Building + Paving[d,c]	Building + Trenching[d]			
R1	70.9	62.0	64.7	65.2	66.6	66.9	80.0	0.0	No
R2	65.8	56.7	59.4	62.1	61.3	63.2	75.0	0.0	No
R3	72.8	64.5	67.1	72.0	69.0	72.7	75.0	0.0	No
R4	70.5	61.9	64.6	64.7	66.5	66.5	75.0	0.0	No

[a] Consists primarily of interior demolition and limited exterior site areas. The existing building would remain.
[b] Construction activities would primarily consist of interior improvements, with limited exterior equipment installation.
[c] Activities are anticipated to overlap for a total of four weeks.
[d] Activities are anticipated to overlap for a total of ten weeks.
[e] Significance criteria based on County of Los Angeles Noise Ordinance (Municipal Code Section 12.08.440) for mobile equipment noise at single-family residential (75 dBA) and multi-family residential (80 dBA).
Source: (AES, 2025a)

Mechanical Equipment

As part of the proposed Project, new building mechanical equipment (e.g., heating and air ventilation equipment) would be located at the building roof level and at the ground level.[44] Although operation of this equipment would generate noise, proposed Project-related outdoor mechanical equipment generally would be sited and designed so as not to increase the existing ambient noise levels. In addition, as provided in LRDP PP 4.9-6(a), all outdoor mechanical equipment would be shielded from off-site noise-sensitive receptors. Table 12 presents the estimated on-site mechanical equipment noise levels at the off-site receptor locations with the required shielding. As shown, the estimated noise levels from the mechanical equipment would range from 48.3 dBA (Leq) at receptor location R2 to 56.1 dBA (L_{eq}) at receptor location R3. The estimated noise levels would be below the existing ambient noise levels at all off-site receptors except for receptor R3, which would exceed the significance criteria by 6 dBA. Therefore, noise impacts from mechanical equipment would be potentially significant prior to mitigation. Implementation of Project-specific MM SMI NOI-1, which identifies the required sound attenuation for roof-mounted mechanical equipment, would reduce the proposed Project's mechanical noise level at receptor location R3 by 6.7 dBA (from 56.1 dBA to 49.6 dBA) and would also reduce noise levels at other receptor locations. With installation of additional sound attenuation features for the mechanical equipment pursuant to MM SMI NOI-1, the noise level at receptor location R3 would be reduced to below the significance threshold, thus resulting in a less than significant impact.

TABLE 12 MECHANICAL EQUIPMENT NOISE LEVELS

Receptor Location	Estimated Noise from Project Mechanical Equipment, dBA (L_{eq})	Significance Criteria[a] dBA (L_{eq})	Exceedance over Significance Criteria (Prior to Mitigation)	Estimated Noise from Project Mechanical Equipment with Mitigation, dBA (L_{eq})	Significant Impact with Mitigation?
R1	53.1	55.4	0.0	45.3	No
R2	48.3	49.4	0.0	46.1	No
R3	**56.1**	50.1	6.0	49.4	No
R4	50.6	52.7	0.0	44.5	No

[a] Significance criteria are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower.
Source: (AES, 2025a)

Loading Areas and Trash Compactors

Loading areas and trash compactors would be located at the ground level of the building and generally shielded to the off-site sensitive receptors. Noise sources associated with loading activities and waste management would include delivery/trash collection trucks and operation of the trash compactors. Based on measured noise levels from typical loading dock facilities and trash compactors, delivery/trash collection trucks and trash compactors could generate noise levels of approximately 70 dBA (L_{eq}) and 66 dBA (L_{eq}), respectively, at a distance of 50 feet. Table 13 presents the estimated noise levels at the off-site sensitive receptors resulting from these activities. As shown, the estimated noise levels from the loading areas and trash compactors would range from 29.4 dBA (L_{eq}) at receptor location R2 to 48.7 dBA (L_{eq}) at receptor location R3. These estimated noise levels would be below the significance criteria at all off-site receptor

[44] An alternative scenario involving full electrification of the building mechanical systems has also been evaluated with regard to potential noise impacts and is provided in Appendix E of this Initial Study (AES, 2025b).

locations. Therefore, noise impacts from loading and trash compactor operations would be less than significant.

TABLE 13 LOADING AREA AND TRASH COMPACTOR NOISE LEVELS

Receptor Location	Estimated Noise from Project Loading and Trash Compactors dBA (L_{eq})	Significance Criteria[a] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	31.4	56.7	0.0	No
R2	29.4	49.4	0.0	No
R3	48.7	50.7	0.0	No
R4	45.1	56.5	0.0	No

[a] Significance criteria are equivalent to the measured daytime ambient noise levels since it is assumed that loading and trash compactors would operate during the daytime hours.
Source: (AES, 2025a)

Emergency Generators

The proposed Project includes four emergency generators located at the south portion of the Project site, which would be shielded to the off-site sensitive receptors by an approximately 12-foot-high enclosure. The emergency generators would be provided with a Quiet Site II Second Stage sound enclosure to minimize noise levels.[45] By their nature, emergency generators are only operated during a major loss of power in order to keep critical equipment and buildings systems running. However, periodic testing of the emergency generators would be required and is expected to occur during the daytime hours, proceeding with one generator at a time. Table 14presents the estimated noise levels at the off-site sensitive receptors resulting from the periodic testing of the emergency generators. As shown, the estimated noise levels from periodic testing would range from 29.9 dBA (L_{eq}) at receptor location R1 to 50.6 dBA (L_{eq}) at receptor location R4. These estimated noise levels would be below the significance criteria at all off site receptor locations. Therefore, noise impacts from periodic testing of the emergency generators would be less than significant.

TABLE 14 EMERGENCY GENERATOR NOISE LEVELS

Receptor Location	Estimated Noise from Project Emergency Generators Testing dBA (L_{eq})	Significance Criteria[a] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	29.9	56.7	0.0	No
R2	32.2	49.4	0.0	No
R3	47.9	50.7	0.0	No
R4	50.6	56.5	0.0	No

[a] Significance Criteria are equivalent to the measured daytime ambient noise levels since it is assumed that loading and trash compactors would operate during the daytime hours.
Source: (AES, 2025a)

[45] Cummins Diesel Generator Set, 450 kW-500 kW Standby with Quiet Site II Second Stage sound enclosure, 73 dBA at 7 meters. This noise level conservatively does not take into consideration the noise reduction that can be attributed to the short-term nature of the emergency generator testing (estimated to be approximately 15 minutes).

Off-Site Mobile Noise Sources

The off-site roadway noise levels were calculated at the sensitive receptor locations using the traffic data prepared for the proposed Project.[46] Table 15 presents the estimated noise levels associated with the proposed Project's off-site traffic. Roadway noise levels were calculated conservatively assuming that 100 percent of the proposed Project traffic would utilize Pacific Concourse Drive to La Cienega Boulevard with 100 percent of the traffic going north and south on La Cienega. As identified, the estimated noise levels from off-site traffic range from 28.5 dBA (L_{eq}) at receptor R2 to 55.3 dBA (L_{eq}) at receptor location R1, which would be below the existing ambient noise levels and below the significance criteria. Therefore, noise impacts from off-site traffic would be less than significant.

TABLE 15 OFF-SITE TRAFFIC NOISE LEVELS

Receptor Location	Estimated Noise from Project Traffic dBA (L_{eq})	Significance Criteria[a] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	55.3	56.7	0.0	No
R2	28.5	49.4	0.0	No
R3	31.5	50.7	0.0	No
R4	36.7	56.5	0.0	No

[a] Significance criteria are equivalent to the measured daytime ambient noise levels, whichever is lower. It is assumed that loading and trash compactors would operate during the daytime hours.
Source: (AES, 2025a)

Composite Noise Impacts from Project Operations

In addition to considering the proposed Project's potential noise impacts to neighboring noise-sensitive receptors from each specific on-site and off-site noise source (e.g., mechanical equipment, loading areas/trash compactors, emergency generators, and off-site traffic), an evaluation of potential composite noise level increases (i.e., noise levels from all on-site noise sources combined) at the analyzed sensitive receptor locations was also performed. This evaluation of composite noise levels from all proposed Project-related noise sources, evaluated using the CNEL noise metric, was conducted to determine the total contributions at the noise-sensitive receptor locations.

Table 16 presents the estimated composite noise levels in terms of CNEL at the four off-site sensitive receptor locations resulting from proposed Project-related noise sources. As shown, the proposed Project would result in an increase in composite noise levels ranging from 2.6 dBA at receptor location R4 to 8.6 dBA at receptor location R3. The composite noise level from proposed Project operation at three of the four receptor locations would be below the 5-dBA significance criterion, as the ambient plus proposed Project composite noise level falls within the conditionally acceptable (55 to 70 CNEL) range for residential land use categories. The estimated composite noise levels at receptor location R3 would exceed the significance criterion by 3.6 dBA CNEL. However, implementation of Project-specific MM SMI NOI-1 would reduce this impact to a less than significant level, as indicated in Table 17.

[46] As discussed in Section V.17, Transportation, of this Initial Study, the proposed Project is expected to generate a net increase of 2,048 daily vehicle trips. However, the noise analysis conservatively assumed a maximum net increase of 2,190 daily vehicle trips.

TABLE 16 COMPOSITE NOISE IMPACTS PRIOR TO MITIGATION

Receptor Location	Existing Ambient Noise Levels (CNEL [dBA])	Calculated Project-Related Noise Sources (CNEL [dBA])				Project Composite Noise Levels (CNEL dBA])	Ambient Plus Project Composite Noise Levels (CNEL [dBA])	Increase in Noise Levels due to Project (CNEL [dBA])	Significance Threshold[a] (CNEL [dBA])	Significant Impact?
		Traffic	Mechanical	Loading & Trash Compactors	Emergency Generators					
R1	60.4	58.0	59.8	28.6	22.2	62.0	64.3	3.9	65.4	No
R2	55.2	31.5	55.0	26.6	24.5	55.0	58.1	2.9	60.2	No
R3	54.9	35.5	62.8	45.9	40.1	62.9	63.5	8.6	59.9	**Yes**
R4	58.4	41.8	57.3	42.3	42.8	57.7	61.1	2.7	63.4	No

[a] Significance thresholds are equivalent to the existing ambient noise levels plus 3 dBA if the estimated noise levels (ambient plus Project) fall within the "normally unacceptable" or "clearly unacceptable" land use categories; or ambient noise levels plus 5 dBA if the estimated noise levels fall within the "normally acceptable" or "conditionally acceptable" land use categories, per the County of Los Angeles Noise Element. If the estimated noise levels exceed those significance thresholds, a potentially significant noise impact is identified.

Source: (AES, 2025a)

TABLE 17 COMPOSITE NOISE IMPACTS WITH MITIGATION

Receptor Location	Existing Ambient Noise Levels (CNEL [dBA])	Calculated Project-Related Noise Sources (CNEL [dBA])				Project Composite Noise Levels (CNEL dBA])	Ambient Plus Project Composite Noise Levels (CNEL [dBA])	Increase in Noise Levels due to Project (CNEL [dBA])	Significance Threshold[b] (CNEL [dBA])	Significant Impact with Mitigation Measure?
		Traffic	Mechanical[a]	Loading & Trash Compactors	Emergency Generators					
R1	60.4	58.0	51.6	28.6	22.2	58.9	62.7	2.3	65.4	No
R2	55.2	31.5	52.8	26.6	24.5	52.8	57.2	2.0	60.2	No
R3	54.9	35.5	56.3	45.9	40.1	56.8	58.9	4.0	59.9	No
R4	58.4	41.8	51.3	42.3	42.8	52.7	59.4	1.0	63.4	No

[a] Noise levels associated with mechanical equipment reflect noise attenuation per Mitigation Measure SMI NOI-1.

[b] Significance thresholds are equivalent to the existing ambient noise levels plus 3 dBA if the estimated noise levels (ambient plus Project) fall within the "normally unacceptable" or "clearly unacceptable" land use categories; or ambient noise levels plus 5 dBA if the estimated noise levels fall within the "normally acceptable" or "conditionally acceptable" land use categories, per the County of Los Angeles Noise Element. If the estimated noise levels exceed those significance thresholds, a potentially significant noise impact is identified.

Source: (AES, 2025a)

Specifically, with additional sound attenuation for roof-mounted mechanical equipment, the estimated noise level increase at receptor location R3 would be reduced from 8.6 to 4.0 dBA, which would reduce the noise impact to a less than significant level.

Project-Level Mitigation Measures

No additional mitigation measures are required during construction. MM SMI NOI-1 addresses operational noise levels associated with roof-mounted mechanical equipment.

MM SMI NOI-1 *Roof-mounted mechanical equipment shall be provided with sound attenuation (e.g., sound attenuator, duct silencer) to reduce the noise levels at receptor R3, as follows:*

- *Roof-mounted exhaust fans: minimum 10 dBA noise reduction.*
- *Roof-mounted lab exhaust fans: minimum 15 dBA noise reduction.*
- *Roof-mounted chillers: minimum 10 dBA noise reduction.*

Level of Significance after Mitigation

With implementation of MM SMI NOI-1, the proposed Project would have a less than significant impact related to the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in any applicable plan or noise ordinance, or applicable standards of other agencies.

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

Discussion

UCLA does not have an adopted significance threshold to assess vibration impacts with respect to building damage during construction, nor does the County. Additionally, the vibration criteria established by the FTA are generally the same or more stringent than those used by Caltrans. As such, for purposes of this analysis UCLA has elected to use FTA guidance to determine the significance of vibration impacts. Thus, based on FTA guidance, impacts relative to ground-borne vibration associated with potential building damage would be considered significant if any of the following future events were to occur:

- Project construction activities cause ground-borne vibration levels to exceed the following building damage thresholds for identified structures:
    - Building extremely susceptible to vibration damage: 0.12 PPV
    - Non-engineered timber and masonry buildings: 0.20 PPV
    - Engineered concrete and masonry (no plaster): 0.30 PPV
    - Reinforced-concrete, steel or timber (no plaster): 0.50 PPV

With respect to human annoyance, the County of Los Angeles has a vibration limit of 0.01 inch/second, which is equal to 80 VdB and consistent with the FTA vibration limit for residential uses. For purposes of this analysis, construction vibration impacts associated with human annoyance would be significant if the following were to occur:

- Project construction activities cause ground-borne vibration levels to exceed 80 VdB at the off-site sensitive uses.

Construction-related Vibration Impacts

Ground-borne vibration impacts due to the proposed Project's construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the identified representative sensitive-receptor locations, and comparing the proposed Project's vibration levels at those locations to the applicable vibration significance criteria, as described above. Vibration levels were calculated based on the FTA published standard vibration velocities for various construction equipment operations. The vibration velocities were calculated based on a point source with standard distance propagation conditions, pursuant to FTA procedures. Construction of the proposed Project would not use impact pile driving methods and as such, impact pile driving vibration is not included in this construction vibration analysis.

With regard to potential building damage, the proposed Project would generate ground-borne vibration during demolition and trenching activities when heavy construction equipment, such as jackhammer and loaded trucks, would be used. provides the estimated ground vibration velocity levels (in terms of inch per second PPV) at the nearest off-site structures to the Project site. The assessment of construction vibration for potential building damage due to on-site construction compares the estimated vibration levels generated during construction of the proposed Project to the 0.2 PPV significance criterion for the nearest residential uses to the south and west, and to the 0.5 PPV significance criterion for the nearest multi-family residential building to the north and the industrial building to the east. As indicated in Table 18, the estimated vibration levels at the off-site buildings would be well below both the 0.2 and 0.5 PPV building damage significance criteria. Therefore, vibration impacts (pursuant to the significance criteria for building damage) from on-site construction activities would be less than significant.

Human Annoyance Impacts from On-Site Construction

Table 19 provides the estimated vibration levels at the off-site sensitive uses due to construction equipment operation and compares the estimated vibration levels to the specified significance criteria for human annoyance. As indicated in Table 19, the estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at all off-site sensitive receptor locations. Therefore, vibration impacts as related to human annoyance during construction of the proposed Project would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to generation of excessive groundborne vibration.

TABLE 18 CONSTRUCTION VIBRATION IMPACTS – BUILDING DAMAGE

Receptor Location[a]	Estimated Vibration Velocity Levels at the Off-Site Buildings (PPV [inch/second])[b]			Significance Criteria (PPV [inch/second])	Significant Impact?
	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.076	0.035	0.003	—	—
Multi-Family Residential Building to the North	0.016	0.007	0.001	0.5[d]	No
Single-Family Residential Building to the South	0.036	0.016	0.001	0.2[c]	No
Industrial Building to the East	0.014	0.007	0.001	0.5[d]	No
Single-Family Residential Building to the South	0.040	0.018	0.002	0.2[c]	No

[a] Represents nearby off-site structures located nearest to the Project site to the north, south, east, and west.
[b] Vibration level calculated based on FTA reference vibration level at 25-foot distance.
[c] FTA criterion for non-engineered timber and masonry buildings (applicable for the existing residential buildings to the south and west).
[d] FTA criterion for reinforced-concrete, steel or timber buildings (applicable for the existing multi-family residential to the north and industrial building to the east).
Source: (AES, 2025a)

TABLE 19 CONSTRUCTION VIBRATION IMPACTS – HUMAN ANNOYANCE

Receptor Location[a]	Estimated Vibration Velocity Levels at the Off-Site Buildings (VdB)[b]			Significance Criteria (VdB)	Significant Impact?
	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	86	79	58	—	—
R1	67	60	39	80	No
R2	66	59	38	80	No
R3	78	71	50	80	No
R4	77	70	49	80	No

[a] Represents nearby off-site sensitive receptors
[b] Vibration level calculated based on FTA reference vibration level at 25 foot distance.
Source: (AES, 2025a)

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

Discussion

The Project site is located less than one mile southeast of LAX; however, it is located outside of the Airport Influence Area and outside the 65 dBA CNEL LAX noise contour (AES, 2025a). Accordingly, the proposed Project would not expose people residing or working in the Project area to excessive noise levels from airport operations. This impact would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

There would be a less than significant impact related to exposure of people residing or working in the Project area to excessive noise levels from airport operations.

14. POPULATION AND HOUSING

It is estimated that 593 employees would be employed at the Project site during operation of the proposed Project. The proposed Project does not involve the development of residential uses. There are no relevant PPs or MMs adopted as part of the LRDP Final SEIR.

Project Impact Analysis

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

Discussion

The proposed Project involves interior and exterior improvements to an existing building. No new housing or infrastructure is proposed that would induce population growth.

According to the Demographic & Growth Forecast technical report included in SCAG's Connect SoCal 2024, the number of employees in Los Angeles County is estimated to increase from approximately 5,131,000 in 2025 to 5,277,000 in 2030 (an increase of approximately 146,000

employees) (SCAG, 2024). The proposed Project's employee estimate of 593 employees represents a gross (not net new) number of employees and conservatively does not take into consideration the number of workers who would be relocated from other existing UCLA Health facilities in the region (at least 152), or the number of employees who previously occupied the Project building prior to Siemens vacating the site in 2024. The estimated Project-related employment represents approximately 0.4 percent of the anticipated employment growth in Los Angeles County between 2025 and 2030. Therefore, the proposed Project would not induce substantial unplanned population growth in the area due to an increase in employment.

The proposed Project would have a less than significant impact on population growth, either directly or indirectly.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to inducing substantial unplanned population growth in an area, either directly or indirectly.

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

Discussion

The proposed Project involves renovation of an existing building and would not displace housing or people. The construction of replacement housing elsewhere, even on a temporary basis, would not be required. No impacts would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

15. PUBLIC SERVICES

The proposed Project involves interior and exterior improvements to an existing building currently served by public services. The proposed building improvements would include upgrades to the fire sprinkler system, fire alarm system, and other life/safety systems as needed for the proposed uses and/or to comply with current regulations. The proposed Project also includes minor improvements to the existing driveways and site circulation to improve site access.

Project Impact Analysis

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

Discussion

The County of Los Angeles Fire Department (LACoFD) provides fire suppression, rescue operations, and emergency medical services for unincorporated Los Angeles County, including the Project site. LACoFD Station 161 (Battalion 18 Headquarters) is located at 4475 W. El Segundo Boulevard in the City of Hawthorne, approximately 1.06 mile southeast of the Project site, and Station 18 is located at 4518 W. Lennox Boulevard in the City of Inglewood, approximately 1.17 mile northeast of the Project site (LACoFD, 2025). As County-operated stations, Stations 161 and 18 would have primary responsibility for a first alarm call to the Project site.

While the University of California Police Department (UCPD) has primary responsibility for police protection services on campus, the off-campus Project site is within the jurisdiction of the Los Angeles County Sherriff's Department (LASD). LASD provides police protection to the Project site from the South Los Angeles Sheriff's Station, located at 1310 W. Imperial Highway, Los Angeles, approximately 4.1 miles east of the Project site.

The proposed Project does not involve the development of residential uses and would not increase the residential population served by existing fire and police protection facilities. Further, the types and volume of service calls for police and fire protection services at the Project site are expected to be similar to conditions when the building was previously occupied (late 2024). On-site private security service would continue to be provided and would include regular site patrols. Additionally, on-site security systems would be improved relative to existing conditions. Notably, all entries would be keycard accessed at doors and driveway gates for employees, and there would be ticketing kiosks for guests. Cameras covering interior and exterior areas around the Project site would be installed, and alarms would be installed at both of the proposed pharmacies.

The proposed Project involves interior and exterior improvements to the existing building at the Project site to meet current CBC and California Fire Code requirements. This would include but not be limited to installation of a new fire water connection and new sprinkler systems, which would improve fire prevention systems compared to existing conditions. Consistent with the campus' standard procedures, the Campus Fire Marshal would review and approve Project plans to ensure that adequate fire flows are maintained, and that the proposed renovations adhere to applicable building and fire codes, including fire sprinkler systems, alarm systems, and emergency lighting and signage. In addition, the proposed Project would adhere to all relevant UCLA safety standards for both medical uses and laboratories, including programs administered by EH&S that reduce hazard conditions in the workplace and maintain compliance with applicable local, state, and federal environmental regulations. Further, the proposed Project would not alter

emergency access to the Project site, which would continue to be provided from Pacific Concourse Drive and La Cienega Boulevard.

Given a negligible change in demand, no new or physically altered police or fire protection facilities would be required to serve the proposed Project. Therefore, no physical environmental impacts related to the provision of these services would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would not require new or altered fire protection or police services, and no physical impacts would occur.

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

Discussion

The Project site is within the Wiseburn Unified School District (WUSD). The proposed Project involves interior and exterior improvements to the existing building at the Project site. The proposed Project does not involve the development of residential uses and would not directly result in elementary, middle, or high school student generation. Any indirect student generation resulting from Project employees who relocate to the Project area is anticipated to be minimal. Therefore, there would be a negligible increase in demand for WUSD services and facilities. The proposed Project would not result in a need for the construction of new or altered school facilities, and no physical environmental impacts would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

The proposed Project involves interior and exterior improvements to the existing building at the Project site. The proposed Project would not involve new housing or generate a direct increase in the residential population that would increase the demand for parks or other public services. Any indirect demand resulting from Project employees who relocate to the Project area is anticipated to be minimal. Additionally, employee use of nearby parks or other facilities during the workday is anticipated to be limited given scheduling constraints and commute considerations. Accordingly, no new or physically altered park or other public facilities would be required to serve the proposed Project. Therefore, no physical environmental impacts would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would not require new or altered parks or other public facilities, and no physical impact would occur.

16. RECREATION

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

Project Impact Analysis

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

Discussion

The proposed Project involves interior and exterior improvements to the existing building at the Project site. The proposed Project would not involve new housing or generate a direct increase in residential population that would increase the demand for recreational facilities such that

substantial physical deterioration of neighborhood or regional recreational facilities would occur or be accelerated. Any indirect demand resulting from Project employees who relocate to the Project area is anticipated to be minimal. Additionally, employee use of nearby recreational facilities during the workday is anticipated to be limited given scheduling constraints and commute considerations. Additionally, the proposed Project does not involve the construction or expansion of recreational facilities; therefore, no physical impact on the environment would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact related to an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

17. TRANSPORTATION

As previously described, the Project site is currently developed with an existing approximately 170,000-gsf life sciences building that was occupied by Siemens until late 2024. The proposed Project involves interior and exterior improvements to the existing building to accommodate the proposed uses (new Sports Medicine Institute, relocated UCLA Health Clinical Microbiology Laboratory, and a community fill pharmacy and specialty pharmacy). It is estimated that 593 employees would be located at the Project site with implementation of the proposed Project.

Relevant elements of the proposed Project related to transportation include construction activities that would generate a minimal number of truck trips on a temporary but daily basis, primarily for hauling interior demolition materials and the delivery of materials and equipment. The maximum number of truck trips per day would occur when the building construction and paving stages overlap (estimated to be a maximum of 20 trips per day). Other construction phases would require fewer daily truck trips. The proposed Project would involve minor changes to the gated driveways along La Cienega Boulevard and Pacific Concourse Drive that are used to access the Project site. These driveways would be widened for improved truck access. Minor modifications to on-site circulation through the parking lots would also be implemented to improve truck, pedestrian, and ADA access.

The UCLA Sports Medicine Institute VMT Study (VMT Study) prepared by Fehr & Peers and included in Appendix F of this Initial Study (Fehr & Peers, 2025) provides the trip generation estimate for the proposed Project based on the current edition (12th Edition) of the Institute of Transportation Engineers (ITE) Trip Generation Manual, and applying trip reductions for walk, bike, and transit modes due to proximity of the Project site to the existing Metro C Line Aviation/ Imperial Station (within one-half mile). The trip generation methodology and detailed trip generation information is provided in the VMT Study. Table 20 provides a summary of the estimated trip generation associated with the previous R&D use (Siemens), and the trip generation resulting from the proposed Project. As shown, the proposed Project would generate a net increase of 2,048 new daily vehicle trips, with 133 net new AM peak hour trips and 219 net new PM peak hour trips. Although trip generation is not used as the basis for the VMT Study discussed under Threshold (b), this trip generation information has been included as it is used to estimate air pollutant and GHG mobile-source emissions and traffic-related noise impacts resulting from operation of the proposed Project.

TABLE 20 AVERAGE DAILY TRIP GENERATION ESTIMATES

Land Use[1]	Size	Daily[2]	AM Peak Hour[2]	PM Peak Hour[2]
Proposed Uses				
Medical Office Building – Stand-Alone (Sports Medicine Institute)	71.3 KSF	2,693	167	250
Research and Development Center (Laboratory, Specialty Pharmacy, and Other Uses)	98.7 KSF	893	44	43
Proposed Use Trip Generation		*3,586*	*211*	*293*
Existing Use				
Research and Development Center	170 KSF	1,538	78	74
Total Proposed Project Net Trip Generation		**2,048**	**133**	**219**

Note: KSF = thousand square feet
[1] The ITE Land Use Codes and associated trip generation rates were selected for the proposed uses based on the land use descriptions provided in the ITE 12th Edition Trip Generation Manual and whether the proposed uses are patient-generating or non-patient-generating. The ITE land use categories include ancillary uses, which in this case would include the pharmacy and other amenities.
[2] Includes trip reductions for walk, bike, and transit modes which were applied using the Mixed-Use Development (MXD) methodology to reflect the share of trips made by non-auto travel.
Source: (Fehr & Peers, 2025)

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed; and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

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

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

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

Project Impact Analysis

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

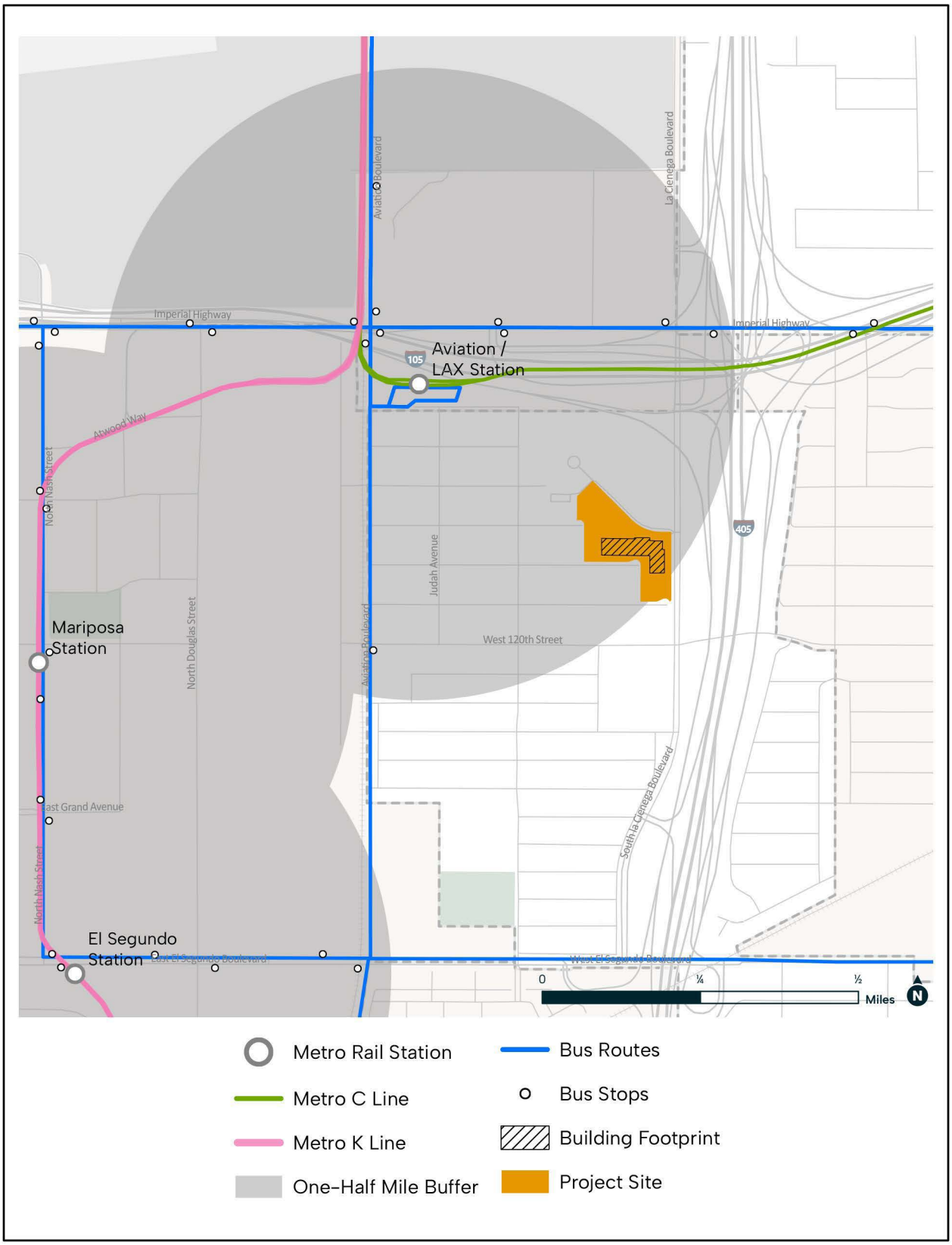
Discussion

Transit

As discussed in Section V.8, Greenhouse Gas Emissions, of this Initial Study, the UC Policy on Sustainable Practices and UCLA CAP address reducing dependency on the use of single occupancy vehicles to reduce emissions from mobile sources. As previously discussed in Section V.1, Aesthetics, of this Initial Study, the proposed Project is located in a TPA, which is defined as an area that is within 0.5-mile of a major transit stop that is existing or planned. The Metro C Line runs parallel to I-105, with the Aviation/Imperial Station located at the intersection of W. 116th Street and Aviation Boulevard northwest of the Project site (refer to Figure 11). This station provides connections for Beach Cities Transit, GTrans, LADOT Commuter Express, Los Angeles Metro Bus, Metro Micro, and Torrance Transit. Additionally, there are bus stops located at the intersection of Imperial Highway and La Cienega Boulevard, approximately 0.3-mile north of the Project site. Therefore, the proposed Project would be well-served by public transit. Refer to the discussion of related TDM programs discussed below.

Roadways

The Project site and surrounding uses are well-served by freeways and local streets. The Project site has two driveways (one along Pacific Concourse Drive adjacent to and north of the Project site and one along La Cienega Boulevard adjacent to and east of the Project site). Pacific Concourse Drive intersects with La Cienega Boulevard at the northeast corner of the Project site. I-105 and I-405 are located north and east of the Project site, respectively, and are easily accessible from La Cienega Boulevard. These freeways provide access to the regional roadway network. According to the County of Los Angeles Master Plan of Highways, La Cienega Boulevard is designated as a Major Highway (County of Los Angeles, 2025). The proposed Project would not require modifications to the existing roadways serving the Project site. The proposed Project would improve access at the existing driveways, which would reduce the potential for conflicts between vehicles entering/exiting the Project site during operations. Project employees would have access to a range of TDM programs required by LRDP PP 4.13-1(d) to reduce vehicle trips. These programs are described below.



Source(s): Fehr & Peers (08-14-2025)

Figure 11

Not to Scale

Transit Service in Project Vicinity

With respect to construction activities, for purposes of analysis in this Initial Study, construction of the proposed Project is expected to begin in 2026 and be complete in 2028. With respect to the circulation system, construction traffic resulting from the proposed Project would primarily be associated with construction workers commuting to and from the Project site; removal of demolition materials; delivery of building materials; and transport of construction equipment. Construction workers do not typically commute during peak commute hours as they generally arrive prior to morning (AM) peak hour and leave prior to the evening (PM) peak hour. The use of heavy trucks for the transport and disposal of demolition materials, building materials and equipment would occur periodically throughout the workday but largely outside of peak hours.

For the proposed Project, the peak days for construction-related heavy truck traffic would occur during interior construction activities. A maximum of 20 daily truck trips spread out over the workday would occur during the overlapping building construction and paving stages; other stages of construction would require fewer daily truck trips. It is anticipated that construction truck traffic would travel along Pacific Concourse Drive, head north on La Cienega Boulevard to Imperial Highway, and then continue to the regional transportation facilities. Haul trucks are anticipated to use regional freeways to access the Azusa Land Reclamation Landfill in the City of Azusa.

As discussed above, the proposed Project involves minor modifications to the Project site driveways and internal site circulation to improve access and would not involve or require modifications to the off-site circulation system along Pacific Concourse Drive and La Cienega Boulevard. The proposed Project would improve access at the existing driveways, which would reduce the potential for conflicts between vehicles entering/exiting the Project site during construction. Additionally, the proposed Project incorporates LRDP PP 4.13-5, which requires one travel lane in each direction and actions to take when lane closures are needed. Implementation of LRDP PP 4.13-5 would reduce potential circulation impacts during construction to a less than significant level.

Bicycle and Pedestrian Facilities

As mentioned above, there are existing sidewalks along Pacific Concourse Drive and La Cienega Boulevard adjacent to the Project site; however, there are no bicycle facilities. As discussed above, the proposed Project involves minor modifications to the Project site driveways to improve access and would not involve or require modifications to the off-site circulation system along Pacific Concourse Drive and La Cienega Boulevard. The existing sidewalks would be retained. The proposed Project would include internal sidewalks and walkways adjacent to the building and within the surface parking lot.

The proposed Project would align with Vision Zero Los Angeles County: A Plan for Safer Roadways 2020-2025. In February 2017, the County of Los Angeles Departments of Public Health and Public Works started developing the Vision Zero Action Plan with the goal of eliminating traffic-related fatalities and severe injuries in unincorporated Los Angeles County by 2035. Vision Zero specifically seeks to implement traffic safety infrastructure enhancements at intersections and along roadway segments identified as Collision Concentration Corridors (CCCs) to improve safety for pedestrians, bicyclists, and other vulnerable road users. The proposed Project is not located along a CCC (County of Los Angeles, 2019). Although the proposed Project is not located along a CCC, the proposed Project would incorporate measures to align with Vision Zero policies. The proposed Project would improve access at the existing driveways, which would reduce the potential for conflicts between vehicles entering/exiting the Project site and pedestrians and bicyclists. Additionally, the proposed Project would include bicycle racks, thus incentivizing Project employees to travel via bicycle to/from the Project site.

During construction of the driveway access improvements there may be a need to temporarily close sidewalk segments and redirect pedestrians with appropriate signage and safety barriers. The proposed Project incorporates LRDP PP 4.13-6, which requires signage for alternate pedestrian routes when closure of a pedestrian route during construction is required. Implementation of LRDP PP 4.13-6 would reduce potential impacts to non-vehicular circulation during construction to a less than significant level.

UCLA Transportation Demand Management Strategies

With respect to UCLA transportation programs, as previously discussed in Section IV.8, Greenhouse Gas Emissions, the proposed Project is consistent with transportation policies outlined in the UC Policy on Sustainable Practices and the UCLA CAP. These polices address, among other items, reducing the percentage of employees and students commuting by single-occupancy vehicles. Notably, consistent with the UC Policy on Sustainable Practices, the proposed Project would strive to have no more than 40 percent of its employees and no more than 30 percent of all employees and students commuting to the location by SOV. Further, UCLA Health has a Sustainable Transportation Program that provides alternative transportation options designed to encourage commuters to travel by means other than driving alone.

As required by LRDP PP 4.13-1(d), the following TDM strategies would be implemented as part of the proposed Project to reduce vehicle trips.

- **Pedestrian Access Improvements.** Given the roadway connectivity in the Project area, the walking distance between the Metro C Line Aviation/Imperial Station and the Project site using public rights-of-way is approximately 0.9 mile. However, as part of the Covenants, Conditions and Restrictions (CC&Rs) for the Pacific Concourse development, a pedestrian gate located behind 5230 Pacific Concourse Drive (at W. 116th Street and Isis Avenue) is kept unlocked during business hours, with a code provided for occupants who require after-hours access. To encourage the use of transit and facilitate walking and biking between the Metro C Line Aviation/Imperial Station and the Project site, proposed Project employees would be provided access via this gate. This access would provide a more direct pedestrian path and reduce the walking distance from the station to the Project site to 0.5 mile.
- **Subsidized Transit Passes.** Employees would be eligible for UCLA Transportation's Bruin Commuter Transit Benefit program, which offers one free quarterly transit pass and subsequent discounted passes for seven transit agencies, including Los Angeles Metro bus and rail lines.
- **Carpooling.** The UCLA Transportation Trip Planner would assist employees in forming carpools based on similar commute patterns (travel areas and working hours). Carpool groups would be able to apply for a Staff Carpool Permit to reduce parking costs at the Project site.
- **Vanpooling.** Vanpooling services to/from locations potentially including Palmdale and Santa Clarita, etc. would be offered if there is sufficient demand from proposed Project employees. Consistent with current vanpools for UCLA Health, the vanpool service would be independently operated by Enterprise.
- **Zero Emission Vehicles (ZEV).** In alignment with the UC Sustainable Practice Policy, the proposed Project would support ZEV commuting by providing 28 EV chargers, exceeding CALGreen standards.

In summary, the proposed Project would incorporate LRDP PP 4.13-19(d), PP 4.13-5, and PP 4.13-6, which require implementation of TDM programs to reduce reliance on single vehicle occupancy trips and measures to minimize impacts to the circulation system during construction. Further, the Project site is located within a TPA with access to multiple transit facilities. The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. No impact would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

With the incorporation of LRDP PPs, the proposed Project would have no impact related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

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

Discussion

SB 743, codified in PRC Section 21099, directed the State to adopt new guidelines for evaluating transportation impacts. In response to SB 743, the 2019 updates to the CEQA Guidelines included the addition of CEQA Guidelines Section 15064.3(b). Section 15064.3(b) establishes criteria for evaluating a project's transportation impacts based on project type and using automobile vehicle miles traveled (VMT) as the metric. To help lead agencies with SB 743 implementation, the Governor's Office of Planning and Research, now referred to as the Office of Land Use and Climate Innovation (LCI), produced a Technical Advisory on Evaluating Transportation Impacts in California Environmental Quality Act (CEQA) (December 2018).[47] LCI's Technical Advisory provides recommendations on VMT impact thresholds and considerations on the level of VMT analysis that is required based on Project characteristics, and was used as a guide for the VMT Study for the proposed Project that is included in Appendix F of this Initial Study.

As described in the VMT Analysis, LCI's Technical Advisory suggests three screening criteria that agencies can use to identify if a proposed project is expected to cause a less than significant impact without conducting a detailed study: project size, project accessibility to transit, and project location in a low VMT area. The proposed Project does not screen out from needing detailed analysis under any of these criteria. The project size criterion is not applicable to the proposed Project, because it is anticipated to generate approximately 2,048 net new daily vehicle trips, above the small project threshold of 110 daily trips. With respect to accessibility to transit, LCI's Technical Advisory states that a project can be presumed to have a less than significant impact if it satisfies CEQA Guidelines Section 15064.3(b)(1) by being located within one-half mile of a major transit stop or an existing stop along a high-quality transit corridor. However, this

[47] Effective July 1, 2024, the Governor's Office of Planning and Research was renamed the Governor's Office of Land Use and Climate Innovation (LCI).

presumption does not apply if the project does not meet additional considerations recommended in the LCI Technical Advisory. To qualify for transit proximity screening, a project site is required to have a Floor Area Ratio (FAR) of 0.75 or higher. The FAR of the proposed Project is 0.4. Therefore, although the Project site is located within one-half mile of the existing Metro C Line Aviation/Imperial Station, the existing building FAR is below 0.75 and the proposed Project does not screen out based on this criterion. Therefore, a Project-specific VMT analysis is required and is summarized below. (Fehr & Peers, 2025)

Per LCI's Technical Advisory, "a proposed project exceeding a level of 15 percent below [the] existing regional VMT per employee may indicate a significant transportation impact." Using this guidance, based on the regional Home-Based Work VMT per Employee of 12.67 per employee, the VMT impact threshold for the proposed Project is 10.77, which represents a 15 percent reduction from the regional average VMT.[48] Therefore, if the proposed Project results in a daily Home-Based Work VMT per Employee above 10.77, a significant VMT impact would occur.

The 2024 SCAG Regional Travel Demand Forecasting Model (SCAG model) was used to conduct the proposed Project's VMT impact analysis, and the methodology for conducting the analysis is described in the VMT Study. Table 21 presents results from SCAG model for the proposed Project's estimated occupancy year of 2028. The proposed Project is forecasted to generate approximately 6,200 daily Home-Based Work VMT, which equates to 10.46 daily Home-Based VMT per Employee. In comparison to the VMT impact threshold of 10.77, the proposed Project is projected to generate less daily Home-Based Work VMT per Employee than the impact threshold and thus would not result in a significant VMT impact. Therefore, this impact is less than significant, and no mitigation is required. Notwithstanding, as discussed under Threshold (a) above, UCLA Health would implement various TDM strategies that would further reduce the proposed Project's VMT. However, these TDM strategies were not quantitatively accounted for in this VMT analysis.

TABLE 21 PROPOSED PROJECT VMT IMPACT ANALYSIS

Metric	Size
Proposed Project Daily Home-Based Work VMT	6,200
Proposed Project Number of Employees	593
Proposed Project Daily Home-Based Work VMT per Employee	10.46
VMT Impact Threshold	10.77
Project Compared to Impact Threshold	**-0.31**
VMT Impact?	**No**
Source: (Fehr & Peers, 2025)	

Project-Level Mitigation Measures

No mitigation measures are required.

[48] Given the Project's non-residential land uses, Home-Based Work VMT per Employee is the appropriate VMT metric and was obtained from the SCAG model. For non-residential land uses, vehicle trips between home and work are accounted for and then divided by the number of employees within the geographic area to produce Home-based Work VMT per Employee.

Level of Significance

The proposed Project would not be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

Discussion

The proposed Project does not involve any permanent changes to public roadways, sidewalks, or other circulation routes. As described above, consistent with existing conditions, access to the site would be provided from Pacific Concourse Drive and La Cienega Boulevard, and minor driveway improvements would be made as part of the proposed Project. Specifically, the driveways would be widened for improved truck access. Minor modifications to on-site circulation through the parking lots also would be implemented to improve truck, pedestrian, and ADA access.

Construction activities associated with the driveway improvements could result in the temporary closure of traffic lanes and/or sidewalks near the driveways. Any potential reduction of roadway capacity, narrowing of traffic lanes, or the occasional interruption of traffic flow on streets associated with Project-related construction activities could pose hazards to vehicular traffic and pedestrians due to localized traffic congestion, decreased turning radii, or temporary conditions of the roadway surfaces. To minimize traffic disruption, implementation of LRDP PP 4.13-5, which requires maintenance of one travel lane in each direction and/or the provision of signal carriers (i.e., flagpersons), would ensure that impacts associated with a construction-related traffic lane closure remain less than significant.

To avoid conflicts and potential hazards to pedestrians during construction, the sections of sidewalk near the driveways may be closed to pedestrians during construction of the driveway improvements. Safe pedestrian movement within and around the Project site and access to the nearby uses would be maintained as efficiently as possible. With incorporation of LRDP PP 4.13-6, which requires appropriate signage for alternate pedestrian routes, as well as installation of appropriate safety barriers in accordance with UCLA's standard Temporary Barricade & Enclosure requirements, there would be less than significant impacts related to pedestrian hazards during construction.

Fire and other emergency vehicular access would continue to be provided from Pacific Concourse Drive and La Cienega Boulevard. Therefore, operation of the proposed Project would result in a less than significant impact related to vehicular hazards.

Implementation of the proposed Project would not increase hazards due to design features or incompatible uses and this impact would be less than significant impact.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

With the incorporation of LRDP PPs, the proposed Project would have a less than significant impact related to a substantial increase in hazards due to a design feature or incompatible uses.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project result in inadequate emergency access?	☐	☐	☒	☐

Discussion

As identified above, construction of the proposed driveway improvements may result in temporary closure of traffic lanes along Pacific Concourse Drive and La Cienega Boulevard. Any potential reduction of roadway capacity, narrowing of traffic lanes, or the occasional interruption of traffic flow could temporarily impair emergency access. Construction activities would be planned such that access for emergency vehicles is maintained at all times. Therefore, there would be less than significant impacts related to emergency access during construction of the proposed Project.

Relative to long-term operations, emergency access to the Project site would continue to be provided from Pacific Concourse Drive and La Cienega Boulevard. Additionally, the proposed minor modifications to the site driveways and internal circulation are intended to improve access, including emergency access. Consistent with UCLA standard procedures, the Campus Fire Marshal would review and approve the proposed Project plans to ensure that circulation and design features allow adequate emergency vehicle access in compliance with Fire Code requirements. Therefore, there would be less than significant impacts related to emergency access during operation of the proposed Project.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to emergency access.

18. TRIBAL CULTURAL RESOURCES

Relevant elements of the proposed Project related to tribal cultural resources include limited exterior trenching for utility and EV conduit installations and minor grading primarily in the southeast parking area for the new service yard. While grading depths would be on the order of a few inches, the required trenching would not be deeper than approximately six feet below the finished surface (above the location of existing utilities). Additionally, plumbing improvements for the proposed uses would necessitate select areas of utility trenching beneath the existing building (i.e., inside the building footprint) to depths of two to five feet in most locations and a maximum 7.3-foot depth at the service connection point, all occurring within areas previously excavated and

recompacted during construction of the existing building. Such activities would not encroach into native soils. The total disturbance area would be less than an acre spread throughout the Project site and would involve a total of approximately 150 cubic yards of soil export.

LRDP PP 4.4-5 and MMs 4.4-2(a) and 4.4-2(b) presented in Section V.5, Cultural Resources, of this Initial Study, which identify actions to take if human remains or archaeological resources are discovered during construction, have been incorporated into the proposed Project and are assumed in the analysis presented in this section.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☐	☒

Discussion

As discussed in Section V.5, Cultural Resources, the results of the SCCIC records search indicate there are no historic resources listed on the California Register or National Register within 0.25 mile of the Project site (SCCIC, 2025). No tribal cultural resources either listed or eligible for listing at the state or local level were identified in the SCCIC records search or during the required Native American consultation conducted for the proposed Project, which is discussed under Threshold (b), below. Therefore, no impact would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact to a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	☐	☐	☒	☐

Discussion

AB 52 (Chapter 532, Statutes of 2014), known as the Native American Historic Resource Protection Act, became effective on July 1, 2015 and created a new category of environmental resources that must be considered under CEQA: tribal cultural resources. AB 52 defines a tribal cultural resource as a site, feature, place, defined cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources, or that the lead agency chooses at its discretion to treat as a tribal cultural resource. When a lead agency chooses to treat a resource as a tribal cultural resource, that determination shall be supported with substantial evidence, applying the criteria in the historical register and considering the significance of the resource to a California tribe. A project that may cause a substantial adverse change in the significance of a tribal cultural resource is one that may have a significant effect on the environment.

AB 52 establishes requirements for consultation with California Native American tribes regarding projects that may affect a tribal cultural resource; emphasizes a broad definition of what may be considered to be a tribal cultural resource; and includes a list of recommended mitigation measures. Recognizing that local tribes may have expertise regarding their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. Specifically, AB 52 requires that the lead agency provide project notifications to tribes that request notification in writing prior to the lead agency's release of a notice for an EIR, an MND, or Negative Declaration (ND). Once Native American tribes receive a project notification, they have 30 days to respond as to whether they wish to initiate consultation regarding the project and specifically consult regarding mitigation for any potential project impacts to tribal cultural resources. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. Consultation is considered concluded when the parties agree to measures to avoid or reduce a significant impact on a tribal cultural resource, or when a party concludes that mutual agreement cannot be reached. If no formal agreement on the appropriate mitigation is established, mitigation measures that avoid or substantially lessen potentially significant impacts should be implemented, as feasible.

Based on the results of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, there are no sacred sites located within the Project site (NAHC, 2025). The NAHC

SLF records search is included in Appendix G of this Initial Study. Further, based on the records search conducted by the SCCIC for the proposed Project, included in Appendix C of this Initial Study, there are no known archaeological resources within the Project site and one archaeological resource site within a 0.5-mile radius of the Project site (SCCIC, 2025).

The following summarizes the AB 52 consultation process conducted to date regarding the proposed Project:

Following extensive outreach to local tribes between September 2024 and July 2025 to develop an AB 52 notification list, UCLA acting as Lead Agency provided formal notification of the proposed Project on July 17, 2025, providing a 30-day response period in compliance with the requirements of AB 52. Letters were sent via U.S. Postal Service (with tracking) to the following Native American Tribes that are included on UCLA's AB 52 contact list and have ancestral ties to the southern and coastal portions of Los Angeles County:

- Gabrieleno Band of Mission Indians—Kizh Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Tribe

The letters contained a Project Description including basic information regarding Project construction and anticipated earthwork activities, a summary of AB 52-prescribed timelines, an invitation to consult, and contact information for the Lead Agency representative. On July 28, 2025, UCLA received a request for consultation via email from the Gabrieleno Band of Mission Indians–Kizh Nation (Kizh Nation). No other requests for consultation were received.

UCLA scheduled a consultation meeting with Kizh Nation via telephone on October 28, 2025. Due to a scheduling conflict, on October 27 the Tribe cancelled the call and requested to conduct consultation via email. That same day, UCLA emailed the Tribe a Project presentation that included an overview of the proposed Project, draft Project-specific mitigation measures regarding tribal cultural resources, and the previously adopted relevant LRDP measures. UCLA received a response from Kizh Nation on November 3, 2025, which documented the Tribe's ancestral and cultural affiliation to the Project area and requested that a tribal monitor from or approved by Kizh Nation be present during all ground-disturbing activities. Also included in the documents received were Kizh Nation's own proposed mitigation measures regarding: (1) the retention of a tribal monitor; (2) procedures in the event of an unanticipated discovery of a tribal cultural resource; and (3) procedures in the event of an unanticipated discovery of human remains.

As the proposed grading and excavation for utility trenches would occur entirely within previously developed and paved areas and would not extend into native soils, potential impacts to tribal cultural resources are anticipated to be less than significant. However, in light of the importance of the Project area to local tribes and based on input received from the Kizh Nation during the AB 52 consultation process, mitigation is proposed to minimize the potential for Project activities to cause a substantial adverse change in the significance of a tribal cultural resource. Additional mitigation regarding the unanticipated discovery of human remains is also provided and expands on the requirements identified in LRDP PP 4.4-5 included in Section V.5, Cultural Resources, of this Initial Study. Consultation with the Tribe is ongoing in order to finalize the proposed mitigation.

Project-Level Mitigation Measures

The following Project-specific mitigation measures are proposed to reduce potential impacts to tribal cultural resources. These measures expand on similar requirements related to archaeological resources established in the LRDP Final SEIR MMs and PPs identified previously.

MM SMI TCR-1 *Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities:*

A. The University shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, any disturbance occurring from the exterior ground surface through the full depth of demolition or subsurface intrusion, including exterior demolition activities, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the Environmental Planning section of UCLA Capital Programs prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Environmental Planning section of UCLA Capital Programs upon completion of monitoring activities.

D. On-site tribal monitoring shall conclude upon either of the following: (1) written confirmation to the Kizh from a designated point of contact for the University that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the Environmental Planning section of UCLA Capital Programs that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM SMI TCR-2 *Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial):*

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM SMI TCR-3 *Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects:*

A. *Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.*
B. *If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.*
C. *Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).*
D. *Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.*
E. *Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.*

Level of Significance

Although potential impacts to tribal cultural resources are anticipated to be less than significant, implementation of MM SMI TCR-1, MM SMI TCR-2, and MM SMI TCR-3 would further reduce any such impacts and ensure the proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource.

19. UTILITIES AND SERVICE SYSTEMS

The proposed Project involves interior and exterior improvements to the existing building to accommodate the proposed uses. The proposed Project would continue to be served by existing utility infrastructure located within and adjacent to the Project site. No off-site upgrades to the existing public utility infrastructure would be required. The proposed Project would involve modifications to the on-site water system for fire protection, the on-site storm drain system, and the on-site electrical system, as described further below.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

PP 4.14-2(a) *New facilities and renovations ~~(except for patient care facilities in the Medical Center)~~ shall be equipped with low-flow showers, toilets, and urinals.*

PP 4.14-2(b) *Measures to reduce landscaping irrigation needs shall be used, such as automatic timing systems to apply irrigation water during times of the day when evaporation rates are low, installing drip irrigation systems, using mulch for landscaping, subscribing to the California Irrigation Management Information System Network for current information on weather and evaporation rates, and incorporating drought-resistant plants as appropriate.*

PP 4.14-2(c) *The ~~campus~~ **University** shall promptly detect and repair leaks in water and irrigation pipes.*

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

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

PP 4.14-3 *The ~~campus~~ **University** shall continue to implement a solid waste reduction and recycling program designed to limit the total quantity of ~~campus~~ **Project** solid waste that is disposed of in landfills ~~during the LRDP horizon~~.*

PP 4.14-9 *The ~~campus~~ **University** shall continue to implement energy conservation measures (such as energy-efficient lighting and microprocessor-controlled HVAC equipment) to reduce the demand for electricity and natural gas. The energy conservation measures may be subject to modification as new technologies are developed or if current technologies become obsolete through replacement.*

In addition, LRDP PP 4.15-1, discussed in Section V.8, Greenhouse Gas Emissions, of this Initial Study, requires implementation of the provisions of the UC Policy on Sustainability Practices, which will serve to reduce water use, electricity and natural gas demand, and waste generation.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Discussion

As previously described in Section II.5, Project Components, of this Initial Study, there is existing utility infrastructure on-site to serve the existing building, and the off-site utility infrastructure has sufficient capacity to accommodate the demands associated with the proposed uses. Further, the existing on-site domestic water, natural gas, and telecommunications infrastructure serving the building is sufficient and no modifications to these systems are proposed. Utility infrastructure within the building would be replaced, as needed, to serve the proposed uses. Additionally, the

existing public storm drain and sewer easements located within the Project site would be protected. The proposed Project would involve modifications to the on-site water system for fire protection, the on-site storm drainage system, and the on-site electrical system, as summarized below.

- **Water for Fire Protection.** The existing fire hydrant located behind the building near an existing maintenance enclosure would be relocated slightly to avoid conflict with proposed access modifications (specifically, a new curb to create a wider turning radii for trucks). A new 6-inch lateral and valve would be provided. Additionally, a new 6-inch underground fire protection line would be extended from the existing east public fire hydrant to serve the building standpipe risers, along with a new service connection east of the building footprint.
- **Site Drainage.** Some of the existing roof drains would be replaced as part of the proposed roof repairs. Additionally, modifications to the ground-level surface areas may result in the addition of drain inlets to connect to the on-site storm drain. No changes to the on-site water quality treatment facilities are proposed or required.
- **Electricity.** The existing building power service is provided by Southern California Edison (SCE) to an on-site pad-mounted 1500 kVA transformer. To support the increased electric demands from the proposed Project, the transformer would be upsized to a 2500 kVA transformer.[49] The new transformer would be located in the existing transformer location, and the existing point of entry into the building would be maintained. New normal power distribution would be required in the building. The upgraded utility service would be extended underground from the exterior pad mounted transformer to the main switchboard in the Main Electrical Room located on Level 1 close to the utility service entrance.
- **Interior Wastewater Piping.** New subterranean wastewater drainage piping would be needed to serve specific rooms and equipment within the medical and laboratory areas of the proposed Project. These lines would be located above the existing building foundation and would primarily be 4 inches in size, increasing to 6-inch lines at two exterior connection points.

The physical impacts that would result from the installation of utility infrastructure have been addressed in the analysis presented throughout this Initial Study and would be less than significant. No additional impacts would occur, and no additional mitigation is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

Less than significant impacts related to the relocation or construction of water, wastewater conveyance and treatment, storm drain, and dry utility (i.e., electricity, natural gas, and telecommunications) infrastructure would occur.

[49] The Project as currently planned would require a 2500 kVA transformer; however, if additional electrification of building systems ultimately occurs, a 3750 kVA transformer may be required, in coordination with SCE.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

Discussion

The Golden State Water Company (GSWC) supplies domestic water to properties within the community of Del Aire, including the Project site. In their 2020 Urban Water Management Plan (UWMP), GSWC developed a water demand forecast through the year 2045 with passive conservation including codes, ordinances, and conservation phases for each of the major categories of demand. GSWC is projected to have sufficient water supply to meet all demands for normal year, single-dry year, and multiple-dry year conditions through the planning period of 2025 to 2045 (GSWC, 2021).

The proposed Project involves interior and exterior improvements to an existing approximately 170,000 gsf building and would have an estimated 593 employees. The proposed Project would not add floor area to the existing building and would not substantially increase the amount of water consumed at the Project site. It is estimated that the proposed Project would have a water demand of approximately 795,880 gallons per year (0.8 million gallons per year).[50] This conservatively does not take into consideration the water demand associated with the prior operations conducted by Siemens. Further, LRDP PPs 4.14-2(a) through 4.14-(d) from the LRDP Final SEIR are incorporated into the proposed Project and require using low-flow water fixtures, reducing irrigation needs, promptly detecting and repairing water and irrigation pipe leaks, and minimizing the use of water to clean walkways and other hardscape, which would serve to reduce water demands. Additionally, as required by LRDP PP 4.14-2(g), building occupants would be educated on the importance of water conservation measures.

The GSWC included the water demands from existing development, which includes the existing building, in its 2020 UWMP. 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.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

With the incorporation of LRDP PPs, the proposed Project would have a less than significant impact related to the availability of sufficient water supplies to serve the proposed Project and reasonably foreseeable future development during normal, dry and multiple dry years.

[50] Based on a preliminary estimate using the LEED water calculator.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Discussion

The Los Angeles County Sanitation Districts maintains wastewater conveyance facilities from the Project site to the A.K. Warren Water Resource Facility (WRF) located at 24501 S. Figueroa in the City of Carson. Wastewater generated by the proposed Project would be treated at the A.K. Warren WRF, consistent with existing conditions. The A.K. Warren WRF has a design capacity to treat 400 million gallons of water per day (mgd). In 2023, approximately 246 mgd of effluent entered the A.K. Warren WRF, or approximately 61.5 percent of its capacity (LA County Sanitation Districts, 2025). The proposed Project involves interior and exterior improvements to an existing building, would not increase floor area, and would not substantially increase the amount of wastewater generated at the Project site. Conservatively assuming all of the water consumed at the Project site enters the sewer system, the proposed Project would generate an average of approximately 2,180.5 gallons per day (0.002 mgd) of wastewater,[51] which represents a negligible amount of the remaining daily treatment capacity at the A.K. Warren WRF (154 mgd). Therefore, the A.K. Warren WRF would continue to have sufficient capacity to treat wastewater generated from the Project site in addition to the provider's existing commitments. This impact would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to the adequacy of wastewater treatment capacity to serve the proposed Project's projected demand in addition to the provider's existing commitments.

[51] Average wastewater generation reflects Project operations seven days per week, although some proposed Project uses would operate only five days per week.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Would the project comply with applicable federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

UCLA currently contracts with a private waste disposal company (Athens Services) to collect, recycle, and dispose of solid waste generated by UCLA Health facilities located both on and off campus. Following waste separation, sorting and recycling activities, trash is transported to any of five landfills in San Bernardino County operated by Athens Services: Barstow Landfill, Landers Landfill, Mid-Valley Landfill in Rialto, San Timoteo Landfill in Redlands, and Victorville Landfill. Based on the County of San Bernardino Countywide Integrated Waste Management Plan (IWMP), the total maximum daily capacity for all five landfills is 14,200 tons per day, the average daily rate of disposal is 5,316 tons per day, and the estimated remaining site life ranges from 8 to 47 years, as shown in Table 22 (County of San Bernardino, 2018).

TABLE 22 SAN BERNARDINO LANDFILL SUMMARY

Landfill	Maximum Permitted Rate				Avg Daily Rate		Estimated Remaining Site Life	Years Remaining
	Daily Tons	Daily Cubic Yards (compacted)	Yearly Tons	Yearly Cubic Yards (compacted)	Tons	Cubic Yards (compacted)		
Barstow	1,500	2,500	460,500	767,500	215	357	2071	46
Landers	1,200	2,000	370,800	618,000	173	288	2072	47
Mid-Valley	7,500	12,525	2,317,500	3,870,225	3,107	5,178	2033	8
San Timoteo	1,000	1,670	309,000	516,030	890	1,483	2043	18
Victorville	3,000	5,000	1,074,000	1,790,000	931	1,552	2047	22
Total	**14,200**	**23,695**	**4,531,800**	**7,561,755**	**5,316**	**8,858**		

Source: (County of San Bernardino, 2018)

UCLA's recyclable materials are transported to Athens Material Recovery Facility in Sun Valley located in the San Fernando Valley, and compostable organics are sent to American Organics in Victorville. It is expected that construction debris and limited soils export would be transported to the Azusa Land Reclamation Landfill in the City of Azusa.

Section 4.14, Utilities and Service Systems, of the LRDP Final SEIR, which is incorporated by reference, provides a discussion of the regulatory framework for solid waste management relevant to UCLA projects. AB 939 required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal was later increased to 75 percent by 2020 per SB 341. Further, the Solid Waste Disposal Measurement Act of 2008 (SB 1016) was established to make the process of goal measurement (as established by AB 939) simpler, timelier, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a

disposal-based indicator, the per capita disposal rate, which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. Additionally, the CALGreen Code requires all new developments to divert 65 percent of non-hazardous construction and demolition (C&D) debris.

Notwithstanding the State's requirements, the UC Policy on Sustainable Practices, previously discussed in Section V.8, Greenhouse Gas Emissions, of this Initial Study, establishes goals addressing waste reduction and recycling which exceed the established state requirements. Notably, the Policy for Zero Waste indicates that the University is committed to achieving a 25 percent reduction of waste per person from fiscal year (FY) 2015/2016 by 2025, a 50 percent reduction of waste per person from FY 2015/2016 by 2030, and a total 90 percent solid waste diversion rate from the landfill. These requirements exceed those established by AB 341 and the CALGreen Code.

Additionally, the UC Policy on Sustainable Practices establishes goals specific to UC Health facilities, including a target of 25 pounds (lbs) of total waste, as defined by Practice Greenhealth, per Adjusted Patient Day (APD) by 2025 and striving for 20 lbs/APD by 2030. Practice Greenhealth defines total waste as municipal solid waste plus all forms of regulated waste, including but not limited to, regulated medical waste, biohazardous waste, pharmaceutical waste, and universal waste. It does not include construction and demolition waste.

According to the most current data available from UCLA Health, nearly 25 percent of the health system's total waste steam was diverted, recycled, or composted in Fiscal Years 2022 and 2023, increasing to nearly 30 percent in Fiscal Year 2024; however, the average waste generation per patient day increased from approximately 25 lbs/APD in Fiscal Years 2022 and 2023, to just over 27 lbs/APD in Fiscal Year 2024.[52,53] UCLA's extensive multi-stream waste diversion is accomplished through various recycling and waste management programs, including but not limited to programs for food and beverage containers, plastics, paper, metals, green waste, food waste, construction waste, and electronics. UCLA is able to monitor and enforce compliance with established diversion requirements through review of waste hauler data.

As the proposed Project involves interior and exterior improvements to an existing building, solid waste would be generated during construction activities. Based on compliance with the CALGreen Code, at least 65 percent of non-hazardous C&D debris would be diverted from landfills. Additionally, as with previous operations at the existing building, the proposed Project would generate solid waste during operation. However, the change in use from research (laboratory) to medical, laboratory and pharmacy uses would not be expected to result in a substantial increase in solid waste generation at the Project site. As at other UCLA facilities, regulated medical waste and universal hazardous waste would be processed at a transfer station and transported out of state for incineration. Biohazardous waste generated by the proposed Project would be sterilized using a self-contained, closed, San-I-Pak unit and stored on-site until it is transported and treated off-site prior to landfill disposal. Waste compactors would be located in the proposed service yard and would serve to reduce the number of haul trips needed for waste disposal. Further, the proposed Project reflects continued implementation of the provisions of the UC Policy on Sustainable Practices, as required by PP 4.15-1. With the University's diversion requirements that would be effective during construction and operation of the proposed, the waste stream for the

[52] Data reflects the waste streams associated with the Ronald Reagan UCLA Medical Center, including the associated Medical Plazas, and Santa Monica UCLA Medical Center, including the associated Surgery Center, as reported to UCOP; source: Sarah Brockhaus, UCLA Health Sustainability Programs Manager, July 29, 2025.

[53] This increase may be attributable to the calculation of estimated volumes of regulated medical waste and hazardous waste in the absence of actual data from the respective waste disposal vendor, which may have overestimated actual volumes.

proposed Project would not exceed the permitted daily capacity of landfills serving the proposed Project.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

With the incorporation of LRDP PPs, the proposed Project would have less than significant impacts related to: (1) solid waste generation in excess of landfill capacity; and (2) compliance with applicable federal, state, and local management and reduction statutes and regulations related to solid waste.

20. WILDFIRE

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:				
a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion

The Project site is located within the limits of the County 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. Based on review of the Los Angeles County General Plan Safety Element, Figure 12.5, Fire Hazards Severity Zones Policy Map, the Project site is not located within or near a very high, high or moderate fire hazard severity zone (LA County, 2025b). Additionally, according to the California Department of Forestry and Fire Protection (CalFire), the Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ); the nearest VHFHZA is approximately 4.8 miles to the north (CAL FIRE, 2025). Therefore, the proposed

Project would have no impacts related to wildfires or the associated issues identified in Thresholds (a) through (d), above. No impacts would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact related to wildfires.

21. MANDATORY FINDINGS OF SIGNIFICANCE

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE – The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the CEQA Guidelines):				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐

Discussion

As discussed in Section V.4, Biological Resources, of this Initial Study, the proposed Project, which is in a developed urban area, would not impact special status plant and wildlife species, sensitive habitats, or wildlife corridors. The proposed Project incorporates LRDP MM 4.3-1(a) and MM 4.3-1(b) from the LRDP Final SEIR and, as a result, would have a less than significant impact on nesting birds. The proposed Project also incorporates LRDP MM 4.3-1(c) to ensure a less than significant impact related to the removal of existing trees, and LRDP MMs 4.3-1(a) through 4.3-1(e) to address the protection of trees to remain. Therefore, the potential for the proposed Project to degrade the quality of the environment related to biological resources would be less than significant.

As discussed under Section V.5, Cultural Resources, of this Initial Study, the proposed Project would have no impact on historic resources. The proposed Project would involve limited shallow excavations that are not expected occur in native sediments. Therefore, previously unknown archaeological resources are not expected to be discovered during construction. Notwithstanding, in the unlikely event that archaeological resources are encountered, with incorporation of LRDP

MMs 4.4-2(a) and 4.4-2(b), which describes procedures to be followed in case of an inadvertent discovery, impacts would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

With the incorporation of LRDP MMs, the proposed Project would have a less than significant impact related to the potential to degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of a Rare or Endangered plant or animal. The proposed Project would have a less than significant impact related to the potential to eliminate important examples of the major periods of California history or prehistory.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?	☐	☐	☒	☐

Discussion

As defined in CEQA Guidelines Section 15355, cumulative impacts refer to two or more individual effects, which, when considered together, are considerable or which compound or increase other environmental impacts. Per CEQA Guidelines Section 15130(b)(1), the analysis of cumulative impacts may be based on a list of past, present, and probable future projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency. The proposed Project involves interior and exterior improvements to an existing building, and limited site improvements for circulation, equipment, and utilities. There are no known projects within the area surrounding the Project site.

As addressed in the analyses presented in Section V.1 through V.20 of this Initial Study, for all environmental issues, the proposed Project would have no impact, a less than significant impact, a less than significant impact with continued implementation of applicable PPs and MMs from the LRDP Final SEIR, or a less than significant impact with implementation of identified Project-specific MMs. Therefore, the proposed Project would not result in a cumulatively considerable contribution to any potential cumulative impacts, and no additional mitigation would be required.

Project-Level Mitigation Measures

No additional mitigation measures beyond those presented in the respective sections of this Initial Study are required.

Level of Significance

With the incorporation of LRDP PPs and MMs and Project-specific MMs, the proposed Project would have a less than significant impact related to impacts that are individually limited, but cumulatively considerable.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion

As described in the analyses presented in Section V.1 through V.20 of this Initial Study, potential impacts of the proposed Project would be less than significant with incorporation of relevant LRDP PPs and MMs and Project-specific mitigation to address operational noise associated with rooftop mechanical equipment. Additionally, although not required to reduce impacts to a less than significant level, Project-specific mitigation would be implemented to minimize potential impacts to tribal cultural resources. No significant and unavoidable adverse environmental effects to human beings would occur as a result of the proposed Project.

Project-Level Mitigation Measures

No additional mitigation measures beyond those presented in the respective sections of this Initial Study are required.

Level of Significance

With the incorporation of LRDP PPs and MMs and Project-specific MMs, the proposed Project would have a less than significant impact related to environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly.

Fish and Wildlife Determination

Based on consultation with the California Department of Fish and Wildlife, there is no evidence that the Project has a potential for a change that would adversely affect wildlife resources or the habitat upon which the wildlife depends.

___ Yes (No Effect)

_X_ No (Pay Fee)

VI. SUPPORTING INFORMATION SOURCES

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