Geffen Academy at UCLA
Final Subsequent Environmental Impact Report

VOLUME 2

Responses to Comments
Mitigation Monitoring and Report Program

SCH No. 2016021050

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

Prepared by | BonTerra Psomas
3 Hutton Centre Drive, Suite 200
Santa Ana, California 92707

July 2016

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SECTION 1.0 INTRODUCTION

1.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS

Under the California Environmental Quality Act (CEQA) and University of California (UC) Procedures for Implementing CEQA, the Lead Agency must prepare and certify a Final Environmental Impact Report (Final EIR) for projects within the University's discretionary approval authority. The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines, which states that:

The Final EIR shall consist of:

(a) The Draft EIR or a revision of the Draft.
(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
(c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
(e) Any other information added by the Lead Agency.

This document, in its entirety (Volumes 1 and 2), constitutes the Final Subsequent EIR (SEIR) for the Geffen Academy at the University of California, Los Angeles (UCLA). A Final EIR is defined by Section 15362(b) of the CEQA Guidelines as "…containing the information contained in the draft EIR; comments, either verbatim or in summary, received in the review process; a list of persons commenting; and the response of the Lead Agency to the comments received."

This Final Subsequent EIR (SEIR) is composed of:

Volume 1 **Geffen Academy of UCLA Draft Subsequent EIR and Technical Appendices.** This volume contains the Draft SEIR (June 2016). No revisions or clarifications to the text of the Draft SEIR have been made.

Volume 2 **List of Commenters, Responses to Comments, Project Refinements, and the Mitigation Monitoring Plan.** This volume contains an explanation of the format and content of the Final SEIR; a complete list of public agencies and individuals that commented on the Draft SEIR; copies of the comment letters; the University's responses to all comments; a discussion of refinements to the project description that have been made; and the Mitigation Monitoring and Reporting Program (MMRP).

The Lead Agency must provide each agency that commented on the Draft SEIR with a copy of the proposed response at least ten days before certifying the Final SEIR. In addition, the Lead Agency may also provide an opportunity for members of the public to review the Final SEIR prior to certification, though this is not a requirement of CEQA.

1.2 USE OF THE FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

The Final SEIR will serve as the environmental document that informs the UCLA Chancellor's consideration of the campus' request for approval of the proposed project. After completing the

Final SEIR, and before approving the project, the Lead Agency must make the following three certifications, as required by Section 15090 of the CEQA Guidelines:

- The Final EIR has been completed in compliance with CEQA;
- The Final EIR was presented to the decision-making body of the Lead Agency and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project;
- The Final EIR reflects the Lead Agency's independent judgment and analysis.

As required by Section 15091 of the *CEQA Guidelines*, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The possible findings are:

(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when a Lead Agency approves a project that would result in significant unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing its reasons for supporting the approved action. This Statement of Overriding Considerations is supported by substantial information in the record, which includes this Final SEIR. Since the proposed Project would result in significant unavoidable impacts, the UCLA Chancellor would be required to adopt a Statement of Overriding Considerations if it approves the proposed Project.

These certifications, the Findings of Fact, and the Statement of Overriding Considerations are included in a separate Findings document. Both the Final EIR and the Findings are submitted to UCLA Chancellor for consideration prior to making a decision on whether to approve the proposed Project.

1.3 PUBLIC REVIEW PROCESS

On February 10, 2016, UCLA issued a Notice of Preparation (NOP) and Initial Study for the Geffen Academy at UCLA Draft SEIR for a 30-day public review period. As discussed in Section 2.3.1, Scoping Process, of the Draft SEIR, NOP/Initial Study comment letters were received from three public agencies: the Native American Heritage Commission (outlining various State and federal statutes related to Native American tribes), the South Coast Air Quality Management District (providing recommendations regarding the analysis of potential air quality impacts from the proposed Project and mitigation measures), and the California Department of Transportation (outlining recommendations for construction traffic and permit requirements for storm water and

construction vehicles). A summary of written comments received in response to the NOP is provided in each technical section in the Draft SEIR, as applicable.

A Public Information and Draft SEIR Scoping Meeting for the proposed Project was also held on February 25, 2016 during the NOP review period to solicit input from interested agencies, individuals, and organizations regarding the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in the EIR. This meeting provided a forum for interested parties to submit comments on the project and on issues that should be analyzed in the Draft SEIR. Approximately 12 individuals attended the meeting. Section 2.3.1, Scoping Process, of the Draft SEIR, summarizes the comments received at the Community and Draft SEIR Scoping Meeting.

CEQA requires that a Draft EIR have a review period lasting at least 45 days but no longer than 60 days for projects that have been submitted to the State Clearinghouse for review by State agencies (CEQA Guidelines, Section 15105[a]). The Draft SEIR was released for a 45-day public review period that concluded on July 20, 2016.

UCLA used several methods to solicit comments on the Draft SEIR. A Notice of Availability (NOA) along with a CD containing the Draft SEIR and technical appendices was mailed to various public agencies, homeowners associations (HOAs), organizations, and individual community members that previously requested such notice. The NOA was posted on- and off-site (on each floor of the Kinross Building and at the FlyAway bus stop at Parking Structure 32). Additionally, copies of the Draft SEIR were available for review at the Charles E. Young Research Library. The Draft SEIR was also available on UCLA's website and at the UCLA Capital Programs Facility, which is located at 1060 Veteran Avenue, Third Floor, on the UCLA campus, and was submitted to the State Clearinghouse for distribution to and review by State agencies.

A public hearing was held on June 30, 2016 on the UCLA campus during which the public was given the opportunity to provide comments on the Draft SEIR. The public hearing was attended by one individual who did not provide oral comments at the meeting, but provided written comments on the Draft SEIR, which are included in Section 2, of this Final SEIR. No public agency representatives attended the public hearing.

1.4 LIST OF EIR COMMENTERS

In accordance with Section 15132 of the State CEQA Guidelines, following is a comprehensive list of the agencies and individuals that submitted comments on the Draft SEIR. Responses to all comments received are provided in Section 2, Responses to Comments.

Each comment letter has been divided into sequential numbered comments (i.e., 1, 2, 3).

Comment Letters	**Date of Letter**
State Agencies	
1. Governor's Office of Planning and Research (OPR)	July 21, 2016
2. California Department of Transportation (Caltrans)	June 14, 2016
Individuals	
3. Roxane Stern	June 26, 2016

1.5 PROJECT REFINEMENTS

As discussed in Section 3 (Volume 2) of this Final SEIR, refinements to the proposed Project were made after the Draft SEIR was released for public review. The project refinements address the relocation of on-campus library personnel currently occupying the Kinross Building (the project site) and Kinross South building (south of the project site) to existing and available space in the on-campus Library system, which allows the Kinross South building to be used as a temporary staging location for the Project's first year classes (2017/2018 school year). Section 3 of this Final SEIR addresses the project refinements and identifies why recirculation of the Draft SEIR is not required.

1.6 MITIGATION MONITORING AND REPORTING PROGRAM

The University will adopt a MMRP for the proposed Project, as required for compliance with Sections 21081(a) and 21081.6 of the *California Public Resources Code.* The proposed MMRP is included in its entirety in Section 4 of this Final SEIR (Volume 2).

The Final SEIR for the proposed Geffen Academy at UCLA analyzes the impacts of the proposed Project, which includes all relevant mitigation measures (MMs) and campus programs, practices, and procedures (PPs) carried forward from the March 2009 LRDP Amendment Final EIR. The MMRP included in Section 4 identifies the LRDP EIR MMs and PPs included as part of the Project description and one project design feature (PDF) related to air quality, and obligates the University to implement the identified PPs, MMs, and PDF. The MMRP will be reviewed by the UCLA Chancellor in conjunction with consideration for approval of the proposed Project and certification of the Final SEIR.

Following certification of the Final SEIR and approval of the MMRP by the UCLA Chancellor, the PPs and MMs from the March 2009 LRDP Amendment Final EIR included as part of the Project description would be monitored in conjunction with UCLA's annual LRDP EIR Mitigation Monitoring Program and reporting process.

SECTION 2.0 RESPONSES TO COMMENTS RECEIVED DURING PUBLIC REVIEW PERIOD

2.1 COMMENT LETTERS RECEIVED

This section of the Final SEIR contains all comments received on the Draft SEIR during the public review period, as well as the University's responses to these comments. Consistent with Section 15088 of the CEQA Guidelines, comments that raise significant environmental issues are provided with responses. Reasoned, factual responses have been provided to all substantive Draft SEIR comments received. Detailed responses have been provided where a comment raises a specific issue; however, a general response has been provided where the comment is relatively general. Where a comment does not raise a significant environmental issue or where it expresses the subjective opinion of the commenter, the comment is noted, but no response is provided. Comments that have been noted or that are outside the scope of CEQA review will be forwarded for consideration to the decision makers as part of the campus' request for project approval. All comments will be considered by the University when making a decision on the project.

The complete text of the written comments—and the University of California's response to those comments—is presented in this section. This section is formatted so that the respective comment letters are followed immediately by the corresponding responses. The comment number provided in the right margin of the letter corresponds to the responses provided. A summary the public hearing comments, followed by responses, is also provided.

2.2 RESPONSES TO COMMENT LETTERS RECEIVED

This section includes responses to substantive Draft SEIR comments received by the University. This section is formatted so that the respective comment letters are followed immediately by the corresponding responses. The comment number provided in the right margin of the letter corresponds to the responses provided.

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

July 21, 2016

Tracy Dudman
University of California, Los Angeles
1060 Veteran Avenue, CPB
Los Angeles, CA 90095

Subject: Geffen Academy at UCLA
SCH#: 2016021050

Dear Tracy Dudman:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 20, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET. P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2016021050
Project Title Geffen Academy at UCLA
Lead Agency University of California, Los Angeles

Type EIR Draft EIR

Description The proposed Project involves the renovation of the existing Kinross Building and adjacent areas for the Geffen Academy at UCLA, a 6th through 12th grade college preparatory school. There would be up to 620 new students and 109 faculty/staff. A new driveway would be constructed at Kinross Avenue to allow vehicles to exit the project site. The Academy is planned to open for grades 6 and 9 in the 2017-2018 school year, with full enrollment in all grades expected by the 2020-2021 school year.

Lead Agency Contact

Name Tracy Dudman
Agency University of California, Los Angeles
Phone 310-206-9255 **Fax**
email
Address 1060 Veteran Avenue, CPB
City Los Angeles **State** CA **Zip** 90095

Project Location

County Los Angeles
City
Region
Lat / Long 34° 03' 33.50" N / 118° 26' 48.55" W
Cross Streets Kinross Avenue & Gayley Avenue
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways I-405
Airports
Railways
Waterways
Schools Marymount HS, Fairburn ES, St. Sebastian and others
Land Use Kinross Building at UCLA Campus (Designated as Public Facility in the City of Los Angeles General Plan and Zoning)

Project Issues Air Quality; Drainage/Absorption; Economics/Jobs; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 06/06/2016 **Start of Review** 06/06/2016 **End of Review** 07/20/2016

Note: Blanks in data fields result from insufficient information provided by lead agency

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
www.dot.ca.gov

Clear 7/20/16 E

Serious drought. Help save water!

June 14, 2016

Governor's Office of Planning & Research
JUN 14 2016
STATE CLEARINGHOUSE

Tracy Dudman, Senior Planner
Campus and Environmental Planning
UCLA Capital Programs
1060 Veteran Avenue
Los Angeles, CA 90095-1365

RE: Geffen Academy at UCLA
Vic: LA-405/P.M. 55.277
SCH # 2016021050
Ref. IGR/CEQA 160235ME-NOP
IGR# 160608ME-DEIR

Dear Ms. Dudman:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Geffen Academy at UCLA Project.

The proposed Project involves the renovation of the Kinross Building and adjacent areas for the Geffen Academy at UCLA campus. The Geffen Academy is proposed to open for the 2017-2018 school year with approximately 160 students in grades 6 and 9. The enrollment is projected to increase to up to a maximum of 620 students in grades 6 through 12 by the 2020-2021 school year.

The nearest State facilities to the project is I-405. Based on information received and subsequent SEIR, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

As a reminder, storm water run-off is a sensitive issue for Los Angeles Counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State Highway facilities without a storm water management plan.

Transporting of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

If you have any questions regarding these comments, please contact Ms. Miya Edmonson the project coordinator at (213) 897-6536 and refer to IGR/CEQA No. 160608ME-DEIR.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Response to Comment Letter 1

Governor's Office of Planning and Research
July 21, 2016

The University received the preceding letter from the Governor's Office of Planning and Research, State Clearinghouse and Planning Unit documenting compliance with CEQA review requirements and forwarding a copy of a letter from the California Department of Transportation (Caltrans) which was received during the public review period. As to the acknowledgement of CEQA compliance, no response is required.

Caltrans sent its letter directly to the University. The comment letter followed by the University responses follows.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
www.dot.ca.gov

Serious drought.
Help save water!

June 14, 2016

Tracy Dudman, Senior Planner
Campus and Environmental Planning
UCLA Capital Programs
1060 Veteran Avenue
Los Angeles, CA 90095-1365

RE: Geffen Academy at UCLA
Vic: LA-405/P.M. 55.277
SCH # 2016021050
Ref. IGR/CEQA 160235ME-NOP
IGR# 160608ME-DEIR

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The nearest State facility to the project is I-405. Based on information received and Subsequent EIR (SEIR), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. 2

As a reminder, storm water run-off is a sensitive issue for Los Angeles Counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State Highway facilities without a storm water management plan. 3

Transporting of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods. 4

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

If you have any questions regarding these comments, please contact Ms. Miya Edmonson the project coordinator at (213) 897-6536 and refer to IGR/CEQA No. 160608ME-DEIR.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."

Response to Comment Letter 2

California Department of Transportation (Caltrans)
June 14, 2016

1. This comment accurately summarizes the Project description. No response is required.

2. This comment identifies that development of the proposed Project would not impact Interstate (I) 405, consistent with the conclusion of the Draft SEIR. No response is required.

3. This comment addresses storm water runoff from the project site. As described in Section 3.5.7, Utility Infrastructure, of the Draft SEIR (page 3-10), the proposed project would implement water quality treatment features, as required by applicable regulations. Additionally, storm water runoff from the project site would not discharge to any State Highway facilities.

4. As identified by the commenter, construction activities would be conducted in compliance with relevant Caltrans requirements, including obtaining a Caltrans Transportation Permit if transport of oversize or overweight vehicles is required. Section 4.8, Transportation/Traffic, of the Draft SEIR, includes an analysis of potential traffic impacts during construction (page 4.8-20). As identified, the use of heavy trucks for the transport and disposal of demolished materials, building materials, equipment, and soils would occur periodically throughout the workday but largely outside of the peak hours. It should also be noted that the peak days for construction-related heavy truck traffic would occur during completion of the project's minor grading activities when there would be up to 10 round truck trips over an 8-week period. Conservatively assuming that all of these truck trips occurred in one day, this would represent 3 equivalent trips during the peak hour. Additionally, UCLA coordinates major construction projects on and adjacent to the campus to reduce construction-related traffic congestion (refer to campus practice, program and procedure [PP] 4.13-2).

From: Roxane Stern <roxane.stern@gmail.com>
Date: 06/26/2016 10:00 (GMT-08:00)
To: "Dudman, Tracy" <t.dudman@capnet.ucla.edu>
Subject: Geffen Academy SEIR

I have read the Geffen Academy Draft SEIR and appreciate the opportunity to view it.

Based on the information provided, I support the current proposal over doing nothing or using the extension building. Just have a few comments or questions. 1

Does the project meet standards for physical activity inside and out as required for Los Angeles high schools? If more space is needed to expand external recreational space would it come from taking more parking lot spaces? What plans are there to use the space on UCLA campus for football, soccer, swimming, or tennis? 2

The goal to keep the number of trips down would be channeling students into different means of transportation - car pools, van, public transportation, etc. Would that be monitored throughout the year? And what would be the repercussions of not following the rules? 3

A side issue is the probable increased traffic on Strathmore Dr. from Levering to Veteran. Strathmore Dr is a secondary road (narrow) at least from Levering to Weyburn Place. Parking is allowed on both sides of the street and when there is traffic in both directions it is a difficult situation. Making a left turn on to Veteran from Strathmore Dr. is dangerous as Veteran traffic has the right of way. Putting a signal at that intersection would be helpful. Even a stop sign would slow down speeders on Veteran and allow side street traffic to enter the street going south. Having the city remove parking on the west side of Veteran from Levering to the south would create another lane and reduce congestion. 4

Are there repercussions of closing the alley to the south of Gayley Center? 5

Thank you for all the work and dedication that went into this report.

Roxane Stern
11053 Strathmore Dr
Los Angeles CA 90024
310-443-1106

Response to Comment Letter 3

Roxane Stern
June 26, 2016

1. This comment acknowledges that the commenter has reviewed the Draft SEIR and supports the proposed project. This comment will be taken into consideration by the decision makers.

2. This comment addresses the space provided at the project site to accommodate physical activities. As discussed in Section 3.5.1, Geffen Academy Operations, of the Draft SEIR, the Geffen Academy would have recreational activities and various competitive athletic teams that would utilize on-site facilities, including a proposed outdoor half-court (refer to the conceptual site plan provided on Figure 3-5 of the Draft SEIR). It is expected that this would include, but not be limited to, dance, wrestling, yoga, cardio and resistance training, and basketball and volleyball practice and instruction (using the proposed half court). It is premature to identify the need for or location of other athletic or recreational facilities on the UCLA campus or off campus that may be used by the Academy in the future; identification of such facilities would be speculative at this time. Should the use of any facilities not located at the Geffen Academy site be implemented in the future, that use or construction of new facilities would be addressed as part of separate environmental documentation prepared pursuant to CEQA. There are no standards for physical activity applicable to the proposed Project.

3. Monitoring and enforcement of applicable UCLA Transportation Demand Management (TDM) measures and TDM measures specific to the proposed Geffen Academy would be conducted by UCLA Transportation consistent with current practices for existing uses on campus. All students would be required to, as part of registering for the Geffen Academy each year, indicate agreement of use of an alternative mode for travel to campus. To ensure feasibility, the Academy would provide students and parents with the range of TDM options available to them and provide the internal coordination to identify the right alternative mode of travel.

4. The trip distribution assumptions for the proposed Project during the AM and PM peak hours for each study area intersection is presented in Figures 4.8-6a and 4.8-6b of the Draft SEIR. It is not expected that traffic generated by the proposed Geffen Academy would use Strathmore Drive between Levering Avenue and Veteran Avenue. Therefore, no impacts to this roadway segment or associated intersections would occur, and no mitigation is required. The proposed project is not required to improve or otherwise mitigate existing adverse traffic conditions.

5. Closure of the alley south of Gayley Center is not a component of the proposed project. As discussed in Section 4.4-2, Land Use and Planning, of the Draft SEIR (page 4.4-2), in November 2013, the City of Los Angeles approved a request to vacate the alley westerly of Gayley Avenue adjoining the Wilshire Gayley project site for driveway access. Use of the alley was not assumed for purposes of vehicular circulation to accommodate the proposed Geffen Academy; therefore, this closure would not affect the proposed Project.

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SECTION 3.0 PROJECT REFINEMENTS

Section 15088.5(a) of the California Environmental Quality Act (CEQA) Guidelines states:

> (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:
>
> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
>
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
>
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
>
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The purpose of this section of the Final SEIR is to identify that following release of the Draft SEIR, the University has determined that library personnel, located in the Kinross South building (see Draft SEIR Figure 3-3), would be relocated to existing and available on-campus space. Vacating Kinross South provides the opportunity for the Geffen Academy Project to use the facility as a temporary staging location for the Project's first year's classes. The interior renovation and construction needed to transform the Kinross Building for the Academy is able to occur without concurrent occupancy by the Academy's students, faculty, and staff.

The Kinross South building would require minimal interior modifications to redefine spaces for the Academy's use. A pick-up/drop-off zone would be established at the south entrance, and parking spaces in this area would be restriped to accommodate drop off and provide spaces for guest parking. A modified circulation pattern would have inbound vehicles approaching from Kinross Avenue; proceeding south on Midvale Alley, consistent with the access assumptions in the Draft SEIR. The vehicles would then continue along Midvale Alley on the east side of Kinross North and South; dropping-off at the building's south side; and exiting through Lot 36 to the signaled intersection at Kinross, consistent with the Project as analyzed in the Draft SEIR. Traffic can proceed on Kinross both east and westbound. There would be no changes to the proposed Project components associated with construction and use of the Kinross Building as described and analyzed in the Draft SEIR, or in the estimated number of students, faculty of staff anticipated with implementation of the proposed Project.

Pursuant to CEQA Guidelines section 15088.5, the temporary use of Kinross South has been reviewed against the environmental impact categories analyzed in the Draft SEIR, to determine if the conditions representing "significant new information" occur, thus requiring recirculation. As

described below, no new significant information results from this project change and recirculation of the Draft SEIR is not required. It should also be noted that the proposed Project refinements would not change the environmental conclusion for environmental topics addressed in the Initial Study included in Appendix A of the Draft SEIR, and for which it was determined that the proposed project would have no impact or a less than significant impact (aesthetics, agricultural and forestland resources, biological resources, cultural resources, geology/soils, hazards and hazardous materials, and mineral resources).

Air Quality

The Academy's staging would locate them in a facility immediately south of the proposed Project site at the Kinross Building (approximately 20 feet to the south at the closest location). By locating the Academy in substantially the same location, construction and operational air quality conditions are the same as analyzed in the Draft SEIR. Additionally, the construction activities associated with interior improvements to the Kinross South building would not result in emissions air quality emissions that exceed the daily emissions identified in the Draft SIER (see Table 4.1-5). Therefore, based on the Draft SEIR Air Quality analysis (See page 4.1-1) and its conclusions, the air quality impacts related to the temporary staging of students in the Kinross South building during construction are less than significant for the following thresholds:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- Result in a cumulatively considerable new increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors to substantial pollutant concentrations.

Greenhouse Gas Emissions

The Academy's staging in Kinross South would utilize an existing building that requires minor interior modifications for use by the Academy. No grading, heavy construction activities, or diesel trucks would be required for the renovation. In addition, the staging allows Kinross Building renovations to proceed in a fully vacant building. This could potentially reduce the construction duration of the Kinross Building, which in turn, may reduce construction emissions. Additionally, the proposed Project refinements would not change any operations assumed in the analysis for the proposed Project and would not increase the amount or type greenhouse gas (GHG) emissions that would be generated. Based on the Draft SEIR Greenhouse Gas Emissions analysis (See page 4.2-1) and its conclusions, the Greenhouse Gas Emissions impacts related to the temporary staging of students in the Kinross South building during construction are less than significant for the following thresholds:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Hydrology and Water Quality

The Academy's staging would utilize an existing building that was built in 2002, and compliant with State and Regional Water Quality Control Board regulations for treatment of storm water at the time of construction. Use of the Kinross South building for staging would not require exterior construction that would result in soil disturbance, grading, or on-site stockpiling of soil or construction materials. Thus, there would be no potential for storm water contact with earth or construction materials that could alter existing drainage patterns or pollute storm water runoff. Based on the Draft SEIR Hydrology and Water Quality analysis (See page 4.3-1) and its conclusions, the Hydrology and Water Quality impacts related to the temporary staging of students in the Kinross South building during construction are less than significant for the following thresholds:

- Violate any water quality standards or waste discharge requirements.
- Otherwise substantially degrade water quality.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site.
- Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Land Use and Planning

The Academy's staging would be consistent with the existing land uses in the campus' Southwest zone. The building is currently occupied by Library personnel for academic uses. A temporary use of the facility by the Academy would maintain an academic use and consistency with the 2002 LRDP, as Amended and the March 2009 LRDP Amendment Final EIR. In addition, staging in an existing facility would not impact the campus' development entitlement and would have the same average daily trips and parking needs as discussed in the Draft SEIR. Based on the Draft SEIR Land Use and Planning analysis (See page 4.4-1) and its conclusions, the Land Use and Planning impacts related to the temporary staging of students in the Kinross South building during construction are less than significant for the following thresholds:

- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Create other land use impacts.

Noise

The Academy's staging would place students, faculty, and staff in the same noise environment as the proposed Project site, the Kinross Building. Located approximately 20 feet south of the Kinross Building, Kinross South is also a stand-alone structure in Parking Lot 36, bounded by Wilshire Boulevard to the south; Veteran Avenue to the west; Kinross Avenue to the north; and Midvale Alley to the northeast. Kinross South has the same existing exterior noise levels as described in the Draft SEIR, which includes the parking lot, roadways (the aforementioned streets and the I-405 Freeway), and helicopter noise. Based on the Draft SEIR Noise analysis (See page 4.5-1) and its conclusions, the Noise impacts related to the temporary staging of students in the Kinross South building are less than significant for the following thresholds:

- Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.

- Result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels.

- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

However, regarding construction-related, or temporary noise levels, the Draft SEIR Noise analysis considered the potential impact of the following threshold:

- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project (including construction).

The construction activities internal to the Kinross South building to accommodate temporary uses by the Geffen Academy would generate similar or reduced noise levels compared to those anticipated for interior renovations at the project site (Kinross Building). However, the Draft SEIR also analyzed the construction noise related to the adjacent, proposed, private development of the Wilshire Gayley Project. This project, approved by the City of Los Angeles, would be located on the parcel immediately east of the Kinross South building (refer to the Draft SEIR Figure 3-3). Should the Wilshire Gayley Project be under construction during the Academy's proposed temporary occupancy of the Kinross South building, those construction activities represent a potential temporary increase in the ambient noise levels of more than 10 dBA at the Kinross South Building. The potential for the Academy to be exposed to construction-related noise levels is a potentially significant impact for which there is no feasible mitigation; UCLA cannot require mitigation be implemented for this off-campus project. Therefore, this temporary impact would be significant and unavoidable, consistent with the findings of the March 2009 LRDP Amendment Final EIR, and the analysis conclusions in the Draft SEIR for the proposed Project, which identified the potential for construction-noise related impacts to on-campus uses.

A Statement of Overriding Considerations was adopted by The Regents for this significant and unavoidable impact identified in the March 2009 LRDP Amendment Final EIR.

Population and Housing

The Academy's staging would result in the same number of students, faculty, and staff in the first year's classes; 160 students, 42 fulltime faculty/staff, and 8 remote employees. By year 2020/21, the proposed Project would reach its full enrollment and staffing with 620 students, 109 faculty/staff, and 31 remote employees; this assumption would not change with the proposed Project refinements. In addition, and as detailed in the Draft SEIR Population and Housing

analysis (see page 4.6-1), a new campus population baseline has been established for the 2014-2015 academic year, based on the campus methodology for a 3-quarter weekday population (see Draft SEIR Table 4.6-2). This baseline condition and project growth on campus also would not change with the proposed Project refinements. Further, based on the Draft SEIR Population and Housing analysis and its conclusions, the Population and Housing, impacts related to the temporary staging of students in the Kinross South building during construction are less than significant for the following threshold:

- Induce substantial 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).

Public Services (Schools) and Recreation

The Academy's staging would result in the same demand for public services (schools) and recreation as described in the Draft SEIR. The proposed Project would result in the hiring of new faculty and staff, who themselves may require enrollment in LAUSD or local private schools for their children. Development of recreational facilities for the students of the Geffen Academy would include both inside and outdoor facilities, as described in the Draft SEIR. Based on the Draft SEIR Public Services and Recreation analysis (See page 4.7-1) and its conclusions, the Public Services and Recreation impacts related to the temporary staging of students in the Kinross South building during construction are less than significant for the following thresholds:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 schools.

- 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.

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 parks.

- Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

Transportation and Traffic

The Academy's staging would result in a similar, but modified, circulation pattern compared to that described in the Draft SEIR. During the first year's classes, vehicles would maintain the same inbound approach to the Academy, which includes a right turn onto Midvale Alley from eastbound Kinross Avenue (buses would make a left turn from westbound Kinross Avenue), proceeding southbound on Midvale Alley. Vehicles would then proceed south, along the east side of Kinross South, turning right at the building's southeast corner, to the existing entrance to the facility that would be the temporary pick-up/drop-off area. Vehicles would then proceed west along the buildings south side, turn right at the fourth bay of parking stalls in Lot 36, proceed northbound through the parking lot to the existing signaled exit at Kinross Avenue. Vehicles and buses would

be able to make either a right or left turn onto Kinross Avenue. Alternatively, students, faculty, and staff of the Academy, located at Kinross South during the first year, who want to utilize public transit or other modes of alternative transportation would be highly encouraged to do so through campus Transportation Demand Management (TDM) program. Based on the Draft SEIR Transportation and Traffic analysis (See page 4.8-1) and its conclusions, the Transportation and Traffic impacts related to the temporary staging of students in the Kinross South building during construction are less than significant for the following thresholds:

- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

  However, regarding the proposed Project's contribution to operational traffic impacts, the Draft SEIR Transportation and Traffic analysis considered the potential impact of the following threshold:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

With the proposed Project refinements, there would be no change in the estimated trip generation resulting from the proposed Project during construction or operation. Therefore, based on the analysis presented in the Draft SEIR (see page 4.8.1), significant and unavoidable project-related impacts would occur at the following intersection under the Existing Plus Project Scenario:

- Veteran Avenue and Wilshire Boulevard (PM Peak Hour)

Significant and unavoidable cumulative impacts would occur at the following intersections under the Future Plus Project Scenario:

- Veteran Avenue and Wilshire Boulevard (PM Peak Hour)

- Gayley Avenue/Midvale Avenue and Wilshire Boulevard (AM Peak Hour)

Physical modification of the intersection to improve capacity could mitigate potential impacts. However, these intersections are fully improved within the existing right-of-way and therefore restriping is not possible. Widening would require acquisition of land by the City of Los Angeles and, due to proximity of office or retail uses adjacent to the roadways, is not feasible. No other feasible mitigation options have been identified for this intersection.

Because there is no feasible mitigation for the impacts at these intersections, the cumulative impacts would be considered significant and unavoidable. The above-described significant unavoidable cumulative operation-related traffic impacts associated with implementation of the approved entitlement under the 2009 LRDP EIR, of which this Project is a part, were adequately analyzed and addressed in the LRDP EIR and in the Findings and Overriding Considerations

adopted by The Regents in connection with its approval of the 2009 LRDP Amendment and certification of the LRDP EIR. No Project-specific mitigation is feasible as changes or alterations of the intersections are within the responsibility and jurisdiction of another public agency.

Utilities and Service Systems

The Academy's staging would utilize an existing building with existing water and wastewater services and no new utility infrastructure would need to be constructed. Both water and wastewater systems are utilized by the existing Library tenants and these services would continue to be used by the proposed temporary occupation by the Geffen Academy's students, faculty, and staff. During Academy's first year, the Kinross Building would be vacated of all existing occupants, thus, the building would have no or minimal water or wastewater demand, which would decrease both water and wastewater system demands/generation the staging. Based on the Draft SEIR Utilities and Service Systems analysis (See page 4.9-1) and its conclusions, the Utilities and Service Systems impacts related to the temporary staging of students in the Kinross South building during construction are less than significant for the following thresholds:

- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

- Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

  Have insufficient water supplies available to serve the project from existing entitlements and resources, or if new or expanded entitlements are needed.

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SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with project development. The Final Subsequent Environmental Impact Report (SEIR) for the proposed Geffen Academy at UCLA (the Geffen Academy or proposed Project) (State Clearinghouse No. 2016021050) analyzes the impacts of the proposed Project, which includes all relevant mitigation measures (MMs) and campus programs, practices, and procedures (PPs) carried forward from the March 2009 LRDP Amendment Final EIR. This Mitigation Monitoring and Reporting Program (MMRP), which identifies the LRDP EIR MMs and PPs included as part of the Project description and one project design feature (PDF) related to air quality, obligates the University to implement the identified PPs, MMs, and PDF. Under the delegated-authority process, the MMRP will be reviewed by the Chancellor, in conjunction with consideration for approval of the proposed Project and adoption of the Final SEIR.

Monitoring of the PPs, MMs, and PDFs identified in the MMRP is required by Public Resources Code Section 21081.6. Following adoption of the Final SEIR and approval of this MMRP, the PPs and MMs from the March 2009 LRDP Amendment Final EIR included as part of the Project description would be monitored in conjunction with UCLA's annual LRDP EIR Mitigation Monitoring Program and reporting process.

4.1.1 PURPOSE

The purpose of the MMRP is to ensure compliance with all PPs, MMs, and PDFs to avoid or reduce adverse environmental impacts resulting from construction and operation of the proposed Geffen Academy, which were identified in the Draft SEIR. The implementation of the applicable PPs, MMs, and PDFs shall be performed by the University, consulting architects, contractors, and appropriate agencies during the following:

- Development of the design
- Preparation of the construction contracts
- Construction phase
- Project operation

4.1.2 PROJECT DESCRIPTION

The proposed Geffen Academy would be operated by UCLA and would provide an innovative college preparatory education for 6th through 12th grade students. The Academy is proposed to open for the 2017–2018 school year with approximately 160 students in grades 6 and 9, followed by an enrollment increase up to a maximum of 620 students in grades 6 through 12 by the 2020–2021 school year. New faculty and staff would be hired to operate the Geffen Academy. This would include full- and part-time faculty and staff and remote employees (not on campus). Based on preliminary estimates, with 620 students by the 2020–2021 school year, it is expected that the employee population would include approximately 81 full-time faculty/staff, 28 part-time staff (total of 109 faculty/staff), and 31 remote employees. The Geffen Academy would have recreational activities and various competitive athletic teams that would utilize on-site facilities, including a proposed outdoor half-court.

Internal modifications would be made to all 3 levels of the 75,000 gsf Kinross Building to accommodate the proposed uses and programs associated with the Geffen Academy.

Additionally, minor exterior site modifications are proposed, including a proposed exit driveway at Kinross Avenue, an outdoor half-court basketball court, and a new main entry to the building along the western building facade. The proposed Project would retain existing connections to campus utilities, including domestic water, sewer, storm drains, and dry utility systems that are currently located in the project area.

Upon completion, the proposed circulation pattern for the Geffen Academy would involve vehicles entering the site at the Midvale Alley entrance east of the Kinross Building and west of the Gayley Center, following a route around the Kinross Building to the proposed new entrance and pick-up/drop-off location at the northwest portion of the building. Vehicles would then either (1) exit onto Kinross Avenue from a new driveway to be constructed as part of the proposed Project (right-turns only) or (2) during controlled periods, exit the site from a swing or sliding fence that would allow vehicles to use the existing Parking Lot 36 exit and turn left onto Kinross Avenue. Parking for the Geffen Academy, including parking in compliance with the Americans with Disabilities Act (ADA), would be provided on site for Academy students and visitors. Full-time Academy faculty or staff (which would also be UCLA faculty and staff) would have the opportunity to obtain a campus parking permit for either Parking Lot 36 or Parking Structure 32.

As discussed in Section 3 of this Final SEIR, during renovation and construction activities at the project site (Kinross Building) to accommodate the proposed Project, the Kinross South building would be used as a temporary staging location for the Project's first year classes (2017/2018 school year). This would allow the construction needed to transform the Kinross Building for the Academy to occur without concurrent occupancy by the Academy's students, faculty, and staff.

The proposed Project would not require an amendment to the 2002 LRDP (as amended in March 2009) since the proposed renovations to the Kinross Building would result in no new square footage being added in the Southwest zone.

4.1.3 MONITORING PROCEDURES

The project manager (PM) from the University Capital Programs, Design and Construction Department, would be responsible for ensuring that design and construction contracts contain the relevant mitigation measures adopted in the Final SEIR, and that mitigation measures are implemented during the design, construction and operational phases of the Project.

In general, monitoring will consist of demonstrating that mitigation measures were implemented, and that the responsible units monitored the implementation of the measures. Monitoring will consist of determining whether the following occurred:

- Specific issues were considered in the design development phase
- Construction contracts included the specified provisions
- Certain actions occurred prior to construction
- The required measures were acknowledged and implemented during construction of the project

Any problems or concerns between monitors and construction personnel shall be addressed by the PM. The contractor shall prepare a construction schedule subject to review and approval by the PM. The contractor shall inform the PM of any major revisions to the construction schedule at least 48 hours in advance. The PM and contractor shall meet weekly, in order to assess compliance and review future construction activities.

4.1.4 REPORTING PROCEDURES

Monitoring of PPs, MMs, and PDFs included as part of the Project as well as project-specific mitigation measures will be reported in conjunction with the LRDP EIR Mitigation Monitoring and Reporting Program Status Report prepared annually by UCLA Capital Programs. The annual reporting identifies the Project's PPs, MMs, and PDFs and describes their implementation status for each phase of project development, including design, construction, landscaping and operation.

4.2 LIST OF CAMPUS PROGRAMS, PRACTICES AND PROCEDURES AND MITIGATION MEASURES

Table 4-1 lists the MMs and PPs from the certified March 2009 LRDP Amendment Final EIR applicable to and included as part of the Geffen Academy at UCLA Project, and one project-specific PDF (PDF Geffen Air-1) presented in **bold** text. Table 1 also identifies the monitoring timing for each phase of project development, including design, pre-construction, construction, landscaping and operation.

TABLE 4-1
LRDP CAMPUS PROGRAMS, PRACTICES AND PROCEDURES; MITIGATION MEASURES; AND PROJECT DESIGN FEATURES INCLUDED AS PART OF THE GEFFEN ACADEMY AT UCLA PROJECT

MM, PDF, and PP Number	Mitigation Timing	LRDP Mitigation Measure(s) (MMs), LRDP Campus Programs, Practices, and Procedures (PPs), and Project Design Feature (PDF)
Air Quality		
PP 4.1-2(c)	Design and Construction	Projects proposed under 2002 LRDP shall include landscaping.
MM 4.1-3(a)	Design	Design for specific projects shall provide for the use of textured non-reflective exterior surfaces and non-reflective glass.
MM 4.1-3(b)	Design	All outdoor lighting shall be directed to the specific location intended for illumination (e.g., roads, walkways, or recreation fields) to limit stray light spillover onto adjacent residential areas. In addition, all lighting shall be shielded to minimize the production of glare and light spill onto adjacent uses.
MM 4.1-3(c)	Design	Ingress and egress from parking areas shall be designed and situated so the vehicle headlights are shielded from adjacent uses. If necessary, walls or other light barriers will be provided.
PP 4.2-2(a)	Construction	The campus shall continue to implement dust control measures consistent with SCAQMD Rule 403—Fugitive Dust during the construction phases of new project development. The following actions are currently recommended to implement Rule 403 and have been quantified in the URBEMIS[1] program as being able to reduce dust generation between 5 and 84 percent depending on the measure or combination of measures used from the list below: • 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.

TABLE 4-1
LRDP CAMPUS PROGRAMS, PRACTICES AND PROCEDURES; MITIGATION MEASURES; AND PROJECT DESIGN FEATURES INCLUDED AS PART OF THE GEFFEN ACADEMY AT UCLA PROJECT

MM, PDF, and PP Number	Mitigation Timing	LRDP Mitigation Measure(s) (MMs), LRDP Campus Programs, Practices, and Procedures (PPs), and Project Design Feature (PDF)
		• 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. [1] The URBEMIS model has been superseded by the CalEEMod model which has improved methods and an updated data base. The CalEEMod model has been used to quantify emissions from the proposed Project.
PP 4.2-2(b)	Pre-construction and Construction	The campus shall continue to require by contract specifications that construction equipment engines will be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction.
PP 4.2-2(c)	Pre-construction and Construction	The campus shall continue to require by contract specifications that construction operations rely on the campus' existing electricity infrastructure rather than electrical generators powered by internal combustion engines to the extent feasible.
PP 4.2-2(d)	Construction	The campus shall purchase and apply architectural coatings in accordance with SCAQMD Rule 1113, thereby ensuring the limitation of VOCs during construction.
MM 4.2-2(a)	Pre-construction and Construction	The campus shall require by contract specifications that construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than five minutes.
MM 4.2-2(b)	Pre-construction and Construction	The campus shall encourage contractors to utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and low-NOx fuel) to the extent that the equipment is reasonably commercially available and cost effective.
MM 4.2-2(c)	Pre-construction and Construction	The campus shall require by contract specifications that construction-related equipment used on site and for on-road export of soil meet USEPA Tier III certification requirements, as feasible.
PDF Geffen Air-1	**During Construction of the Wilshire Gayley Building**	**The campus shall install a heating, ventilating and air conditioning (HVAC) system at the Geffen Academy designed to use air filters with a Minimum Efficiency Rating Value (MERV) of 13, or filters with equivalent performance. During concurrent operation of the Geffen Academy and construction of the Wilshire Gayley Project, the campus shall install MERV 13 air filters, or filters with equivalent performance. These filters shall be replaced as needed to maintain rated efficiency, and shall continue to be used until construction of the Wilshire Gayley Project is complete.**
Biological Resources		
PP 4.3-1(a)	Construction	Mature trees to be retained and protected in place during construction, shall be fenced at the drip-line, and maintained by the contractor in accordance with landscape specifications contained in the construction contract.
PP 4.3-1(b)	Pre-construction	Trees shall be examined by an arborist and trimmed, if appropriate, prior to the start of construction.

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MM, PDF, and PP Number	Mitigation Timing	LRDP Mitigation Measure(s) (MMs), LRDP Campus Programs, Practices, and Procedures (PPs), and Project Design Feature (PDF)
PP 4.3-1(c)	Pre-construction and Construction	Construction contract specifications shall include the provision for temporary irrigation/watering and feeding of these trees during construction, as recommended by the designated arborist.
PP 4.3-1(d)	Pre-construction and Construction	Construction contract specifications shall require that no building material, parked equipment, or vehicles shall be stored within the fence line of any tree.
PP 4.3-1(e)	Construction	Examination of these trees by an arborist shall be performed monthly during construction to ensure that they are being adequately maintained.
MM 4.3-1(a)	Pre-construction	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 CDFG 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)	Pre-construction and Construction	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 CDFG.
MM 4.3-1(c)	CEQA Documentation	In conjunction with CEQA documentation required for each project proposal under the 2002 LRDP, as amended, that would result in the removal of one or more mature trees, the project will include a tree replacement plan with a 1:1 tree replacement ratio at the development site where feasible and/or elsewhere within the campus boundaries where feasible. If it is not feasible to plant replacement trees at a 1:1 ratio within the campus boundaries, the tree replacement plan will include the planting of native shrubs in ecologically appropriate areas within the campus boundaries that would provide nesting, foraging or roosting habitat for birds so that the replacement number of trees and shrubs will result in a 1:1 replacement ratio.
MM 4.3-4	Design and Construction	UCLA shall replace protected trees removed for construction of projects under the 2002 LRDP, as amended, with protected trees of the same species at a 2:1 ratio as presented in the City of Los Angeles Protected Tree Ordinance (Ordinance Number 177404). Protected trees are defined as coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel.
Greenhouse Gas Emissions		
PP 4.15-1	Design and Operation	The campus shall continue to implement provisions of the UC Policy on Sustainability Practices including, but not limited to: Green Building Design; Clean Energy Standards; Climate Protection Practices; Sustainable Transportation Practices; Sustainable Operations; Recycling and Waste Management; Environmentally Preferable Purchasing Practices; and provisions of the applicable UCLA Climate Action Plan.
Hazards and Hazardous Materials		
PP 4.6-1	Construction and Operation	The campus shall continue to implement the same (or equivalent) health and safety plans, programs, practices, and procedures related to the use, storage, disposal, or transportation of hazardous materials during the LRDP Amendment planning horizon, including, but not necessarily limited to, the Business Plan, Hazardous Materials Management Program, Hazard Communication Program, Injury and Illness Prevention Program, Chemical Exposure Monitoring Program, Asbestos Management Program, Respiratory Protection Program, EH&S procedures for decommissioning and demolishing buildings that may contain hazardous materials, and the Broadscope Radioactive Materials License. These programs may be subject to modification as more stringent standards are developed or if the programs become obsolete through replacement by other programs that incorporate similar health and safety protection measures.

TABLE 4-1
LRDP CAMPUS PROGRAMS, PRACTICES AND PROCEDURES; MITIGATION MEASURES; AND PROJECT DESIGN FEATURES INCLUDED AS PART OF THE GEFFEN ACADEMY AT UCLA PROJECT

MM, PDF, and PP Number	Mitigation Timing	LRDP Mitigation Measure(s) (MMs), LRDP Campus Programs, Practices, and Procedures (PPs), and Project Design Feature (PDF)
Hydrology and Water Quality		
PP 4.7-1	Construction and Operation	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.
PP 4.7-5	Design	Site-specific hydrologic evaluation shall be conducted for each proposed development project based on the project-specific grading plan and site design of each individual project. This evaluation shall include, but not be limited to: (1) an assessment of runoff quality, volume and flow rate from the proposed project site; (2) identification of project-specific BMPs (structural and non-structural) to reduce the runoff rate and volume to appropriate levels; and (3) identification of the need for new or upgraded storm drain infrastructure (on and off campus) to serve the project. Project design shall include measures to upgrade and expand campus storm drain capacity where necessary, as identified through the project-specific hydrologic evaluation. Design of future projects shall include measures to reduce runoff, including, but not limited to, the provision of permeable landscaped areas adjacent to structures to absorb runoff and the use of pervious or semi-pervious paving materials.
MM 4.7-1	Design, Pre-Construction and Construction	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.

TABLE 4-1
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MM, PDF, and PP Number	Mitigation Timing	LRDP Mitigation Measure(s) (MMs), LRDP Campus Programs, Practices, and Procedures (PPs), and Project Design Feature (PDF)
Land Use and Planning		
PP 4.8-1(e)	Design	Facilities shall be sited and designed to enhance spatial development of the campus while maximizing use of limited land resources.
Noise		
PP 4.9-6(a)	Design	The campus shall continue to shield all new stationary sources of noise that would be located in close proximity to noise-sensitive buildings and uses.
PP 4.9-7(a)	Construction	To the extent feasible, construction activities shall be limited to 7:00 A.M. to 9:00 P.M. Monday through Friday, 8:00 A.M. to 6:00 P.M. on Saturday, and no construction on Sunday and national holidays, as appropriate, in order to minimize disruption to area residences surrounding the campus and to on-campus uses that are sensitive to noise.
PP 4.9-7(b)	Construction	The campus shall continue to require by contract specifications that construction equipment be required to be muffled or otherwise shielded. Contracts shall specify that engine-driven equipment be fitted with appropriate noise mufflers.
PP 4.9-7(c)	Construction	The campus shall continue to require that stationary construction equipment material and vehicle staging be placed to direct noise away from sensitive receptors.
PP 4.9-7(d)	Pre-construction and Construction	The campus shall continue to conduct regular meetings with on-campus constituents to provide advance notice of construction activities in order to coordinate these activities with the academic calendar, scheduled events, and other situations, as needed.
Public Services		
PP 4.11-1	Design	Fire alarm connections to the University Police Command Center shall continue to be provided in all new and renovated buildings to provide immediate location information to the Los Angeles Fire Department to reduce response times in emergency situations.
PP 4.11-2(a)	Design and Operation	Police staffing levels and equipment needs shall continue to be assessed on an ongoing basis as individual development projects are proposed and on an annual basis during the campus budgeting process to ensure that the appropriate service levels will be maintained to protect an increased campus population and an increased level of development.
Recreation		
PP 4.12-1(a)	Design and Operation	The campus shall continue to provide, operate, and maintain recreational facilities for students, faculty, and staff on campus.
PP 4.12-1(b)	Design and Operation	The campus shall continue to integrate landscaped open space (including plazas, courts, gardens, walkways, and recreational areas) with development to encourage use through placement and design.
Transportation/Traffic		
PP 4.13-1(d)	Operation	The campus shall continue to implement a TDM program that meets or exceeds all trip reduction and AVR requirements of the SCAQMD. The TDM program may be subject to modification as new technologies are developed or alternate program elements are found to be more effective.
PP 4.13-2	Pre-construction and Construction	UCLA Capital Programs will assess construction schedules of major projects to determine the potential for overlapping construction activities to result in periods of heavy construction vehicle traffic on individual roadway segments, and adjust construction schedules, work hours, or access routes to the extent feasible to reduce construction-related traffic congestion.
PP 4.13-5	Construction	To the extent feasible, the campus shall maintain at least one unobstructed lane in both directions on campus roadways. At any time only a single lane is available, the campus shall provide a temporary traffic signal, signal carriers (i.e., flagpersons), or other appropriate traffic controls to allow travel in both directions. If construction activities require the complete closure of a roadway segment, the campus shall provide appropriate signage indicating alternative routes.

TABLE 4-1
LRDP CAMPUS PROGRAMS, PRACTICES AND PROCEDURES; MITIGATION MEASURES; AND PROJECT DESIGN FEATURES INCLUDED AS PART OF THE GEFFEN ACADEMY AT UCLA PROJECT

MM, PDF, and PP Number	Mitigation Timing	LRDP Mitigation Measure(s) (MMs), LRDP Campus Programs, Practices, and Procedures (PPs), and Project Design Feature (PDF)
PP 4.13-6	Construction	For any construction-related closure of pedestrian routes, the campus shall provide appropriate signage indicating alternative routes and provide curb cuts and street crossings to assure alternate routes are accessible.
PP 4.13-8	Pre-construction and Construction	To ensure adequate access for emergency vehicles when construction projects would result in temporary lane or roadway closures, UCLA shall consult with the UCPD, EH&S, and the LAFD to disclose temporary lane or roadway closures and alternative travel routes.
Utilities and Service Systems		
PP 4.14-2(a)	Design	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)	Operation	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)	Operation	The campus shall promptly detect and repair leaks in water and irrigation pipes.
PP 4.14-2(d)	Operation	The campus shall minimize the use of water to clean sidewalks, walkways, driveways, and parking areas.
PP 4.14-2(g)	Operation	The campus shall educate the campus community on the importance of water conservation measures.
PP 4.14-3	Operation	The campus shall continue to implement a solid waste reduction and recycling program designed to limit the total quantity of campus solid waste that is disposed of in landfills during the LRDP plan horizon.
PP 4.14-9	Design and Operation	The campus shall continue to implement energy conservation measures (such as energy-efficient lighting and microprocessor-controlled HVAC equipment) to reduce the demand for electricity and natural gas. The energy conservation measures may be subject to modification as new technologies are developed or if current technologies become obsolete through replacement.