Gayley Towers Redevelopment Project

Draft Initial Study/Mitigated Negative Declaration

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

June 2023

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GAYLEY TOWERS REDEVELOPMENT PROJECT
UNIVERSITY OF CALIFORNIA, LOS ANGELES

Project No. 908052.01

Initial Study and Environmental Checklist Form

I. PROJECT INFORMATION

1. PROJECT TITLE

Gayley Towers Redevelopment Project

2. LEAD AGENCY NAME AND ADDRESS

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

3. CONTACT PERSON AND PHONE NUMBER

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

4. PROJECT LOCATION

565 Gayley Avenue
Los Angeles, California 90024
(Refer to Figures 1 and 2)

5. PROJECT SPONSOR'S NAME AND ADDRESS

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

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

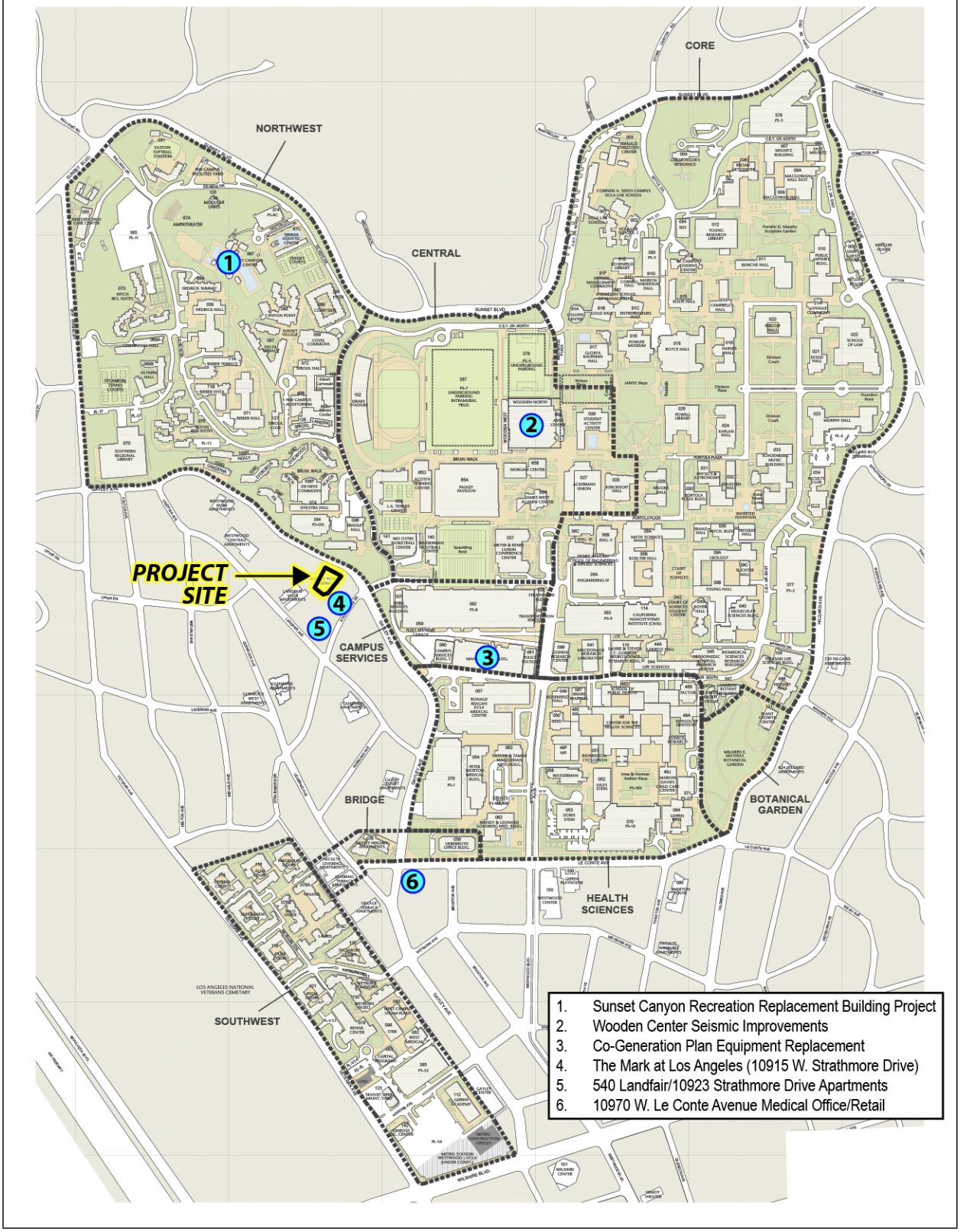
Because the Project site is located off campus, this Initial Study/Mitigated Negative Declaration (referred to herein as the IS or IS/MND) is not tiered from the UCLA Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (referred to herein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

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

Figure 1

0 300 600 1,200 Feet

Regional and Local Vicinity Map



Source(s): UCLA (April 2023)

Figure 2

Not to Scale

Campus Map and Related Projects

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

Introduction

The California Environmental Quality Act (CEQA) requires that government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. Therefore, in accordance with CEQA (Public Resources Code [PRC] Sections 21000 et seq., the CEQA Guidelines (14, California Code of Regulations [CCR], Sections 15000 et seq.), and the University of California Procedures for the Implementation of CEQA, this Initial Study (IS) has been prepared to support a Mitigated Negative Declaration (MND) and analyzes the potential environmental effects of the proposed Gayley Towers Redevelopment Project (Project). This IS/MND 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 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 that are the responsibility of the University of California are implemented in a timely manner. This IS identifies relevant 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. These LRDP PPs and MMs have been incorporated into the proposed Project and will be reflected in the Project-specific MMRP. Throughout the IS, 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 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. Therefore, this IS identifies and proposes for adoption Project-specific MMs to reduce Project-specific

[1] January 2018 Regents Action: Approval of Amendment #6 to the UCLA 2002 Long Range Development Plan for Additional On-Campus Student Housing Following Action Pursuant to the California Environmental Quality Act, Los Angeles Campus, which is available at https://regents.universityofcalifornia.edu/minutes/2018/fin1.pdf. It should be noted that the LRDP was subsequently amended (LRDP Amendment #7) following approval by the Executive Vice President and Chief Financial Officer in October 2018 to transfer 12,000 gross square feet (gsf) of remaining development allocation from the Core zone to the Health Sciences zone.

environmental impacts related to geology and soils and construction-related noise. In addition to addressing the potential environmental impacts that would result from the proposed Project, this IS 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 Project.

This IS, 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 September 2023.

II. PROJECT DESCRIPTION

The proposed Project would introduce a co-living style of student housing on the approximately 20,831 square foot (sf) (0.48 gross acre) Project site located at 565 Gayley Avenue.[2] Specifically, the proposed Project would involve the development of an eight-level, approximately 112,000 gross square foot (gsf) residential structure with a landscaped interior courtyard. There would be 187 bedrooms and up to 545 beds provided; at least 65 percent of these beds (358 beds) would be offered as affordable beds.[3,4] To accommodate the proposed development, the Project includes the demolition of an existing University-owned six-level, approximately 57,075 gsf apartment building on the Project site. More detailed information regarding the Project Description is provided in Section II.5, Proposed Project Components, below.

1. PROJECT LOCATION

The proposed Project is located at 565 Gayley Avenue within the community of Westwood, in the City of Los Angeles. The Project site is across the street from the western edge of UCLA's main campus. The Project site is approximately 11 miles west of downtown Los Angeles and approximately 4.9 miles northeast of the Pacific Ocean (refer to Figure 1, which depicts the regional location and local vicinity). Figure 2 provides a map of the UCLA campus and specifically shows the location of the proposed Project adjacent to the campus.

For purposes of this IS, the "Project site" is the proposed Gayley Towers Redevelopment Project building site, and the "Project area" includes the area that encompasses the proposed building site and the surrounding areas, including off-site and adjacent areas that may be disturbed during construction, as described in Section II.5, Proposed Project Components.

[2] The Project site includes an eight-foot-wide strip of land between the northern property line and the Gayley Avenue sidewalk that is dedicated to the City of Los Angeles. This approximately 1,058-square-foot area is part of the Project site, as defined under CEQA. Any construction activities or permanent improvements within this area would be subject to approval by the City of Los Angeles, as applicable.

[3] Preliminary estimates indicate monthly Project rents at approximately 59 percent below market rates, based on North Westwood Village data for Winter 2022, escalated by three percent per annum (CBRE, 2022).

[4] Pursuant to Assembly Bill 183, the rents for "affordable student rental housing" supported by the Higher Education Student Housing Grant Program shall be calculated at 30 percent of 50 percent of the area median income for a single-room occupancy unit type, subject to specified annual adjustments.

2. ENVIRONMENTAL SETTING

As shown on the aerial photograph provided on Figure 3 and the site survey provided on Figure 4, the approximately 0.48-gross-acre Project site (0.45 net acres when excluding public street right-of-way from the parcel area) is currently developed with a University-owned six-level, approximately 57,075 gsf apartment building. The existing building was constructed in 1981 and includes 51 studio/studio loft units housing approximately 100 students. Three levels of partially/subterranean parking, which accommodate 63 vehicles, is provided on-site, and is accessed from three driveways along Gayley Avenue, along the northern boundary of the Project site. There are permitted (unmetered) street parking spaces along both sides of Gayley Avenue, generally north and west of the Project site.

The elevations of the Project site range from approximately 375 feet above mean sea level (amsl) at the northeast corner to approximately 419 feet at the southwest corner. As shown on the site survey provided on Figure 4, due to the existing sloping topography, there are existing eight-foot (above grade) retaining walls along the east and west sides of the existing building. Immediately south of the building is a paved area enclosed by an eight-foot-tall retaining wall, south of which is a landscaped slope rising approximately 0 to 13 feet in height above the retaining wall, and beyond which extends another eight-foot-high retaining wall near the southern property line. Exterior staircases are provided along the east and west sides of the building. Existing site conditions are depicted on the site photographs provided on Figures 5a and 5b.

There is a dense mix of urban development in the vicinity of the Project area, with varied architectural styles, building massing, and building heights, and predominantly occupied by students. The Project site is surrounded by existing multi-family residential structures, generally with three to six stories, to the east, west and south, including fraternity houses located to the immediate east and west. Additionally, a nine-story student housing building is located to the southeast on Landfair, and new multi-family residential uses of up to seven stories are currently under construction immediately southeast of the Project site along Strathmore Avenue. The southern portion of the UCLA main campus, specifically the Northwest zone, is located north of the Project site, across Gayley Avenue and west of De Neve Drive (refer to the campus map provided on Figure 2). The Project site is located just west of a designated campus entry and perimeter buffer area located north of the intersection of Gayley Avenue and Strathmore Drive, as identified in the UCLA Physical Design Framework (UCLA, 2009a). Existing campus uses in the Northwest zone north of the Project site include Tom Bradley International Hall and Parking Structure DD, and the main student housing community further to the north. Existing campus uses to the northeast include athletic facilities in the Central zone. Parking Structure 8 in the Campus Services zone is located further to the east, east of Gayley Avenue and Charles E. Young Drive South.

Due to the density of urban development, the height of surrounding buildings, and variations in topography, views of the Project site are essentially limited to vantage points along the adjacent roadways or in immediately adjacent areas. The visual character of the Project site and surrounding areas is shown in the photographs presented on Figures 5a and 5b.

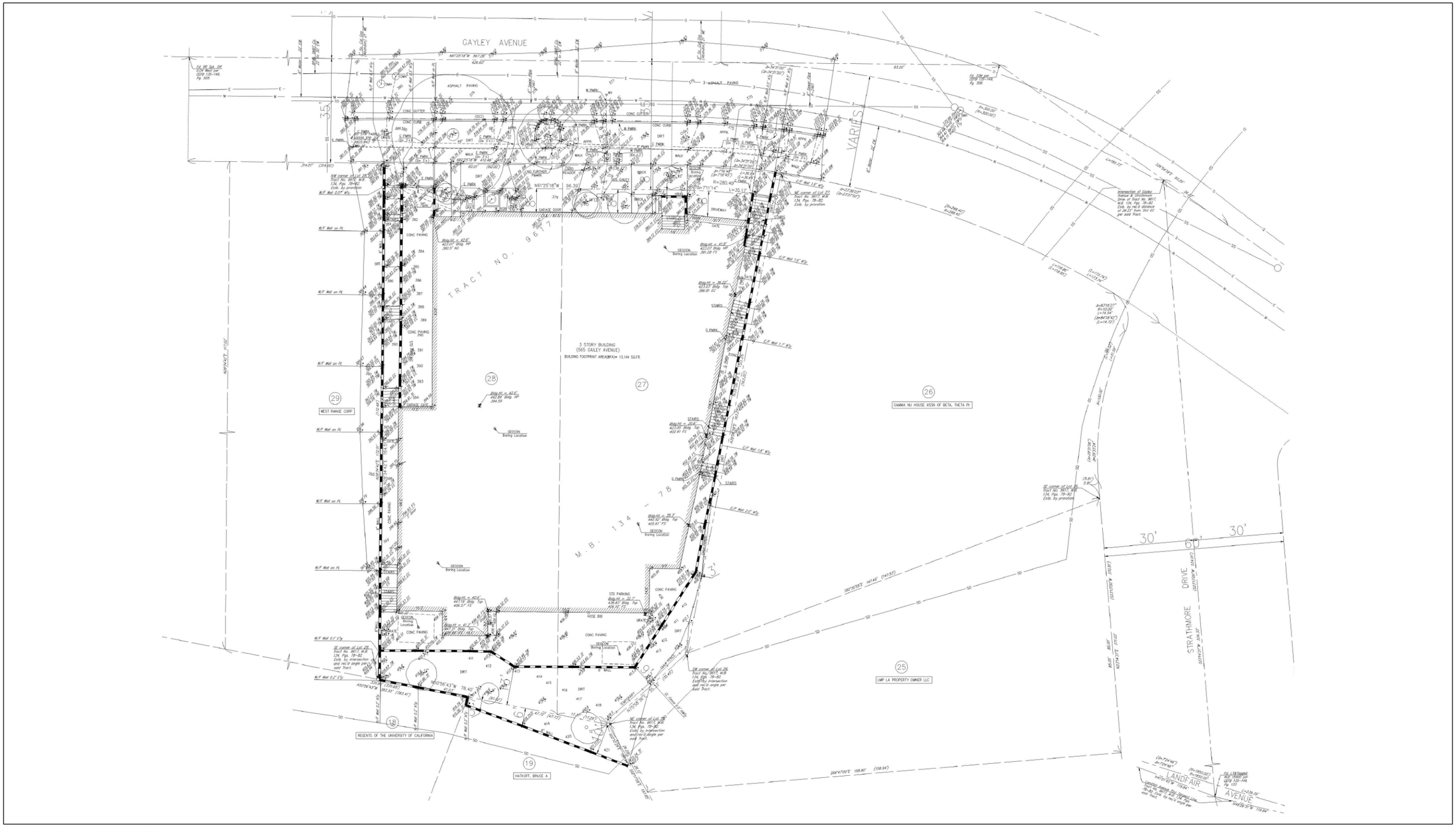
The Project site is underlain by artificial fill to a maximum depth of four feet below the ground surface (bgs) and older Pleistocene age alluvial fan deposits beneath the fill. Regionally, the Project site is in a seismically active area; the nearest surface trace of an active fault is the Santa Monica Fault Zone, approximately 1.4 miles to the south. There are no known active or potentially active faults that underlie the Project area. Groundwater was encountered in one boring near the northern end of the Project site at a depth of 38.6 feet bgs, and the historically highest groundwater level in the area is approximately 40 feet bgs. (Geocon, 2023)

Source(s): Esri, Nearmap Imagery (2023)

Figure 3

0 37.5 75 150
Feet

Aerial Photograph

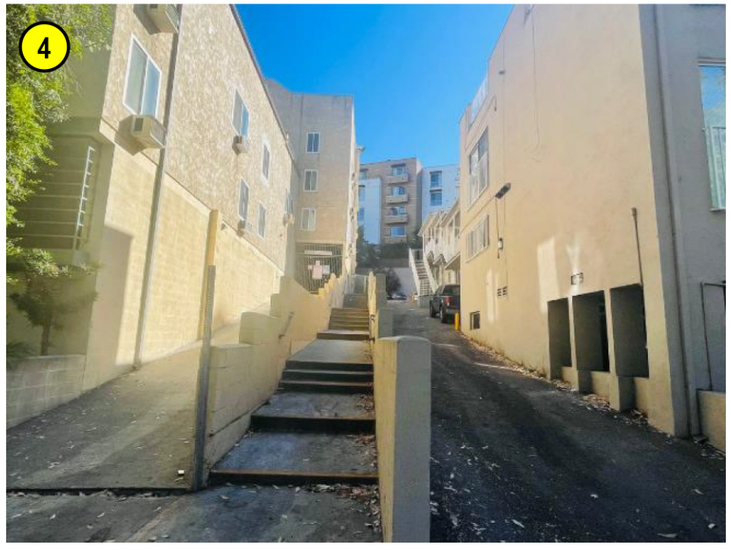


Source(s): Mithun, Inc. (12-05-2022)

Figure 4

Not to Scale

Site Survey

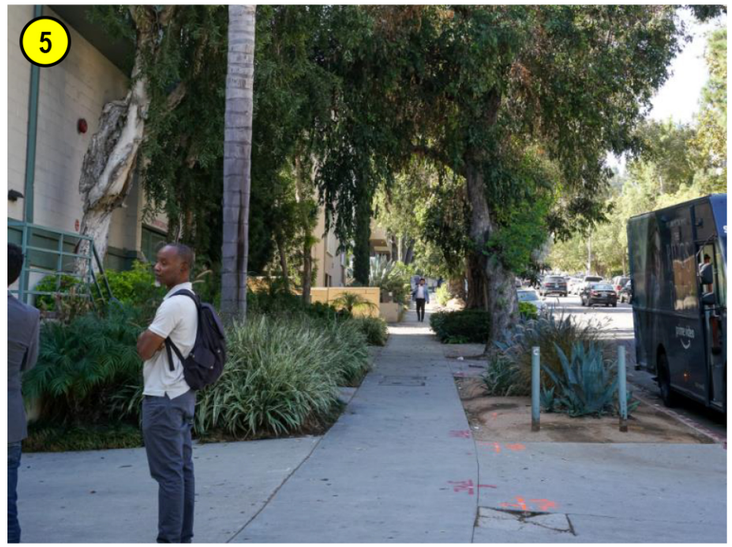


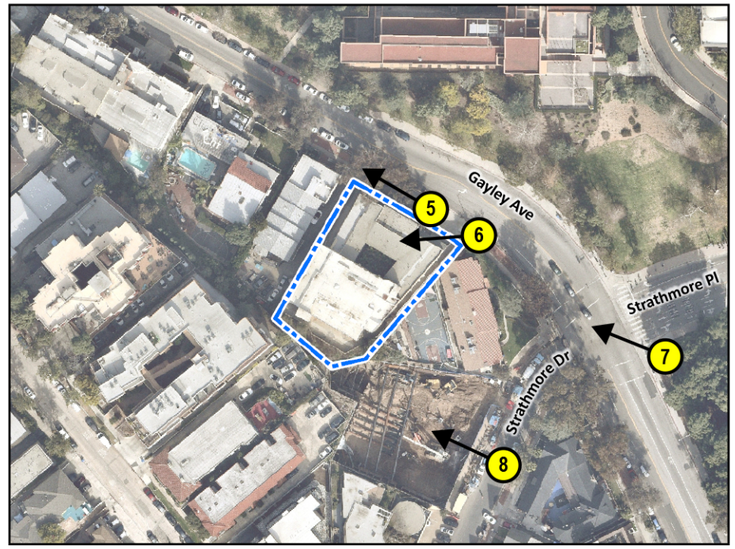
Source(s): Esri, Nearmap Imagery (2023)

Figure 5a

Not to Scale

Site Photographs





Source(s): Esri, Nearmap Imagery (2023)

Figure 5b

Not to Scale

Site Photographs

There is no natural vegetation, 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 IS, six mature trees occur within the Project site limits and four additional trees are located in the immediate vicinity of the Project site. Although the University of California, a constitutional entity, is not subject to local regulations, none of these tree species are protected under the City of Los Angeles Native Tree Protection Ordinance (LANTPO, Ordinance No. 186873). Surface water at the site flows to Gayley Avenue. Existing water, sewer, drainage, electric, and telecommunications infrastructure is located in the roadways adjacent to the Project site, as further discussed in Section II.5, Utilities/Infrastructure, below.

While the University of California is not subject to local regulations, the Project site and adjacent parcels have a City of Los Angeles General Plan land use designation of High Medium Residential and are zoned [Q]R4-1VL (City of Los Angeles, 2023a), which is a multiple dwelling zone. Further, the Project site is within the boundaries of the North Westwood Village Community Specific Plan (City of Los Angeles, 1988), which establishes development standards for multiple-family residential buildings in specified portions of the *Westwood Community Plan* area (City of Los Angeles, 1999).

3. BACKGROUND AND NEED FOR THE PROPOSED PROJECT

Over the past several decades, UCLA has evolved from a predominately commuter campus into a thriving residential community, and the on-campus supply of undergraduate beds has increased from approximately 4,300 to 18,800 between 1986 and 2022. With the recent completion of student housing projects on campus, UCLA increased its housing guarantee to four years for incoming first-year students and two years for incoming transfer students. Achieving this guarantee achieves a long-held aspiration set forth in the UCLA Student Housing Master Plan (UCLA, 2017) and responds to directives from The Regents to increase the student housing supply.

While UCLA has achieved its primary mission relative to the housing guarantee, there are additional key planning principles of the Student Housing Master Plan to guide the growth and evolution of the undergraduate housing program, which UCLA seeks to implement through the redevelopment of the Gayley Towers site, including the following:

- Campus housing is a vital resource to support the recruitment, transition, personal growth and development, academic achievement, retention, and graduation of undergraduate students.

- More affordable living options must be considered in developing the student housing program.

- Limited land and resources require a high-density living model to maximize the number of students housed, with a focus on a high-quality living experience.

- Campus housing helps create a supportive and cohesive student community by integrating the housing program with other aspects of campus life.

- Allocation strategies must be refined to ensure that housing resources support academic program objectives and student recruitment and retention goals.

UCLA currently houses approximately 58 percent of all undergraduates in a combination of on- and off-campus housing. Approximately 13,500 undergraduate students opt out of UCLA housing, and it is assumed that cost is a key factor in these decisions. However, the residential community

surrounding UCLA is a desirable market, and supply is limited. Based on a market rent study completed by CBRE for UCLA in January 2022, the area had a two percent vacancy rate (CBRE, 2022).

Currently, there are an estimated 4,898 undergraduate students housed in University-owned apartment buildings located off campus within a one-mile radius. The existing Gayley Towers apartment building, which was constructed in 1981 and purchased by The Regents in 2000, accommodates 100 students in 51 studio/studio loft units. The proposed Project, with 545 beds configured in triple units, would increase the capacity of the Project site by 445 bed spaces.

With respect to affordability, the proposed Project would add a new inventory type for undergraduate students, comprised of affordable co-living style units with shared kitchens and bathrooms and other community spaces. This addition to UCLA's inventory would allow students with the highest need to live adjacent to campus with significantly lower rents than are now available in Westwood. In 2020, the state established the Higher Education Student Housing Grant Program (Program) to fund projects providing housing for low-income undergraduate students. In September 2022, the state appropriated $35 million under this Program for UCLA's proposed redevelopment of Gayley Towers. This funding commitment would allow UCLA to offer a monthly housing rental rate of $600 for the 358 state-supported beds. The 184 additional beds would be priced at sufficient levels to guarantee the entire Project's financial feasibility.

4. PROJECT OBJECTIVES

The objectives of the proposed Gayley Towers Redevelopment Project are consistent with UCLA's academic, research, and community service mission as follows:

- Provide up to 545 undergraduate student beds near campus to address current and anticipated demand consistent with the continued transformation of UCLA from a commuter to a residential campus.

- Maintain UCLA's housing guarantee to all undergraduate students.

- Provide affordable housing that reflects rental rates lower than other below-market campus alternatives with the introduction of a new inventory type (a co-living model) that creates the support and social structures of the on-campus living experience with a more affordable rent.

- Introduce new off-campus, University-owned housing units to help relieve the demand for on-campus housing, thus reducing room occupancy densities and maintaining an optimal level of density across the on-campus community.

- Provide updated and modern student housing facilities that improve the quality of student life, support their academic experience, and encourage their personal and social development.

- Provide undergraduate housing that is consistent with the spatial development and density of existing housing in the North Westwood Village while maintaining and maximizing the use of limited land resources.

- Continue the infill development of the area adjacent to the UCLA campus, which reduces vehicle miles traveled, energy consumption, and associated greenhouse gas emissions.

- Plan, design, and implement the proposed Project in a manner consistent with the UC Policy on Sustainable Practices.

- Plan, design, and implement the proposed Project within the practical constraints of available funding sources, including the need to maintain affordable University-owned housing fees subject to the requirements of Assembly Bill 183 ("AB 183"), which implements the Higher Education Student Housing Grant Program.[5]

5. PROPOSED PROJECT COMPONENTS

Provided in this section is a description of the following Project components evaluated in this IS:

- Gayley Towers Building and Housing Characteristics
- Circulation
- Outdoor Amenities, Landscape/Hardscape, and Exterior Lighting
- Sustainable Building Features
- Utilities/Infrastructure
- Population
- Demolition and Construction Activities

Gayley Towers Building and Operational Characteristics

The proposed Project involves the construction of an eight-story, approximately 112,000-gsf co-living style of housing with communal living and study spaces on each floor. Co-living housing is a hybrid of dorm-style housing with community bathrooms and shared spaces for students to cook, eat, study, and socialize. The proposed Project would provide 187 bedrooms and up to 545 beds in triple-occupancy rooms, of which at least 65 percent (358 beds) would be offered as affordable beds. Each floor would include a unit for a Resident Assistant (RA). When compared to the existing building, the proposed Project would result in a net increase of 445 beds (residents), and a net increase of approximately 54,925 gsf of development.

The conceptual site plan for the proposed Project is provided on Figure 6; the floor plans for each level of the new structure are provided on Figures 7a and 7b; and building sections are provided on Figure 8. As illustrated, the proposed building would be built around a central courtyard and would have eight levels with a partial basement level for mechanical equipment. As shown in the building elevations, the roofline would be approximately 86 feet above the lowest adjacent ground level along Gayley Avenue, with a total building height of approximately 90 feet to the top of the parapet.

The proposed building would be a concrete-framed structure, with a donut shape such that the interior courtyard would be open to the exterior elements. The overall arrangement of the building program is configured in a way that maximizes public and private uses. The ground floor communal spaces would be configured around the central courtyard, creating a contiguous area with the main entry.

The courtyard would exhibit transparency, lighting, shared materials, and circulation elements designed to provide a seamless connection between the building's interior and exterior spaces.

[5] Pursuant to Assembly Bill 183, the rents for "affordable student rental housing" supported by the Higher Education Student Housing Grant Program shall be calculated at 30 percent of 50 percent of the area median income for a single-room occupancy unit type, subject to specified annual adjustments.

Legend

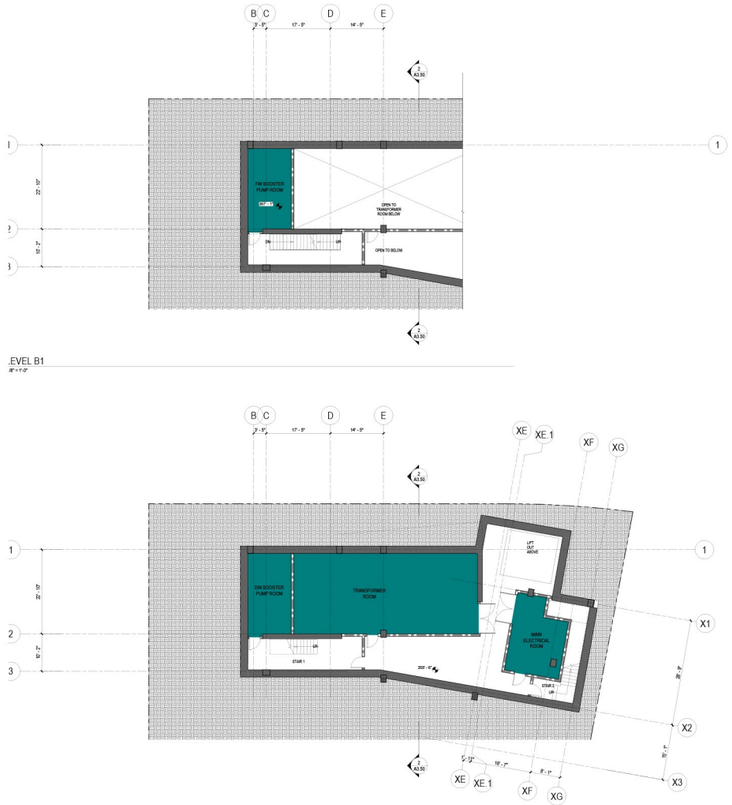
- CONCRETE PAVING
  FINISH TO BE TOPCAST SURFACE RETARDER TO ACHIEVE SANDBLAST LOOK WITH SAW CUT JOINTS
- PERMEABLE PAVING
  CONCRETE UNIT PAVERS WITH PERMEABLE JOINTS
  REFER TO CIVIL FOR SUB-BASE AND DRAINAGE
- PLANTING + DRIP IRRIGATION
  5 GAL. SHRUBS SPACED 36" O.C.
  3" DEPTH BARK MULCH
  36" DEPTH IMPORTED PLANTING SOIL
- BIORETENTION + DRIP IRRIGATION
  5 GAL. SHRUBS SPACED 36" O.C.
  3" DEPTH BARK MULCH
  REFER TO CIVIL IN THE APPENDIX
- BENCH BOULDERS
  ROUGH CUT WITH HONED TOP
  ±18" TALL AND WIDE, VAR. LENGTHS
- LANDSCAPE EDGE BOULDERS
  VAR. SIZES, 8"-12" HEIGHT AND WIDTH
- ELECTRIC BBQ
  STEEL LEGS, HONED STONE TOP
- INTEGRATED CATENARY LIGHTING AND SUSPENDED CANOPY ELEMENT
- SS CABLE VERTICAL GREEN WALL
  JAKOB SYSTEM OR SIMILAR
  20' HEIGHT, SET AWAY FROM BUILDING
- TRASH, RECYCLE, COMPOST BINS
- MOVABLE FURNITURE
- COURTYARD TREE TYPE 1
  48" BOX
- COURTYARD TREE TYPE 2
  48" BOX
- TREE TYPE 3
  48" BOX
- BUILDING OVERHANG
- LOT LINE
- PROJECT SITE BOUNDARY

Source(s): Mithun, Inc. (May 2023)

Figure 6

Not to Scale

Conceptual Site Plan



	TYPE	ROOMS	BEDS
LEVEL 01	TRP	11	33
	RA	1	1
LVL TOTAL		12	34
LEVEL 02	TRP	24	72
	RA	1	1
LVL TOTAL		25	73
LEVEL 03	TRP	24	72
	RA	1	1
LVL TOTAL		25	73
LEVEL 04	TRP	24	72
	RA	1	1
LVL TOTAL		25	73
LEVEL 05	TRP	24	72
	RA	1	1
LVL TOTAL		25	73
LEVEL 06	TRP	24	72
	RA	1	1
LVL TOTAL		25	73
LEVEL 07	TRP	24	72
	RA	1	1
LVL TOTAL		25	73
LEVEL 08	TRP	24	72
	RA	1	1
LVL TOTAL		25	73
GRAND TOTAL		187	545

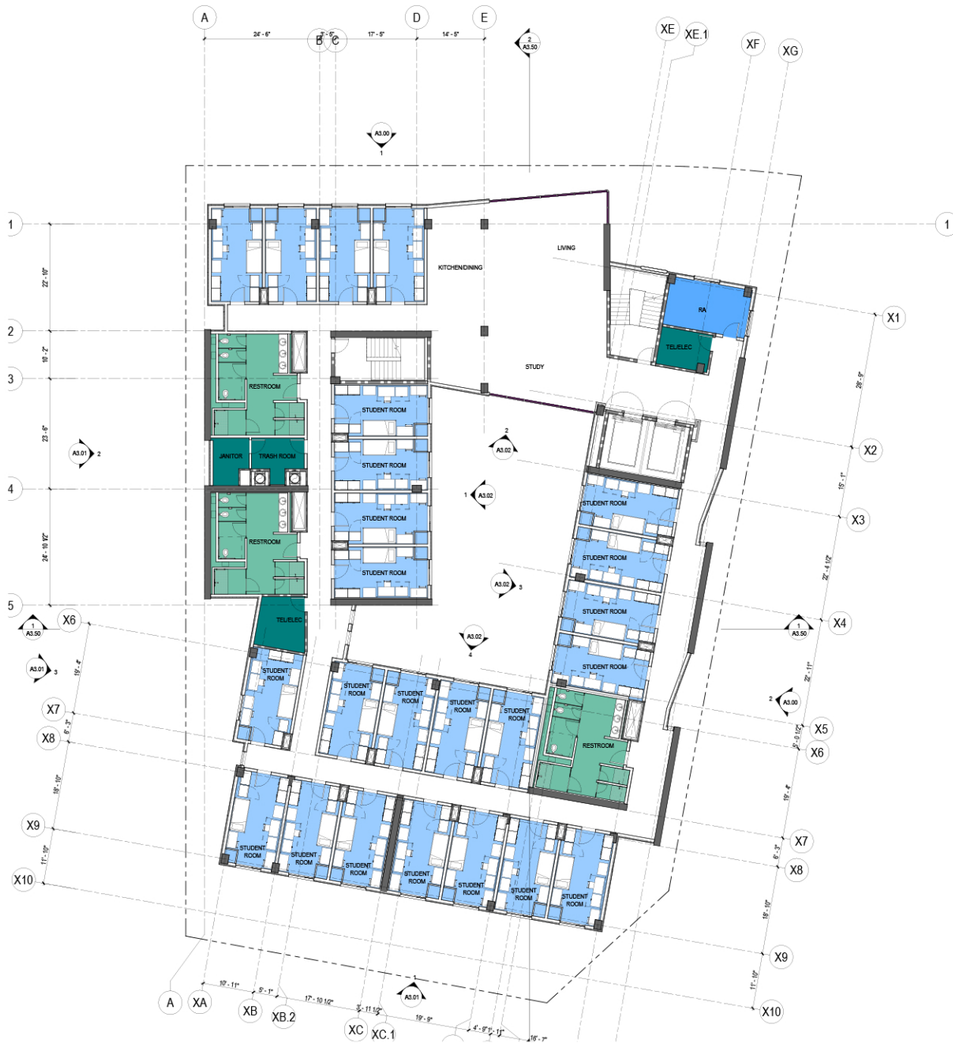
Source(s): Mithun, Inc. (03-29-2023)

Figure 7a

Not to Scale

Floor Plans – Level 1 and Basement Level

LEVEL 2



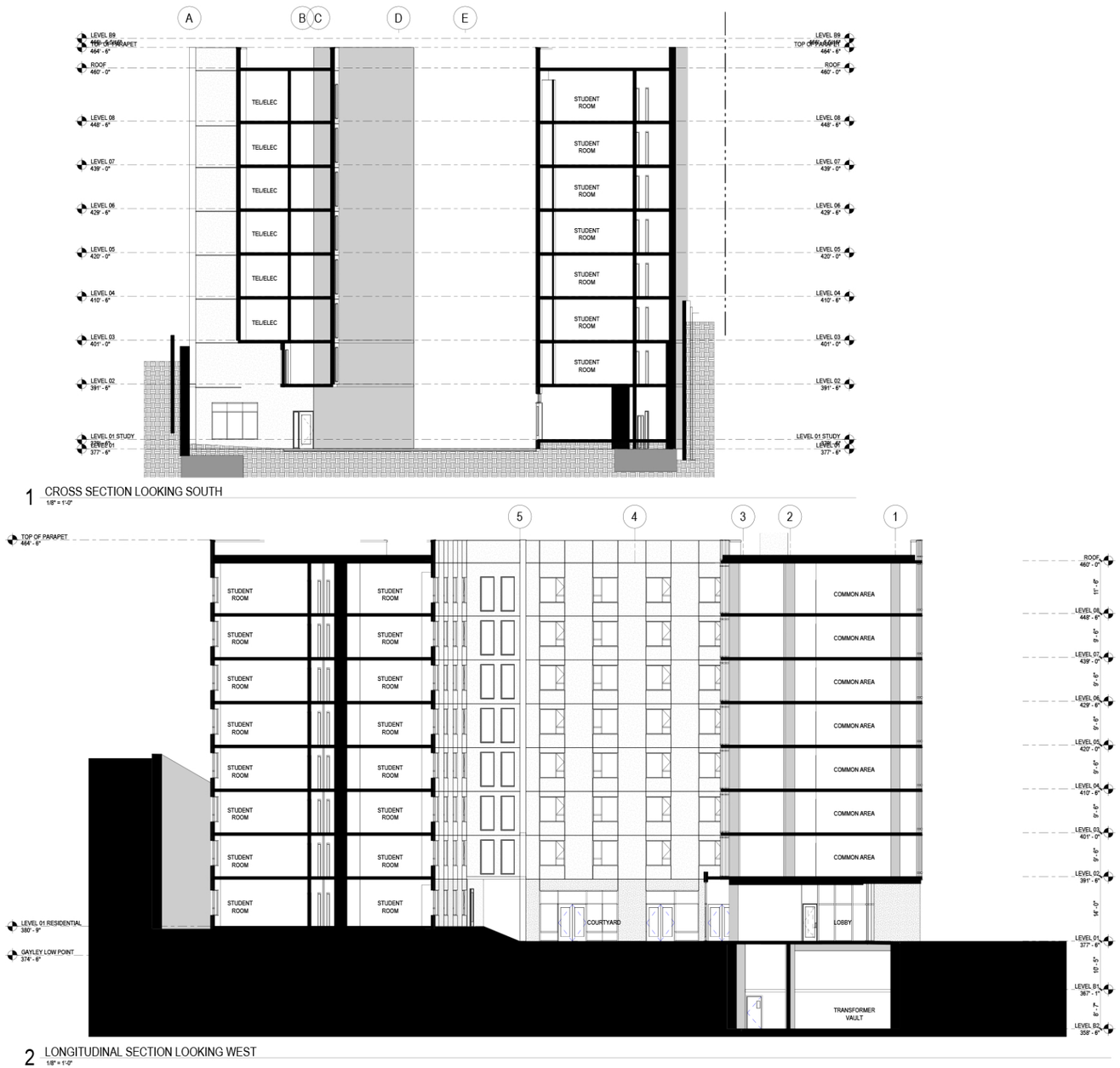
LEVEL 5

Source(s): Mithun, Inc. (03-29-2023)

Figure 7b

Not to Scale

Floor Plans – Level 2 and Level 5



Source(s): Mithun, Inc. (May 2023)

Figure 8

Not to Scale

Building Sections

The typical upper-floor communal spaces would be concentrated within a central glass tower between the two main masses of the building. These common areas would overlook the street and activate the visual connection between the interior and exterior spaces. The majority of bedroom units would be oriented (via window openings) towards the central courtyard, with limited units oriented to the building exterior and/or perimeter lightwells, in order to provide natural light to all units and privacy from the interior hallways. The proposed building would exhibit a contemporary architectural style sensitive to the surrounding dense, multi-family residential context. Figures 9a through 9c depict the proposed building massing. As shown, the central tower window wall and vertically oriented residential windows would serve to break up the building massing along the front façade. In addition, the main entrance along Gayley Avenue would be recessed to provide a pedestrian scale.

The exterior material palette would be comprised of durable and timeless materials selected to respond to the existing neighborhood and campus context. Building materials and exterior finishes would potentially include concrete, plaster, porcelain or stone tile, metal, and glass. More specifically, the base of the building would consist of stucco with tile accents, while the exterior envelope of the upper stories and the courtyard would consist of a blend of stucco, metal-clad windows, and window wall assemblies. Glass would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside. Low-level outdoor lighting may be used for security, wayfinding, and aesthetic purposes and would comply with UC energy standards, which are generally more stringent than Title 24 requirements. Additionally, any outdoor lighting would be shielded and/or directed toward the Project site to minimize light spillover. Entry improvements located outside of the public right-of-way would include plantings, associated irrigation, retaining bench boulders, concrete paving, stairs, and handrails.

Communal spaces throughout the building would include shared kitchens, study rooms, living rooms, workrooms, quiet spaces, and laundry facilities, as well as a mail room and bike storage. Programming for the proposed Project includes features to support a safe, equitable, and inclusive environment for residents. Additional features include gender-inclusive restrooms and a common courtyard (discussed further below).

The proposed building would be designed and constructed in compliance with applicable requirements of the *California Building Code* and *California Health and Safety Code* (Sections 13000 et seq.) pertaining to fire protection systems. Specifically, fire sprinklers, fire alarm systems, emergency lighting, emergency response notification systems, and illuminated signage would be installed. Additionally, the project has been designed to accommodate required emergency access, including for emergency response vehicles. An emergency generator would be located on the roof.

Circulation and Parking

The proposed Project would not include on-site vehicular parking. Should residents need parking, parking permits would be available for existing spaces on the UCLA campus. The Project includes a service drive/garage accessed from Gayley Avenue, which would be located at the northwest corner of the building (refer to the site access plan provided in Figure 10). The garage would provide a single parking space for service vehicles and deliveries and allow direct access for trash removal. In addition, on-site alternative transportation facilities would include a bike storage room on the ground level that could accommodate at least 16 bikes, as well as a designated area for scooter parking.

Pedestrian access to the proposed building would be provided from the south side of Gayley Avenue, as shown on Figure 10. On-site access and stairways would comply with the Americans

VIEW FROM GAYLEY

Source(s): Mithun, Inc. (03-29-2023)

Figure 9a

Not to Scale

Conceptual Building Renderings

VIEW DOWN GAYLEY (LOOKING TO THE EAST)

Source(s): Mithun, Inc. (03-29-2023)

Figure 9b

Not to Scale

Conceptual Building Renderings

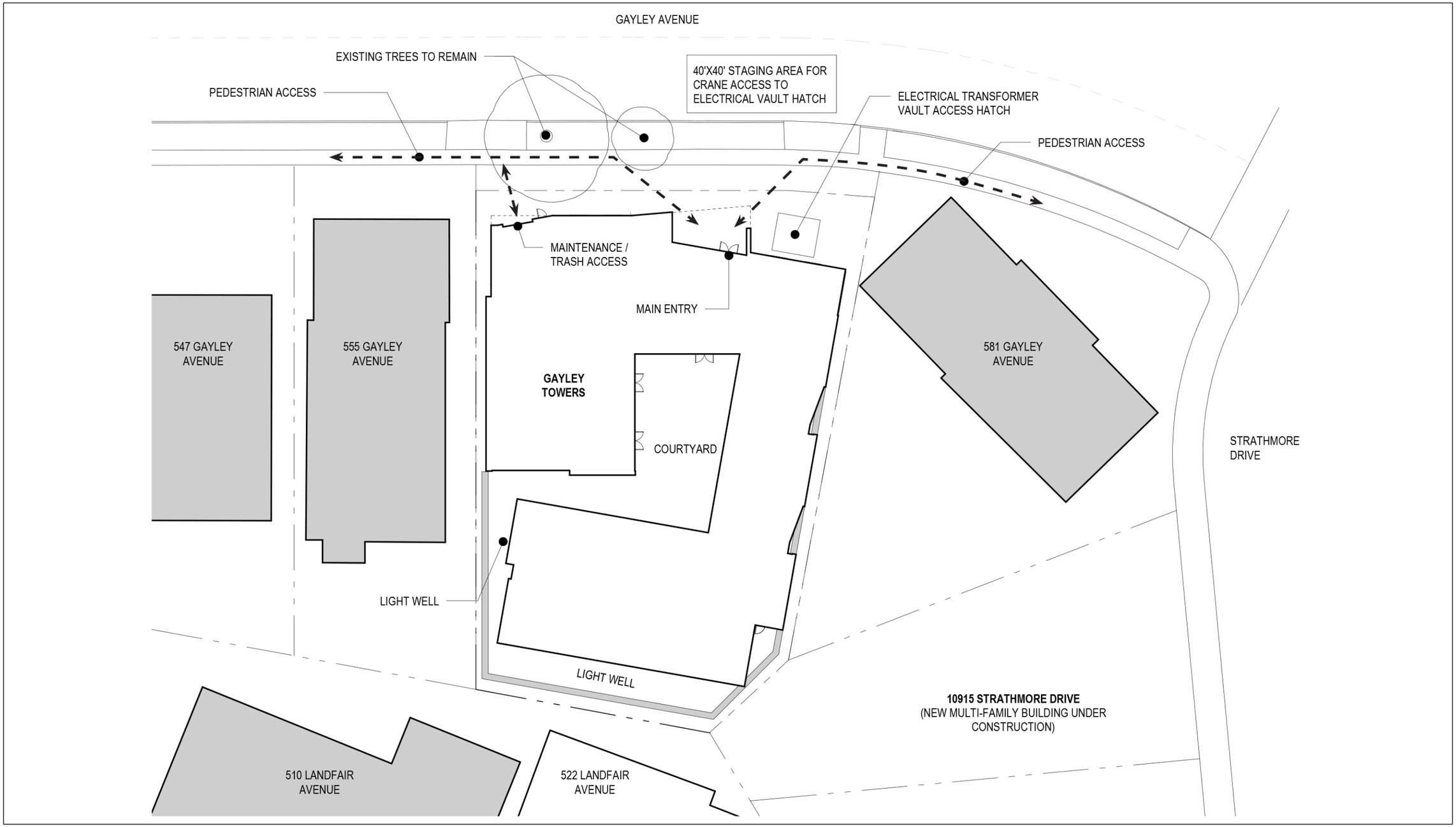
VIEW UP GAYLEY (LOOKING TO THE WEST)

Source(s): Mithun, Inc. (03-29-2023)

Figure 9c

Not to Scale

Conceptual Building Renderings



Source(s): Mithun, Inc. (May 2023)

Figure 10

Not to Scale

Conceptual Site Access Plan

with Disabilities Act (ADA) requirements. An electronic card key security system would provide secure access to the building. Project residents would have access to a full range of existing campus Transportation Demand Management (TDM) programs, including, but not limited to: campus transit; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; on-campus car share program; and use of UCLA's Commuter's Guide.

Outdoor Amenities, Landscape/Hardscape and Exterior Lighting

As shown on the site plan included on Figure 6, the proposed Project would include a courtyard that connects the ground level common spaces. The courtyard would be approximately 2,000 sf in size and would provide opportunities for formal and informal interaction, socialization, BBQ, picnics, and study activities. Movable furniture would be provided to keep the space flexible and allow for spill out from the interior spaces.

Implementation of the proposed Project would require the removal of the limited existing vegetation on-site, including six mature trees (refer to the discussion of Biological Resources in Section V.4). The proposed Project would provide one new tree for every one mature tree removed. Two mature street trees along Gayley Avenue would be protected in place and retained. The new landscape palette would include various species of trees, shrubs, groundcover, and vines. Planting within the public right-of-way along Gayley Avenue would follow City of Los Angeles standards. The entrance area outside of the public right-of-way would be planted to provide a sense of arrival and identify the proposed building as housing within the campus context. The courtyard would be designed with California native plant species along with rough cut stone features, creating a peaceful garden atmosphere. Landscape edge boulders of varying sizes would provide edge support between planting and pavers. Vertical green walls with vines or other plantings would be used to provide interior natural views and visual interest. Controlled irrigation systems would be provided to ensure water efficiency.

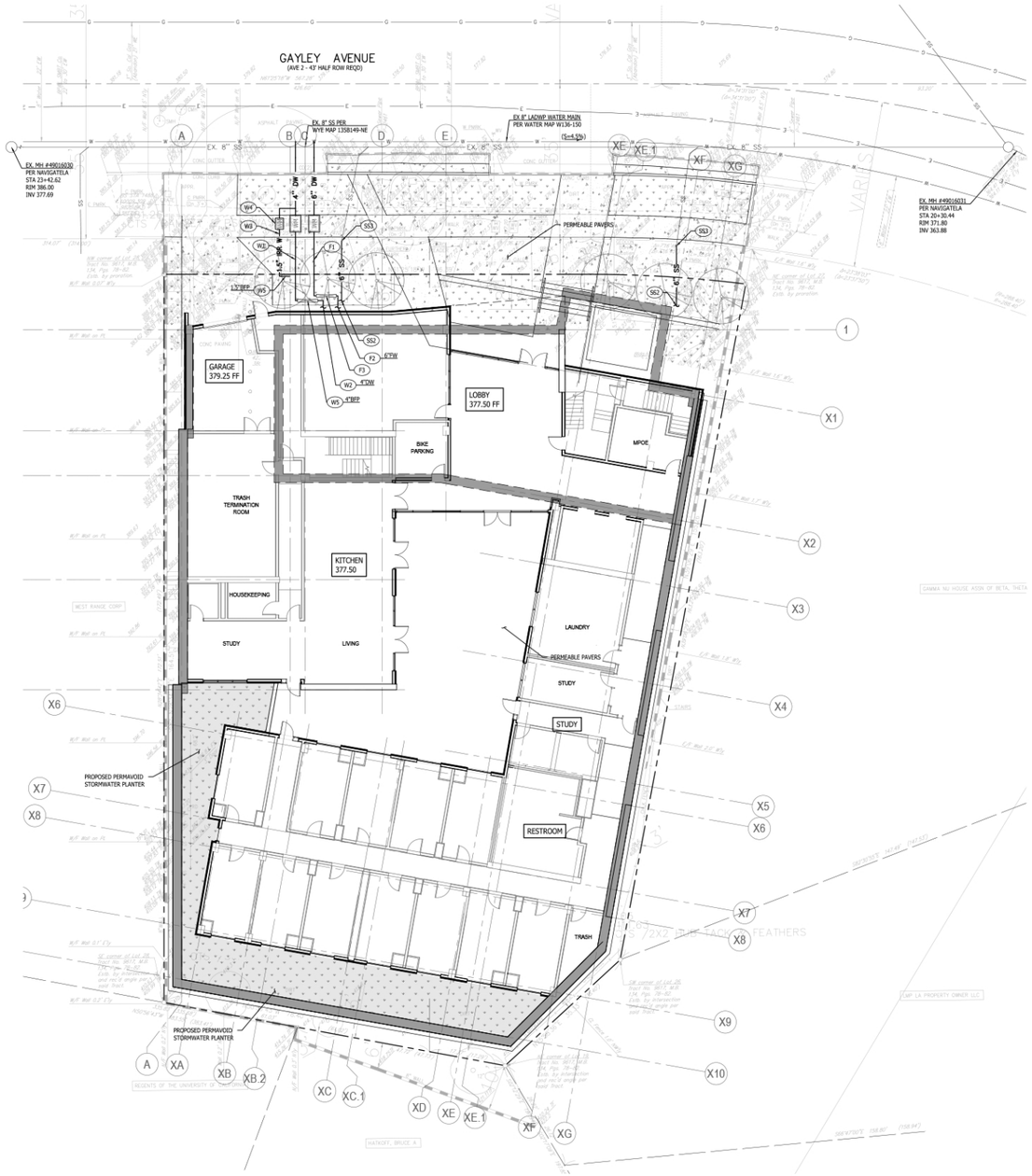
Exterior lighting would be provided for pedestrian safety and site security. Energy efficient LED signs would be provided at exits, stairwells, along the paths of egress on every floor and where required by code.

Utilities

The proposed Project would require connections to existing utilities (domestic water, sewer, and electrical systems) that are currently located along Gayley Avenue. The proposed Project would not involve the use of natural gas, therefore gas service to the existing building would be capped prior to building demolition. Following is a description of proposed utility systems, including drainage facilities and water quality Best Management Practices (BMPs), which are shown on Figure 11:

- ***Water –*** Domestic, irrigation, and fire water needs of the proposed Project would be served via the installation of lateral connections to an existing 8-inch Los Angeles Department of Water and Power (LADWP) domestic water main located along Gayley Avenue. This would include a 4-inch lateral for domestic water, a 6-inch lateral for fire water, and a 1.5-inch lateral for irrigation.

- ***Sewer –*** The proposed Project would include the installation of 2- and 6-inch sewer laterals that would connect to the existing 8-to 12-inch City of Los Angeles LA Sanitation& Environment (LASAN) sewer line within Gayley Avenue. Based on the Sewer Capacity Availability Request (SCAR) approved by the City of Los Angeles Bureau of Engineering



UTILITY CONSTRUCTION NOTES:

STORM DRAIN

- (SD1) SDR-26 PVC STORM DRAIN PIPE PER DETAIL 1 ON SHEET C2.00. SIZE PER PLAN.
- (SD2) POINT OF CONNECTION 5' FROM BUILDING FACE. SEE PLUMBING DRAWING P1.00 FOR CONTINUATION. CONTINUE SLOPE FROM BUILDING LINE TO CLEAR FOOTING.
- (SD3) PERMAVOID FILTRATION PLANTER BOX PER DETAIL 1 ON SHEET C2.01.
- (SD4) CURB DRAIN PER APWA GREENBOOK STD PLAN 150-3, SEE DETAIL 9, SHEET C2.00.
- (SD5) 4" DIAMETER ATRIUM PLANTER DRAIN PER JAY R SMITH CO MODEL #1330 OR EQUAL. GRATE SHALL BE CAST IRON.
- (SD6) PRECAST CONCRETE CATCH BASIN. JENSEN PRECAST OR EQUAL. SIZE PER PLAN.
- (SD7) POINT OF CONNECTION FROM FOUNDATION DRAIN. SEE C1.10 FOR CONTINUATION.
- (SD8) SITE RETAINING WALL CONTINUOUS FOUNDATION DRAIN PER DETAIL 3, SHEET C2.02. CONNECT TO NEAREST SITE STORM DRAIN PIPE. SEE C1.10 FOR POC LOCATIONS AND INVERT ELEVATIONS.
- (SD9) 6" FLOOR DRAIN, ZURN OR EQUAL. HEELPROOF GRATE OPENING.

SANITARY SEWER

- (SS1) SDR-26 PVC SANITARY SEWER PIPE PER DETAIL 1 ON SHEET C2.00. SIZE PER PLAN.
- (SS2) POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE PLUMBING DRAWING P1.00 FOR CONTINUATION. CONTINUE SLOPE FROM BUILDING LINE TO CLEAR FOOTING.
- (SS3) CONTRACTOR TO VERIFY CONDITION AND INVERT AT PL OF EXISTING SEWER HOUSE CONNECTION LATERAL AND COORDINATE WITH CIVIL ENGINEER. EXISTING LATERAL TO BE REUSED IF FEASIBLE. IF LATERAL CANNOT BE REUSED MAKE NEW SEWER HOUSE CONNECTION PER CITY OF LA STD PLAN S-110-1. SEE DETAIL 3, SHEET C2.01.

DOMESTIC WATER

- (W1) CEMENT LINED CLASS C900 DUCTILE IRON DOMESTIC WATER PIPE PER DETAIL 1, SHEET C2.00. SIZE PER PLAN.
- (W2) POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE PLUMBING DRAWING P1.00 FOR CONTINUATION.
- (W3) CONSTRUCT 1.5" DIA. IRRIGATION LINE PER LANDSCAPE DRAWING.
- (W4) INSTALL 1-1/2" WATER METER. SEE IRRIGATION DRAWINGS FOR DETAILS.
- (W5) REDUCED PRESSURE BACKFLOW PREVENTER PER FEBCO OR EQUAL

FIRE WATER

- (F1) CEMENT LINED CLASS C900 DUCTILE IRON FIRE WATER PIPE PER DETAIL 1, SHEET C2.00. SIZE PER PLAN.
- (F2) POINT OF CONNECTION 5 FEET FROM BUILDING FACE. SEE FIRE PROTECTION DRAWING FOR CONTINUATION.
- (F3) BACKFLOW PREVENTION DEVICE. PER DETAIL 6, SHEET C2.00.

LEGEND:

- CITY OF LA RIGHT-OF-WAY
- AREA OF WORK
- SD — STORM DRAIN (SDR-26 PVC)
- SS — SANITARY SEWER (SDR-26 PVC)
- W — WATER (CEMENT LINED CLASS 50 DUCTILE IRON)
- FW — FIRE WATER (CEMENT LINED CLASS 50 DUCTILE IRON)
- PERMAVOID LID PLANTER PER DETAIL 1, C2.01. (NEED APPROXIMATELY 900 SF TOTAL)
- PERMEABLE PAVERS PER DETAIL 2, C2.01.

NOTE TO CONTRACTOR::

CONTRACTOR TO CONTACT UNIVERSITY FACILITIES FOR ALL UTILITY CAPPING, SHUT OFF, OR SWITCHOVER. CONTRACTOR TO EXPOSE UTILITY AND VALVE AND PROVIDE REQUIRED MATERIALS.

Source(s): Mithun, Inc. (May 2023)

Figure 11

Not to Scale

Conceptual Utility and LID Plan

(BOE) and included in Appendix G of this IS, the Project's estimated maximum discharge of 38,150 gallons per day (gpd) could be accommodated in the downstream sewer lines and no off-site improvements would be necessary (City of Los Angeles BOE, 2023).[6]

- ***Drainage and Water Quality –*** No storm drains exist in Gayley Avenue, and the existing building outlets stormwater through curb drains along Gayley Avenue. New site area drains would be installed, and storm drain pipes would be sized to convey the peak runoff from a 25-year rain event, with pipes flowing no greater than 75 percent full in compliance with City requirements. Additionally, Low Impact Development (LID) design elements would satisfy current City of Los Angeles requirements to capture and treat the 85th percentile runoff volume. Due to site conditions, infiltration is not considered feasible. All roof drain downspouts would be routed to Permavoid filtration planters proposed in the southwest and southern portions of the Project site. The on-grade hardscape, including the proposed courtyard, may include permeable pavers in some areas which would treat stormwater. All excess runoff would be routed to the street through storm drain lines and through the curb to Gayley Avenue, consistent with existing conditions. However, as further discussed in Section V.9, Hydrology and Water Quality, of this IS, due to a minor increase in pervious area on-site, the amount of storm water runoff entering the public storm drain system would be reduced. The required sizing of structural BMPs would be determined as part of the site-specific hydrology evaluation and would be based on the regulatory requirements of the applicable National Pollutant Discharge Elimination System (NPDES) permit at the time of construction.

  In addition to structural BMPs, the proposed Project would implement non-structural BMPs at the Project site related to maintenance and use of parking areas; education and training; landscaping; and monitoring and maintenance of structural BMPs.

- ***Electricity and Telecommunications –*** Electricity would be supplied to the proposed building by LADWP via connections to existing lines located along Gayley Avenue. The existing electrical vault on-site would be removed, and a new electrical vault would be installed following LADWP design standards. The vault would be located underground adjacent to Gayley Avenue and would include all required LADWP equipment. The main electrical room for the proposed building would also be in the basement level, adjacent to the new vault. The electrical room would include electrical distribution for the proposed building. A diesel engine-driven generator would be installed on the roof to support the life safety loads and legally required stand-by loads for the proposed building. For purposes of analysis, it is assumed that the generator would have an aboveground, double wall, 450-gallon diesel fuel tank sized for 10 hours of runtime. A 60-gallon day tank would be provided with the generator.

  Telecommunications services to the new building would be provided by a local internet provider with distribution by UCLA Information Technology Services. New utility connections would be required, and the main point of entry would be provided at the ground floor of the building.

Sustainable Building Features

The proposed Project would comply with the University of California Policy on Sustainable Practices and Guidelines and would adopt the principles of energy efficiency and sustainability to

[6] As discussed in Section V.19, Utilities and Service Systems, Threshold (c), of this IS, based on the estimated average wastewater generation rate of students living in recently constructed UCLA housing, the Project's anticipated actual wastewater generation would be substantially less than the maximum calculated by the City BOE, which is based on a general generation rate for college dormitories.

the fullest extent possible, consistent with budgetary constraints and regulatory and programmatic requirements. Leadership in Energy and Environmental Design (LEED™) is a green building rating system that contains prerequisites and credits in five areas: (1) environmentally sensitive site planning; (2) water conservation; (3) energy efficiency; (4) conservation of materials and resources; and (5) indoor air quality. A minimum standard of a LEED BD+C Gold rating has been established for the proposed Project. However, the proposed Project would be designed to strive to achieve a LEED BD+C Platinum rating. To achieve this rating, the design, construction, and operation of the proposed Project incorporates a series of green building strategies including, but not limited to, the following:

- Providing high-density redevelopment on a site that is connected to existing community services, public and alternative transportation, and other urban infrastructure;
- Encouraging alternative transportation by limiting parking capacity and providing bicycle racks;
- Outperforming CBC Title 24 energy efficiency requirements, that are in effect at the time of building design, by 20 percent;
- Providing an all-electric (no use of natural gas) building;
- Incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands;
- Selecting water fixtures (e.g., taps, toilets, shower heads, and other fixtures) to achieve a 36 percent reduction in per capita water demand (compared to the Fiscal Year 2005-2008 average baseline) and increased water efficiency;
- Incorporating filtration planters to treat site runoff;
- 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;
- 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 SCAQMD Rule 1113; and
- Diverting a minimum of 65 percent of construction waste from landfills in order to reduce solid waste disposal.

Population

The Project is intended to serve the existing student population and specifically provide a new housing type not currently available to students with high financial needs. The proposed Project would create housing to accommodate 545 undergraduate students, representing a net increase of 445 student residents at the Project site. It is assumed that most of these students currently live in on-campus housing and would select these apartments during the annual “Returning Resident Sign-Up” process. No increase in student enrollment would result from the proposed Project. Also, the proposed Project would not increase the number of UCLA faculty or staff.

Demolition and Construction Activities

For purposes of analysis in this IS, construction of the proposed Project is anticipated to begin in 2024 with completion in 2026, for occupancy as early as Fall Quarter 2026. Construction phases are generalized as follows, and may overlap:

- Demolition (2 months);

- Site preparation and grading (4 months); and
- Building construction including utility installation (24 months).

The entirety of the Project site (20,831 sf or approximately 0.48 gross acres) would be directly impacted by construction, as analyzed in this IS. Site demolition would involve removal of the existing building, driveways, stairs, walkways, and landscaping, as well as all of the existing on-site retaining walls.[7] The proposed demolition and erosion control plan is provided on Figure 12 and would extend from Gayley Avenue at the northern end of the Project site to the on-site retaining wall near the southern Project site boundary. As required by existing regulations, soil erosion from the Project site during construction would be controlled through the use of BMPs, including, but not limited to: street sweeping and vacuuming, installation of sandbag barriers, stabilized driveways at construction entrances and exits, and entrance/exit tire wash. Existing catch basins would also be protected with appropriate BMPs to minimize sedimentation entering the storm drain system. Dust and waste management and materials pollution control BMPs would also be employed.

It is estimated that grading activities for the proposed Project would require the net export of approximately 10,375 cubic yards (cy) of soil from the Project site (refer to the conceptual grading plan provided on Figures 13a and 13b).[8] Grading is estimated to occur over an approximate 88-day period with 14-cy trucks (741 total truck one-way truck trips). Therefore, for purposes of analysis, it is assumed that the soil export would require a total of approximately 18 round truck trips (9 one-way trips) per day over the total period of 88 days. Additionally, the depth of excavation is estimated to be approximately 42 feet bgs in the southern portion of the Project site. Depending on the construction phase, implementation of the proposed Project would require common construction equipment. Because of the limited size of the site, the number of pieces of equipment on site at any given time would also be limited. With the exception of the drill rig, United States Environmental Protection Agency (USEPA) Tier IV construction equipment would be used for construction of the proposed Project. Construction equipment assumptions are outlined in the air quality analysis included in Appendix A of this IS.

In addition to the identified construction area, a staging area is needed to receive, lay down, and prepare materials for use during construction. The construction staging area would be limited to a single lane of Gayley Avenue in front of the Project site. Construction workers would park on campus, likely at Parking Structure 8, within a short walking distance of the Project site.

Vehicular and Pedestrian Circulation During Construction

A construction traffic route has been designated to efficiently move construction vehicles to avoid traffic from any other UCLA projects under construction at the same time, to the extent feasible.[9] Pursuant to LRDP PP 4.13-2 from the LRDP Final SEIR, the construction of these major projects would be coordinated to adjust construction schedules, work hours, and access routes to the extent feasible in order to reduce construction-related traffic congestion. Following is the planned route for construction traffic for the proposed Project.

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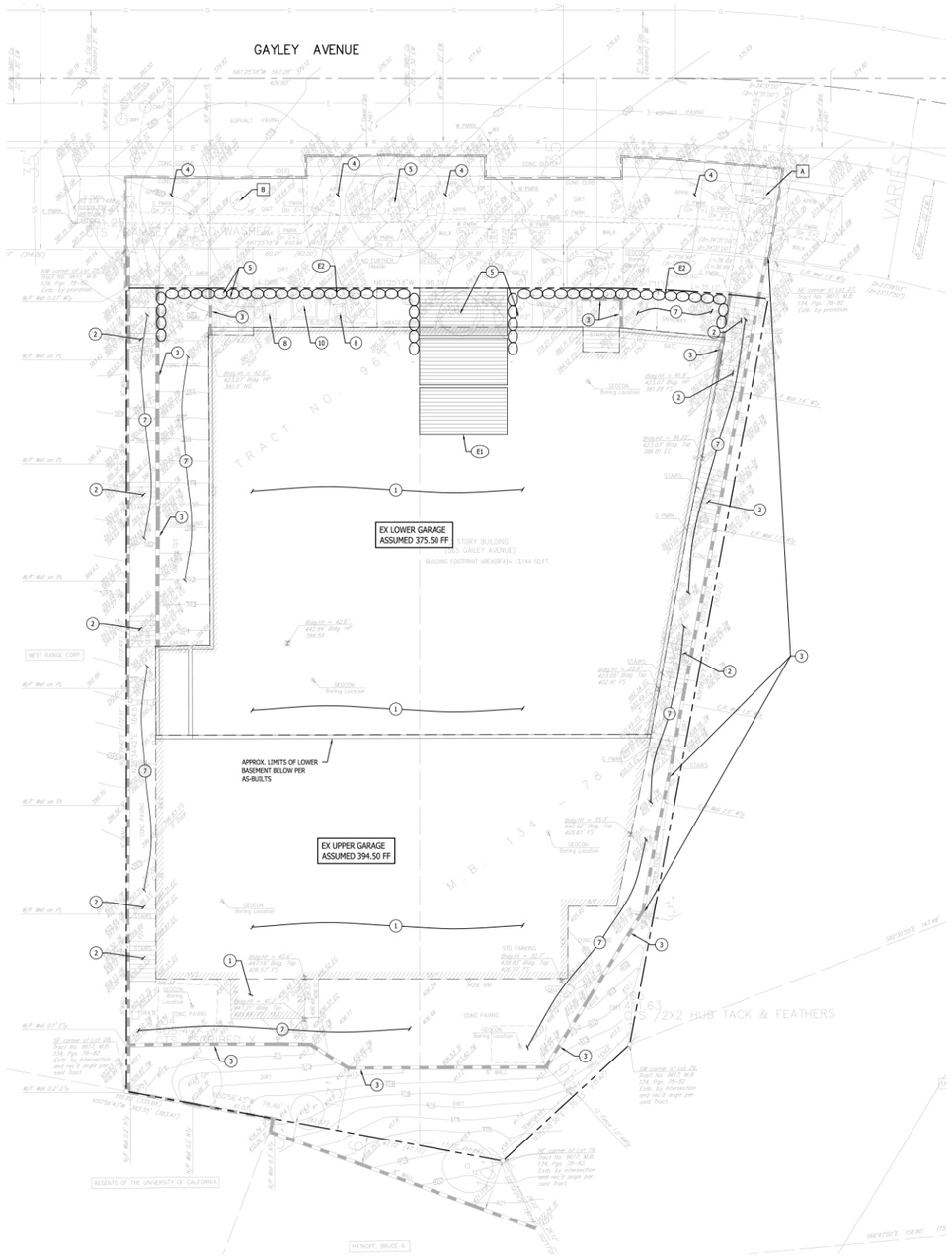
7 Segments of the existing retaining walls may be retained where possible pending further structural and soils engineering assessment; however, the analysis herein assumes removal and replacement of all existing retaining walls to provide a conservative analysis of construction impacts.

8 The estimate for export of soil is based on 8,810 cy of cut, 510 cy of fill, and 2,075 cy of expansion (assumed 25 percent of net cut/fill).

9 Current projects on campus or in close proximity that may be under construction at the same time as the proposed Project are identified on Figure 2, UCLA Campus Map, of this IS, and are described in Section V.21.



EROSION CONTROL NOTES:

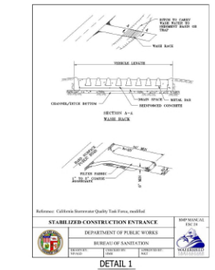
- E1 STABILIZED CONSTRUCTION ENTRANCE PER DETAIL 1, HEREON.
- E2 INSTALL SILT FENCE PER DETAIL 2, HEREON. PERIMETER SHALL BE CONTROLLED TO PROTECT UN-DISTURBED HILLSIDE AND SIDEWALKS.

DEMOLITION NOTES:

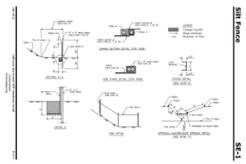
1. REMOVE EXISTING BUILDING/STRUCTURE.
2. REMOVE EX STAIR CASE.
3. REMOVE EXISTING WALL.
4. REMOVE EXISTING DRIVEWAY.
5. REMOVE EXISTING TREE.
6. REMOVE EXISTING PLANTER.
7. REMOVE EXISTING HARDSCAPE.
8. REMOVE EXISTING TRENCH DRAIN/ CATCH BASIN.
9. REMOVE EXISTING CURB AND GUTTER.
10. REMOVE EX ELECTRICAL VAULT.

PROTECTION NOTES:

- A PROTECT IN PLACE EXISTING STREET LIGHT.
- B PROTECT IN PLACE EXISTING TREE.
- C PROTECT IN PLACE EXISTING PROPERTY LINE WALL.



DETAIL 1



DETAIL 2

TEMPORARY EROSION CONTROL MEASURES EFFECTIVE DURING RAINY SEASON:

1. TEMPORARY EROSION CONTROL DEVICES SHOWN WHICH INTERFERE WITH THE WORK SHALL BE RELOCATED AS NEEDED.
2. ALL LOOSE SOIL AND DEBRIS SHALL BE REMOVED FROM THE STREET AREAS UPON STARTING OPERATIONS AND PERIODICALLY THEREAFTER AS DIRECTED.
3. WHEN DIRECTED BY THE INSPECTOR, A 12-INCH BERM SHALL BE MAINTAINED ALONG THE TOP OF THE SLOPE OF THOSE FILLS ON WHICH GRADING IS NOT IN PROGRESS.
4. PROVIDE VELOCITY CHECK DAMS ACROSS THE OUTLET OF ALL LOTS DRAINING INTO THE STREET.
5. ALL FILLS SHALL BE GRADED TO PROMOTE DRAINAGE AWAY FROM THE EDGES OF THE FILL.
6. ALL UTILITY TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS FROM THE BOTTOM TO TOP WITH A DOUBLE ROW OF SANDBAGS PRIOR TO BACKFILL. STORM AND SEWER TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS WITH A DOUBLE ROW OF SANDBAGS EXTENDING UPWARD, TO WITHIN TWO SANDBAGS FROM THE GRADED SURFACE OF THE STREET. SANDBAGS ARE TO BE PLACED WITH ALTERNATE HEADER AND STRETCHER COURSES. THE INTERVALS PRESCRIBED BETWEEN SANDBAG BLOCKING SHALL DEPEND ON THE SLOPE OF THE GROUND SURFACE, BUT NOT TO EXCEED THE FOLLOWING:

GRADE OF STREET	INTERVAL
LESS THAN 2%	AS REQUIRED
2% TO 4%	100 FEET
4% TO 10%	50 FEET
OVER 10%	25 FEET

7. AFTER SEWER AND UTILITY TRENCHES ARE BACKFILLED AND COMPACTED, THE SURFACES OVER SUCH TRENCHES SHALL BE MOUNDED SLIGHTLY TO PREVENT CHANNELING OF WATER IN THE TRENCH AREA. CARE SHOULD BE EXERCISED TO PROVIDE FOR CROSS FLOW AT FREQUENT INTERVALS WHEN TRENCHES ARE NOT ON THE CENTERLINE OF A CROWNED STREET.
8. ALL DEVISES SHOWN SHALL BE IN PLACE AT THE END OF EACH WORKING DAY WHEN THE FORECAST OF RAIN PROBABILITY EXCEEDS 40% AND MAINTAINED DURING THE RAINY SEASON (OCTOBER 1 TO APRIL 15).
9. AFTER EACH STORM, ALL "DESILTING BASINS" SHALL BE PUMPED DRY AND REMOVED OF ALL DEBRIS AND SILT WITHIN 24 HOURS AND RESTORED TO THEIR ORIGINAL CAPACITY.
10. EROSION CONTROL DEVICES SHALL BE STOCKPILED IN PARKWAYS READY TO BE PLACED IN POSITION WHEN RAIN IS FORECASTED.
11. ALL CUT AND FILL SLOPES GREATER THAN 1 VERTICAL TO 3 HORIZONTAL SHALL BE COVERED WITH 10 MIL PLASTICSHEETING HELD IN PLACE WITH SANDBAGS (UNLESS PLANTED OR HYDRO-SEEDED.
12. BRUSH AND VEGETATIVE GROUND COVER MAY NOT BE REMOVED MORE THAN 10-FEET ABOVE FILLS DURING THE RAINY SEASON WHICH OCCURS BETWEEN OCTOBER 1 AND APRIL 15.
13. A "STANDBY EMERGENCY CREW" SHALL BE ALERTED BY THE DEVELOPER OR THE CONTRACTOR TO PERFORM EMERGENCY WORK DURING RAINSTORMS. THE PARTY TO BE CONTACTED IS:
NAME:
PHONE NUMBER:

BMP NOTES:

THE FOLLOWING BMPS AS OUTLINED IN, BUT NOT LIMITED TO, THE BEST MANAGEMENT PRACTICE HANDBOOK, CALIFORNIA STORMWATER QUALITY TASK FORCE, SACRAMENTO, CALIFORNIA, JULY 2012, MAY APPLY DURING THE CONSTRUCTION OF THIS PROJECT (ADDITIONAL MEASURES MAY BE REQUIRED IF DEEMED APPROPRIATE BY CITY INSPECTORS):

EROSION CONTROL

EC1-SCHEDULING
EC2-PRESERVATION OF EXISTING VEGETATION

TEMPORARY SEDIMENT CONTROL

SE7-STREET SWEEPING AND VACUUMING
SE8-SANDBAG BARRIER

EQUIPMENT TRACKING CONTROL

TC1-STABILIZED CONSTRUCTION ENTRANCE/EXIT
TC3-ENTRANCE/OUTLET TIRE WASH

WIND EROSION CONTROL

WE1-WIND EROSION CONTROL

NON-STORMWATER MANAGEMENT

NS1-WATER CONSERVATION PRACTICES
NS3-PAVING AND GRINDING OPERATIONS
NS12-CONCRETE CURING
NS13-CONCRETE FINISHING

WASTE MANAGEMENT & MATERIALS
POLLUTION CONTROL

WM1-MATERIAL DELIVERY AND STORAGE
WM2-MATERIAL USE
WM3-STOCKPILE MANAGEMENT
WM4-SPILL PREVENTION AND CONTROL
WM5-SOLID WASTE MANAGEMENT
WM6-HAZARDOUS WASTE MANAGEMENT
WM7-CONTAMINATED SOIL MANAGEMENT
WM8-CONCRETE WASTE MANAGEMENT
WM9-SANITARY/SEPTIC WASTE MANAGEMENT
WM10-LIQUID WASTE MANAGEMENT

DUST CONTROL NOTES:

1. DUST SHALL BE CONTROLLED BY WATERING AND/OR APPLYING A DUST PALLIATIVE. THE DUST PALLIATIVE SHALL BE APPLIED IN THE AMOUNT AT THE LOCATIONS AS DIRECTED BY THE ENGINEER.
2. WATER FOR DUST CONTROL SHALL BE APPLIED BY MEANS OF PRESSURE TYPE DISTRIBUTORS OR PIPE LINES EQUIPPED WITH A SPAY SYSTEM OR HOSES WITH NOZZLES THAT WILL INSURE A UNIFORM APPLICATION OF WATER.
3. UNLESS WATER IS APPLIED BY MEANS OF PIPE LINES, AT LEAST ONE MOBILE UNIT WITH A MINIMUM CAPACITY OF 100 GALLONS SHALL BE AVAILABLE FOR APPLYING WATER.
4. ALL SOIL MATERIALS OR DEBRIS TRUCKED FROM THE SITE SHALL BE COVERED AND SPRINKLED PRIOR TO ENTERING PUBLIC STREETS.
5. PROVIDE FOR WET SUPPRESSION OR CHEMICAL STABILIZING OF EXPOSED SOILS.
6. PROVIDE FOR RAPID CLEAN-UP OF SEDIMENTS DEPOSITED ON THE PAVED ROADS.
7. LIMIT THE AMOUNT OF AREAS DISTURBED BY CLEARING & EARTH MOVING OPERATIONS BY SCHEDULING THESE ACTIVITIES IN PHASES.

SALAGE NOTES:

1. SIGN SHOP - CONTACT CARLOS MONTOYA
   A. UPDATED ADA SIGNAGE THROUGHOUT BUILDING ON ALL FLOORS.
2. CARPENTER SHOP - CONTACT LORENZO VILLANUEVA
   A. ALL FIRE EXTINGUISHERS THROUGHOUT BUILDINGS.
3. PLUMBING SHOP - CONTACT TODD CONOVER AND TIM MOORE
   A. BACKFLOWS IN BASEMENT.
   B. ALL EMERGENCY EYE WASH COMBOS THROUGHOUT BUILDINGS.
   C. GAS METER (TURN INTO ENERGY SERVICES).
   D. GAS EQ VALVE STORED FOR FUTURE USE.
   E. HEADER SET REGULATORS.
   F. WATER METERS.
   G. HILLBLOM METERS AND BACKFLOWS.
4. ELECTRICAL SYSTEMS SHOP - CONTACT ERIK ULSTRUP
   A. MCC BUCKETS IN ELECTRICAL ROOM.
   B. BREAKERS AND METERS.
   C. AIR BREAKERS FROM SUBSTATIONS.
   D. METAL SHELVING UNITS IN BASEMENT.
   E. ALL MXL FIRE ALARM DEVICES AND CIRCUIT BOARDS.
   F. ELEVATOR CONTROL BOARDS.
   G. WHEELCHAIR LIFT.
   H. HILLBLOM GENERATOR AND ATS.

DEMOLITION AND ABATEMENT NOTES

1. REFER TO CITADEL SITE INVESTIGATION REPORT IDENTIFYING ALL BUILDING AND SITE ITEMS THAT REQUIRE SPECIAL DISPOSAL AND ABATEMENT.
2. EXISTING SITE UTILITIES SHOWN ARE BASED ON AVAILABLE SURVEY AND RECORD DRAWINGS. ADDITIONAL UTILITIES NOT SHOWN ON THE DRAWINGS MAY BE DISCOVERED WITHIN THE SITE. CONTRACTOR TO NOTIFY UNIVERSITY AND CIVIL ENGINEER PRIOR TO DEMOLITION OF UNKNOWN SITE UTILITIES.

LEGEND:

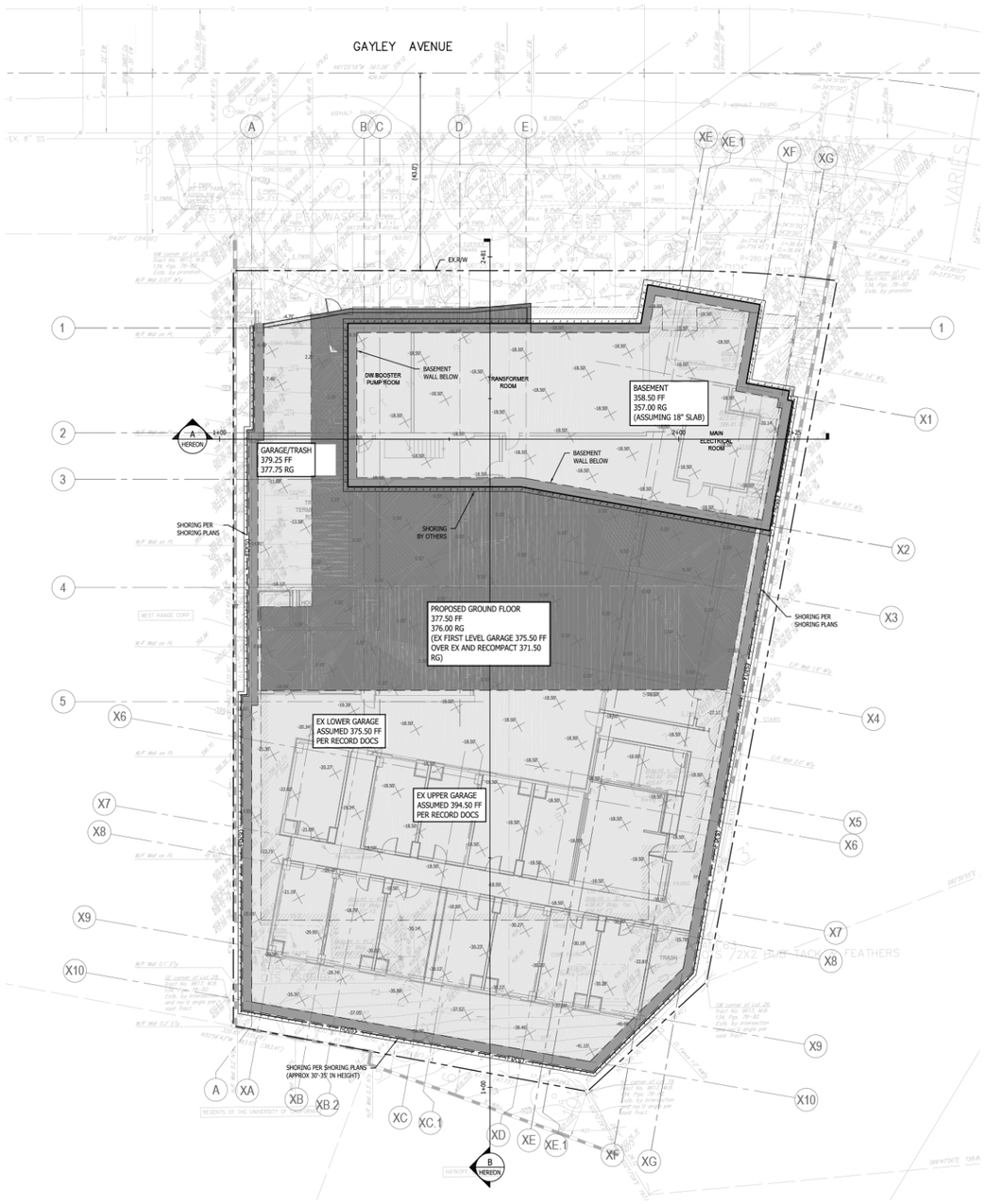
- PROPERTY LINE
- AREA OF WORK
- FIBER ROLLS
- PROPOSED BUILDING OUTLINE (GROUND LEVEL)
- EXISTING UTILITY TO BE DEMOLISHED OR RELOCATED. CONTRACTOR TO COORDINATE SERVICE SHUT-OFF OR SWITCH-OVER WITH UNIVERSITY.

Source(s): Mithun, Inc. (May 2023)

Figure 12

Not to Scale

Demolition and Erosion Control Plan



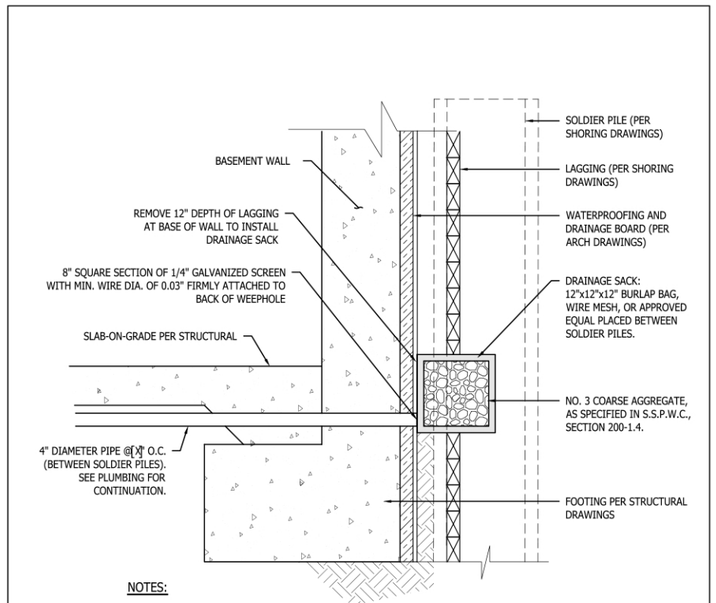
ESTIMATED EARTHWORK QUANTITIES

CUT:	9,860 CUBIC YARDS
FILL:	130 CUBIC YARDS
EXPANSION (ASSUMED 25% OF NET CUT):	2,465 CUBIC YARDS
SHRINKAGE (ASSUMED 15% OF OVER EX AND RECOMPACT UNDER EX. P1):	(125) CUBIC YARDS
NET (EXPORT):	12,325 CUBIC YARDS

NOTES:
1. QUANTITIES SHOWN ON HERE ARE FOR PLAN CHECK PURPOSES ONLY. CONTRACTOR TO GENERATE OWN QUANTITIES FOR BIDDING PURPOSES.

LEGEND:

- BASEMENT BUILDING WALL PER STRUCTURAL
- SHORING BY OTHERS
- FD(S) — FOUNDATION DRAINAGE FOR SHORED CONDITION PER DETAIL 1, HEREON. SEE PLUMBING DRAWINGS FOR CONNECTION TO BASEMENT SUMP PUMP.



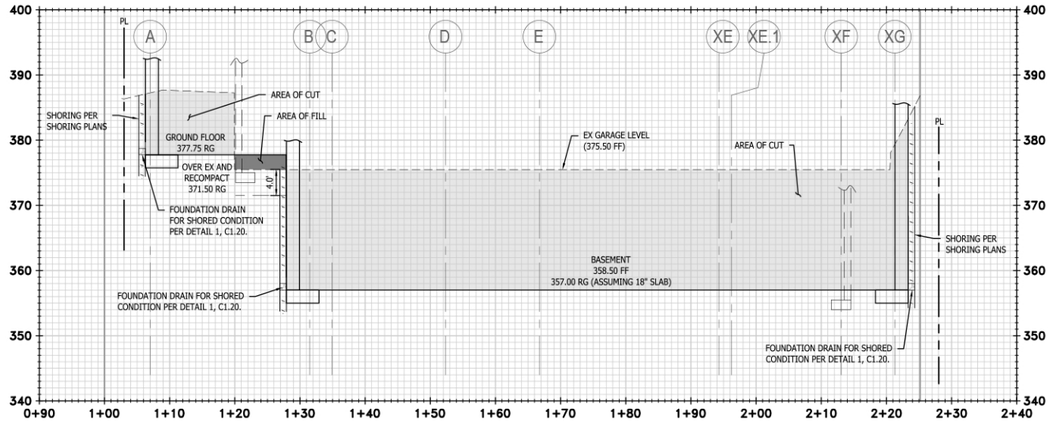
1 FOUNDATION DRAINAGE FOR SHORED CONDITION N.T.S.

Source(s): Mithun, Inc. (May 2023)

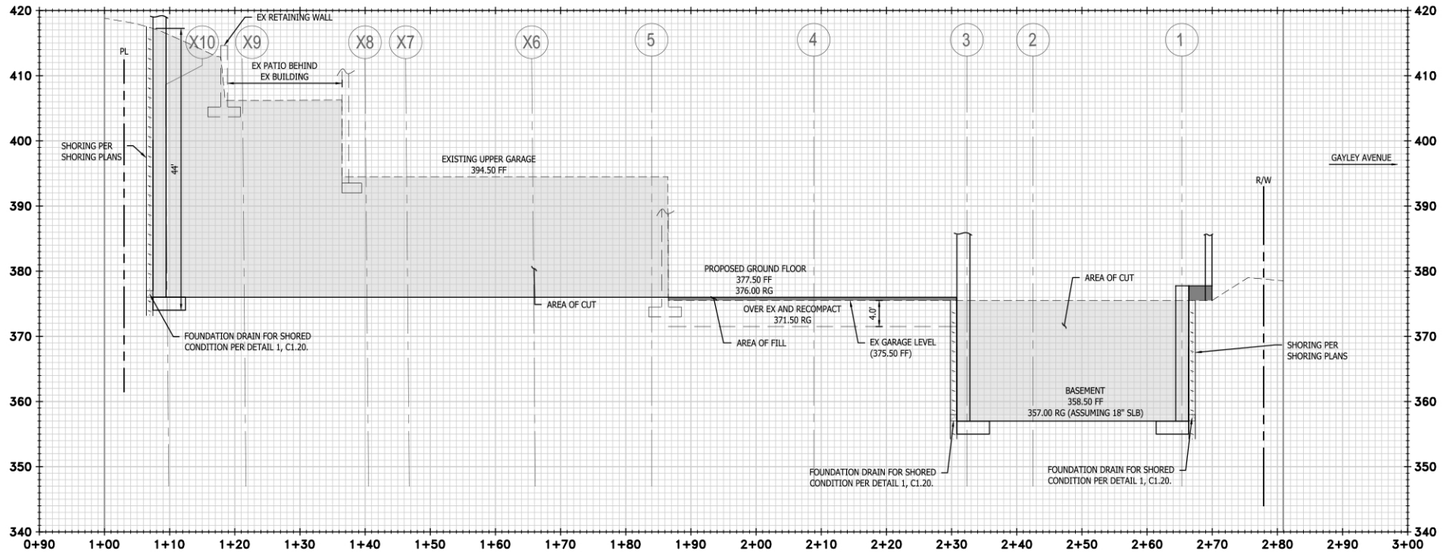
Figure 13a

Not to Scale

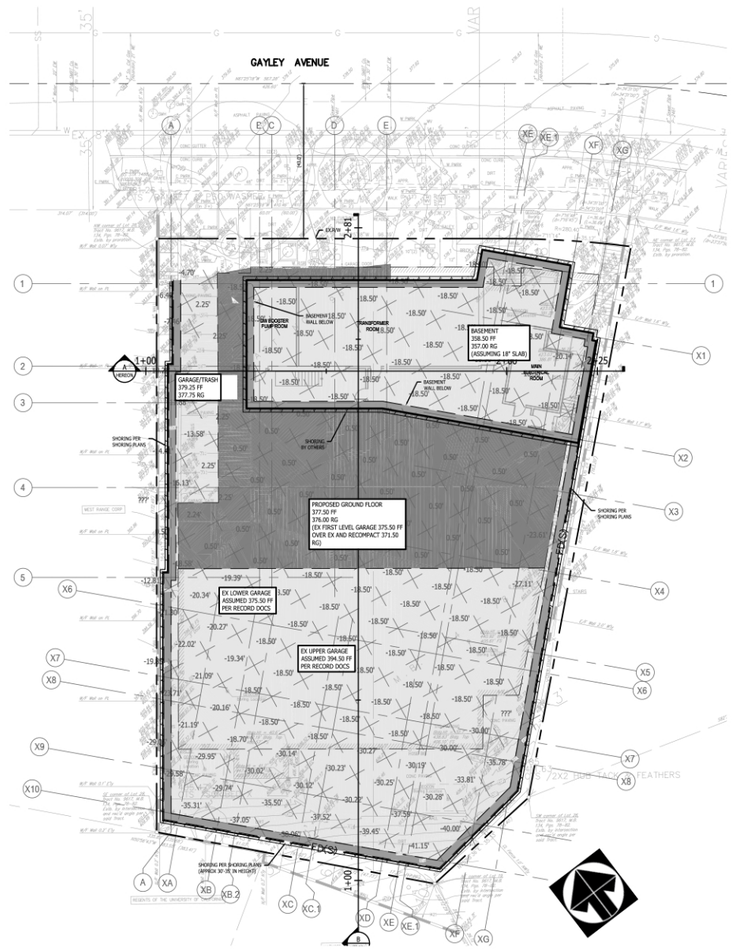
Conceptual Grading Plan



PROFILE A
HORIZONTAL SCALE: 1"=10'
VERTICAL SCALE: 1"=10'



PROFILE B
HORIZONTAL SCALE: 1"=10'
VERTICAL SCALE: 1"=10'



Source(s): Mithun, Inc. (May 2023)

Figure 13b

Not to Scale

Conceptual Grading Plan

Approach: I-405 exit to eastbound Wilshire Boulevard; left turn on Veteran Avenue; right turn on Weyburn Avenue; left turn on Gayley Avenue to the Project site.

Departure: Southbound on Gayley Avenue; right turn on Weyburn Avenue; left turn on Veteran Avenue; right turn on Wilshire Boulevard; on-ramp to I-405 north or south.

During construction, the section of sidewalk along the south side of Gayley Avenue adjacent to the Project site would be closed to pedestrians, with appropriate barriers in place in accordance with UCLA's Temporary Barricade & Enclosure requirements, as appropriate. Pedestrians heading northbound or southbound along Gayley Avenue would be directed to the sidewalk on the north side of the street.

6. ANTICIPATED DISCRETIONARY APPROVALS

The Regents and the responsible agencies identified below are expected to use the information contained in this IS for consideration of approvals related to and involved in the implementation of the proposed Gayley Towers Redevelopment Project. This IS 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 IS and MND
- Approval of the Gayley Towers Redevelopment Project

Responsible Agencies

- **State Water Resources Control Board.** UCLA, or its designee, shall comply with requirements of the applicable NPDES Phase II Small MS4 General Permit.
- **City of Los Angeles.** Coordination and compliance with applicable standards, design requirements, and guidelines for construction activities, including construction staging, utility connection(s), street improvements, and tree removal/replacement, as well as any permanent improvements such as paving, bike racks, lighting, or landscaping within City rights-of-way.
- **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).

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

6/5/23
Date

Ashley Rogers, Assistant 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 mitigation measures and campus programs, practices, and procedures identified in the LRDP EIR. If there are one or more "Potentially Significant Impacts" a Project EIR will be prepared.

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

C) "**Less Than Significant Impact**" applies where the 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 a University-owned six-level, approximately 57,075-sf residential apartment building. As described previously in Section II, Project Description, of this IS, relevant elements of the proposed Project related to aesthetics/visual character include the redevelopment of the Project site with a new, approximately 112,0000-gsf, up to eight-level (with a partial basement level for mechanical equipment), residential building. As shown in the massing diagrams provided on Figures 9a through 9c, the proposed new building would have a contemporary architectural style sensitive to its surrounding dense, multi-family residential context. As shown, the central tower window wall and vertically oriented residential windows would serve to break up the building massing along the front façade. In addition, the main entrance along Gayley Avenue would be recessed to provide a pedestrian scale. As previously described, building materials and exterior finishes would potentially include concrete, plaster, porcelain or stone tile, metal, and glass. More specifically, the base of the building would consist of stucco with tile accents, while the exterior envelope of the upper stories and the courtyard would consist of a blend of stucco, metal-clad windows, and window wall assemblies. Glass would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside. Low-level outdoor lighting may be used for security, wayfinding, and aesthetic purposes and would comply with UC energy standards, which are generally more stringent than Title 24 requirements. Additionally, any outdoor lighting would be shielded and/or directed toward the Project site to minimize light spillover. Entry improvements located outside of the public right-of-way would include plantings, associated irrigation, retaining bench boulders, concrete paving, stairs, and handrails.

As shown on Figure 6, landscape and hardscape features would be provided throughout the Project site. As discussed in Section V.4, Biological Resources, of this IS, existing ornamental vegetation and mature trees on-site would be removed; however, none are protected species and all trees would be replaced as required by the LRPD EIR mitigation measures. Two existing mature street trees located within the public right-of-way at the northwest corner of the Project site (on the south side of Gayley Avenue) would be protected in place.

As with existing conditions at the Project site and in the vicinity, exterior lighting would be provided for pedestrian safety and site security. There is one existing City of Los Angeles street light located within the public right-of-way at the northeast corner of the Project site (on the south side of Gayley Avenue), which would be retained.

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

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

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

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

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

Project Impact Analysis

Threshold(s)	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?	☐	☐	☐	☒
b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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

Governor Edmund Gerald Brown Jr. signed Senate Bill 743 in September 2013, which made several changes to CEQA for projects located in areas served by transit (i.e., transit-oriented development or TOD). With respect to this IS section, SB 743 (PRC Section 21099, Subdivision [d]) provides that aesthetic impacts shall not be considered significant impacts on the environment, in some circumstances. Specifically, PRC Section 21099(d)(1) provides that aesthetics impacts shall not be considered significant CEQA impacts of a project that meets the following criteria:

1. The project is a residential, mixed-use residential, or employment center project.
2. The project is located on an infill site[10] within a transit priority area.[11]

The proposed Project meets these criteria. Criterion 1 is met due to the residential nature of proposed development. Criterion 2 is met because the Project site is an infill site located in a transit priority area (TPA). Based on consistency with the SB 743 criteria, potential aesthetic impacts are not considered to be impacts under CEQA for the proposed Project, and no impact would result. No further analysis of this issue is required.

[10] Infill site means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. Pursuant to PRC Section 21072, "qualified urban use" means any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or a combination of those.

[11] Transit Priority Area is defined as an area that is within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in an adopted federal Transportation Improvement Program. Pursuant to PRC Section 21064.3, "'major transit stop" means a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. The Project site meets these criteria.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would not have a substantial adverse effect with regard to aesthetics.

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 not mapped as part of the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP), as confirmed by review of the most recent 2018 FMMP Important Farmland Map for Los Angeles County (DOC, 2023). No farmland, agricultural activity, forest land, or timberland exists on or in the vicinity of the Project site. Although the University, a State entity, is not subject to local land use regulations, the Project site is currently designated for multiple family residential uses [Q]R4-1VL in the City of Los Angeles Zoning Code; the Project site is not designated 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.

Additional Project-Level Mitigation Measures

No additional 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 demolition of the existing 57,075 gsf apartment building, which provides 51 units (100 beds); excavation and removal/export of an estimated 10,375 cy of soil; and construction and operation of a new approximately 112,000-sf residential structure, which would provide up to 187 rooms (545 beds). The use of diesel-powered construction equipment would contribute to local and regional emissions (refer to discussion of "Construction Activities" in Section II.5, Proposed Project Components, of this IS); however, with the exception of drill rigs, Tier IV construction equipment would be used.[12] Long-term operational emissions of the proposed Project would primarily include emissions from vehicles used by the residents, consumer products, and energy (electricity). No natural gas would be used for operation of the proposed Project.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Any necessary changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed. Changes have been made so the stated requirement better applies to the proposed Project, which is located off campus and would not involve the use of any unpaved roads.

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

- *Minimize land disturbance to the extent feasible.*
- *Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer's specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days).*
- *Apply water three times daily to all active disturbed areas.*
- *Replace ground cover in disturbed areas as quickly as possible.*
- *Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content.*
- *Water active grading sites at least twice daily.*
- *Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period.*

[12] The USEPA has adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines by integrating engine and fuel controls as a system to gain the greatest emission reductions. To meet these Tier IV emission standards, engine manufacturers now produce engines with advanced emission control technologies. Tier IV emission standards as defined by CARB are provided at: https://ww2.arb.ca.gov/resources/documents/non-road-diesel-engine-certification-tier-chart.

- *All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.*
- *Sweep streets at the end of the day if visible soil material is carried over to adjacent roads.*
- *Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.*
- *Apply water three times daily or chemical soil stabilizers according to manufacturers' specifications to all unpaved parking or staging areas or unpaved road surfaces.*
- ~~*Post and enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.*~~

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

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

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

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

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

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

The campus would exceed the requirements outlined in MM 4.2-2(c). With the exception of a drill rig, Project construction equipment would meet USEPA Tier IV certification requirements. The following project design feature (PDF) would be included in the Project-specific MMRP to ensure implementation of this measure.

PDF Gayley AQ-1 *The campus shall require by contract specifications that the construction contractor ensure, with the exception of a drill rig, that off-road diesel construction equipment rated at 150 hp or greater complies with USEPA/CARB Tier IV off-road emissions standards or equivalent and*

shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturers' specifications.

In addition, LRDP PP 4.15-1 included under the Greenhouse Gas Emissions analysis (Section V.8) requires UCLA to continue to implement provisions of the UC Policy on Sustainability Practices, including, but not limited to, Green Building Design; Clean Energy Standards; Climate Protection Practices; Sustainable Transportation Practices; Sustainable Operations; Recycling and Waste Management; Environmentally Preferable Purchasing Practices; and provisions of the applicable UCLA Climate Action Plan (CAP), which would also reduce associated air pollutant emissions.

Air Quality Background

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

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

Regulatory Framework

A discussion of the regulatory framework for assessing air quality impacts is provided in Section 4.2, Air Quality, of the LRDP Final SEIR and is incorporated by reference. Regulations addressed in the LRDP Final SEIR include, but are not limited to, the following, as updated below as applicable.

The federal Clean Air Act (CAA) (42 U.S.C. Section 7401) requires the adoption of National Ambient Air Quality Standards (NAAQS) to protect the public health, safety, and welfare from known or anticipated effects of air pollution. These pollutants are called criteria pollutants. The State of California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS) for the federal criteria pollutants that are generally more restrictive than the NAAQS and additional standards for atmospheric sulfates, vinyl chloride, hydrogen sulfide, and visibility. Specific geographic areas are classified as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with federal and state standards. NAAQS and CAAQS currently in effect and the associated attainment status for the SCAB are presented in Appendix A of this IS and summarized below (CARB, 2022a). The criteria pollutants

for which federal standards have been promulgated and that are most relevant to this air quality impact analysis are discussed below and include: ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), 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 USEPA requires each state with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and maintain the federal standards. The California Clean Air Act (CCAA) also requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the CAAQS. The AQMPs from each district are compiled into the California SIP. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

The SCAQMD is principally responsible for air pollution control in the SCAB and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. Currently, these state and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards.

In December 2022, the SCAQMD released the *Final 2022 AQMP* (2022 AQMP) (SCAQMD, 2022). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the SCAG *2020-2045 Regional Transportation Plan/Sustainable Community Strategy* (Connect SoCal), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements (SCAG, 2020).

Criteria Pollutants and Health Effects

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

- **O_3** is a highly reactive and unstable gas that is formed when VOCs) and NO_X undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects.
- **PM_{10}** consists of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles, about 0.0004 inches or less, allows them to easily enter the lungs

where they may be deposited, resulting in adverse health effects. Particulate matter pollution is a major cause of reduce visibility (haze) which is caused by the scattering of light and consequently the significant reduction air clarity.

- **$PM_{2.5}$** is a subgroup of PM_{10} that consists of smaller particles that have an aerodynamic diameter of 2.5 micrometers or less. PM2.5 is also formed in the atmosphere from gaseous emissions from power plants, industrial facilities, automobiles and other combustion sources. A consistent correlation between elevated ambient fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children and to school and kindergarten absences.
- **NO_2** is typically created during combustion processes and is a major contributor to smog formation and acid deposition. NO_2 absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. The strongest health evidence, and the health basis for the ambient air quality standard for NO_2, is results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.
- **CO** Is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or in wildfires. Because CO is emitted directly from internal combustion engines, motor vehicles operating at slow speeds are the primary source of CO in the urban environment. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. The most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects.

Related Pollutants

- VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The SCAQMD uses the terms VOC and Reactive Organic Gases (ROG) interchangeably.
- **NOx** includes nitric oxide (NO), nitrogen dioxide (NO_2) and nitrous oxide (N_2O), which are formed when nitrogen (N_2) combines with oxygen (O_2). Their lifespan in the atmosphere ranges from one to seven days for NO and NO_2, to 170 years for N_2O. Nitrogen oxides

are typically created during combustion processes and are major contributors to smog formation and acid deposition.

Existing Air Quality Setting

As previously indicated, specific geographic areas are classified as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with federal and state standards. The USEPA and CalEPA have established NAAQS and CAAQS, respectively, for six of the most common criteria air pollutants: CO, Pb, O_3, particulate matter (PM_{10} and $PM_{2.5}$), NO_2, and SO_2. The attainment designations for the SCAB are presented in Table 1 (CARB, 2022a).

TABLE 1
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SCAB

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

Source: (CARB, 2022a)

1. That National 1-hour O_3 standard was revoked effective June 15, 2005.

2. The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.

The Project site is occupied by an approximately 57,075 gsf apartment building. The existing building includes 51 studio/studio loft units and houses approximately 100 students (beds). As further discussed in Section V.17, Transportation, of this IS, it is estimated that the existing building generates approximately 150 average daily trips (ADT). Estimated air pollutant emissions generated by operations at the existing building are presented in Table 2.[13]

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

TABLE 2
EXISTING BUILDING REGIONAL OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	0.57	0.46	5.09	0.01	0.37	0.07
Area Source	1.63	0.79	3.20	0.00	0.06	0.06
Energy Source	0.01	0.13	0.05	0.00	0.01	0.01
Total Maximum Daily Emissions	**2.21**	**1.38**	**8.34**	**0.02**	**0.44**	**0.15**
Winter						
Mobile Source	0.56	0.51	4.67	0.01	0.37	0.07
Area Source	1.36	0.76	0.32	0.00	0.06	0.06
Energy Source	0.01	0.13	0.05	0.00	0.01	0.01
Total Maximum Daily Emissions	**1.93**	**1.40**	**5.05**	**0.02**	**0.44**	**0.14**

Source: (Urban Crossroads, 2023)

Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors." These structures typically include residences, hotels, hospitals, etc. as they are also known to be locations where an individual can remain for 24 consecutive hours. The nearest land use where an individual could remain for 24 hours in proximity to the Project site (in this case, the nearest residential land use) is the residence located at 581 Gayley Avenue adjacent to and east of the Project site, as shown on Figure 14. Potential impacts to sensitive receptors are assessed under the analysis of Threshold c below.

Project Impact Analysis

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

Discussion

As identified above, the applicable AQMP for the proposed Project is the SCAQMD 2022 AQMP. For a specific project to be consistent with the AQMP, the pollutants emitted from the proposed Project should not:

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

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

Source(s): Urban Crossroads (05-17-2023)

Figure 14

Not to Scale

Sensitive Receptors

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if localized significance thresholds (LSTs) or regional significance thresholds were exceeded. As evaluated under Threshold b and Threshold c, below, the proposed Project's regional and localized construction-source emissions would not exceed applicable regional significance thresholds or LST thresholds, and impacts would be less than significant. Therefore, the proposed Project is determined to be consistent with Criterion No. 1.

With respect to Criterion No. 2, the 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the SCAQMD are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections for the City of Los Angeles is considered consistent with the AQMP. The proposed Project would provide 187 rooms for UCLA undergraduate students and there would be up to 545 residents/beds. This represents an increase of 445 residents/beds compared to the existing building. The proposed Project would not result in new students attending UCLA. As further discussed in Section V.14, Population and Housing, of this IS, the proposed Project would not conflict with the local or regional growth assumptions, including growth assumptions in Connect SoCal, which are consistent with the 2022 AQMP. Therefore, the proposed Project is determined to be consistent with Criterion No. 2. Thus, the proposed Project would not conflict with or obstruct implementation of the applicable air quality plan.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would not conflict with or obstruct implementation of the applicable air quality plan. 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 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

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 SCAB is a federal or 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. The proposed Project would have an incremental, cumulative contribution to O_3, PM_{10}, and $PM_{2.5}$ levels in the region. SCAQMD's policy with respect to cumulative impacts associated with criteria pollutants and their precursors is that Project-specific impacts which are less than significant would also be cumulatively less than significant (SCAQMD, 2003).

Thresholds of Significance

The SCAQMD recommends that projects under their jurisdiction be evaluated in terms of their quantitative thresholds, which have been established to assess both the regional and localized impacts of project-related air pollutant emissions. The significance thresholds are updated, as needed, to appropriately represent current ambient air quality standards and attainment statuses. 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
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
MAXIMUM MASS DAILY REGIONAL EMISSIONS THRESHOLDS

Mass Daily Thresholds (lbs/day)		
Pollutant	**Construction**	**Operation**
VOC	75	55
NOx	100	55
CO	550	550
PM_{10}	150	150
$PM_{2.5}$	55	55
SOx	150	150
Pb	3	3

Source: (SCAQMD, 2023)

Regional Construction Impacts

Air pollutant emissions during construction activities would primarily occur from construction equipment exhaust; fugitive dust from demolition and site grading; exhaust and particulate emissions from trucks hauling soil and building materials to and from the Project site and from vehicles driven to and from the Project site by construction workers; and VOCs from painting and asphalt paving operations. The CalEEMod input for construction emissions was based on the proposed Project's construction parameters and default assumptions from CalEEMod, as further discussed in the UCLA Gayley Towers Redevelopment Project Air Quality and Greenhouse Gas Emissions Assessment (Air Quality and GHG Assessment) included in Appendix A of this IS. As identified in PDF Gayley AQ-1, the analysis assumes use of Tier IV equipment during construction, with the exception of the drill rig.

Table 4 presents the estimated maximum daily emissions during construction of the proposed Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. The emissions estimates include reductions associated with adherence to SCAQMD Rule 403 (refer to LRDP PP 4.2-2[a]). Compliance with LRDP PPs 4.2-2(b), 4.2-2(c), 4.2-2(d), and LRDP MMs 4.2-2(a), 4.2-2(b), and 4.2-2(c) would further reduce construction-related emissions; however, these reductions are not quantified in order to present a conservative analysis. As shown, emissions resulting from construction of the proposed Project would not exceed thresholds established by the SCAQMD for emissions of any criteria pollutant, and no additional mitigation is required.

TABLE 4
ESTIMATED MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2024	68.21	11.73	110.79	0.04	2.87	1.32
2025	0.91	8.48	22.55	0.02	2.14	0.56
2026	6.40	14.24	31.33	0.04	2.83	0.78
Winter						
2024	68.21	11.83	110.61	0.04	2.87	1.32
2025	0.90	8.58	21.01	0.02	2.14	0.56
2026	0.82	8.48	20.44	0.02	2.14	0.56
Maximum Daily Emissions	**68.21**	**14.24**	**110.79**	**0.04**	**2.87**	**1.32**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

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

Operations

Operational related emissions are expected from the following primary sources: area source emissions, energy source emissions, and mobile source emissions. Area source emissions are the result of consumer products, architectural coatings (maintenance repainting), and landscape maintenance equipment. For the purpose of analysis, the emissions associated with area sources were calculated based on default assumptions provided in CalEEMod. Energy source emissions are associated with building electricity; no natural gas would be used at the Project. For the purpose of analysis, the emissions associated with energy sources were also calculated based on default assumptions provided in CalEEMod. Mobile source emissions are related to emissions from vehicular trips and vehicle miles traveled (VMT) associated with on-road vehicles, which would be the primary emission source from the proposed Project. The calculation of mobile source emissions was based on the vehicle trip generation rates provided in the VMT Assessment for UCLA Gayley Towers Redevelopment Project (VMT Assessment) prepared for the proposed Project (KOA, 2023) and included in Appendix F of this IS.

Estimated maximum daily operational emissions resulting from the proposed Project are shown in Table 5, and the net increase in operational emissions compared to the existing building is shown in Table 6. As shown, operational-source emissions from the proposed Project would not exceed the applicable SCAQMD regional thresholds for emissions of any criteria pollutant, even if no credit is taken for the operations associated with the existing building. No additional mitigation is required.

TABLE 5
ESTIMATED MAXIMUM DAILY REGIONAL OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	2.35	1.76	20.31	0.05	1.77	0.34
Area Source	3.82	2.90	12.89	0.02	0.23	0.23
Energy Source	1.31	5.87	3.35	0.01	0.19	0.19
Total Maximum Daily Emissions	**7.49**	**10.53**	**36.54**	**0.07**	**2.19**	**0.76**
Winter						
Mobile Source	2.32	1.93	18.70	0.05	1.77	0.34
Area Source	2.70	2.79	1.19	0.02	0.23	0.23
Energy Source	1.31	5.87	3.35	0.01	0.19	0.19
Total Maximum Daily Emissions	**6.34**	**10.59**	**23.23**	**0.07**	**2.19**	**0.76**

Source: (Urban Crossroads, 2023)

TABLE 6
PROJECT NET INCREASE IN REGIONAL OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Proposed Project	7.49	10.53	36.54	0.07	2.19	0.76
Existing Building	2.21	1.38	8.34	0.02	0.44	0.15
Net Emissions (Proposed – Existing)	**5.27**	**9.15**	**28.20**	**0.06**	**1.75**	**0.62**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Proposed Project	6.34	10.59	23.23	0.07	2.19	0.76
Existing Building	1.93	1.40	5.05	0.02	0.44	0.14
Net Emissions (Proposed – Existing)	**4.40**	**9.19**	**18.18**	**0.05**	**1.75**	**0.61**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2023)

As shown in Tables 4, 5, and 6, 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.

Additional 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.

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

As part of the SCAQMD's environmental justice program, attention has focused on local air quality impacts from nearby sources. The SCAQMD has promulgated exposure standards and a conservative, simple Localized Significance Thresholds (LST) screening method for construction sites less than five acres in area (SCAQMD, 2008a). The LST method provides tables of emissions limits based on the location of a project in the SCAB, the area of the Project site, and distance to the sensitive receptors. The LSTs used in this analysis are specific to SCAQMD Source Receptor Area (SRA) 2, Northwest Coastal Los Angeles County, in which the Project site is located. The emissions limits are then compared to the on-site emissions from the proposed Project. Localized impacts during construction are assessed for NO_x and CO at receptors where persons could be present for one hour; and for PM_{10} and $PM_{2.5}$ where persons could be present for 24 hours. As discussed above, the closest receptor to the Project site is the adjacent residential building to the east, and this receptor has been used for the evaluation of NO_x, CO, PM_{10} and $PM_{2.5}$. Emissions at other receptors located at a further distance would be less than at this location.

For purposes of the analysis of construction-related emissions, emissions associated with peak site demolition, preparation, and grading activities are considered for purposes of LSTs since this phase represents the maximum localized emissions that would occur. The Project's construction activities could disturb a maximum of approximately 0.5 acre per day for demolition and 1.5 acres per day for site preparation/grading activities when accounting for multiple passes of any given site area by the construction equipment. For all other construction phases, 0.5 acres per day was assumed.

For purposes of analysis of operation-related emissions, to establish a maximum potential impact scenario, the emissions shown on Table 8 represent all on-site Project-related area, mobile, and stationary sources. Further, the analysis accounts for the longest on-site distance that a vehicle could theoretically travel, which is conservatively assumed to be 0.04 mile (i.e., the distance on the Project site from one edge of the site boundary to the farthest edge of the site boundary, although such a path of travel is not planned as part of the Project).[14]

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

[14] Since there will be no parking on-site, a vehicle can only pull into the driveway (12'6" length) and the service garage (22'10" length) to access the trash enclosure, which is a total length of approximately 0.0067 mile.

TABLE 7
PROJECT LOCALIZED CONSTRUCTION IMPACTS

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition				
Maximum Daily Emissions	**9.33**	**108.82**	**2.12**	**1.10**
SCAQMD Localized Threshold	81	430	3	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Site Preparation/Grading				
Maximum Daily Emissions	**8.49**	**15.53**	**2.08**	**1.00**
SCAQMD Localized Threshold	125	695	5	4
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Building Construction				
Maximum Daily Emissions	**7.17**	**12.11**	**0.07**	**0.07**
SCAQMD Localized Threshold	81	430	3	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Paving				
Maximum Daily Emissions	**3.57**	**5.24**	**0.04**	**0.04**
SCAQMD Localized Threshold	81	430	3	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Architectural Coating				
Maximum Daily Emissions	4176	415;	3137	3137
SCAQMD Localized Threshold	81	430	3	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Trenching				
Maximum Daily Emissions	**4.29**	**5.80**	**0.07**	**0.06**
SCAQMD Localized Threshold	81	430	3	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2023)

TABLE 8
PROJECT LOCALIZED OPERATIONAL IMPACTS

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**9.27**	**20.27**	**0.44**	**0.43**
SCAQMD Localized Threshold	221	1,531	13	6
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2023)

CO Hotspot Analysis

An adverse CO concentration, known as a “hot spot,” can occur when an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm occurs. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (with requirements for certain other vehicle types that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, the CO concentration in the SCAB is now designated as attainment.

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO “hot spot” analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak

morning and afternoon time periods.[15] This "hot spot" analysis did not predict any violation of CO standards (refer to Table 9 of the Air Quality and GHG Analysis included in Appendix A of this IS).

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), it was determined that peak CO concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.

Traffic volumes generating the CO concentrations for the 2003 "hot spot" analysis is shown on Table 10 of the Air Quality and GHG Analysis included in Appendix A of this IS. The busiest intersection evaluated was Wilshire Boulevard and Veteran Avenue, which had AM/PM traffic volumes of 8,062 vph and 7,719 vph, respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the hourly traffic volume increase four times to 32,248 vehicles per hour, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). Despite its proximity to the Wilshire Boulevard/Veteran Avenue intersection, since the Project would only generate approximately 566 net ADT, with those trips dispersed throughout the local and regional roadway network, the Project would not generate sufficient ADT to cause a CO hotspot.

Toxic Air Contaminant (TAC) Emissions

TACs are airborne substances that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. CARB identified particulate exhaust emissions from diesel-fueled engines (diesel particulate matter [PM]) as TACs in 1998.

Proposed Project construction would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. The proposed Project would result in the generation of diesel PM emissions from the use of off-road diesel equipment required for construction activities and from on-road diesel equipment used to transport materials to and from the Project site. Exposure is a function of both the emissions rate and the duration of exposure. The total Project construction period is anticipated to last approximately 28 months (approximately 2.34 years). However, the proposed Project would use relatively little diesel construction equipment, and with the potential exception of the drill rig, Tier IV equipment would be used, which meets the most stringent regulatory standards and therefore results in the least amount of diesel exhaust TAC emissions. The maximum amount of diesel equipment use would occur during a four-month site preparation/grading phase on the Project site, which is expected to involve one grader, one rubber-tired dozer, and one crawler tractor. Diesel trucks would also arrive at and leave the site throughout the day.

Given the relatively limited duration of diesel-intensive equipment use, the minimal number of pieces of equipment that would be used at any given time, and the Project's commitment to meeting Tier IV standards for nearly all construction equipment, occupants of the adjacent residences and nearby buildings would not be exposed to substantial toxic air pollutants from construction equipment exhaust. Therefore, implementation of the proposed Project would not

[15] The CO "hot spot" analysis conducted in 2003 is the most current study used for CO "hot spot" analysis in the SCAB.

result in exposure of sensitive receptors to substantial concentrations of TACs. There would be a less than significant impact.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

Construction and operation of the 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

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

The proposed Project does not propose an odor-generating use identified by the SCAQMD (e.g., wastewater treatment plants, agricultural operations, landfills, composting, food processing plants, chemical plants, refineries) and would not create an odor nuisance pursuant to SCAQMD Rule 402. Furthermore, none of these odor-generating land uses are located in the vicinity of the Project site. Long-term operations may involve minor odor-generating activities such as cooking, trash facilities, and painting for maintenance purposes. These types and concentrations of odors are typical for residential uses and currently occur at the Project site and at adjacent residential uses. As such, 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.

Additional Project-Level Mitigation Measures

No additional 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 within the Project site. Mature trees to be removed would be replaced, as described below. None of the trees located on the Project site are considered protected species, as defined in the LRDP Final SEIR (i.e., coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel).

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 is located off campus.

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

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

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

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

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

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

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

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

> *within the ~~campus~~ **project** boundaries that would provide nesting, foraging or roosting habitat for birds so that the replacement number of trees and shrubs will result in a 1:1 replacement ratio.*

Regulatory Framework

The LRDP Final SEIR, which has been incorporated by reference, includes a detailed discussion of the federal, state, and local regulatory framework for biological resources. As previously discussed, the Project site is located within an urban area and is developed with an existing residential building.

Biological resource regulations that are most relevant to the proposed Project include the federal Migratory Bird Treaty Act (MBTA) and the provisions of the *California Fish and Game Code* regarding the protection of birds of prey and migratory birds.

Pursuant to the MBTA of 1918, as amended in 1972, federal law prohibits the taking of migratory birds, their nests, or their eggs (16 United States Code [U.S.C.] Section 703), except as allowed by permit (pursuant to 50 CFR Section 21). Also, Section 3503.5 of the California Fish and Game Code specifically protects birds of prey and states:

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

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

> *It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.*

Project Impact Analysis

Threshold(s)	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, is currently developed and disturbed, and has limited natural (unpaved/undeveloped) ground surfaces. 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. Based on a site survey conducted by a certified arborist on March 15, 2023 (Psomas, 2023), vegetation within or adjacent to the Project site primarily consists of 10

mature trees, including two street trees located in the parkway along Gayley Avenue (refer to additional information provided under Threshold e below). Information about the trees surveyed (i.e., number of trunks, height, canopy, health, aesthetics) is provided in Appendix B of this IS. There is also limited ornamental vegetation and several trees that are not considered mature on-site. 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.

Additional Project-Level Mitigation Measures

No additional 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, is currently developed and disturbed, and does not contain any riparian habitat, sensitive natural community, or wetlands. Therefore, there would be no impact and no mitigation is required.

Additional Project-Level Mitigation Measures

No additional 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, development of the proposed Project would require the removal of mature trees and existing ornamental vegetation. 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 MBTA; raptors are also protected by the California Fish and Game Code. 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 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 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.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

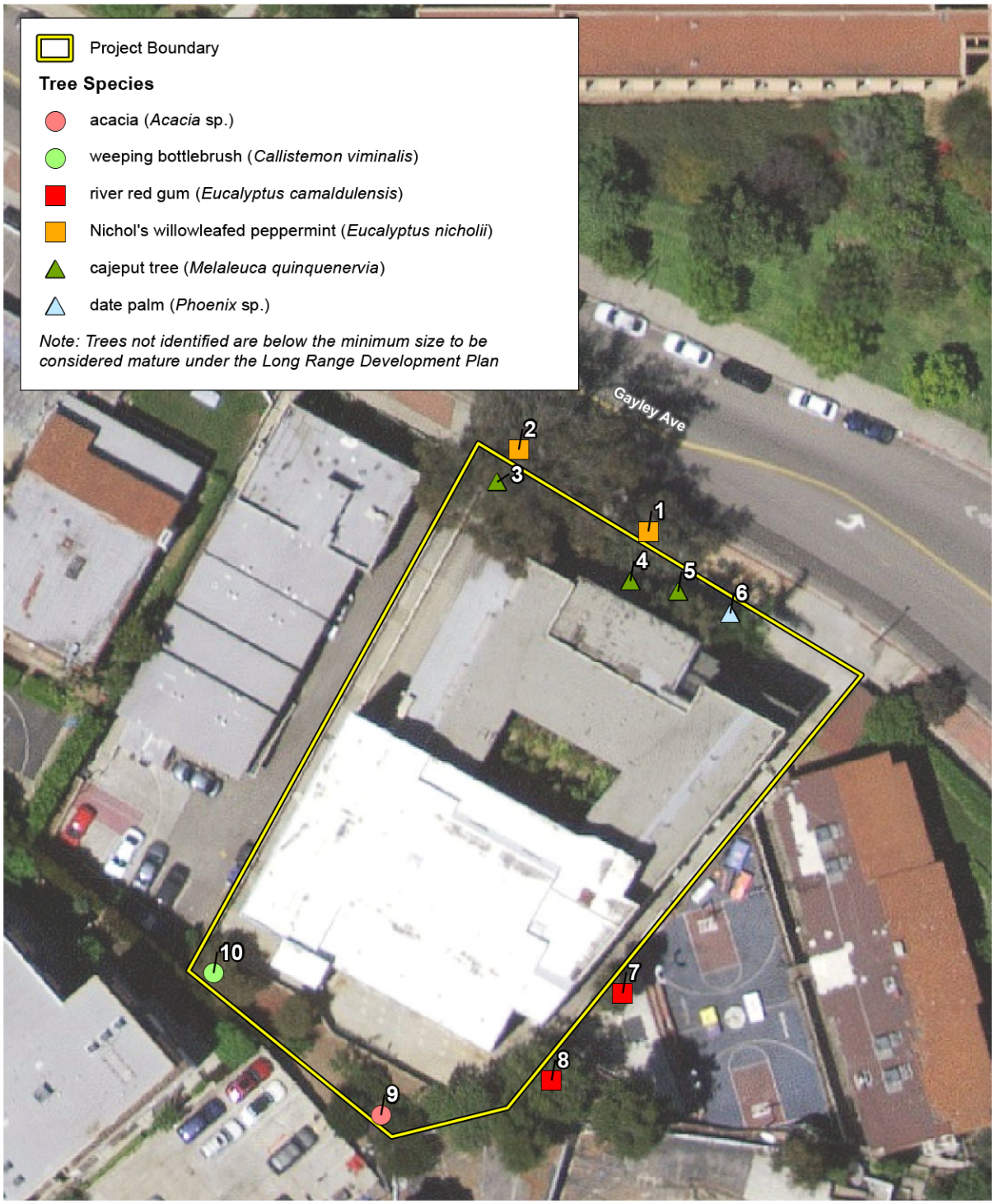
The analysis of Impact 4.3-4 in Section 4.3, Biological Resources, of the LRDP Final SEIR concluded that with implementation of LRDP PPs 4.3-1(a) through 4.3-1(e), MM 4.3-1(c), and MM 4.3-4, the removal of mature and protected trees would result in a less than significant impact. As noted in the LRDP Final SEIR, the University of California is not subject to local zoning and planning ordinances, including the City of Los Angeles Native Tree Protection Ordinance (LANTPO, Ordinance No. 186873).[16] Therefore, UCLA mitigates the loss of trees consistent with the campus' LRDP. UCLA's currently adopted tree replacement mitigation is consistent with the City's requirements at the time the LRDP Final SEIR was adopted.[17] Furthermore, although not required, UCLA has historically met or exceeded the City of Los Angeles tree replacement requirements.

A tree survey was conducted at the Project site by Certified Arborist Trevor Bristle (International Society of Arboriculture Certificate No. WE-10233A; Registered Consulting Arborist #746) on March 15, 2023. Trees documented during the field survey included all trees located within the proposed Project work limits, as well as those immediately adjacent to the work limits to account for any potential indirect impacts. The LRDP 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 removed mature trees 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). Accordingly, all trees with a trunk measuring at least 12 inches dbh were included in the survey; however, no protected species were identified. The field survey assessed the size, height, canopy width, aesthetic value, and overall health of each tree, and their locations were mapped using a hand-held Geographic Positioning System unit. This tree data is provided in Appendix B of this IS.

A total of six mature trees occur within the Project site and another four mature trees are located adjacent to the northern and eastern Project site boundaries (offsite). Therefore, 10 mature trees, as defined in the LRDP Final SEIR, were documented in the site inventory. These consist of one acacia (*Acacia* sp.), one weeping bottlebrush (*Callistemon viminalis*), two river red gums (*Eucalyptus camaldulensis*), two Nichol's willowleafed peppermint trees (*Eucalyptus nicholii*), three cajeput trees (*Melaleuca quinquenervia*), and one date palm (*Phoenix* sp.), as shown in Figure 15. In addition, the interior courtyard of the existing building contains several king palms

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

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



Source(s): Psomas (04-20-2023)

Figure 15

Not to Scale

Tree Survey

(*Archontophoenix cunninghamiana*) contained in large pots. These potted palms are not subject to LRDP Final SEIR requirements as they can be removed and replaced as needed.

As shown on Figure 15, the proposed Project is expected to result in the removal of six mature trees on-site: one acacia, one weeping bottlebrush, three cajeput trees, and one date palm, none of which are considered a protected species. Pursuant to LRPD MM 4.3-1(c), these mature trees would be replaced at a 1:1 ratio. Therefore, a total of six replacement trees would be needed to mitigate the proposed Project's impact to trees. A summary of trees to be impacted and required replacement is provided in Table 9. Trees would be replaced within the Project site to the extent feasible. If it is not feasible to plant replacement trees within the project boundary, the Tree Replacement Plan required by LRDP MM 4.3-1(c) would include the planting of trees or native shrubs in ecologically appropriate areas on-site or within the campus boundaries in order to provide nesting, foraging or roosting habitat for birds such that the replacement number of trees and shrubs would result in a 1:1 replacement ratio.

TABLE 9
ANTICIPATED TREE REPLACEMENT SUMMARY

Species		Total in Survey Area	Within Work Limits	Tree Replacement Ratio[1]	Tree Replacement Requirement
Common Name	**Scientific name**				
Trees Within the Limit of Work					
acacia	*Acacia* sp.	1	1	1:1	1
weeping bottlebrush	*Callistemon viminalis*	1	1	1:1	1
cajeput tree	*Melaleuca quinquenervia*	3	3	1:1	3
date palm	*Phoenix* sp.	1	1	1:1	1
Trees Located Off-site[2]					
Nichol's willowleafed peppermint	*Eucalyptus nicholii*	2	0	N/A	N/A
river red gum	*Eucalyptus camaldulensis*	2	0	N/A	N/A
	Total	**10**	**6**		**6**

[1] LRDP MM 4.3-1(c) does not require in-kind tree replacement. All trees subject to this requirement shall be mitigated at a 1:1 ratio.
[2] These trees would be protected in place.

The remaining four mature trees, which are adjacent to the Project site, would be protected in place during Project construction, including: two Nichol's willowleafed peppermint, which are located along Gayley Avenue in the public right-of-way; and two river red gums located to the east of the Project site (refer to Figure 15). Although these trees would be protected in place, due to their location adjacent to the construction limits they may be impacted during construction of the proposed Project through impacts to the root zone. To ensure that these are not significantly impacted, the proposed Project incorporates LRDP PP 4.3-1(a) (fencing at the drip line); PP 4.3-1(b) (examination and trimming of trees prior to construction); PP 4.3-1(c) (temporary irrigation and feeding); PP 4.3-1(d) (no storing or construction equipment or vehicles in the fence line of any tree); and PP 4.3-1(e) (monthly examination of trees). Should these trees be impacted during or after construction, replacement requirements under LRDP MM 4.3-1(c) would apply.

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

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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.

Additional Project-Level Mitigation Measures

No additional 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 excavation to a depth of up to 42 feet bgs that would extend into native sediment, and development of a new residential building in the vicinity of historic resources.

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

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

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

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

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

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

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

Project Impact Analysis

Threshold(s)	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

Records Search

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

Regulatory Framework

Section 4.4, Cultural and Tribal Cultural Resources, of the LRDP Final SEIR, which is incorporated by reference, and the UCLA Gayley Towers Historic Resources Due Diligence Report (Historic Resources Report) prepared by Page & Turnbull for the proposed Project (Page & Turnbull, 2023) and included in Appendix C of this IS, include a detailed discussion of the regulatory framework for cultural and historic resources, including categories of historic resources, as outlined in Section 15064.5(a) of the CEQA Guidelines, and the thresholds for significant impacts to historic resources as outlined in Section 15064.5(b) of the CEQA Guidelines. In summary, Section 15064.5(a)(2) identifies that "A resource included in a local register of historical resources…shall be presumed to be historically or culturally significant."

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

> (1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
>
> (2) The significance of an historical resource is materially impaired when a project:

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

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

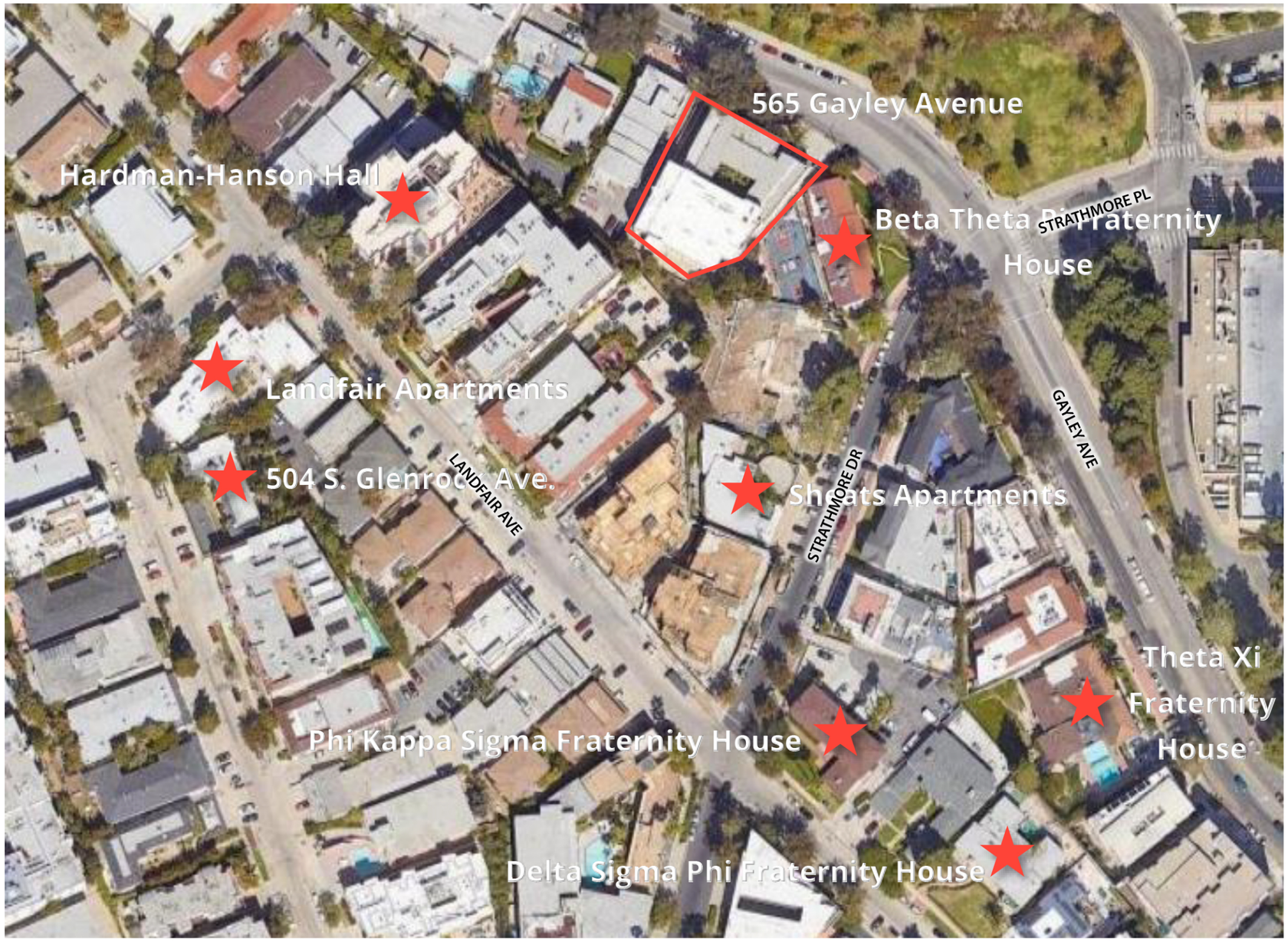
(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

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

Known Historic Resources in the Project Vicinity

Eight known historic resources are located in the immediate vicinity of the proposed Project, as indicated in Figure 16 and Table 10. Two are designated City of Los Angeles Historic Cultural Monuments (HCMs), and six are eligible historic resources recognized by the City of Los Angeles through SurveyLA and other survey efforts (Page & Turnbull, 2023).[18] Brief descriptions and photographs of each property are provided in the Historic Resources Report included in Appendix C of this IS.

[18] SurveyLA is a Citywide historic resources survey that serves as a planning tool for identifying, recording, and evaluating historic properties and districts in Los Angeles.



Source(s): Page & Turnball (06-01-2023)

Figure 16

Not to Scale

TABLE 10
HISTORIC RESOURCES IN THE PROJECT VICINITY

Designated Historic Resource) (Historic Cultural Monuments)	Eligible Historic Resources[a,b]
Sheats Apartments. 10919 W. Strathmore Drive (HCM-367)	Beta Theta Pi Fraternity House, 581 Gayley Avenue 3S, 3CS, 5S3
Landfair Apartments, 10944 W. Ophir Drive (HMC-320)	Hardman-Hanson Hall, 500 S. Landfair Avenue 3CS, 5S3
	Phi Kappa Sigma Fraternity House, 10938 W. Strathmore Drive 3S, 3CS, 5S3
	504 S. Glenrock Avenue 3S, 3CS, 5S3
	Delta Sigma Phi Fraternity House, 620 S. Landfair Ave. 3S, 3CS, 5S3
	Theta Xi Fraternity House, 629 S. Gayley Avenue 3S, 3CS, 5S3

[a] Most of the eligible resources were identified by SurveyLA, which assigned California Historical Resource Status Codes to the surveyed properties. As defined by the California Office of Historic Preservation (OHP), they mean:

- 5S3 - Appears to be individually eligible for local listing or designation survey evaluation.
- 3CS: Appears eligible for California Register of Historical Resources (CR) as an individual property through survey evaluation.
- 3S: Appears eligible for National Register of Historic Places (NR) as an individual property though survey evaluation.

[b] The University Lutheran Chapel at 10915 W. Strathmore Drive was located to the southeast of the proposed Project site on the west side of W. Strathmore Drive. Built in 1965 and designed by the architecture firm of Wilkes, Steinbreuck, and McKinney, the building was found eligible as a historic resource by SurveyLA but was demolished in 2019.

Source: (Page & Turnbull, 2023)

Direct Impacts

The existing building on-site (565 Gayley Avenue) was completed in 1981 and is less than 50 years old (42 years old). A discussion of the physical characteristics of the existing building, site history, ownership history, and architects and builders is provided in the Historic Resources Report included in Appendix C of this IS.

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). However, both registers allow for exceptions. For the National Register, Criterion Consideration G states that properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register unless it can be demonstrated that they are of exceptional importance. According to National Register Bulletin 15, the phrase exceptional importance "may be applied to the extraordinary importance of an event or to an entire category of resources so fragile that survivors of any age are unusual." In order for a property to be evaluated under this Criteria Consideration there must be sufficient historical perspective to determine that the property is exceptionally important. In addition, the property must be compared with other related properties to determine if the property qualifies as exceptionally important.

For the California Register, guidance is provided by the California Office of Historic Preservation in Technical Bulletin 6: "In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance."

Preliminary research presented in the Historic Resources Report did not reveal any significant events or individuals associated with the existing building on-site, nor did it indicate that the building possesses a significant architectural design that would raise the property to the level of "exceptional importance." Therefore, the existing building on-site does not appear to be eligible for listing on the National Register or California Register and is not a historic resource for the purposes of CEQA. Therefore, there would be no direct impacts to historic resources as a result of removing the building as part of the proposed Project. (Page & Turnbull, 2023)

Indirect Impacts

Based on the CEQA Guidelines noted above, a proposed project can have a significant adverse impact if it changes the immediate surroundings of a historic resource so that the significance of the resource is "materially impaired." A historic resource's significance is materially impaired when it can no longer convey its significance that justifies its eligibility as a historic resource; in other words, when it has lost its integrity. Integrity is the ability of a resource to convey its historic significance, and is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance."

The National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation identifies seven aspects or qualities that in various combinations define integrity. These seven aspects are generally defined as follows:

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

As the proposed Project is in the conceptual design phase, the building materials, fenestration, and articulation details have not yet been fully developed. However, the new building would be approximately 112,000 square feet in size and eight stories tall. Given this scale, the proposed Project has the potential to alter the setting of the surrounding area and thus could indirectly impact historic resources in the vicinity. The setting surrounding the eight existing designated or eligible historic resources near the Project site is relatively consistent from block to block with minimal differences between Gayley Avenue, W. Strathmore Drive, and S. Landfair Avenue. The blocks of the Westwood neighborhood on the southwest side of Gayley Avenue are generally characterized by low- and mid-rise apartment buildings and fraternity houses between three and six stories tall, with older buildings typically consisting of two stories over a raised garage or parking area and built on sloping topography that often makes the buildings appear visually taller than they are. Examples include several of the designated or eligible historic resources in the

area, including the Beta Theta Pi Fraternity House, Phi Kappa Sigma Fraternity House, Delta Sigma Phi Fraternity House, Theta Zi Fraternity House, Sheats Apartments, Landfair Apartments, and 504 S. Glenrock Avenue apartments. However, there are some exceptions, and some of the tallest buildings in the area are also designated or eligible resources, including the nine-story Hardman-Hanson Hall at 500 S. Landfair Avenue. The UCLA campus on the northeast side of Gayley Avenue features taller mid-rise student apartment towers and UCLA Medical Center buildings between roughly three and 10 stories tall.

The buildings in the immediate vicinity of the Project site were also constructed over a long period of time and exhibit a range of architectural styles, including Period Revival, Mid-Century Modern, and contemporary styles, giving the neighborhood an eclectic and heterogenous appearance.

The closest historic resource to the Project site with the highest potential to be impacted by the proposed Project is the two- to three-story Beta Theta Pi Fraternity House, located directly to the southeast. The existing building at the Project site is six stories tall, significantly taller than the Beta Theta Pi building but within the overall range of existing building heights in the area. The University Lutheran Chapel, a historic resource built in 1965 on the opposite side of the Beta Theta Pi building, which was demolished in 2019, was also taller at approximately five stories on top of a high plinth. A new multi-family building is currently under construction at that site and will have seven stories when complete.[19] Although the proposed Project's eight-story building would be somewhat taller than the existing building on the property and the former University Lutheran Church, it would not significantly alter the immediate existing setting of the Beta Theta Pi building, which has been surrounded by taller buildings for many decades. Furthermore, the proposed building height would be consistent with other existing buildings on the block, including the new apartments under construction adjacent to the Beta Theta Pi Fraternity House.

The next closest historic resource is the Sheats Apartments building, located around the corner from the Project site at 10919 W. Strathmore Drive. The building is two stories tall over a raised garage, similar in scale to the Beta Theta Pi Fraternity House. The building is located on a sloping site on W. Strathmore Drive that is at a higher grade than the Project site, thus reducing the visual impact of the proposed new eight-story building. Based on distance and the lower elevation of the project site, the proposed new building at the Project site would not have a significant impact on the setting of the Sheats Apartments building.

The only other historic resource on the same block as the Project site is Hardman-Hanson Hall at 500 S. Landfair Avenue. It is one of the tallest buildings in the vicinity at nine stories tall and is located on a high sloped site overlooking the buildings along Gayley Avenue. In addition to its height, the building stands out as a rare example of Brutalist architecture in the area and reflects the eclectic mix of architectural styles in the neighborhood. The proposed new eight-story building would be constructed at a lower grade than Hardman-Hanson Hall, such that it would have a lower roofline and would not compete visually with the historic resource.

While the proposed Project would somewhat alter the setting near the intersection of Gayley Avenue and W. Strathmore Drive, the presence of several seven- to nine-story buildings and sufficient distance from other nearby historic resources in the neighborhood would ensure that its eight-story height would not significantly affect the setting of the identified historic resources on S. Landfair Avenue, S. Glenrock Avenue, or south of W. Strathmore Drive. The siting of the proposed Project at the bottom of a sloping site would further lessen its potential visual impact on historic resources located at higher grades on hillsides to the south and west. Two- to four-story apartment buildings of a variety of ages and architectural styles would continue to dominate the

[19] City of Los Angeles Planning Commission Letter of Determination, Case No. CPC-2020-6504-CU-DB-DRB-SPP-VHCA and CEQA Case No. ENV-2020-6505-CE, 10915 West Strathmore Drive, December 7, 2021.

surrounding area. The contemporary design of the new building would also be consistent with and maintain this existing architecturally varied setting. As such, the proposed Project would not have any significant indirect impacts on historic resources in the vicinity, and no mitigation is required.

Additional 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 potential to cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

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

Discussion

Based on a records search conducted by the SCCIC for the UCLA campus on February 23, 2016, there are no historic or prehistoric archaeological sites recorded on or within 0.25 mile of the campus, including the Project site.

Based on review of the Geotechnical Investigation for the proposed Project and as further discussed in Section V.7, Geology and Soils, of this IS, exploratory borings indicate the Project area is underlain by fill materials up to four feet in depth; the fill is underlain by Pleistocene age older alluvial fan deposits (Geocon, 2023). Excavations of up to 42 feet bgs would be required for construction of the proposed Project. Therefore, disturbance of native alluvial sediments would occur during grading and excavation activities and would have the potential to impact previously unidentified archaeological resources. This would be considered a potentially significant impact. The proposed Project therefore incorporates LRDP MM 4.4 2(a), which requires an instructional program to assist construction personnel in identifying archaeological resources; MM 4.4-2(b), which describes procedures to be followed in the event that cultural resources are discovered; and MM 4.4-2(c), which requires that projects that would occur on a site with native sediments/soils have a qualified Archaeological Monitor present during earth-disturbing activities and that additional provisions be made for any project where archaeological resources are identified. With incorporation of these mitigation measures, the proposed Project would result in a less than significant impact.

Additional 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 potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines.

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

Discussion

As discussed under Threshold b, an archaeological records search conducted for the UCLA campus and surrounding areas, including the Project site, did not yield evidence of known archaeological resources, including human burials. However, because the proposed Project would involve excavation into native alluvial soils, the potential exists for previously unidentified human burials to be present and for excavation during construction activities to disturb these resources, although the likelihood of such a discovery is extremely low.

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment set forth in Section 5097 of the California Public Resources Code. Disturbing human remains could violate the health code, destroy the resource, and would be considered a significant impact. LRDP PP 4.4-5 identifies procedures for UCLA to follow in the event that human remains are discovered, 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.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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 for demolition, site excavation and grading followed by building construction. The proposed Project consists of replacement of the existing 57,075 gsf apartment building, which provides 51 units (100 beds) with a new approximately 112,000-sf residential structure, which would provide up to 187 rooms (545 beds). Operation of the proposed Project would require the direct use of electrical energy for heating and air conditioning (HVAC), lighting, and typical household appliances. No natural gas service would be provided to the building for operation of the proposed Project. As described in Section II.5, Proposed Project Components, under the discussion of “Sustainable Building Features” and discussed below, the Project would comply with the UC Policy on Sustainable Practices, and the Project would achieve a minimum LEED BD+C Gold rating.

The following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section: LRDP 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), 4.14-3, and 4.14-9 included in Section V.19, Utilities and Service Systems, of this IS have been incorporated into the proposed Project, as applicable, and require that the campus 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. LRDP PPs and MMs adopted for the purpose of reducing construction phase air pollutant or greenhouse gas (GHG) emissions also result in positive energy use benefits. Notably, LRDP MM 4.2-2(a) limits the idle time on equipment and delivery trucks, which would reduce energy consumption; MM 4.2-2(b) addresses the use of alternative fuel construction equipment; MM 4.2-2(c) requires that diesel construction equipment be rated as Tier III or better,[20] 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 Project would result in single event consumption of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, which promote equipment fuel efficiencies. CCR Title 13, 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).

[20] However, the Project is committed to using Tier IV construction equipment with the exception of any drill rig, thus further improving performance.

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

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

Operations

The proposed Project would include direct use of electricity for the HVAC system, lighting, and appliances; indirect energy use for the processing and distribution of water and wastewater; and fossil-fueled and electric-powered vehicles used by residents. There are no aspects of the proposed Project that would contribute to wasteful, inefficient, or unnecessary energy consumption. Conversely, the proposed Project would involve the redevelopment of the Project site at a higher density, making use of existing infrastructure and improving energy efficiency. Specifically, the existing building on-site was constructed in 1981 and thus does not meet current energy conservation requirements, nor the more stringent energy conservation requirements of the UC Policy on Sustainable Practices. The proposed new building would achieve a minimum LEED BD+C Gold rating. To achieve this 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:

- Providing high-density redevelopment on a site that is connected to existing community services, public and alternative transportation, and other urban infrastructure;
- Encouraging alternative transportation by limiting parking capacity and providing bicycle racks;
- Outperforming CBC Title 24 energy efficiency requirements, that are in effect at the time of building design, by 20 percent;
- Providing an all-electric (no use of natural gas) building;
- Incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands;
- Selecting water fixtures (e.g., taps, toilets, shower heads, and other fixtures) to achieve a 36 percent reduction in per capita water demand (compared to the Fiscal Year 2005-2008 average baseline) and increased water efficiency; and
- 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.

Relative to vehicular energy use, as described in Section V.17, Transportation, of this IS, a VMT Assessment was performed for the proposed Project. For residential uses, the VMT analysis generates a VMT per capita value, which is the VMT produced by the residential component of a development project divided by the number of residents within the development. The VMT analysis conservatively determined that a standard multi-family housing project with 187 dwelling units located at the Project site would generate a daily household VMT per capita of 5.5. Because of the proposed Project characteristics (e.g., dense student housing adjacent to campus and no

vehicular parking provided on-site), the actual VMT per capita for the proposed Project would be expected to be less. The Project is located within the West Los Angeles Area Planning Commission area, where the VMT impact threshold criterion is 7.4 daily household VMT per capita. The proposed Project's estimated daily household VMT per capita of 5.5 is less than the threshold, resulting in a less than significant VMT impact. Further, the Project would function as a local-serving use by providing off-campus student housing located directly across the street from the UCLA campus, the optimal location for siting such housing and reducing the need for automobile-related travel by Project residents. In addition, the Project site is located in a transit-rich area that qualifies as a Transit Priority Area (TPA). Pursuant to LRDP PP 4.13-1(d) (discussed in Section V.17, Transportation, of this IS), which is incorporated into the proposed Project, Project residents would have access to a full range of existing campus TDM programs, including, but not limited to: campus transit; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; on-campus car share program; zip cars; public transit incentives; and use of UCLA's Commuter's Guide.

In summary, the proposed Project would conserve energy through the provision of highly efficient building and mechanical systems designed to reduce direct and indirect electricity use; a prohibition on the use of natural gas; and a location adjacent to campus and Westwood, resulting in reduced vehicle energy use. Thus, the Project's operational energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, thus resulting in a less than significant impact.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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 or operation.

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

Discussion

Regulatory Framework

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. 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 addressed in the LRDP Final SEIR relative to energy include the following (updated, as appropriate):

- **Executive Order B-30-15.** On April 29, 2015, Governor Edmund Brown signed EO B-30-15, which orders "A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established

in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050.". Three of the five key goals for reducing GHG emissions through 2030 relate to energy: (1) increasing renewable electricity to 50 percent; (2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; and (3) reducing petroleum use in cars and trucks by up to 50 percent.

- **Senate Bill 350.** SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of EO B-30-15. The objectives of SB 350 are:

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

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

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

- **Senate Bill 100.** In September 2018, the Governor signed into law the California Clean Energy Act (SB 100), which accelerated the State Renewables Portfolio Standard (RPS)[21] to 60 percent by 2030. The bill also requires that 100 percent of all retail sales of electricity come from eligible renewable energy and zero-carbon resources by 2045.

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

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

[21] 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.

- **UC Policy on Sustainable Practices.** In June 2004, the UC developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the University as a leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, it has been revised several times (with the most recent version becoming effective in March 2022). Notably, the UC Policy on Sustainable Practices covers the areas of green building design, clean energy, and sustainable transportation. Particularly relevant to the proposed Project, the UC Policy on Sustainable Practices, under the category of Green Building Design, requires that major construction projects meet a minimum rating of LEED Silver, outperform Title 24 Energy Efficiency Standards by 20 percent, and register with the Savings By Design program in order to document compliance with the requirement to outperform energy efficiency standards by at least 20 percent (UC, 2022).

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

Consistency Analysis

Similar to existing conditions at the Project site, the proposed Project would receive electricity from the Los Angeles Department of Water and Power (LADWP). LADWP was among the first electric utilities to achieve the first major state-legislated target of 20 percent renewables by 2010. In 2019, LADWP achieved a 34 percent renewable portfolio (LADWP, 2023), surpassing the state-legislated requirement of 33 percent by 2020. LADWP's Draft 2022 Power Strategic Long-Term Resource Plan establishes an accelerated goal for all of the city's electricity to come from zero-carbon energy by 2035, exceeding the requirements of SB 100. Thus, the Project is consistent with the renewable energy elements of EO B-30-15, SB 350, and SB 100.

As discussed in Section II.5, Proposed Project Components, and further discussed in Section V.8, Greenhouse Gas Emissions, of this IS, the proposed Project would meet the requirements and intent of the UC Policy on Sustainable Practices and the UCLA Sustainability Plan as it pertains to energy efficiency, green building, design, and sustainable transportation. The proposed Project, which would replace an existing residential building that does not meet current UC or state energy conservation requirements, would achieve a minimum LEED BD+C Gold rating, and would outperform the required provisions of Title 24 Energy Efficiency Standards by at least 20 percent. The proposed Project would also be registered with the applicable Savings by Design energy efficiency program and the required documentation for participation in the program would be completed. Further, the proposed Project would comply with CALGreen Code Mandatory Measures. Notable features of the proposed Project to address improving energy efficiency are described in the response to Threshold (a) above. Therefore, the proposed Project would be implemented in compliance with the UC Policy on Sustainable Practices, the UCLA Sustainability Plan, 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.

Additional Project-Level Mitigation Measures

None 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

Relevant elements of the proposed Project related to geology and soils include proposed excavation (up to 42 feet bgs) during earth-moving activities; construction of a new residential structure up to eight stories in height with a partial basement level for mechanical equipment; and installation of landscape and utility improvements.

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

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

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

PP 4.5-1(c) *The campus 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.*[22]

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.*

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

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

MM 4.4-3(b) *A qualified Paleontologist shall first determine whether a paleontological resource uncovered during construction meets the definition of a "unique archaeological resource" under Public Resources Code, Section 21083.2(g) or a "historical resource" under Section 15064.5 of the CEQA Guidelines. If the paleontological resource is determined to be a "unique archaeological resource" or a "historical resource", the Paleontologist shall formulate a Mitigation Plan in consultation with the campus that satisfies the requirements of Section 21083.2 of the CEQA Statutes.*

If the Paleontologist determines that the paleontological resource is not a unique resource, s/he may record the site and submit the recordation form to the Natural History Museum of Los Angeles County.

The Paleontologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the University and to the Natural History Museum of Los Angeles County.

In addition, LRDP PP 4.7-1 and MM 4.7-1 presented in Section V.10, Hydrology and Water Quality, of this IS, 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 modifications adopted by state agencies and local governing bodies. The version of the California Building Code (CBC) that will be applicable to the proposed Project is the 2022 edition, which became effective in January 2023 and supersedes the 2016 CBC discussed in the LRDP Final SEIR.

Consistent with LRDP PP 4.5-1(a), a site-specific geotechnical study (Geotechnical Investigation) was prepared for the Project by Geocon West, Inc. (Geocon, 2023). The Geotechnical Investigation involved the excavation of several 4-inch diameter borings (B1 through B3) excavated to depths between 17.5 and 20.5 feet bgs, and an 8-inch diameter boring (B4) excavated to a depth of 40.5 feet bgs. Laboratory testing of representative soil samples collected from the borings; a review of public geologic data and available geotechnical engineering information; and a geotechnical engineering analysis of the proposed Project based on the collected data was conducted. The results of the Geotechnical Investigation are summarized in the analysis below, as applicable.

Project Impact Analysis

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

Discussion

Based on review of available literature and performance of site reconnaissance, there are no known active or potentially active faults with the potential for surface rupture traversing the Project site. The Project site is not within an Alquist-Priolo Earthquake Fault Zone, as established by the California Geological Survey (CGS), or a City-designated Preliminary Fault Rupture Study Area. Therefore, the potential for surface rupture due to faulting occurring beneath the Project site during the design life of the proposed Project is considered low. There would be no impact related to surface rupture of a known earthquake fault.

Other seismic-related hazards investigated include liquefaction and slope stability (i.e., landslides). Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction. The Project site is not identified as susceptible to liquefaction on the CGS' Seismic Hazards Zone Map for the Beverly Hills Quadrangle. In addition, the site is not identified as having a potential for liquefaction in the County of Los Angeles Safety Element. The soils encountered at the site are Pleistocene age older alluvial fan deposits, which are typically dense and not prone to liquefaction. Based on these considerations, the potential for liquefaction and associated ground deformations (e.g., lateral spreading) at the site is considered very low. Additionally, since the Project site is underlain by Pleistocene age alluvial fan deposits, which are typically dense, the potential for appreciable seismically-induced settlements is very low. The proposed Project would not directly or indirectly cause potential substantial adverse effects related to seismically-induced liquefaction or settlement.

Regarding landslides, the topography at the site slopes to the northeast (from the rear of the Project site to Gayley Avenue) and is not considered susceptible to slope stability hazards. The Project site is within a City of Los Angeles Hillside Grading Area but is not within a City-designated

Hillside Ordinance Area. Additionally, the Project site is not within an area identified as having a potential for seismic slope instability (i.e., earthquake-induced landslides). Moreover, there are no known landslides near the Project site nor is the Project site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the proposed Project is considered low. The proposed Project would not directly or indirectly cause potential substantial adverse effects related to landslides.

Additional Project-Level Mitigation Measures

No additional 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, and 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 surface trace of an active fault to the Project site is the Santa Monica Fault Zone located approximately 1.4 mile to the south. Other nearby active faults are the Hollywood Fault, Newport-Inglewood Fault Zone and the Malibu Coast Fault located 3.3 miles east, 3.8 miles east-southeast, and 11.9 miles west of the Project site, respectively. The active San Andreas Fault Zone is located approximately 39 miles northeast of the Project site. Several buried thrust faults, commonly referred to as blind thrusts, underlie the Southern California area at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers (approximately 1.8 miles). These thrust faults and others in the Los Angeles area are not exposed at the surface and do not present a potential surface fault rupture hazard at the Project site; however, these thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the site.

The Project site is classified as Site Class D, corresponding to a “Stiff Soil” Profile. This classification is used as the basis for seismic design parameters to be implemented for the proposed Project in accordance with 2022 CBC standards, which are currently in effect. Another measure of seismic activity calculated in the Geotechnical Investigation is the Maximum Considered Earthquake Ground Motion (MCE), which is the level of ground motion (i.e., Peak Ground Acceleration [PGA]) that has a 2 percent chance of exceedance in 50 years. The Design Earthquake Ground Motion (DE) is the level of ground motion that has a 10 percent chance of exceedance in 50 years. The MCE is utilized for the evaluation of liquefaction, lateral spreading, and seismic settlement; and to develop seismic design criteria to maintain “Life Safety” during an

MCE event. For the Project site, the Geotechnical Investigation calculated a PGA of 0.949g (i.e., approximately 95 percent the force of gravity) for the MCE.

Potential impacts related to strong seismic ground shaking would be less than significant with implementation of: (1) recommendations from the Project-specific geotechnical investigation as required by LRDP PP 4.5-1(a); (2) compliance with the current CBC (required by PP 4.5-1[a]); (3) incorporation of LRDP PP 4.5-1(c), which requires compliance with the current University Policy on Seismic Safety; and (4) incorporation of LRDP PP 4.5-1(d), which requires structural peer review and incorporation of peer review recommendations into project design.[23] Although there would be less than significant impacts with incorporation of identified LRDP PPs, additional Project-level MM Gayley GEO-1, detailed below, is proposed to ensure that potential impacts resulting from implementation of the proposed Project remain less than significant.

In summary, the primary geologic hazard on the Project site is moderate to strong ground shaking as a result of an earthquake. Neither soil nor geologic conditions were encountered during the Geotechnical Investigation that would preclude the construction of the proposed Project provided the recommendations presented therein (and required by MM Gayley GEO-1) are followed and implemented during design and construction. As discussed above, there would be no impact related to liquefaction or landslides, and there would be less than significant impacts related to strong seismic ground shaking with incorporation of LRDP PPs 4.5-1(a), 4.5-1(c), and 4.5-1(d). MM Gayley GEO-1 would be required to ensure that recommendations from the site-specific Geotechnical Investigation are included in the Project design.

Additional Project-Level Mitigation Measures

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

MM Gayley GEO-1 *Prior to building permit issuance for the Gayley Towers Redevelopment Project, a qualified Engineer shall review the final designs and contract specifications to verify that all geotechnical recommendations provided in the site-specific geotechnical investigation(s) for the Project site have been fully and appropriately incorporated. Such recommendations shall comply with applicable provisions and standards set forth in or established by CGS Special Publication 117, the current Uniform Building Code, relevant state and code requirements, and current standards of practice designed to minimize potential geologic, geotechnical, and related impacts. The recommendations for the Project site shall include, but not be limited to, the following geotechnical engineering topics:*

- *General Requirements*
- *Soil and Excavation Characteristics*
- *Minimum Resistivity, pH, and Water-Soluble Sulfate*
- *Conventional Foundation Design*
- *Foundation Settlement*

[23] 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.

- *Lateral Design*
- *Miscellaneous Foundations*
- *Concrete Slab-on-Grade*
- *Preliminary Pavement Recommendations*
- *Retaining Wall Design*
- *Dynamic (Seismic) Lateral Forces*
- *Retaining Wall Drainage*
- *Elevator Pit Design*
- *Elevator Piston*
- *Temporary Excavations*
- *Shoring (Soldier Pile Design and Installation)*
- *Temporary Tie-Back Anchors*
- *Anchor Installation*
- *Anchor Testing*
- *Internal Bracing*
- *Surcharge from Adjacent Structures and Improvements*
- *Stormwater Infiltration*
- *Surface Drainage*
- *Plan Review*

Level of Significance after Mitigation

With implementation of all applicable mitigation, there would be a less than significant impact related to seismic ground shaking.

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

Discussion

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

Earth-disturbance associated with construction of the proposed Project would include the removal of existing site improvements and vegetation and excavations to a depth of 42 feet bgs for the building foundations. During construction activities, soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. Erosion can occur due to, and can be accelerated by, site preparation activities associated with development. Vegetation

removal in landscaped (pervious) areas could reduce soil cohesion and reduce the protection from wind, water, and surface disturbance, which could render exposed soils more susceptible to erosive forces. Additionally, during a storm event, soil erosion could occur at an accelerated rate.

Construction activities would comply with all provisions of the CBC related to excavation activities, grading activities, erosion control, and construction of foundations and retaining walls to minimize or eliminate soil erosion or loss of topsoil. In addition, the 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 IS 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. As shown on Figure 12, temporary erosion control BMPs implemented during construction would include, but would not be limited to: stabilization of the construction entrance and installation of a silt fence along the northern perimeter of the Project site. 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 potential erosion impacts remain less than significant during construction.

In the long term, under Project conditions, the proposed Project would slightly increase the landscaped (pervious) area on-site from approximately 10 percent to approximately 14 percent. Soil transported off site (by wind or water erosion) would be reduced by the presence of development and landscaping. Areas of exposed soils would be minimal following construction of the proposed Project, and potential erosion impacts would be less than significant during operation.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

The Project site is underlain by artificial fill materials (to a maximum depth of 4 feet bgs) and Pleistocene age older alluvial fan deposits. The artificial fill is characterized as being olive brown to brown sandy clay, sandy silt, and silty sand with varying amounts of gravel (up to 1-inch diameter) and is likely associated with past grading and construction activities at the Project site. The artificial fill is characterized as slightly moist and firm or medium dense. The Pleistocene-age older sediments underlying the artificial fill was generally olive brown to reddish brown, brown, or yellowish-brown interbedded sand and silt with lenses of gravel (up to 2-inch diameter) and lesser interbeds of clay. The older alluvium is characterized as slightly moist and firm to very hard or medium dense to very dense.

Review of the CGS Seismic Hazard Zone Report of the Beverly Hills Quadrangle indicates the historically highest groundwater level in the Project area is approximately 40 feet bgs. Based on current groundwater basin management practices, the Geotechnical Investigation concludes it is unlikely that groundwater levels would ever exceed the historic high levels. Groundwater was encountered at boring B4 at a depth of 38.5 feet below the grade of Gayley Avenue along the northern Project site boundary. Considering the depth to groundwater encountered in the boring, and the reported historic high groundwater level, groundwater is not anticipated to be encountered during construction. However, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for storm water infiltration could result in shallower seepage conditions in the immediate site vicinity.

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

Laboratory testing indicates the on-site soils are considered moderately corrosive to ferrous metals on site. The Geotechnical Investigation recommends use of corrosion-resistant ABS (acrylonitrile butadiene styrene), or equivalent, in lieu of cast-iron for subdrains and retaining wall drains beneath the structure. The Portland cement portion of concrete is subject to corrosion when exposed to water-soluble sulfates. The Geotechnical Investigation determined that the water-soluble sulfate content of the soils at the Project site possess a sulfate exposure class of “S0” (0.004 percent by weight) to concrete structures. There would be a less than significant impact related to corrosive soils with implementation of MM Gayley GEO-1, which ensures that recommendations from the Geotechnical Investigation are included in the Project design.

The Geotechnical Investigation determined that the on-site geologic materials have very low expansion potential, and are classified as non-expansive. The recommendations presented in the Geotechnical Investigation assume that the building foundations and slabs would derive support in these materials. Specifically, the Geotechnical Investigation recommends the structure be supported on conventional spread foundations deriving support in the competent older alluvium. If needed, the existing artificial fill and site soils are considered suitable for re-use as engineered fill provided all procedures outlines in the grading recommendations of the Geotechnical Investigation are followed. These recommendations would be implemented through MM Gayley GEO-1.

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

Additional Project-Level Mitigation Measures

MM Gayley GEO-1 provided above would be implemented; no additional mitigation measures are required.

Level of Significance

With implementation of MM Gayley GEO-1, the proposed Project would result in less than significant impacts related to unstable geologic units or soils and expansive soils.

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

Discussion

The City of Los Angeles Bureau of Sanitation provides sewer service to the Project site, and existing wastewater infrastructure serves the Project site. New sewer lines installed to serve the proposed Project would connect to the existing City of Los Angeles wastewater facilities. Because no septic tanks or alternative wastewater systems are proposed, there would be no impact related to the presence of soils incapable of adequately supporting these systems.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

As discussed in Section 4.4, Cultural and Tribal Cultural Resources, of the LRDP Final SEIR, which is incorporated by reference, paleontological resources include fossil remains, fossil localities, and formations that have produced fossil material in other nearby areas. Paleontological resources are limited, nonrenewable, sensitive, scientific, and educational resources protected by state and federal environmental laws and regulations. As discussed, rock units identical to those underlying the UCLA campus and surrounding areas have, in nearby contexts, yielded fossils of substantial number and importance, and the potential exists for the rock units underlying the campus and surrounding areas to yield fossils. Accordingly, the rock units underlying the campus and immediate surrounding area, including the Project site, are considered paleontologically sensitive. No unique geologic features are known to exist on the Project site.

As discussed above, the Project site is underlain by artificial fill materials to a maximum depth of 4 feet bgs, and Pleistocene age older alluvial fan deposits. Excavations of up to approximately 42 feet bgs would be required during construction of the proposed Project and would extend into the native alluvial sediments. As such, excavation activities in native alluvium could damage or destroy unknown fossils, should they exist, resulting in a potentially significant impact. The proposed Project would incorporate LRDP MM 4.4-3(a), which requires an instructional program to assist construction personnel in identifying paleontological resources, and LRDP MM 4.4-3(b), which defines the requirements for review and recordation by a qualified Paleontologist of any paleontological resources encountered on a site. With implementation of LRDP MM 4.4-3(a) and MM 4.4-3(b), potential impacts related to paleontological resources would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

8. GREENHOUSE GAS EMISSIONS

Relevant elements of the proposed Project related to GHG emissions include the demolition of the existing 57,075 gsf apartment building, which provides 51 units (100 beds); excavation and removal/export of an estimated 10,375 cy of soil; and construction and operation of a new approximately 112,000-sf residential structure, which would provide up to 187 rooms (545 beds). The primary contributors of operational GHG emissions would be mobile emissions and energy consumption related to Project operations. As previously indicated, the proposed Project would achieve a minimum LEED BD+C Gold rating.

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

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

In addition, LRDP PPs 4.14-2(a), 4.14-2(b), 4.14-2(c), 4.14-2(d), 4.14-2(g), 4.14-3, and 4.14-9 included in Section V.19, Utilities and Service Systems, of this IS have been incorporated into the proposed Project, 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

Description of Global Climate Change

Increasing GHG emissions have led to an anthropogenic warming trend of the Earth's average temperature, which is causing changes in the Earth's climate.[24] GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activities; and (4) solid waste decomposition. This increasing temperature phenomenon is known as "global warming," and the climatic effect is known as "climate change" or "global climate change."

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

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

> Human influence on the climate system is clear. This is evident from the increasing greenhouse gas concentrations in the atmosphere, positive radiative forcing, observed warming, and understanding of the climate system. Human influence has been detected in warming of the atmosphere and the ocean, in changes in the global water cycle, in reductions in snow and ice, in global mean sea level rise, and in changes in some climate extremes. It is *extremely likely*[25] that human influence has been the dominant cause of the observed warming since the mid-20th century.

Greenhouse Gases

GHGs are comprised of atmospheric gases and clouds in the atmosphere that influence the Earth's temperature by absorbing most of the infrared radiation that rises from the sun-warmed surface and that would otherwise escape into space. This process is commonly known as the "Greenhouse Effect." GHGs are emitted by natural processes and human activities. The Earth's

[24] 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.

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

surface temperature averages about 58°F because of the Greenhouse Effect. Without it, the Earth's average surface temperature would be somewhere around an uninhabitable 0°F. The resulting balance between incoming solar radiation and outgoing radiation from both the Earth's surface and the atmosphere maintains the planet's habitability.

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

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

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

Regulatory Framework

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

Federal

- **SAFE Vehicles Rule and CAFE Standards.** The USEPA and the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) have issued rules to reduce GHG emissions and to improve fuel economy for new cars and trucks sold in the United States. On April 2, 2018, the USEPA signed the Mid-term Evaluation Final Determination, which declared that the model year (MY) 2022-2025 GHG standards are not appropriate and should be revised (Federal Register, 2018). This Final Determination serves to initiate a notice to further consider appropriate standards for MY 2022-2025 light-duty vehicles. On August 2, 2018, the NHTSA in conjunction with the USEPA, released a notice of proposed rulemaking, the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend existing Corporate Average Fuel Economy (CAFE) and tailpipe CO_2 standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and USEPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO_2 emissions standards by 1.5 percent each year through model year 2026 (NHTSA,

2020). However, on March 14, 2022, the USEPA rescinded the SAFE Vehicles Rule, once again allowing California to enforce its own GHG emissions standards.

State

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

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

- **SB 375** provides for a new planning process to coordinate land use planning and regional transportation plans (RTPs) and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 requires Metropolitan Planning Organizations (MPOs), including SCAG, to incorporate a Sustainable Communities Strategy (SCS) in their RTPs that will achieve GHG emission reduction targets set by CARB. There are two mutually important facets to SB 375: reducing VMT and encouraging more compact, complete, and efficient communities for the future.

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

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

- **SB 32** implements a goal of EO B-30-15. Under SB 32, in "adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions," CARB must ensure that statewide greenhouse gas emissions are reduced to 40 percent below the 1990 level by 2030. SB 32's findings state that CARB will “achieve the state’s more stringent greenhouse gas emission reductions in a manner that benefits the state’s most disadvantaged communities and is transparent and accountable to the public and the Legislature.”

- **AB 197**, a companion to SB 32, adds two members to the CARB and requires measures to increase transparency about GHG emissions, climate policies, and GHG reduction actions.

- **The CARB Scoping Plan**, required by AB 32, proposes a comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health. In November 2017, CARB released the *Final 2017 Scoping Plan Update*, which identifies the state’s post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. The 2017

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

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

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

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

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

State CEQA Guidelines Regarding Greenhouse Gas Emissions

At the direction of the State Legislature in SB 97, the California Natural Resources Agency (CNRA) adopted amendments to the CEQA Guidelines that require evaluation of GHG emissions or the effects of GHG emissions. CEQA Guidelines Section 15064.4, Determining the Significance of Impacts from Greenhouse Gas Emissions, as revised most recently effective December 28, 2018, provides that:

> (a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
>
> (1) Quantify greenhouse gas emissions resulting from a project; and/or

(2) Rely on a qualitative analysis or performance-based standards.

(b) In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. A lead agency should consider the following factors, among others, when determining the significance of impacts from greenhouse gas emissions on the environment:

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

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

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b)). Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

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

California Code of Regulations Title 24

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

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings

that went in effect on August 1, 2009, and is administered by the California Building Standards Commission (CBSC). CALGreen improves public health, safety, and general welfare through enhanced design and sustainable construction of buildings while conserving natural resources. The California Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy. The 2022 CALGreen Code has also been approved by the CEC and CBSC and went into effect on January 1, 2023.

University of California Policy on Sustainable Practices

In June 2004, the University of California developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the University as a leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, the policy has been revised several times, most recently in March 2022, and has expanded to cover the areas of climate protection, sustainable transportation, sustainable building and laboratory operations for campuses, zero waste, sustainable procurement, sustainable food services, sustainable water systems, sustainability at UC Health, general sustainability performance assessment, and health and well-being (UC, 2022). The UC Policy on Sustainable Practices includes climate change goals for the ten UC campuses that, at a minimum, must meet AB 32 requirements.

Buy Clean California Act

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

UCLA Climate Action Plan

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

Regional

South Coast Air Quality Management District

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions. In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed

several different options that are contained in the SCAQMD *Draft Guidance Document – Interim CEQA GHG Significance 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 the lead agency in adopting its own threshold.

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

UCLA, acting on behalf of the Lead Agency, has elected to use the SCAQMD's Guidance Document screening criteria as thresholds of significance. As identified in the analysis presented in this section, the Project would not have GHG emissions greater than the Tier 3 screening values; therefore, Tier 4 methods are not applicable.

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

Existing Emissions

The Project site is developed with a University-owned residential apartment building, which has existing sources of GHG emissions. The estimated annual GHG emissions are summarized in Table 11 for the existing building (approximately 746.02 $MTCO_2e$/yr). Detailed model outputs are presented in Attachment B of the Air Quality and GHG Analysis included in Appendix A of this IS.

TABLE 11
EXISTING BUILDING ESTIMATED GREENHOUSE GAS EMISSIONS

Source	Emission (MT/year)				
	CO_2	CH_4	N_2O	R	Total CO_2e
Mobile	167.18	0.01	0.01	0.31	169.93
Area	11.84	0.00	0.00	0.00	11.85
Energy	79.30	0.01	0.00	0.00	79.62
Water	4.66	0.06	0.00	0.00	6.66
Waste	3.37	0.34	0.00	0.00	11.78
Refrigerants	0.00	0.00	0.00	0.07	0.07
Total CO_2e (All Sources)	**279.91**				

Source: (Urban Crossroads, 2023)

Project Impact Analysis

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

Discussion

Construction-related GHG emissions were calculated using CalEEMod version 2022.1, as described in Section V.3, Air Quality, of this IS. Construction assumptions are also described in Section V.3 and in the Air Quality and GHG Analysis included in Appendix A. Construction emissions would be associated with vehicle engine exhaust from construction equipment, soil haul truck trips, vendor trips, and worker commuting trips. The estimated construction emissions for the proposed Project would be approximately 1,286 MTCO2e/year. To estimate annual GHG emissions, the SCAQMD recommends amortizing construction emissions over a project's 30-year lifetime (SCAQMD, 2008b). Therefore, the 30-year amortized construction emissions would be approximately 46.64 $MTCO_2e$/year (Urban Crossroads, 2023).

Operational GHG emissions attributed to the proposed Project would include mobile sources, area sources, purchased electricity, the electricity embodied in water consumption, the energy associated with solid waste disposal, and the use of refrigerants. UCLA has committed to achieving a minimum LEED BD+C Gold rating for the proposed Project, with a goal to try to achieve a LEED BD+C Platinum rating. The proposed Project would also implement energy- and water-efficiency measures that would result in increased energy and water efficiency; these measures are described in LRDP PPs 4.14-2(a) through 4.14-2(d), PP 4.14-2(g), PP 4.14-3, and PP 4.14-9 in Section V.19, Utilities and Service Systems, and in Appendix A of this IS. Estimated operational GHG emissions for the proposed Project are shown in Table 12 and conservatively do not include emission reductions resulting from implementation of the energy- and water-efficiency measures. As shown in Table 12, the estimated annual operational GHG emissions for the proposed Project, when taking into consideration the GHG emissions from the existing building, are approximately 876.51 $MTCO_2e$/yr. The proposed Project's net (as well as gross) GHG emissions would be less than the SCAQMD-recommended Tier 3 thresholds of 3,500 $MTCO_2e$/yr for residential projects or 3,000 $MTCO_2e$/yr threshold for combined land uses. Thus, the direct and indirect GHG emissions of the proposed Project would not be cumulatively considerable and would result in a less than significant impact.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

TABLE 12
ESTIMATED ANNUAL OPERATIONAL GREENHOUSE GAS EMISSIONS

Source	Emission (MT/year)				
	CO_2	CH_4	N_2O	R	Total CO_2e
Annual construction-related emissions amortized over 30 years[a]	46.64	2.00E-03	1.98E-03	3.53E-02	47.31
Mobile	750.39	0.04	0.03	1.13	762.00
Area	43.91	0.00	0.00	0.00	43.97
Energy	219.01	0.02	0.00	0.00	220.05
Water	17.13	0.23	0.01	0.00	24.47
Waste	12.35	1.23	0.00	0.00	43.21
Refrigerants	0.00	0.00	0.00	0.12	0.12
Stationary	15.23	0.00	0.00	0.00	15.28
Total Project CO_2e (All Sources)	**1,156.42**				
Existing Building Emissions	**279.91**				
Net Increase in Emissions (Proposed-Existing)	**876.51**				

[a] The total annual construction-related emissions for the proposed project are 1,286 MTCO2e per year.
Source: (Urban Crossroads, 2023)

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

Discussion

University of California Plans, Policies, and Regulations

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

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

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

- All new building projects, other than acute care facilities, will be designed, constructed, and commissioned to outperform the CBC energy-efficiency standards by at least 20 percent or meet the whole-building energy performance targets listed in Table 1 of Section V.A.1 of the UC Policy on Sustainable Practices. The University will strive to design, construct, and commission buildings that outperform CBC energy efficiency standards by

30 percent or more or meet the stretch whole-building energy performance targets listed in Table 1 of Section V.A.1, whenever possible within the constraints of program needs and standard budget parameters.

- No new building or major renovation that is approved after June 30, 2019 shall use on-site fossil fuel combustion (e.g., natural gas) for space and water heating (except those projects connected to an existing campus central thermal infrastructure). Projects unable to meet this requirement shall document the rationale for this decision. This requirement is consistent with the UCLA Sustainability Plan.

- All new buildings will achieve a USGBC LEED "Silver" certification at a minimum. All new buildings will strive to achieve certification at a USGBC LEED "Gold" rating or higher, whenever possible within the constraints of program needs and standard budget parameters. Achieving a minimum Silver rating is also established in Climate Action Plan Initiative 11.3 and various UCLA Sustainability Plan goals.

- All new building projects will achieve at least two points within the available credits in LEED-Building Design and Construction (BD+C) Water Efficiency category and prioritize earning waste reduction and recycling credits. Similarly, the UCLA Sustainability Plan calls for new construction projects to meet the LEED Construction and Demolition Waste Management prerequisite and credit to reduce waste generation and divert materials from landfills.

- Projects will utilize the versions of the CBC energy efficiency standards and LEED-BD+C that are in effect at the time of the first submittal of "Preliminary Plans" (design development drawings and outline specifications).

- Register with the Savings By Design program to document compliance with the requirement to outperform CBC energy efficiency standards by at least 20 percent.

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

Relevant to the proposed Project, the UC Policy for Sustainable Transportation includes mechanisms for reducing commute emissions, which are also discussed in the Climate Action Plan. The Sustainable Transportation policy includes goals to: (1) reduce the percentage of employees and students commuting by single-occupancy vehicles (SOV) by 10 percent relative to the 2015 SOV commute rates by 2025, and (2) have no more than 40 percent of employees and no more than 30 percent of all employees and students commuting to each campus by SOV by 2050 (as also reflected in UCLA's Sustainability Plan). The Commute Emissions Reduction Initiative 8.2 in the UCLA CAP identifies that reductions in commute emissions would be attained by reducing single occupant vehicle trips to and from campus. The campus offers a range of alternative mode programs designed to encourage both employee and student commuters to travel to and from campus by means other than driving alone. This Initiative also identifies that "…housing students and employees on campus brings these commuters to the doorstep of the campus and largely eliminates their commute carbon footprint." By adding up to 545 new beds

adjacent to the campus, which would reduce dependency on vehicles and reduce the SOV rate, the proposed Project is consistent with this Initiative. As further discussed in Section V.17, Transportation, of this IS, the proposed Project is well-served by transit facilities and would have a household VMT per capita of 5.5 miles, which is below the threshold of significance for the West Los Angeles Area Planning Commission area (household VMT per capita of 7.4 miles).

The UCLA CAP Commute Emissions Reduction Initiative also acknowledges the planned extension of the Metropolitan Transportation Authority's (Metro) Rail system to Westwood, providing subway service in proximity to campus and potentially providing significant further reductions in the drive alone rate. The Metro Purple Line extension to Westwood has been initiated and is expected to be completed by 2027 (Metro, 2023). The Westwood/UCLA Station is approximately 0.75 mile from the Project site and would be easily accessible to Project residents, reducing the drive alone rate.

The UC Policy for Zero Waste indicates that the University will achieve zero waste at all locations other than health locations through prioritizing waste reduction in the following order: reduce, reuse, and then recycle and compost (or other forms of organic recycling). Minimum compliance for zero waste is to: (1) reduce per capita municipal solid waste generation by 25 percent per capita from fiscal year (FY) 2015/2016 levels by 2025 and 50 percent per capita from FY 2015/2016 levels by 2030; and (2) 90 percent diversion of municipal solid waste from landfills. The proposed Project would be required to comply with UCLA's programs in place to reduce the amount of solid waste diverted to landfills during construction and operation, including those detailed in UCLA's Zero Waste Plan, which is incorporated into the Sustainability Plan. Notably, to comply with these requirements, the proposed Project would include infrastructure for three waste streams (recycling, compost, and landfill).

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

State Plans, Policies and Regulations

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

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

As previously identified, the 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure, and indicates that in almost all sectors, electrification will play an important role. In addition, Appendix D, Local Actions, of the 2022 Scoping Plan includes key project attributes that reduce operational GHG emissions (CARB, 2022b). The proposed Project includes applicable key attributes for residential projects from Appendix D, including: a location on an infill site surrounded by existing urban uses and reuse or redevelopment of previously undeveloped or underutilized land that is served by existing utilities and essential public services (e.g., transit, streets, water, sewer); no loss or conversion of natural and working lands; development of transit-supportive densities (minimum of 20 residential dwelling units per acre) or

proximity to existing transit stops (within one-half mile); reduced parking requirements (no resident parking would be provided as part of the Project); the provision of affordable housing; no net loss of existing affordable units; and use of all-electric appliances without any natural gas connections, propane, or other fossil fuels for space heating, water heating, or indoor cooking.

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

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

Senate Bill 375 and SCAG Connect SoCal

A primary goal of SB 375 and SCAG's Connect SoCal (i.e., the SCAG 2020-2045 RTP/SCS) is to reduce GHG emissions by reducing vehicle trips and associated VMT. Methods to reduce VMT include locating residents closer to where they work and play; designing walkable environments; and providing access to high-quality transit service. The proposed Project would contribute to these VMT reduction goals by providing the following benefits:

- The Project site is located within walking distance to the main campus, numerous public bus lines, the extensive commercial business district in Westwood Village, and the future Metro subway station at Wilshire Boulevard and Veteran Avenue. The Project site is also located in an existing Transit Priority Area, which is defined as an area within 0.5 mile of a major transit stop.

- The proposed Project would provide long-term bicycle storage within the building as well as a designated area for scooter parking.

- Pursuant to LRDP PP 4.13-1(d) (discussed in Section V.17, Transportation), which is incorporated into the proposed Project, UCLA actively provides and promotes accommodation of the use of other modes of transit, including bicycles, motorcycles, and scooters; a car share program; annual distribution of the UCLA Commuter's Guide; and parking control management.

Therefore, implementation of the proposed Project would be consistent with SB 375 and the SCAG Connect SoCal.

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

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The 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 the demolition of the existing building on-site, which contains environmentally regulated materials, as well as construction activities involving the use of typical fuels, adhesives, paints, and coatings. Operation of the proposed Project would not involve the handling of hazardous materials beyond typical cleaning and maintenance supplies, paints, and pesticides for landscaping, which are already used at the existing apartment building.

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

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

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

In addition, LRDP PPs 4.13-6 and 4.13-8 presented in Section V.17, Transportation, of this IS, which address pedestrian and emergency vehicle access, respectively, are also incorporated into the proposed Project and assumed in the analysis of potential hazards.

Project Impact Analysis

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

Discussion

Construction-Related Hazards

Building Materials

Based on the age of the existing apartment building, which was constructed in 1981, UCLA directed the preparation of an Environmentally-Regulated Materials Survey Report (ERM Report) by Citadel Environmental Services, Inc. (Citadel) (Citadel, 2023), which is included in Appendix D of this IS. Preparation of the ERM Report involved the following:

- Survey of the property (February 6 through February 10, 2023);
- Collecting bulk samples of suspect asbestos-containing materials (ACMs) and asbestos-containing construction materials (ACCMs);
- Conducting an x-ray fluorescence (XRF) survey of suspect lead-containing materials (LCMs), including lead-containing paint (LCP);
- Submitting the asbestos bulk samples to an independent and accredited laboratory for analysis; and
- Visual assessment and identification of other ERMs (polychlorinated biphenyls [PCBs], diethylhexl phthalate [DEHPs], universal and electronic wastes, and ozone depleting substances [ODSs], etc.)

The ERM Report identified ACMs in the vinyl sheet flooring in the second-floor laundry room and roof mastic materials (upper and lower roof). No ACCMs were identified on-site. LCP materials were identified during the survey; however, based on XRF surveys none of the LCP samples exceeded 0.7 mg/cm^2.

Any Project construction-related activity, including demolition or the relocation of underground utilities, that involves cutting, grinding, or drilling where these materials are present could release friable asbestos fibers or lead dust and expose construction personnel unless proper precautions are taken. Because exposure to such materials can result in adverse health effects in uncontrolled situations, several regulations pertaining to abatement, handling, and disposal of ACMs/ACCMs and LCP/LBP have been developed. Per LRDP PP 4.6-1, the UCLA EH&S procedures require

that all applicable federal, state, and local regulations as well as UCLA's Asbestos Management Program and Lead Compliance Program be implemented during construction activities. The Asbestos Management Program ensures safe work practices involving asbestos, including notification of applicable government agencies prior to beginning any renovation or demolition that could disturb asbestos and using safe work practices to eliminate or reduce the potential for release of asbestos fibers. This program also requires medical examinations and monitoring of employees engaged in activities that could disturb asbestos. Similarly, the campus Lead Compliance Program is directed at reducing lead exposure to a less than significant level through education, inspection, testing, and removal.

The ERM Report identified PCB- and DEHP-containing equipment in light fixture ballasts; universal/electronic and radioactive wastes in exit signs, fluorescent light tubes, thermostats, and light bulbs; and ODSs in the parking garage associated with fire extinguishers, elevator hydraulic fluid, and a flammable chemical cabinet. These materials would require special handling during removal to ensure the regulated substances are not released into the environment, as discussed below. It is noted that ODS is not a hazardous waste.

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

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

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

Compliance with federal and state health and safety laws and regulations, as well as continued implementation of existing (or equivalent) campus policies and programs, as required by PP 4.6-1, would ensure a less than significant impact associated with the potential release of hazardous building materials during demolition activities. Thus, there would be a less than significant impact.

Construction Activities

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

Contaminated Soil and/or Groundwater

There are no known current or historical hazardous materials spills at the Project site. Therefore, no hazardous materials are anticipated to be encountered in the soils underlying the site during excavation activities, and there would be no significant hazard to the public through reasonably foreseeable upset and accident conditions of construction of the proposed Project.

Notwithstanding, there is a potential for previously undiscovered underground storage tanks (USTs) or other undetected soil or groundwater contamination to be exposed during earthwork activities. In the event that previously undiscovered USTs are uncovered or disturbed, they would be closed in place or removed in accordance with applicable state regulations. Groundwater was encountered in Boring 4 at a depth of 38.5 feet below the grade of Gayley Avenue along the northern Project site boundary (Geocon, 2023). Considering the depth to groundwater encountered in the borings, groundwater is not anticipated to be encountered during excavation activities, which are expected to a depth of approximately 42 feet bgs. However, if any contaminated soil and/or groundwater is discovered, all construction activities shall stop, and an assessment would be made of the nature and extent of contamination and the type (if any) of remediation that is required. The primary purpose of LRDP PP 4.6-4 is to ensure that the exposure of contaminated soil and/or groundwater or the remediation activities, if necessary, would not expose the public or construction workers to hazardous conditions. Continued compliance with all applicable federal, state, and local laws and regulations, as well as incorporation of LRDP PPs 4.6-1 and 4.6-4, would ensure that impacts associated with the potential exposure of contaminated soil or groundwater are less than significant.

<u>Operational Hazards</u>

The proposed Project involves the development of off-campus student housing. It would not involve the development of new laboratories, research facilities, or other sources of new or

increased handling of hazardous materials. There would also be no change in how hazardous materials are handled, stored, transported, or disposed of on and off campus, and the potential for accidents involving hazardous materials would not increase. Operations associated with the proposed Project would be consistent with the existing residential uses at the Project site and at surrounding residential uses. The types of hazardous materials that could be used in association with the proposed Project would not require special disposal. Cleaning products would be disposed of either through the wastewater system (i.e., sinks, laundry) or evaporation. Neither chlorine nor standard cleaning products (i.e., degreasers, window-cleaning products) are used in quantities that would result in adverse health effects either through direct exposure to the skin or inhalation. Pesticides and herbicides are directly applied to affected areas using methods that follow state and County laws and/or guidelines. Additionally, operation of the proposed Project would comply with applicable federal, state, and local laws and regulations and with the existing (or equivalent) PPs that are required by LRDP PP 4.6-1 identified above. Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material, or reasonably foreseeable upset and accident conditions involving the release of hazardous materials. There would be a less than significant impact during operation.

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

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

Discussion

The UCLA campus, which is located across Gayley Avenue from the Project site, is the nearest school to the Project site. There are existing schools on campus (i.e., the UCLA Lab School [previously Corinne A. Seeds University Elementary School or UES], Fernald Child Development Center, the Infant Development Program, Krieger Childcare Center, and Geffen Academy at UCLA), which are further away than on-campus uses across Gayley Avenue. Marymount High School is located north of Sunset Boulevard, approximately 0.4-mile northwest of the Project site. As discussed under Threshold (a) above, the proposed Project includes student housing, consistent with existing uses on-site and surrounding the Project site, which would not involve hazardous emissions or the handling of hazardous or acutely hazardous materials in quantities significant enough to pose a risk to the campus or existing schools. With continued compliance with federal, state, and local regulations pertaining to hazardous materials and with existing (or

equivalent) campus programs and procedures, as required by LRDP PP 4.6-1, this impact would be less than significant.

Additional 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 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 California Environmental Protection Agency (CalEPA) Cortese List Data Resources (DTSC, 2023), 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.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

The Project site is not located within two miles of a public airport or public use airport and has not been included in an airport land use plan. The nearest public airport is Los Angeles International

Airport (LAX), located approximately 8.4 miles to the south. While there are no public or public use airports in the Project vicinity, the Ronald Reagan UCLA Medical Center (RRUMC) located on campus operates a helistop with two helipads under a California Department of Transportation (Caltrans) Aeronautics Heliport Permit. The proposed Project involves development of off-campus student housing and would not directly increase the number or frequency of medical helicopter operations at the RRUMC.

The Caltrans Aeronautics Heliport Permit establishes an 8:1 approach/departure surface for the RRUMC helistop. This means that an imaginary surface extends upward from each helipad at an angle of 12.5 percent (i.e., 1 divided by 8 = 0.125). Therefore, the farther from the helipad a building is, the taller it can be before penetrating this surface. The helistop is located on top of the 10-story RRUMC and receives a very limited number of flights (average of two flights per day), limited to emergency patient transport and support of the organ transplant program. Non-emergency flights are not allowed. The Caltrans Aeronautics Heliport Permit also conditions that for each pad, two helicopters cannot arrive and/or depart simultaneously, and requires the RRUMC to contact the Caltrans Division of Aeronautics should structures be proposed that would penetrate the established 8:1 approach/departure surface.

The Project site is located approximately 0.2 mile to the northwest of the RRUMC helistop. The elevation of the Project site ranges from approximately 375 feet amsl at the northeast corner to approximately 419 feet at the southwest corner and slightly higher than the RRUMC, which lies at an elevation of approximately 355 feet amsl. However, the RRUMC helipads are located on top of the 10-story building from which the 8:1 approach/departure surface (8 feet horizontal to 1 foot vertical) is determined; the elevation at the helipad is approximately 150 feet above ground level, or at an elevation of approximately 505 feet amsl. Therefore, a building would have to be approximately 640 feet amsl to encroach the 8:1 approach/department surface. The proposed new building would have a maximum elevation of approximately 460 feet amsl at the roofline and approximately 465 feet at the top of the parapet. Based on the proposed building height, the proposed new building would not penetrate the established 8:1 approach/departure surface, consistent with the requirements of the Caltrans Aeronautics Heliport Permit. Also, implementation of the proposed Project would not increase the number or frequency of medical helicopter operations at the RRUMC. The provisions of the existing Caltrans Aeronautics Heliport Permit ensure that potential safety hazards associated with operations of the helistop are less than significant.

Implementation of the proposed Project would not change RRUMC helistop operations and would not result in a safety hazard for people residing or working in the Project area. Additionally, continued implementation of the provisions of the existing Caltrans Aeronautics Heliport Permit by RRUMC ensures that there is no impact related to potential safety hazards to surrounding land uses associated with operations of the helistop. Further, the Project site is located outside the 65-dBA helicopter noise level contour (UCLA, 2009b), and the noise levels experienced at the Project site from a limited number of daily helicopter flights would not be excessive. There would be no impact related to proximity to the RRUMC helistop.

Additional Project-Level Mitigation Measures

No additional 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 no noise-related impacts from the Project related to exposure of people residing or working in the Project area to excessive noise levels from airport uses.

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

Discussion

According to the Los Angeles County Public Works Department City of Los Angeles – West Area Disaster Route Map, Gayley Avenue is not designated as a disaster route (LA County, 2023). The nearest disaster routes to the Project site are S. Sepulveda Boulevard and I-405 (approximately 0.6 miles to the west).

Although construction activity associated with implementation of the proposed Project is anticipated to occur within the boundaries of the Project site and most staging would also occur on-site, some construction staging (e.g., short-term construction vehicle parking at the curb, dumpsters) and utility infrastructure improvements (e.g., pipeline connections) for the proposed Project could periodically occur for short periods on Gayley Avenue. However, this short-term and limited encroachment into the public roadway would not impede access to RRUMC, identified as a "Critical Response Facility" on Figure 4-8 of the City of Los Angeles *2018 Local Hazard Mitigation Plan* (LHMP) (City of Los Angeles, 2018a) and located approximately 0.2-mile southeast of the Project site. Also, UCLA would be required to obtain all necessary encroachment permits from the City of Los Angeles Department of Transportation prior to any construction activity occurring in the Gayley Avenue right-of-way. Ongoing coordination between the University of California Police Department, the City of Los Angeles Fire Department, and UCLA pursuant to LRDP PP 4.13-8 (refer to Section V.17, Transportation, of this IS) would require roadway or travel lane closures to be coordinated with emergency response personnel to ensure that individual development projects would not impair implementation of, or physically interfere with, emergency response and evacuation efforts. The Project incorporates LRDP PP 4.13-8, which ensures that required emergency access to and surrounding the Project site would be maintained during construction. Therefore, there would be a less than significant impact.

Additional 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 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

The Project site is not located in a Wildfire Severity Zone as shown in Figure 13-8 of the City of Los Angeles LHMP (City of Los Angeles, 2018a). The nearest wildland area is in the Santa Monica Mountains and associated foothills, located approximately 0.6 miles to the northwest of the Project site, with intervening urban development. 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) (CalFire, 2022). Implementation of the proposed Project would not expose people or structures to wildland fires. No impact would result.

Additional Project-Level Mitigation Measures

No additional 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 a decrease in impervious surfaces on the Project site, which is currently developed with primarily impervious surfaces. Structural and non-structural BMPs would be used to capture and treat runoff as described in Section II.5, Proposed Project Components, and per LRDP MM 4.7-1, which would manage the post-development hydrology in compliance with all applicable regulations.

The 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, which is located off campus.

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

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

to, the provision of permeable landscaped areas adjacent to structures to absorb runoff and the use of pervious or semi-pervious paving materials.

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

Non-Structural/Structural:

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

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

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

Project Impact Analysis

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

Discussion

Surface Water

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 RWQCB (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."[26] Under this Construction General Permit, discharges of storm water from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit.

Phase II of the NPDES program regulates storm water discharges from small Municipal Separate Storm Sewer Systems (MS4s). As part of Phase II, the SWRCB adopted a General Permit for the Discharge of Storm Water from Small MS4s (WQ Order No. 2003-0005-DWQ) to provide permit coverage for smaller municipalities, including non-traditional Small MS4s, which include public campuses. The Phase II Small MS4 General Permit covers Phase II Permittees statewide.[27] UCLA was approved for coverage under the Phase II MS4 permit program on July 12, 2013 and was assigned a Water Discharge identification (ID) number (WDID 4 19M2000037). UCLA is required to comply with the requirements of the MS4 permit and the campus' Storm Water Management Program.

Construction-Related Water Quality Impacts

Implementation of the proposed Project would result in runoff exiting the Project site during construction. Storm water runoff during construction could contain pollutants such as soils and sediments released during grading and excavation activities as well as petroleum-related pollutants due to spills or leaks from heavy equipment and machinery. Other common pollutants that may result from construction activities include solid or liquid chemical spills; concrete and related cutting or curing residues; wastes from paints, stains, sealants, solvents, detergents, glues, acids, lime, plaster, and cleaning agents; and heavy metals from equipment.

The proposed Project would not involve construction activities on more than 1.0 acre (the site is approximately 0.48 acre) and therefore would not be required to comply with requirements and water quality standards set forth in the current NPDES permit regulations (i.e., processing through

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

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

the SWRCB is not required). However, the Project would comply with the campus' MS4 permit, which requires the contractor to prepare a Storm Water Pollution Prevention Plan (SWPPP), as required by LRDP PP 4.7-1. The SWPPP incorporates BMPs for reducing or eliminating construction-related pollutants in runoff from the site. The MS4 permit also requires incorporation of Low Impact Development (LID) standards for post-construction design, as further discussed under Operational Water Quality Impacts, below. The SWPPP would include both source control and treatment control BMPs to reduce water quality impacts. As shown on Figure 12, temporary erosion control BMPs that would be implemented during construction include, but are not limited to: stabilization of the construction entrance and installation of a silt fence along the northern perimeter of the Project site. Compliance with these requirements would reduce short-term construction related water quality impacts to a less than significant level.

Operational Water Quality Impacts

The Project site is not considered a point source for regulatory purposes and is not subject to waste discharge requirements (WDRs). Further, the proposed Project would not involve any uses that would be subject to the provisions of the campus' industrial wastewater permit. Therefore, the proposed Project would not violate WDRs.

The proposed Project would involve redevelopment of the Project site with a new student housing building. With an overall increase in landscaped area at the Project site, the impervious area with the proposed Project would decrease approximately 4 percent compared to existing conditions (reduction from approximately 90 percent impervious surface to 86 percent). The proposed Project would comply with applicable requirements at the time of construction, per LRDP PP 4.7-1 and MM 4.7-1, to ensure that discharges of post-construction pollutants remain less than significant. This includes the implementation of structural and non-structural BMPs. Storm water management BMPs in compliance with the Phase II MS4 General Permit, including LID requirements, would be designed and constructed within the Project site to treat storm water, remove pollutants, and control the discharge flow rate. The Phase II Small MS4 General Permit prioritizes BMP types as follows: infiltration, storage and reuse, and biofiltration. Based on the results of the percolation test conducted during preparation of the Geotechnical Investigation, a storm water infiltration system is not recommended (Geocon, 2023). Pursuant to LRDP PP 4.7-5, a site-specific hydrologic evaluation would be conducted for the proposed Project and would include identification of Project-specific BMPs (structural and non-structural), including the BMPs listed in LRDP MM 4.7-1. However, the conceptual utility plan for the proposed Project anticipates that roof drain downspouts would be routed to two Permavoid filtration planters proposed in the southeast and southern portions of the Project site. In addition to structural BMPs, non-structural BMPs at the Project site related to maintenance and use of parking areas; education and training; landscaping; and monitoring and maintenance of structural BMPs would be implemented.

With incorporation of LRDP PP 4.7-1, PP 4.7-5 and MM 4.7-1, there would be less than significant impacts related to water quality impacts during construction and operation. No additional mitigation would be required.

Groundwater

As previously discussed, groundwater beneath the Project site was encountered at depths of 38.5 feet bgs at Gayley Avenue along the northern Project site boundary. Considering the depth to groundwater encountered, groundwater is not anticipated to be encountered during excavation activities, which are expected to a depth of approximately 42 feet bgs near the site's southern boundary (where the existing finished grade is substantially higher). Therefore, the proposed Project would not degrade groundwater quality.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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 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

The Project site is located within the Santa Monica Basin. No potable groundwater wells are located on the Project site or are proposed by the Project. Potable water for the proposed Project would be obtained from the LADWP, and the Project would not involve direct withdrawal of groundwater. While water sources for the LADWP include groundwater supplies, the LADWP currently has adequate water supplies to serve the proposed Project (refer to analysis of Threshold (b) in Section V.19, Utilities and Service Systems, of this IS). Therefore, the proposed Project would not substantially decrease groundwater supplies, and potential impacts would be less than significant.

Development of the proposed Project would slightly decrease the amount of impervious surface coverage on the property as compared to existing conditions from approximately 90 percent to 86 percent. Therefore, the Project site would increase the pervious areas available for natural recharge; however, it should be noted that the area covered by the proposed development is negligible from a regional recharge perspective. Additionally, the Project site does not accept run on from adjacent properties, only direct precipitation, providing little overall opportunity for recharge under existing conditions. Furthermore, the Project site is not a designated groundwater recharge area for the Santa Monica Basin. As such, implementation of the proposed Project would not substantially interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

Additional 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 a substantial decrease of groundwater supplies or interference with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

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

Discussion

There are no natural drainage courses or streams on or near the Project site; therefore, the proposed Project would not alter the course of a stream or river and would not impede or redirect flood flows.

Erosion and Siltation

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

In the long term, because the Project would result in a similar impervious surface area coverage as compared to existing conditions, the erosion potential under Project conditions would be similar when compared to existing conditions. Soil transported off site (by wind or water erosion) would be reduced by development and landscaped areas. Areas of exposed soils would be minimal following construction of the proposed Project, and potential erosion impacts would be less than significant during operation.

Site Drainage and Storm Water Runoff

No storm drains exist in Gayley Avenue, and the existing building outlets stormwater through curb drains along Gayley Avenue. As discussed above, development of the proposed Project would slightly decrease the amount of impervious surface at the Project site, compared to existing conditions (a decrease from approximately 90 percent to 86 percent). By increasing the amount of pervious surfaces on the Project site, less surface runoff would be generated and the rate and volume of runoff would slightly decrease. It is estimated that the rate of runoff would decrease from 1.48 cubic feet per second (cfs) to 1.47 cfs during a 25-year rain event. In the proposed developed condition, the Project site has been designed to generally drain in the same direction

as the existing condition (i.e., to Gayley Avenue). New site area drains would be installed, and storm drain pipes would be sized to convey the peak runoff from a 25-year storm event, with pipes flowing no greater than 75 percent full in compliance with City requirements. Additionally, LID design elements would satisfy current City of Los Angeles requirements to capture and treat the 85th percentile runoff volume. Pursuant to LRDP PP 4.7-5, a site-specific hydrologic evaluation would be conducted during design of the proposed Project to confirm the volume and flow rate from the Project site and Project-specific BMPs to reduce the runoff rate and volume to appropriate levels. With adherence to applicable storm water management regulations and incorporation of LRDP PP 4.7-5, the proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site and would not exceed the capacity of the existing storm drain system.

Further, the proposed Project would generate urban pollutants similar to other residential uses in the area. As discussed under Threshold (a), above, with incorporation of required structural and non-structural BMPs, the proposed Project would not generate substantial additional sources of polluted runoff.

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

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would have less than significant impacts related to: (1) substantial erosion or siltation on or off the site; (2) substantial increase in the rate or amount of surface runoff in a manner that would result in flooding on or off the site; (3) 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 Project would not risk the release of pollutants due to inundation resulting from a flood. Based on review of Figure 12-2 of the City of Los Angeles 2018 LHMP, the Project site is not within a mapped tsunami inundation area in the West Los Angeles Area Planning Commission area (City of Los Angeles, 2018a). Further, the Project site is not near a body of water and would not be subject to a seiche. The Project site is within the mapped dam inundation area for Stone Canyon Reservoir dam, which is located approximately 2.6 miles to the north (DSOD, 2023). However, as discussed in Section V.9 of this IS, as with the existing residential building at the Project site, hazardous materials that would be used during construction activities (e.g., chemical agents, solvents, paints, fuel for

equipment) and operation (e.g., for cleaning and maintenance) are common and would not be used in quantities that pose a significant hazard to the public or environment. Therefore, the proposed Project would a less than significant risk related to the release of pollutants due to Project inundation.

Additional 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 release of pollutants due to Project inundation.

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

Discussion

The Project site is located within the jurisdiction of the Los Angeles RWQCB. The RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface water. The RWQCB has developed a Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which was most recently updated in September 2014 (LARWQCB, 2014). The Basin Plan establishes water quality standards for the ground and surface waters of the region and describes the actions by the RWQCB and others that are necessary to achieve and maintain the water quality standards. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. The RWQCB ensures compliance with the Basin Plan through its issuance of NPDES Permits, issuance of WDRs, and Water Quality Certifications pursuant to Section 401 of the CWA. As required by LRDP PP 4.7-1 and MM 4.7-1, the proposed Project would comply with the latest NPDES General Permit, and a SWPPP that incorporates BMPs for reducing or eliminating construction-related pollutants generated at the Project site would be prepared and implemented. As such, the proposed Project would not conflict with the Basin Plan, and no impact would occur.

The 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in "high-" and "medium-priority" basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long-term sustainability. The California Department of Water Resources (DWR) currently categorizes the Santa Monica Basin as a "medium-priority" basin; therefore, the Santa Monica Basin is subject to the requirements of the SGMA (DWR, 2023). The Santa Monica Basin Groundwater Sustainability Agency (SMBGSA) was formed in 2017 in accordance with the SGMA. The five member agencies of the SMBGSA include the City of Santa Monica, the City of Beverly Hills, the City of Los Angeles, by and through its Department of Water and Power, the City of Culver City, and the County of Los Angeles. The five member agencies signed a Memorandum of Understanding (MOU) for the formation of the SMBGSA in May 2017. The SMBGSA is responsible for developing a GSP pursuant to SGMA,

and the regulations issued in accordance therewith. The GSP for the Santa Monica Basin was adopted by the SMBGSA in January 2022. As previously discussed, the Project would not entail the extraction of groundwater located beneath the site during Project operation, would not impact groundwater quality, and the Project site is not within a groundwater recharge area. Therefore, the Project would not obstruct or conflict with a sustainable groundwater management plan.

The proposed Project would not involve any construction activities that would encounter groundwater and would not include the installation or use of groundwater wells. Additionally, there would be limited potential for groundwater recharge at the Project site due to the size of the Project site and primarily impervious site conditions. Therefore, the proposed Project would not degrade groundwater quality, would not decrease groundwater supplies or interfere with groundwater recharge, and would not conflict with groundwater management activities.

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

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The 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 redevelopment of the Project site with a new residential building for undergraduate students. The proposed Project consists of a new 112,000 gsf apartment building, which would accommodate 187 rooms (545 beds). When compared to the existing 57,075 gsf apartment building which has 51 rooms (100 beds), the proposed Project would result in a net increase of 442 beds (residents), and a net increase of approximately 54,925 gsf of development.

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 change in the text from the LRDP Final SEIR are signified by strikeout (~~strikeout~~) where text has been removed; such changes have been made so the stated requirement better applies to the proposed Project, which is located off campus.

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

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

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

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

Project Impact Analysis

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

Discussion

As shown on the aerial photograph provided in Figure 3, the community surrounding the UCLA campus, including the Project site, is fully developed and established. The Project site is currently developed with an apartment building, and the proposed Project would involve redevelopment of the Project site with a new residential building for student housing. The proposed student housing is consistent with existing residential development to the south, east, and west of the Project site and would specifically house students enrolled at UCLA to the immediate north. Thus, the proposed Project would not divide an established community, and no impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The 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

Regional Planning Programs

With respect to regional planning, SCAG is the MPO for Los Angeles, Riverside, Orange, San Bernardino, Ventura, and Imperial Counties. The federal government mandates SCAG, as the designated MPO, to prepare plans for growth management, transportation, air quality, and hazardous waste management. In addition, SCAG reviews EIRs for projects of regional significance for consistency with its regional plans (SCAG, 2023). The policies and strategies of SCAG's regional planning programs, including Connect SoCal, are not applicable to the Project because the proposed Project is not of statewide, regional, or areawide significance based on the established criteria in Section 15206 of the CEQA Guidelines, which are applied by SCAG to

determine regional significance. Residential projects of more than 500 dwelling units are considered regionally significant; the proposed Project would include 187 rooms/units.

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

UCLA Plans

The UCLA 2002 LRDP, as amended through 2017, guides the physical development of the UCLA campus to serve its teaching, research, and public service mission. The Project site is not located on campus and therefore is not considered in relation to the remaining building square footage allocation for campus uses or parking and trip generation limits identified in the LRDP. Nonetheless, the proposed Project would not conflict with the provisions of the LRDP. The proposed Project would help UCLA provide additional student housing (up to 545 beds) proximate to campus to address current and anticipated demands, particularly the demand for affordable housing. The proposed Project would also support the retention of students by providing quality, below-market-priced housing in proximity to campus. The proposed Project would not increase student enrollment at UCLA; rather it would accommodate the existing student population and specifically provide a new housing type not currently available to students with high financial needs.

City 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. Westwood and other surrounding communities are part of the City of Los Angeles, and although this jurisdictional separation provides no formal mechanism for joint planning or the exchange of ideas, UCLA may consider, for coordination purposes, aspects of local plans and policies 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 campus and the broader community. To foster this process, UCLA participates in, and communicates with, City and community organizations and sponsors various meetings and briefings to keep local organizations, associations, and elected representatives apprised of ongoing planning efforts. Following is a discussion of the proposed Project's relationship to local plans and regulations for informational purposes.

The City of Los Angeles General Plan consists of the Framework Element, a Land Use Element, and 10 citywide elements. The City of Los Angeles General Plan Framework, adopted in December 1996 (re-adopted in August 2001), provides general guidance on land use issues for the entire City (City of Los Angeles, 2001). For purposes of developing, maintaining, and implementing the land use portion of the General Plan, the City has been divided between 35 community plan areas, which collectively comprise the Land Use Element of the General Plan. The community plans are intended to implement the policies of the General Plan Framework. Although the provisions of the community plans are not applicable to the proposed Project, the Project site is located within the Westwood Community Plan area (City of Los Angeles, 1999). Most of the multiple family residential development in the Westwood Community is located within several Specific Plan areas. The Project site is within the North Westwood Village Specific Plan

area (City of Los Angeles, 1988). The Westwood Community Plan acknowledges that areas within one mile of the UCLA campus where rental housing is available for students and faculty include East Westwood Village, North Westwood Village, and the area south of Wilshire Boulevard. While the *Westwood Community Plan* anticipates this housing would be provided by the private sector, the provision of student housing by UCLA does not conflict with this anticipated type of land use.

Based on review of the City of Los Angeles Zone Information and Map Access System (ZIMAS), the Project site and adjacent parcels have a High Medium Residential land use designation (City of Los Angeles, 2023a). The High Medium Residential land use designation in this area establishes a density range of 55 to 109 dwelling units per acre. While the proposed Project (with 187 rooms/545 beds) would exceed the density range, as demonstrated through the analysis presented in this IS, with implementation of the identified LRDP PPs and MMs, and Project-specific MMs, the proposed Project would not result in any significant environmental impact as a result of the density of the proposed development.

The Project site is designated as (Q)R4-1VL, which is a Multiple Dwelling Zone (R4), within Height District 1 (Very Low) (City of Los Angeles, 2020). The R4 Zone permits various residential uses including, but not limited to, multiple dwellings and apartment houses. The proposed Project involves the development of a new student housing facility with up to 545 beds and would not conflict with the allowed uses in the R4 zone. The 1VL height district in zone R4 permits three stories, a building height of 45 feet, and a floor area ratio (FAR) of 3:1. While the Project would exceed these limits, zoning variances that exceed these standards are permitted and have become common in the surrounding area, particularly as an incentive to provide affordable housing in light of ongoing local and regional housing shortages.[28]

The North Westwood Village Specific Plan establishes development standards for development within the Specific Plan area. Among other purposes, the *North Westwood Village Specific Plan* is intended to assure that development of the area occurs in accordance with the provisions of the Westwood Community Plan and to encourage the provision of affordable housing for university students and faculty. Other purposes of the North Westwood Village Specific Plan address aesthetics and visual qualities; however, as discussed above in Section V.I of this IS, pursuant to PRC Section 21099(d)(1), any potential aesthetic impacts associated with the proposed Project would not be considered significant impacts under CEQA because the Project is a residential development on an infill site within a transit priority area. Additionally, the Project site is not located adjacent to any single-family residential uses. Rather, there are multi-family residential uses to the west, south, and east, and the UCLA campus to the north. As previously described, the Project site is surrounded by existing multi-family residential structures, generally with three to six stories plus several apartment buildings seven to nine stories.

The proposed Project's alignment with other City of Los Angeles plans, policies, and regulations are addressed in the respective sections of this IS. Notably, Section V.4, Biological Resources, addresses the City's tree replacement requirements; Section V.5, Cultural Resources, addresses designated City of Los Angeles Historic Cultural Monuments; Section V.13, Noise, addresses the City's noise regulations; and Section V.17, Transportation, addresses the City's transportation impact study guidelines and various programs in place relative to vehicular and non-vehicular circulation. As identified, the proposed Project would not conflict with the plans, policies, and

[28] For example, The Mark at Los Angeles, located at 10915 W. Strathmore Drive to the immediate southeast of the Project site, is currently under construction and consists of a new seven-story, 89.5-foot tall multi-family residential building with an FAR of 3.4:1. That project involves a density bonus; increased FAR; higher building height; reduced open space; taller retaining walls; no front, rear or side yards; and reduced width walkway than otherwise permitted in the R4-1VL zone or per LAMC. Source: City of Los Angeles Planning Commission Letter of Determination, Case No. CPC-2020-6504-CU-DB-DRB-SPP-VHCA and CEQA Case No. ENV-2020-6505-CE, 10915 West Strathmore Drive, December 7, 2021.

regulations relative to these issues and would result in a less than significant impact with implementation of identified mitigation measures, as appropriate.

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

Additional Project-Level Mitigation Measures

No additional 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 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

There are no mineral resources of value to the state or region nor mineral resource sites defined by the *City of Los Angeles General Plan* on the Project site; thus, there would be no impact from implementation of the proposed Project.

Additional Project-Level Mitigation Measures

No additional 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 the use of diesel-powered equipment during construction and operational noise that may be generated by mechanical equipment, outdoor social or recreational activities, and associated vehicle traffic.

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 is located off campus, and to ensure implementation of the mitigation.

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

PP 4.9-6(a) *The campus 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.*

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

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

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

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

MM 4.9-7 *A solid noise barrier that would break the line of sight between the construction site and a sensitive use area would reduce construction noise by at least 5 dBA. Therefore, when detailed construction plans are complete, the campus shall review the locations of sensitive receptor areas in relation to the construction site. If it is*

determined that a 12-foot-high barrier would break the line of sight between an 11-foot-high noise source and adjacent sensitive use areas, a temporary barrier shall be erected ~~to the extent practicable~~. The barrier shall be solid from the ground to the top with no openings, and shall have a weight of at least 3 pounds per square foot, such as plywood that is ½-inch thick.

Fundamentals of Sound and Environmental Noise

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

The decibel scale (or dB scale) is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

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

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

- ***L_{eq},*** the equivalent energy noise level, is the average acoustic energy content of noise for a stated time period. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. This rating scale does not vary, regardless of whether the noise occurs during the day or the night.

- ***CNEL,*** the Community Noise Equivalent Level, is a 24-hour average L_{eq} with a 10 dBA "weighting" added to the hours between 10:00 PM and 7:00 AM and an additional 5 dBA weighting added to hours between 7:00 PM and 10:00 PM to account for noise sensitivity in the nighttime and evening, respectively. The logarithmic effect of these additions is that a steady noise source over a 24-hour period would result in a CNEL measurement approximately 7 dBA higher than the L_{eq} over the same period. This is generally not the case with traffic noise, as traffic volumes may vary considerably depending on the hour. For typical urban and suburban traffic, it has been found that the average noise level for the peak hour is numerically equal to the CNEL; therefore, for purposes of this analysis,

the CNEL and peak hour traffic L_{eq} are assumed to be equal. CNEL is also used to describe aircraft noise.

- ***L_{min}*** is the minimum instantaneous noise level experienced during a given period of time.
- ***L_{max}*** is the maximum instantaneous noise level experienced during a given period of time.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. Prolonged noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated natural settings that can provide noise levels as low as 20 dBA and quiet suburban residential streets that can provide noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA CNEL) and commercial locations (typically 60 dBA CNEL). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA CNEL) or dense urban or industrial areas (65 to 80 dBA CNEL).

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

Fundamentals of Environmental Vibration

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

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

However, all structurers reduce vibration levels due to the coupling of the building to the soil (FTA, 2018).

To analyze vibration impacts originating from the operation and construction of the Project, vibration-generating activities are appropriately evaluated against standards established under a jurisdiction's Municipal Code, if such standards exist. However, neither UCLA nor the City of Los Angeles identify specific vibration level limits. Therefore, for analysis purposes, the Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans, 2020) is used in this noise analysis to assess potential temporary construction-related impacts at adjacent building locations. The construction vibration potential damage criteria include consideration of the building conditions. Table 13 describes the maximum acceptable transient and continuous vibration building damage potential levels by structure type and condition. The existing buildings adjacent to the Project site can best be described as "older residential structures" with a maximum acceptable continuous vibration threshold of 0.25 peak particle velocity in inches per second (PPV [in/sec]).

TABLE 13
BUILDING DAMAGE VIBRATION CRITERIA

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

Source: (California Department of Transportation, April 2020)

Human Perception

For vibration-sensitive receiver locations, potential disturbance due to construction-related vibration levels is evaluated based on the Caltrans perception criteria. Table 14 lists the maximum acceptable criteria for transient and continuous sources of vibration. To describe the human reaction to construction vibration levels, this analysis relies on the distinctly perceptible maximum transient vibration threshold of 0.25 PPV (in/sec).

TABLE 14
HUMAN PERCEPTION VIBRATION CRITERIA

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

Source: (California Department of Transportation, April 2020)

Groundborne Noise

Vibration of building components can also take the form of an audible low-frequency rumbling noise, which is referred to as groundborne noise. Typically, groundborne noise is a concern that

occurs with railroad and similar transit sources. As the Project does not involve the introduction of groundborne noise sources, the impact of groundborne noise is not addressed in this analysis.

Noise-Sensitive Receptors

Noise-sensitive receptors are generally considered to be those people engaged in activities or utilizing land uses that may be subject to substantial interference from noise. Activities usually associated with sensitive receptors include, but are not limited to, talking, reading, and sleeping. The nearest sensitive receptors are the residences surrounding the Project site.

Existing Ambient Daytime Noise Levels

Existing ambient daytime noise levels were measured at five locations in the vicinity of the Project site on April 6, 2023, in order to identify representative noise levels during the regular academic session. The noise measurement locations are identified in Table 15 and Figure 17. The noise levels were measured using a Piccolo II sound level meter. The sound level meter and microphone were mounted on a tripod five feet above the ground and equipped with a windscreen during all measurements. The sound level meter was programmed in "slow" mode to record noise levels in "A" weighted form. Meteorological conditions during the measurement periods were favorable and representative of typical conditions, with clear skies, daytime temperatures of approximately 65 to 70°F, and variable winds. Noise measurement information is provided in Appendix E of this IS.

The average, maximum, and minimum noise levels and sources of noise measured at each location are identified in Table 15. These ambient noise levels are characteristic of an urban residential environment. Measurement L1 is intended to represent typical noise levels experienced by residents along Landfair Avenue. L2 is used to describe the existing ambient noise environment at the nearest campus housing. L3 is used to characterize the ambient noise environment along Gayley Avenue, typically experienced by residences fronting Gayley Avenue. L4 and L5 are intended to characterize the ambient noise levels at locations on adjacent properties furthest from the surrounding traffic noise influences. It was observed during the site visit that the dominant sources of noise in the area were traffic on the adjacent streets; a secondary noise source was construction activities on surrounding properties.

TABLE 15
EXISTING AMBIENT NOISE LEVELS

Location[1]	Description	Energy Average Noise Level (dBA L_{eq})[2]	
		Daytime	Nighttime
L1	Located south of Project site near student housing at 510 Landfair Ave.	54.0	53.2
L2	Located northwest of Project site and west of Parking Structure DD	58.5	57.4
L3	Located north of Project site by UCLA Dashew Center at Tom Bradley International Hall	61.2	59.2
L4	Located at the Project site in the outdoor area (backyard) of 565 Gayley Ave.	59.9	55.2
L5	Located west of the Project site at the rear of 510 Landfair Ave.	62.1	56.6

[1] See Figure 17 for the noise level measurement locations.
[2] Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix E of this IS. "Daytime" = 7:00 a.m. to 7:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

Source(s): Urban Crossroads (April 2023)

Figure 17

Not to Scale

Noise Measurement Locations

Project Impact Analysis

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

Discussion

Construction

During construction, nearby noise-sensitive receptors would be exposed to occasional high noise levels associated with the operation of heavy equipment, such as loaders, dozers, and excavators, primarily during the subterranean excavation phase. While UCLA is not subject to local regulations, UCLA strives to meet community standards to ensure compatibility between UCLA land uses and operations and the local community. The City of Los Angeles noise standards are relevant to UCLA in the establishment of guidelines and evaluation of noise impacts. As such, and as previously discussed, UCLA has adopted a number of PPs and MMs that align with City of Los Angeles requirements, where possible. Relative to noise, LRDP PP 4.9-7(a) reflects the hourly restrictions set forth in LAMC Section 41.40, which prohibits construction activities that generate noise between the hours of 9:00 PM and 7:00 AM (during the hours when most people sleep and during the early morning and evening when people are typically within their home and more sensitive to noise effects) of the following day (Monday through Friday), and before 8:00 AM of after 6:00 PM on any Saturday or national holiday. Additionally, construction activities are prohibited on Sundays.

Further, LAMC Section 112.05 limits construction equipment noise between the hours of 7:00 AM and 10:00 PM in any residential zone of the City or within 500 feet thereof to 75 dBA at a distance of 50 feet; however, construction noise levels are exempt from the 75 dBA threshold if all technically feasible noise attenuation measures are implemented. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise-reduction devices or techniques during equipment operation.

In accordance with LRDP MM 4.9-7, which is incorporated into the proposed Project, solid noise barriers would be built on the west, east, and south Project site boundaries to reduce noise levels at the nearby residences. Construction equipment noise would not be constant because of the variations of power, cycles, and equipment location.

To describe construction noise activities, this construction noise analysis was prepared using reference construction equipment noise levels from the Federal Highway Administration (FHWA) published the Roadway Construction Noise Model (RCNM) (FHWA, 2006) The RCNM equipment database provides a comprehensive list of the noise-generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. The anticipated construction stages and loudest pieces of equipment by stage are provided in Table 16.

TABLE 16
REFERENCE NOISE LEVELS OF CONSTRUCTION EQUIPMENT BY STAGE

Construction Stage	Reference Construction Equipment[1]	Reference Noise Level @ 50 Feet (dBA L_{eq})	Composite Reference Noise Level (dBA L_{eq})
Demolition	Jack Hammer	82.0	83.2
	Excavator	77.0	
Grading/Site Preparation	Dozer	78.0	82.1
	Scraper	80.0	
Building Construction	Crane	73.0	74.8
	Generator (<25kVA)	70.0	
Paving	Paver	74.0	76.1
	Dump Truck	72.0	
Architectural Coating	Man Lift	68.0	75.0
	Compressor (air)	74.0	

[1] (FHWA, 2006)

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project's construction noise levels at the nearest sensitive receiver locations were completed. To assess a reasonable worst-case construction scenario and account for the dynamic nature of construction activities, the Project construction noise analysis models the equipment combination with the highest reference level as a moving point source within the construction area (Project site boundary). This is simulated by modeling multiple pieces of construction as moving point sources. As shown on Table 17, the construction noise levels are expected to range from 52.0 to 76.0 dBA L_{eq}, and the highest construction levels are expected to range 59.2 to 76.0 dBA L_{eq} at the nearest receiver locations. Detailed CadnaA construction noise model inputs are provided in Appendix E of this IS.

The existing average ambient daytime noise levels at the facades of residences facing the Project site are 59.9 and 62.1 dBA L_{eq} (refer to Table 15). Without noise attenuation, average construction noise levels at the closest receptors could range up to 16 dBA above ambient noise levels, and occasional maximum construction noise levels could be greater than 20 dBA compared to ambient noise levels. The loudest noise levels would occur during demolition and site preparation/grading. Thus, there would be a substantial temporary noise increase during this period related to on-site heavy equipment use. At the conclusion of these phases, the use of heavy equipment would be limited, and noise levels related to construction activity would be reduced as shown in Table 17.

TABLE 17
PROJECT CONSTRUCTION NOISE LEVEL SUMMARY

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Demolition	Grading/Site Preparation	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	59.1	59.2	51.8	53.2	52.0	59.2
R2	66.5	66.6	59.2	60.6	59.4	66.6
R3	75.9	76.0	68.6	70.0	68.8	76.0
R4	75.1	75.2	67.8	69.2	68.0	75.2
R5	75.9	76.0	68.6	70.0	68.8	76.0

[1] Noise receiver locations are shown on Figure 14.
[2] Construction noise level calculations are based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix E of this IS.

Technically feasible noise attenuation would be provided with the Project's incorporation of LRDP PP 4.9-7(b), which requires the muffling or shielding of equipment; LRDP PP 4.9-7(c), which requires that stationary construction equipment material and vehicle staging be placed to direct noise away from sensitive receptors; and LRDP MM 4.9-7, which requires the installation of noise barriers. To further reduce construction-related noise levels to the maximum extent practicable, additional Project-level MM Gayley NSE-1, which includes technically feasible measures, would be incorporated into the proposed Project. MM Gayley NSE-1 further expands on the LRDP requirements and requires: noisier construction equipment be fitted with enhanced mufflers (depending on the grade of muffler available, noise reductions could range from 10 to 40 dBA; stationary noise-generating construction equipment, such as generators and compressors be located as far as practical from noise-sensitive receptors; the use of electrical power in lieu of internal combustion engines, where feasible; and a minimum noise barrier height of 12 feet. It should be noted that the temporary noise barriers installed in accordance with LRDP MM 4.9-7 would be effective only where they break the line of sight between noise sources and receptors, and they are estimated to achieve a 10- to 11-dBA reduction at the nearest receivers. Thus, when building construction proceeds above the first story, construction noise would be experienced as louder. Typical noise sources during the vertical building phase include hand power tools, hammering, intermittent use of a crane and forklifts for materials handling, and concrete delivery and pumping equipment.

Even with noise attenuation measures, construction activities would be heard at neighboring residences above the existing noise levels and would create temporary annoyance. The Project incorporates LRDP PP 4.9-8, which requires the campus to conduct regular meetings with off-campus constituents to provide notice of construction activities, and LRDP PP 4.9-7(a) (consistent with LAMC Section 41.40) which prohibits construction activities to occur during recognized sleep hours for residents. With adherence to established construction hours and incorporation of the technically feasible mitigation described above, the construction activities associated with the proposed Project would not conflict with the LRDP PPs and MMs established to reduce construction-related noise standards and would be less than significant.

With respect to construction vehicle noise impacts, it is anticipated that up to 15 truck trips per day during the 43-day demolition phase would occur due to debris export from the Project site. This would be a small number of trips compared to the existing traffic along the construction traffic route established for the proposed Project, which includes Wilshire Boulevard, Veteran Avenue, Weyburn Avenue, and Gayley Avenue (refer to the discussion of construction activities in Section II.5, Proposed Project Components, of this IS). The construction traffic route does not include construction traffic on Gayley Avenue north of the Project site. While any single truck passing may be audible, it is expected that the noise from Project-related construction truck traffic would be indistinguishable from typical traffic. A doubling of traffic volumes is required to increase average traffic noise levels by 3 dBA, a change which is barely discernable to human hearing. The quantitative increase in hourly noise level would be negligible at sensitive uses adjacent to the roadways along the construction traffic route and, thus, would be less than significant. No mitigation measures would be required for mobile (truck) noise during construction.

Operations

The primary potential operational Project-generated noise sources that could impact nearby sensitive receptors include a roof-mounted emergency generator, roof-mounted mechanical equipment, outdoor gathering areas, and vehicle operations.

For context, LAMC Section 112.02, part of the City of Los Angeles Noise Ordinance, states, "It shall be unlawful for any person, within any zone of the city to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping,

filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property . . .to exceed the ambient noise level by more than five (5) decibels." Additionally, LRDP PP 4.9-6(a) requires shielding of all new stationary sources of noise that would be located in close proximity to noise-sensitive buildings and uses. With adherence to LRDP PP 4.9-6(a), the noise increase from rooftop ventilation equipment would not result in a substantial permanent increase of ambient noise levels.

The Project's emergency generator would generally be exempt from noise regulations since it would only be used in emergencies. However, the generator would require regular testing, which typically involves operating the equipment for 15 minutes regularly to maintain readiness. A typical generator of the size required to serve the Project could generate uncontrolled noise levels on the order of 85 dBA at a distance of 50 feet. However, the short duration of the testing would reduce the reference noise level by 6 dBA. Additionally, roof-mounted generators must be enclosed in weatherproof enclosures that typically provide up to 15 dBA reduction in noise levels. Thus, the resultant noise level during testing would be reduced to below 60 dBA L_{eq}. Accounting for the shielding provided by the building, the generator would not generate substantial noise levels at surrounding receivers.

Relative to operational noise associated with future residents, the Project represents the continuation of an existing student housing use, consistent with the surrounding uses within a high-density student housing area. Similar to the existing building on-site, the Project would allow for gatherings of people in a central courtyard, which would be enclosed on all sides and open to the sky. Any gatherings at the Project are anticipated to be similar in nature to the gatherings that currently occur at the site and generally similar to or less intensive than those that occur at the surrounding high-density residential uses. Despite the increased number of student residents on-site with the proposed Project, the limited size of the courtyard (approximately 2,000 sf) would restrict the number of students congregating, and the building structure itself would provide substantial shielding from noise generated within the central courtyard. Other outdoor spaces such as the landscaped front setback and proposed lightwells would also be limited in size such that large gatherings could not occur in those areas. Additionally, the majority of residential windows would be oriented towards the central courtyard rather than facing adjacent properties. Furthermore, all of the Project units would be occupied based on current student enrollment at UCLA (i.e., there would be no enrollment increase associated with the Project). Thus, the presence of Project residents is not anticipated to result in a substantial increase in ambient noise levels in the surrounding neighborhood. Additionally, the University of California Police Department (UCPD) would continue to be available to respond to any noise complaints at the Project site, and the Los Angeles Police Department (LAPD) would continue to enforce the local noise ordinance through its joint jurisdiction within one mile of campus. As such, operational noise associated with future residents would not result in a Project impact under CEQA.

As discussed in the VMT Assessment included in Appendix F of this IS, it is conservatively estimated that the proposed Project would generate an estimated 566 daily trips (KOA, 2023). This is considered conservative since the Project would provide student housing across the street (i.e., in walking distance) from the UCLA campus and would not provide resident automobile parking. For purposes of this analysis, it is assumed that Project-generated traffic would enter and exit via a driveway on Gayley Avenue, similar to existing conditions (although only the northernmost driveway would be maintained under the Project to provide access to a small service garage for maintenance purposes). It is estimated that Gayley Avenue adjacent to the Project site (north of Strathmore Drive/Strathmore Place) currently has an average daily traffic

(ADT) volume of 13,825.[29] Based on that traffic volume, the proposed Project would increase traffic on Gayley Avenue approximately 4 percent. As noted above, a doubling of traffic volumes is required to increase average traffic noise levels by 3 dBA, a change which is barely discernable to human hearing. Therefore, the change in traffic noise to residences adjacent to Gayley Avenue would be less than significant. On-site parking limited to a small service drive/garage, parking and engine start noise also would not be a substantial noise source to nearby sensitive receivers.

Additional Project-Level Mitigation Measures

The following Project-specific mitigation measure is required to reduce construction-related noise levels at adjacent sensitive receptors. This measure expands on similar requirements in the LRDP MMs and PPs identified previously.

MM Gayley NSE-1 *The campus shall require by contractor specifications that the following measures be implemented to reduce construction-related noise levels:*

- *Construction equipment anticipated to have noise levels exceeding 75 dBA at a distance 50 feet with standard mufflers shall be equipped with mufflers with enhanced noise attenuation, commonly identified as "industrial grade," "critical grade," or "hospital grade" mufflers.*
- *Stationary engine-driven or noise-generating construction equipment shall be located as far as practical from sensitive receptors. The equipment shall be located in the excavated subterranean area to the extent feasible.*
- *When feasible, electrical power available on site shall be used instead of internal combustion engines.*
- *The noise barriers required by LRDP MM 4.9-7 shall be installed on the west, east, and south Project site boundaries and shall be at least 12 feet high.*

Level of Significance after Mitigation

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

[29] This estimate is based on actual turning movement counts performed at the intersection of Gayley Avenue and Strathmore Drive/Strathmore Place on February 12, 2019 and averaged StreetLight Data (SLD) turning movement estimates prepared for all typical weekdays in February 2019. Based on the actual count performed at the intersection on February 12, 2019, the north leg experienced volumes of 2,480 and 2,953 vehicles during the AM and PM peak periods, respectively. Applying a peak-to-daily conversion factor to the sum of these volumes, the daily traffic volume on the north leg is estimated to be 13,286 vehicles per day (5,433 * ~2.44535). Based on an ambient traffic volume growth factor of 1.0% per year for this area, compounded for the four years from 2019 to 2023, the 2023 estimate is 13,825 vehicles per day.

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

Discussion

Construction activities associated with large grading equipment; pile drilling for the shoring system; and heavy, loaded trucks and similar equipment could generate and expose users or residents of the adjacent buildings to excessive groundborne vibration levels, as analyzed below. As previously discussed, the Project site would not introduce any groundborne noise sources (e.g., railroads), and no further analysis of groundborne noise is required.

Construction activities that could produce measurable vibration would be associated with the demolition and grading/excavation phases at the Project site, which are anticipated to occur for a total period of 26 weeks. Vibration sources to be considered include the operation of excavation and grading equipment and drilling. The potential vibration impacts associated with typical excavation and grading equipment would be reduced to a level considered less than significant with implementation of LRDP MM 4.9-2, which requires the use of medium-sized or smaller equipment.

While impact pile driving, which is an activity that generates substantial vibration levels, would not occur during Project construction, the Geotechnical Investigation notes that piles would be necessary, and these piles may be drilled or vibrated into place, which would reduce potential vibration levels. However, even with these techniques, vibration levels at adjacent properties could potentially exceed the building damage vibration criteria identified in Table 13 (0.25 PPV in/sec for historic and some old buildings, 0.3 PPV in/sec for older residential structures, and 0.5 PPV in/sec for new residential structures and modern industrial/commercial buildings), resulting in a potentially significant impact. The Geotechnical Investigation recommends mitigation for potential vibration impacts to adjacent structures, including continuous observation of the drilling and pouring of the piles by the Geotechnical Engineer while vibration levels are continuously monitored and recorded with seismographs to detect the magnitude of vibration and oscillation experienced by adjacent structures. MM Gayley GEO-1 presented in Section V.7, Geology and Soils, requires that the recommendations from the final Project-specific Geotechnical Investigation be incorporated into the Project, including recommendations related to vibration during the installation of steel soldier piles for shoring. MM Gayley NSE-2, which implements the recommendations in the Geotechnical Investigation related to vibration, requires that if the vibrations exceed the acceptable level for adjacent structures during installation, all pile installation activities should cease until the shoring contractor provides a plan to modify the installation procedure to reduce the values to within the acceptable range. Further, a structural survey of adjacent structures before and during construction for signs of distress or settlement would be required and corrective action would be taken to address any distress or settlement identified during construction. With incorporation of MM Gayley GEO-1 and MM Gayley NSE-2, potential vibration impacts to adjacent buildings during construction of the proposed Project would be less than significant. Vibration during the installation of piles may also exceed the established human perception thresholds for building occupants, as identified in Table 14 (0.25 PPV in/sec). However, implementation of MM Gayley NSE-2 would also reduce this impact to a less than significant level.

Heavy trucks would transport debris from the Project site during the demolition phase, with an average of approximately 15 truck trips per day over the total period of 43 days. The access routes for haul trucks and most construction vehicles would include Wilshire Boulevard, Veteran Avenue, Weyburn Avenue, and Gayley Avenue. These are all paved, generally smooth roads and, as previously noted, if a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. Haul trucks typically generate groundborne vibration velocity levels of 0.036 PPV (in/sec) at 50 feet; this level of vibration may be perceptible but would not be a strong or annoying vibration and would be well below the 0.25 PPV (in/sec) threshold for human perception. As such, the proposed Project would not expose buildings adjacent to haul truck routes to excessive groundborne vibration levels, and this impact would be less than significant. No additional mitigation would be required.

Additional Project-Level Mitigation Measures

MM Gayley NSE-2 *The campus shall require by contractor specifications that the following measures identified in the final Project-specific Geotechnical Investigation be implemented to reduce groundborne vibration impacts resulting from installation of soldier piles for shoring:*

- *Vibrations shall be monitored and recorded with seismographs during pile installation to detect the magnitude of vibration and oscillation experienced by adjacent structures. If the vibrations exceed the acceptable range during installation, the shoring contractor shall modify the installation procedure to reduce the values to within the acceptable range.*

- *Prior to excavation, the existing improvements on adjacent properties shall be inspected to document the present condition. For documentation purposes, photographs shall be taken of preconstruction distress conditions, and level surveys of adjacent grade and pavement shall be considered. During excavation activities, the adjacent structures and pavement shall be periodically inspected for signs of distress. In the event that distress or settlement is noted, an investigation shall be performed and corrective measures taken so that continued or worsened distress or settlement is minimized.*

Level of Significance

With implementation of LRDP MMs, MM Gayley GEO-1, and MM Gayley NSE-2, the proposed Project would have a less than significant impact related to generation of excessive groundborne vibration. There would be no impact related to groundborne noise.

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

Discussion

The Project site is neither within an airport land use plan nor within two miles of a public airport or public use airport; therefore, no impact related to noise from public airport operations would occur. The proposed Project is located approximately 0.2-mile northwest of the Ronald Regan UCLA Medical Center (RRUMC), which operates a helistop (with two helipads) under a Caltrans Aeronautics Heliport Permit. The helistop is located on top of the 10-story facility and generates a limited number of flights, with emergency helicopter operations occurring approximately twice per day. Implementation of the proposed Project would not increase the frequency of or otherwise affect helicopter operations at RRUMC. The Project site is located outside the 65-dBA helicopter noise level contour that defines the area for aircraft noise impacts to noise-sensitive land uses (UCLA, 2009b). Accordingly, the helicopter noise levels experienced by proposed Project users and visitors would not be excessive. Therefore, the proposed Project would not expose people in the Project area to excessive noise levels from RRUMC helistop operations. There would be a less than significant impact, and no mitigation measures would be required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

There would be no impact related to noise exposure from public use airports and a less than significant impact related to RRUMC helistop operations.

14. POPULATION AND HOUSING

Relevant elements of the proposed Project related to population and housing include the redevelopment of the Project site with additional student housing for undergraduate students. When compared to existing conditions, the proposed Project would result in a net increase of 445 beds (residents) at the Project site. However, the proposed Project would not involve an increase in UCLA student enrollment, faculty or staff.

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

Demand for UCLA student housing is consistently high and exceeds the available supply. The proposed Project would accommodate up to 545 undergraduate students (residents), which represents an increase of 445 student residents that would be housed on the Project site compared to the existing apartment building (100 beds). The proposed Project is intended to respond to the existing demand for housing, and particularly affordable student housing, on and near the UCLA campus; it would not generate new student enrollment growth. Also, the proposed

Project would result in no increase in UCLA faculty and staff. The proposed Project would be served by existing roadways and utility infrastructure adjacent to the Project site. Therefore, the proposed Project would not result in any population growth, either directly or indirectly, and there would be no impact. No mitigation is required.

Additional 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 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 Project site is currently developed with one residential apartment building owned and operated by UCLA, which includes 51 studio/studio loft units and houses approximately 100 students. With the implementation of the proposed Project, the existing residents would be temporarily displaced; however, the campus housing program would offer accommodations in other campus housing locations to any returning undergraduate students residing in the existing building. On a long-term basis, the students occupying the existing apartment building could either be accommodated within the proposed student housing facility or in other UCLA-owned housing. Therefore, the proposed Project would not result in permanent displacement of existing people that would necessitate the construction of replacement housing elsewhere. After completion of the proposed Project, there would be additional housing and affordable housing available to students compared to existing conditions, and there would be no impact.

Additional Project-Level Mitigation Measures

No additional 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

Relevant elements of the proposed Project related to public services include the redevelopment of the Project site with a new eight-story student residential building for UCLA students. The new building would consist of up to 187 rooms (545 beds). When compared to existing conditions, the proposed Project would result in a net increase of 136 rooms and 445 beds (residents). The proposed Project would not generate new students, faculty, or staff at UCLA. The proposed new building would be designed and constructed in compliance with applicable requirements

pertaining to fire protection systems. An electronic key card security system would provide secure access to the building's entries.

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

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

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

PP 4.11-2(b) *Annual meetings shall continue to be attended by the Director of UCLA Housing and the UCPD to evaluate the adequacy of police protection service for University-owned housing, assess institutional priorities and budgetary requirements, and identify and implement appropriate actions to ensure the continued adequacy of police protection services for students.*

In addition, LRDP PPs 4.12-1(a) and 4.12-1(b), discussed under the Recreation analysis (Section V.16 of this IS), have been incorporated into the proposed Project and require the campus to continue to provide recreational facilities for students, faculty, and staff and to continue to integrate landscaped open space with development.

Project Impact Analysis

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

Discussion

The proposed Project involves the redevelopment of the Project site with a new student housing building that would accommodate up to 545 beds, an increase of 445 beds compared to the existing apartment building on-site. The types of service calls are anticipated to be similar to those associated with the existing use and surrounding residential uses in the Project area, including, but not limited to, structural fires and emergency medical and rescue services.

The Los Angeles Fire Department (LAFD) provides fire suppression and rescue operations for the UCLA campus and the surrounding area, including the Project site. Fire alarm calls on campus are received by the UCLA Police Department (UCPD) command center staff members, who screen calls; determine the call location; and then alert the LAFD. Fire Station No. 37 is located

at 1090 Veteran Avenue, approximately 0.6 mile south of the Project site, and would have primary responsibility for a first alarm call to the Project site. In cases where there is a need for backup support, additional LAFD fire stations would provide the necessary assistance. Fire Station No. 37 includes a truck and two engines; Basic Life Support (BLS, for evening hours only) and Advanced Life Support (ALS, staffed 24 hours per day/7 days per week) ambulances; and a Fire Chief command car. The station is staffed daily by 14 fire personnel, including 1 paramedic and 1 member of the battalion command team. On a community-wide (Westwood Community) basis from January to December 2022, Fire Station No. 37 had initial response times of 7 minutes and 23 seconds for emergency medical services (EMS) calls; 6 minutes and 53 seconds for non-EMS calls; 6 minutes and 6 seconds for critical ALS calls, and 5 minutes and 40 seconds for structure fires (LAFD, 2023). In addition to LAFD paramedics, UCLA paramedics and ambulances from the RRUMC respond to emergency calls both on and off campus.

Additionally, UCLA Fire, a California state fire agency has authority over all UCLA-owned and occupied interests on campus. UCLA Fire sworn peace officers respond to calls for emergency service (i.e., 911 calls), mitigate threats/hazards to the University, prepare the public to manage emergencies, partner with stakeholders to respond to and recover from emergencies and disasters, investigate fire and explosion incidents, and enforce California fire and explosion law. UCLA Fire takes primary responsibility as first responder to UCLA fire alarm calls, and upon assessment of the situation, they request Fire Station No. 37 to provide response for actual fire situations. In general, LAFD is the first responder to off-campus emergencies.

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

Consistent with the campus' standard procedures, the Campus Fire Marshal would review and approve the proposed Project to ensure that: (1) adequate fire flows are maintained; (2) an adequate number of fire hydrants is provided in the appropriate locations; and (3) circulation and design features allow adequate emergency vehicle access in compliance with the *City of Los Angeles Municipal Code*. The LADWP has confirmed that there is sufficient fire flow pressure in the Gayley Avenue water line to serve the proposed new building (LADWP, 2022). The Campus Fire Marshal also inspects buildings during and after construction, and buildings can only be occupied with the approval of the Fire Marshal. In addition, the proposed Project would comply with all regulations of the California Health and Safety Code (Sections 13000 et seq.) pertaining to fire protection systems, including provision of state-mandated smoke alarms, fire extinguishers, appropriate building access, and emergency response notification systems.

The proposed Project incorporates LRDP PP 4.11-1, which requires direct fire alarm connection to the University Police command center to facilitate emergency response by providing immediate location information. Per the MOU described above, UCLA Fire would be the first responder to all fire alarms initiated from the proposed new building and would request backup support from LAFD only as needed. Due to the efficacy of the MOU, the proximity of Fire Station No. 37 to the Project site, and because the proposed Project involves redevelopment of an existing apartment building with the same type of use, the proposed Project would not substantially increase the demand for fire protection services such that new or physically altered fire protection facilities would be required to serve the proposed Project or to maintain acceptable response times and fire flows. No physical environmental impacts related to the provision of fire protection services would result, and impacts related to maintaining acceptable performance metrics would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would not require new or altered fire protection 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
b) Police protection?	☐	☐	☒	☐

Discussion

The proposed Project involves the redevelopment of the Project site with a new student housing building that would accommodate up to 545 beds, an increase of 445 beds compared to the existing apartment building on-site. The types of service calls are anticipated to be similar to those associated with existing residential uses on-site and surrounding the Project site. The types of crimes typically associated with residential uses are "crimes against persons," such as assault and robberies.

According to Section 92600 of the California Education Code, the University of California Police Department (UCPD) has concurrent jurisdiction with the Los Angeles Police Department (LAPD) within a one-mile radius of University-owned property. The UCPD is often the first responder at properties around the campus and may take primary responsibility for events off campus. The UCPD is comprised of duly sworn police officers under 830.2(b) of the *California Penal Code,* and its jurisdictional responsibilities are articulated in the *California Education Code.* The UCPD station is located on campus, at the northwestern corner of the intersection of Charles E. Young Drive South and Westwood Plaza (601 Westwood Plaza), approximately 0.3-mile southeast of the Project site.

While the UCPD has primary responsibility for police protection services on campus, the UCPD and LAPD concurrently provide police protection to the neighborhoods adjacent to the campus, including the Project site, which is owned by UCLA. UCPD personnel are used in crime prevention, investigations, and administration. In addition, UCPD personnel are instrumental in providing training to staff and faculty on leadership in emergency situations, observation tactics, active shooter scenarios, and use of safety equipment and technology. All sworn officers are available on an on-call basis to respond in emergency situations. On a part-time basis, students are employed as Community Service Officers (CSOs) to provide escort services, equipment security services, and patrol assistance. UCPD currently employs 65 sworn officers, 41 non-sworn personnel, and 130 students employed as CSOs (UCPD, 2023). The campus evaluates police protection needs on an ongoing basis and considers the need to augment UCPD and CSO staffing levels as institutional priorities. Consistent with LRDP PP 4.11-2(a) and PP 4.11-2(b), which have been incorporated into the proposed Project, the campus would continue to assess police staffing levels as individual development projects are proposed.

Additionally, to ensure adequate response to life-safety issues and as required by LRDP PP 4.11-1, the proposed building would have direct fire alarm connections to the UCPD command center to facilitate emergency response by providing immediate location information. In addition, the

UCPD would continue its current practice of cooperating with the LAPD, the Santa Monica Police Department, and the California Highway Patrol to help ensure the adequacy of police protection services cross the campus and surrounding area.

The proposed Project, which would involve the development of additional residential uses in an existing residential area, would not substantially increase the demand for police protection services provided by the UCPD and/or LAPD such that new or physically altered police protection facilities would be required to serve the proposed Project or to maintain acceptable response times. No physical environmental impacts related to the provision of police protection services would result, and impacts related to maintaining acceptable performance metrics would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would not require new or altered police protection services, 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
c) Schools?	☐	☐	☐	☒

Discussion

The proposed Project involves the redevelopment of the Project site to provide additional housing for undergraduate students (an increase of up to 445 beds compared to the existing building). The proposed Project would not include new married student, faculty, or staff housing. Additionally, there would be no increase in student enrollment at UCLA and no increase in UCLA faculty and staff as a result of the proposed Project. The proposed Project would not result in elementary, middle, or high school student generation. Therefore, there would be no increase in demand for Los Angeles Unified School District (LAUSD) services and facilities. The proposed Project would not result in a need for the construction of new or altered school facilities, and no physical environmental impacts would result.

Additional Project-Level Mitigation Measures

No additional 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?	☐	☐	☐	☒

Discussion

The analysis of the proposed Project's impacts related to park facilities is provided in Section V.16, Recreation, of this IS.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would not require new or altered park 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
e) Other public facilities?	☐	☐	☐	☒

Discussion

The proposed Project involves the redevelopment of the Project site to provide additional housing for undergraduate students (an increase of up to 445 beds compared to the existing building). The proposed Project would not include new married student, faculty, or staff housing. Additionally, there would be no increase in student enrollment at UCLA and no increase in UCLA faculty and staff as a result of the proposed Project. Therefore, the proposed Project would not result in an increased demand for on- or off-campus library services or other public services, nor would new or expanded library facilities or other public facilities be required, and no physical environmental impacts would result.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

16. RECREATION

Relevant elements of the proposed Project related to recreation include the redevelopment of the Project site with a new residential building for UCLA students (187 rooms/545 beds). When compared to existing conditions, the proposed Project would result in a net increase of 136 rooms

and 445 beds (residents). The proposed Project would not generate new students, faculty, or staff at UCLA. The proposed Project would include an internal courtyard and amenity spaces for use by students and guests.

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

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

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

Project Impact Analysis

Threshold(s)	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 would accommodate up to 545 beds (residents). The proposed Project would not increase student admissions at UCLA, rather it would accommodate the existing student population.

Although Project residents may utilize a variety of recreational facilities and programs offered by the campus (UCLA, 2023) and/or the City of Los Angeles, the majority of the campus population (students, faculty, and staff) utilizes on-campus recreational facilities. These facilities would continue to be provided and maintained for students, including Project residents, as required by LRDP PP 4.12-1(a). The UCLA Cultural Recreational Affairs Department continuously monitors the demand for recreational facilities on campus and adjusts operating hours and other program-operating procedures to ensure that the existing facilities are used as efficiently as possible. Continued review of the demand for facilities and adjustments to operating procedures and facility design (e.g., extending hours of operation) ensures that the on-campus demands are met. Additionally, LRDP PP 4.12-1(b) is incorporated into the proposed Project and requires the inclusion of open space areas at the Project site; this would be accomplished primarily through the provision of an internal courtyard.

Therefore, the proposed Project would not substantially increase the demand for park and recreational facilities and would not result in a substantial deterioration of existing facilities, nor would it accelerate such deterioration, thus resulting in a less than significant impact. Additionally, the proposed Project would not result in a need for the construction of new or altered park or recreational facilities beyond the internal courtyard included as part of the Project. The impacts

resulting from the on-site courtyard have been evaluated throughout this IS and would be less than significant. No additional physical impacts would occur with implementation of the proposed Project.

Additional 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 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.

The proposed Project would include an internal courtyard; the physical environmental impacts of this proposed Project component is addressed throughout this IS, and impacts would be less than significant.

17. TRANSPORTATION

Relevant elements of the proposed Project related to transportation include development of the Project site with housing for UCLA students. The Project would include up to 545 beds (residents), which is a net increase of 445 beds (residents) compared to the existing apartment building. The Project site is located within walking distance of the UCLA campus, situated approximately 300 feet northwest of the Gayley Avenue and Strathmore Drive/Place access point to the western side of campus. There is also pedestrian access to the campus along Gayley Avenue across the street from the Project site. Project residents would have access to a full range of existing campus TDM programs. Additionally, bicycle storage facilities and a designated area for scooter parking would be provided on site.

Construction activities would involve heavy trucks on the identified construction routes (as described in Section II.5, Proposed Project Components, under “Construction Activities,” of this IS).

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 is located off campus.

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

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

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

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

Project Impact Analysis

As previously discussed in Section V.11, Land Use and Planning, of this IS, UCLA is part of the University of California, a constitutionally created entity of the State of California, and is not subject to municipal regulations. Although there is no formal mechanism for joint planning or the exchange of ideas, UCLA may consider, for coordination purposes, aspects of local plans, ordinances, and policies for the communities surrounding the campus but is not bound by those plans and policies in its planning efforts. The following discussion analyzes the proposed Project's transportation impacts (vehicular and non-vehicular) taking into consideration UCLA and local transportation plans and policies, as appropriate.

The VMT Assessment for UCLA Gayley Towers Redevelopment Project (VMT) Assessment was prepared by KOA (KOA, 2023) to evaluate potential transportation impacts resulting from operation of the proposed Project and is included in Appendix F of this IS.

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 IS, the UC Policy on Sustainable Practices and UCLA CAP address reducing dependency on use of single occupancy vehicles to reduce emissions from mobile sources. The proposed Project is located in a transit priority area, which is defined as an area that is within 0.5 mile of a major transit stop that is existing or planned. An extensive transit network serves the UCLA campus and Westwood area. The roadways in the vicinity of the Project site are served by multiple bus lines managed by the Los Angeles County Metropolitan Transportation Authority (Metro), Santa Monica Big Blue Bus (BBB), Antelope Valley

Transit Authority (AVTA), City of Santa Clarita Transit, Amtrak, and Los Angeles Department of Transportation (LADOT). These bus lines provide a variety of bus services and, when transfer opportunities are considered, those outlined below provide access to Metro rail services, Metrolink, and numerous other bus routes served by Metro, LADOT, and other municipal bus operators. The bus lines within a "reasonable/comfortable walking distance" (approximately one-quarter mile or less) of the Project site are described below. It is noted that bus stops located at the nearby intersection of Gayley Avenue and Strathmore Drive/Place are served by 11 different bus lines, described below. Bus stops are located on the northeast, southwest, and southeast corners of the intersection of Gayley Avenue and Strathmore Drive/Place. Additionally, the Project site is located approximately 0.3 mile west of the UCLA Gateway Plaza located at the Westwood Plaza cul-de-sac in the center of campus, which serves as an area transit hub.

- **Metro Line 602** provides east-west local bus service mainly along Sunset Boulevard with a segment along Gayley Avenue. Line 602 travels between the Pacific Palisades and Westwood. Bus stops are located at the intersection of Gayley Avenue and Strathmore Drive/Place, on the northeast corner for westbound travel and on the southwest corner for eastbound travel. Line 602 operates on weekdays with headways of approximately 45 minutes during the peak hours and approximately 60 minutes on weekends.

- **LADOT Commuter Express Line 431** provides east-west commuter bus service between Westwood and downtown Los Angeles via segments of Gayley Avenue, Wilshire Avenue, the I-10, Grand Avenue, and Olive Street. Line 431 provides eastbound service in the AM peak period and westbound service in the PM peak period. The nearest bus stops are located at the intersection of Gayley Avenue and Strathmore Drive/Place on the northeast corner for westbound travel and on the southwest corner for eastbound travel. It operates during weekdays with headways of approximately 25-35 minutes depending on the direction travel and time of day.

- **LADOT Commuter Express Line 573** provides north-south commuter bus service between Century City and Mission Hills traveling along portions of Balboa Boulevard, the I-405, Gayley Avenue, Wilshire Boulevard, and Santa Monica Boulevard. Commuter service in the southbound direction is mainly provided in the AM period, with the exception of one PM period bus; and northbound service is mainly provided in the PM period, with one AM period bus. The nearest bus stops are located at the intersection of Gayley Avenue & Strathmore Drive/Place, on the northeast corner for northbound travel and on the southwest corner for southbound travel. Line 573 operates during weekdays with headways that vary between 10-45 minutes depending on the direction of travel and time of day.

- **BBB Line 18** provides north-south local bus service along Strathmore Place, Gayley Avenue, Wilshire Boulevard, and 4th Street between Westwood and Marina del Rey. Bus stops are located at the intersection of Gayley Avenue and Strathmore Drive/Place, on the southeast corner for northbound travel and on the southwest corner for southbound travel. Line 18 operates daily with headways of approximately 30 minutes during the weekday peak hours and on weekends.

- **AVTA Line 786** provides north-south commuter bus service between the City of Lancaster and Hollywood along I-405, Gayley Avenue, Santa Monica Boulevard, and La Brea Avenue. The commuter service provides four southbound buses in the AM peak period and four northbound buses in the PM peak period. The nearest bus stops are located at the intersection of Gayley Avenue & Strathmore Drive/Place on the northeast corner for northbound travel and on the southwest corner for southbound travel. Line 786 operates

during weekdays with headways of approximately 25-30 minutes during the AM period and 35-45 minutes during the PM period.

- **Amtrak Westwood/UCLA Thruway Service** provides a dedicated bus that connects the Westwood/UCLA area to the Van Nuys and Bakersfield Amtrak Stations for further connection to the San Joaquin and Pacific Surfliner Amtrak trains. The bus stop is located at 592 Gayley Avenue, just north of Strathmore Place. Bus service is provided daily between the UCLA campus and Van Nuys, with two buses providing service during the AM period and two buses running in the PM period. In the opposite direction, between Van Nuys and UCLA, four buses are provided all during the PM period.

- **Santa Clara Transit Line 792** provides north-south commuter bus service between the City of Santa Clarita and Century City, traveling along I-5, I-405, Gayley Avenue, Wilshire Boulevard, Beverly Glen Boulevard, and Santa Monica Boulevard. Commuter service is provided in the northbound direction during the AM period and in the southbound direction during the PM period. The nearest bus stops are located at the intersection of Gayley Avenue and Strathmore Drive/Place on the northeast corner for northbound travel and on the southwest corner for southbound travel. Line 792 operates during weekdays, with three buses in the AM period with headways of approximately 15-45 minutes and with two buses in the PM period with headways of approximately 60 minutes.

- **Santa Clara Transit Line 797** provides north-south commuter bus service between the City of Santa Clarita and Century City traveling along the Antelope Valley Freeway (SR-14), I-5, I-405, Gayley Avenue, Wilshire Boulevard, Beverly Glen Boulevard, and Santa Monica Boulevard. Commuter service is provided in the southbound direction in the AM period and reverses to the northbound direction in the PM period. The nearest bus stops are located at the intersection of Gayley Avenue and Strathmore Drive/Place on the northeast corner for northbound travel and on the southwest corner for southbound travel. Line 797 operates during weekdays, with five buses provided during the AM and PM periods. During the AM and PM periods, headways are approximately 15-60 minutes and 60 minutes, respectively.

- **FlixBus** provides intercity bus travel throughout the United States. Within the study area, multiple bus lines operate throughout the day. These lines provide connections to the University of California, Santa Barbara and Berkeley, San Diego, Sacramento, Las Vegas, and the University of Arizona. A bus stop is located at the intersection of Gayley Avenue & Strathmore Drive/Place.

Additionally, UCLA runs its own bus network, branded as BruinBus, providing service within the campus and point-to-point connections to off-campus housing and amenities; the nearest BruinBus stop to the Project site is approximately 0.3 mile to the southeast at Gonda Buildings. Los Angeles World Airports and Amtrak also operate bus service near the UCLA campus, which connect to air and rail facilities, respectively. The Westwood/Rancho Park Light Rail Station is located approximately 2.6 miles southeast of the Project site and provides additional transfer opportunities to other regional destinations. Additionally, Metro is currently constructing the Purple Line (D Line) extension which will be adding two new stations, Westwood/UCLA and Westwood/VA Hospital, which will connect the Westside to downtown Los Angeles. The anticipated opening of these stations is in 2027 (Metro, 2023). The Westwood/UCLA station will be located on the northwest corner of the intersection of Wilshire Boulevard and Gayley Avenue, approximately 0.8 mile from the Project site. Once this transit project is completed, the rail line will provide increased access and connectivity throughout the local area and region, as well as decrease vehicular travel on area roadways. The Westwood/UCLA station would be easily accessible to Project residents, reducing the drive alone rate.

The proposed Project does not include the installation of a new bus stop, the relocation of an existing bus stop, or the modification of an existing bus stop. However, as described above, the Project site and surrounding area are well-served by public transit. When transfer opportunities are considered, the Project site is very accessible to and from the greater Los Angeles region via public transit. Further, the UCLA TDM program is a comprehensive program that offers a broad range of services to encourage and assist UCLA commuters in utilizing alternatives to the single-occupancy vehicle.

Roadways

As further described in the VMT Assessment included in Appendix F of this IS, the Project site and surrounding uses in Westwood are well-served by freeways, avenues, and local streets. Freeways are located west and south of the Project site (I-405 and I-10, respectively) and provide convenient access to the larger, regional roadway network. Within the vicinity of the Project site, the primary roadways and roadway classifications according to the City of Los Angeles Mobility Plan 2035 include Gayley Avenue, which is designated as an Avenue II, and Strathmore Drive/Place, which is designated as a Local Street.

Construction Activities

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

As discussed in Section II, Project Description, of this IS, it is conservatively estimated that on peak days there would be up to 18 round truck trips per day during the site preparation and grading/excavation period (estimated to last a total of 88 days). Using the conservative assumption that all trips would be generated by a tractor-trailer combination (and assuming each truck trip is equivalent to 2.5 passenger vehicle trips in terms of traffic impact), peak construction traffic of approximately 45 car-equivalent round trips per day could result. These trips would be spread out over a typical eight-hour construction day; however, it is conservatively estimated that the truck trips would occur over six hours. Therefore, approximately eight equivalent round truck trips would be generated during an average hour. With a typical construction day starting at 7:00 AM, approximately eight equivalent round trips would be generated during the AM peak hour during the period of heaviest construction activity. Construction would typically be completed each day prior to the PM peak hour; therefore, no PM peak hour impacts are anticipated.

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

Construction of the proposed Project is anticipated to overlap with several other major UCLA construction projects, including the following: Sunset Canyon Recreation Replacement Building

Project, Wooden Center Seismic Improvements, and Co-Generation Plant Equipment Replacement. Additionally, non-UCLA development projects under construction or at the following addresses in the surrounding community: The Mark at Los Angeles (10915 W. Strathmore Drive), 540 Landfair/10923 Strathmore Drive Apartments, and 10970 W. Le Conte Avenue. Refer to the Campus Map presented in Figure 2, which identifies the location of these projects. Although heavy truck trips generated by construction activities associated with the proposed Project may coincide with on- and off-campus construction activities, most of these projects would have distinct haul routes with minimal overlap, different construction sequencing with separate peak periods of truck trips, and/or be subject to City of Los Angeles permitting requirements intended to reduce overlapping haul routes. Further, the construction phases with the greatest number of truck trips (demolition and grading) have been completed. Additionally, UCLA would continue to monitor the construction schedules of major projects as they proceed and would adjust construction schedules, work hours, or access routes as needed to reduce construction-related traffic congestion. Therefore, concurrent heavy truck traffic associated with the proposed Project and other major projects in the area would be minimized to the extent possible to avoid substantial traffic congestion on local roadways.

Operation

The proposed Project would not involve the construction of any new roadways. The existing apartment building on-site has three driveways along Gayley Avenue that provide entry to the existing parking garage levels. The proposed Project would provide off-campus student housing located directly across the street from the UCLA campus and would not include any automobile parking spaces for residents. There would be a single service drive/garage accessed from Gayley Avenue, which would be located at the northwest corner of the building. The garage would provide a single parking space for service vehicles and deliveries and allow direct access for trash removal. Therefore, the number of vehicles accessing the Project site would be substantially reduced compared to existing conditions.

Project residents would have access to a full range of existing campus TDM programs required by LRDP PP 4.13-1(d) to reduce vehicle trips, including, but not limited to: campus transit; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; on-campus car share program; zip cars; public transit incentives; and use of UCLA's Commuter's Guide.

Bicycle and Pedestrian Facilities

The City of Los Angeles identifies a bike route (shared lane with painted sharrow) along Gayley Avenue between S. Sepulveda Boulevard and Wellworth Avenue (south of Wilshire Boulevard), which includes the segment adjacent to the Project site (City of Los Angeles, 2018b). Additionally, there are sidewalks along both sides of Gayley Avenue. The proposed Project would align with the City's Vision Zero Los Angeles Initiative. Vision Zero was launched by Executive Order Number 10 in August 2015 with the goals of reducing traffic fatalities by 20 percent by 2017 and eliminating all traffic fatalities citywide by 2025. Vision Zero specifically seeks to implement traffic safety treatments at intersections and along roadway segments to improve safety for pedestrians, bicyclists, and other vulnerable road users. Development projects proposed on a roadway identified as part of the City's High Injury Network (HIN) should be designed to enhance safety. The Project is not located on a HIN roadway (City of Los Angeles, 2023b).

Although the Project is not located within the HIN, the Project would incorporate measures to align with Vision Zero policies. The proposed Project would not provide automobile parking for residents and would eliminate two of the three existing driveways. One driveway would remain and would be limited to use for trash collection, service vehicles and deliveries, substantially

reducing the potential for conflicts between vehicles entering/exiting the site and pedestrians and bicyclists along Gayley Avenue. Additionally, the proposed Project would include bicycle storage racks and a designated area for scooter parking, thus incentivizing Project residents and visitors to travel via bicycle or scooter to/from the Project site. Further, the Project's main entrance would be oriented toward Gayley Avenue to provide strong connectivity to the UCLA campus across the street.

In summary, the proposed Project would incorporate LRDP PP 4.13-19(d), PP 4.13-2, PP 4.13-5, and 4.13-6, which require implementation of TDM programs to reduce reliance of 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.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

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 VMT as the metric. With respect to transportation, PRC Section 21099(d) provides that the parking impacts of a residential, mixed-used residential, or employment center project located on an infill site within a TPA shall not be considered significant impacts on the environment. Therefore, the proposed Project, which does not provide automobile parking for residents, would not result in significant transportation impacts related to parking.

Although UCLA is not required to follow LADOT's TAG, the TAG as well as the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Impacts in California Environmental Quality Act (December 2018) were used as guides for a qualitative VMT Assessment for the proposed Project, which is included in Appendix F of this IS and summarized below. Notably, the TAG was updated in July 2020 and August 2022, with further refined and clarified analysis methodologies.

To assist in determining which development projects would conflict with CEQA Guidelines Section 15064.3(b)(1), the TAG establishes two screening criteria to evaluate the requirement of further

analysis of a land use project's impact based on VMT. Both of the following criteria must be met in order to require further analysis of a land use project's VMT contribution:

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

Along with the updated TAG, the LADOT has developed VMT Calculator Version 1.3 v141 (VMT Calculator). The VMT Calculator estimates the daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee for land use projects. The VMT Calculator utilizes average daily trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition, 2012) and empirical trip generation data to determine the base daily trips associated with a land use project. The number of daily trips is further refined using data from the USEPA's Mixed-Use Model and the City's Travel Demand Forecasting Model.

While the VMT Calculator is typically utilized to determine the net daily trip generation for a development project, off-campus student housing is not contained within the VMT Calculator land use categories and, therefore, the VMT Calculator does not provide trip generation rates and corresponding trip type data. Instead, the vehicle trip potential for the proposed Project's off-campus student housing land use was developed conservatively using trip rates and equations from the latest version of the ITE Trip General Manual (11th Edition, 2021) for Land Use Code 226–Off-Campus Student Apartment (Mid-Rise)–Adjacent to Campus. The Off-Campus Student Apartment trip rates and equations were applied to develop the proposed Project's trip generation estimates for purposes of this analysis. Table 1 of the VMT Assessment included in Appendix F presents the trip generation rates used to generate the weekday daily and peak-hour traffic volumes for the Project. In addition, the Dense Multi-Use Urban (DMUU) vehicle trip rates were used to account for alternative mode usage, which therefore do not require additional travel mode adjustments. A TDM credit was applied to the proposed Project trips to account for the elimination of on-site automobile parking. Additional trip generation assumptions are also described in the VMT Assessment. Based on the DMUU trip rates, the proposed Project is conservatively estimated to generate 566 net daily vehicle trips, with 34 net AM peak-hour trips (12 inbound, 22 outbound) and 52 net PM peak-hour trips (27 inbound, 25 outbound). These trips are assumed to include resident trips to/from the site (despite no parking on-site), ride share trips, deliveries, etc.

As a development project conservatively estimated to generate in excess of 250 net daily vehicle trips, a qualitative assessment of VMT has been prepared for the proposed Project. Based on several indicators, it is appropriate to presume that the proposed Project would have a less than significant VMT impact. The proposed Project would function as a local-serving use by providing off-campus student housing located directly across the street from the UCLA campus, the optimal location for siting such housing, and reducing potential automobile-related travel by Project residents. In addition, the Project site is located in an area so transit-rich that it qualifies as a Transit Oriented Community (TOC) within a TPA. Further, the proposed Project would provide zero on-site automobile spaces for residents in an area with limited on-street parking and instead would provide secure bicycle parking and an area for scooter parking, which would disincentivize resident automobile ownership and travel. Furthermore, at least 65 percent of the proposed beds (358 beds) would be offered at affordable rental rates. As such, it is reasonable to presume qualitatively that the Project would have a less than significant VMT impact.

Nonetheless, a comparative, quantitative analysis was performed using the City's VMT Calculator based on the trip generation estimates cited above. While there is no off-campus student housing land use in the VMT Calculator, there is a standard Multi-Family Housing land use type. Therefore, a standard multi-family housing project, with 187 dwelling units located at 565 Gayley Avenue, was analyzed using the VMT Calculator. For purposes of a more conservative analysis, this hypothetical standard multi-family housing project was assumed to be open to all potential

residents (not just students), provide a standard automobile parking supply per the Los Angeles Municipal Code (LAMC), and not provide bicycle parking per Los Angeles Municipal Code (LAMC) requirements. Non-student residents would logically generate greater VMT, as their primary work destinations would likely be much farther from the site than the UCLA campus. Larger automobile parking supplies and smaller bicycle parking supplies also tend to result in greater VMT. Thus, with these characteristics, the standard multi-family housing project would be expected to have a greater VMT impact than the proposed Project.

As shown in the VMT Calculator results provided in Attachment C of the VMT Assessment, the standard multi-family housing project would generate 5.5 daily household VMT per capita, which is well below the significance threshold of 7.4 daily household VMT per capita for the West Los Angeles Area Planning Commission area, in which the Project site is located. Thus, the Project would be expected to have an even lower VMT impact that would also be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would not or 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

Vehicular and Bicycle Hazards During Construction

The proposed Project does not involve any long-term changes to public roadways, service roads, or other vehicular circulation routes. As described in Section II.5, Proposed Project Components, of this IS, access to the site would be provided from I-405, Wilshire Boulevard, Veteran Avenue, Weyburn Avenue, and Gayley Avenue. Gayley Avenue includes a designated bike route along the construction route. Construction activities associated with the proposed Project could result in the temporary closure of traffic lanes or roadway segments along Gayley Avenue during various construction activities, including, but not limited to, accommodating the delivery of construction supplies, providing adequate site access for construction vehicles and equipment, construction staging, curb and driveway modifications/repairs, and installation of utility infrastructure.

The reduction of roadway capacity, the narrowing of traffic lanes, and the occasional interruption of traffic flow on streets associated with proposed Project-related construction activities could pose hazards to vehicular traffic and bicyclists due to localized traffic congestion, decreased turning radii, or the condition of roadway surfaces. To minimize traffic disruption and congestion, the Project's construction traffic would be routed to minimize affected roadways and efficiently move traffic through the Project area.

In addition, 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) when only a single lane can be maintained, would ensure that impacts associated with a construction-related traffic lane or roadway closures remain less than significant.

Pedestrian Hazards During Construction

There are existing sidewalks located along each side of Gayley Avenue in the vicinity of the Project site. To avoid conflicts/potential hazards to pedestrians during construction, the section of sidewalk adjacent to the Project site may be closed to pedestrians during portions of the construction period. Pedestrians in the Project area would be directed to the sidewalk on the opposite side of the street. Safe pedestrian movement within and around the Project area 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 of alternate pedestrian routes around the proposed Project, there would be less than significant impacts related to pedestrian hazards during construction.

Vehicular Hazards During Operation

The proposed Project does not include permanent modifications to City of Los Angeles roadways, with the exception of the removal of two of the three existing driveways along Gayley Avenue that access the on-site parking garage. Fire and other emergency vehicular access would continue to be provided from Gayley Avenue. Therefore, implementation of the proposed Project would not increase hazards due to design features or incompatible uses. Operation of the proposed Project would result in a less than significant impact related to vehicular hazards.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The 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

Emergency Access During Construction

Construction activities along Gayley Avenue may result in temporary closure of traffic lanes or roadway segments along this roadway to permit the delivery of construction materials; to transport soil; to accommodate the installation of utility infrastructure and other construction activities in the public right-of-way; or to provide adequate site access. The reduction of roadway capacity, the narrowing of traffic lanes, and the occasional interruption of traffic flow could impair emergency access. Construction activities would be planned so that access for emergency vehicles is

maintained at all times. Additionally, implementation of LRDP PP 4.13-8 as part of the proposed Project would require consultation with emergency service providers in the event of lane or street closures. Therefore, there would be less than significant impacts related to emergency access during construction of the proposed Project.

Emergency Access During Operation

With implementation of the proposed Project, emergency access to the proposed Project would be provided from Gayley Avenue. Consistent with UCLA standard procedures, the Campus Fire Marshal would review and approve the proposed Project to ensure that circulation and design features allow adequate emergency vehicle access in compliance with the CBC. Therefore, there would be less than significant impacts related to emergency access during operation of the proposed Project.

Additional 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 emergency access.

18. TRIBAL CULTURAL RESOURCES

Relevant elements of the proposed Project related to tribal cultural resources include excavation to a depth of up to 42 feet bgs that would extend into native soils.

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	☐	☐	☒	☐

Discussion

In September 2014, Governor Brown signed AB 52 (Chapter 532, Statutes of 2014), which creates a new category of environmental resources that must be considered under CEQA: "tribal cultural resources." The legislation imposes new requirements for offering to consult with California Native American tribes regarding projects that may affect a tribal cultural resource, emphasizes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures. Recognizing that tribes may have expertise regarding their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document.

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

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

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

Nonetheless, as previously addressed in Section V.5, Cultural Resources, excavation and grading at the Project site is expected to disturb native alluvial sediments and, therefore, may have the potential to impact previously unidentified tribal cultural resources. The potential to encounter previously unidentified tribal cultural resources during construction is a potentially significant impact that would be reduced to a less than significant level with implementation of LRDP MM 4.4-2(c), which specifies procedures to be taken by the project archaeologist if potential Native American artifacts are encountered.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

With implementation of previously adopted mitigation, the proposed Project would have a less than significant impact related to any substantial adverse change in the significance of a tribal cultural resource as defined in Section 21074 of the *California Public Resources Code*.

19. UTILITIES AND SERVICE SYSTEMS

Relevant elements of the proposed Project related to utilities and service systems include the development of the Project site with approximately 112,000 gsf of student housing space to accommodate up to 187 apartment units (up to 545 beds) with an interior landscaped courtyard. The proposed Project would be designed to achieve a minimum LEED Gold rating with a target of achieving a LEED Platinum rating. The proposed Project would also comply with all current CALGreen mandatory requirements. The proposed Project would also participate in the Savings by Design building performance incentive program administered by the LADWP under the auspices of the CPUC. The design, construction, and operation of the proposed Project would include a series of green building strategies, including exceedance of Title 24 energy efficiency requirements by 20 percent, as required by the UC Policy on Sustainable Practices.

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

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

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

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

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

PP 4.4-29(g) *The campus shall educate the campus community on the important of water conservation measures.*

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

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

In addition, LRDP PP 4.15-1, discussed in Section V.8, Greenhouse Gas Emissions, of this IS, requires implementation of the provisions of the UC Policy on Sustainability Practices; and LRDP PP 4.7-1, PP 4.7-5, and MM 4.7-1, discussed in Section V.10, Hydrology and Water Quality, of this IS, require the development and implementation of Best Management Practices to manage runoff, all of which are also incorporated into 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 require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Discussion

As previously described in Section II.5, Project Components, of this IS, under the discussion of Utilities, and as shown on Figure 11, municipal and private utility infrastructure necessary to serve the Project currently exists in Gayley Avenue, adjacent to the Project site. The proposed Project would involve the removal of existing utility laterals on-site and the installation of new utility infrastructure that would connect to existing water, sewer, electricity, and telecommunications facilities in Gayley Avenue. As discussed herein and further below, the existing utilities have sufficient capacity to serve the proposed Project, and the construction of new or expanded facilities off-site would not be required beyond that necessary to accommodate connections to the new building. As previously discussed, the SCAR approved by the City BOE and included in Appendix G of this IS indicated that a maximum wastewater discharge of 38,150 gpd calculated for the Project could be accommodated in the downstream sewer lines, and no off-site improvements would be necessary (City of Los Angeles BOE, 2023).

No storm drains exist in Gayley Avenue, and the existing building outlets stormwater through curb drains along Gayley Avenue. Implementation of the Project would result in a slight decrease in runoff entering the City of Los Angeles drainage system compared to existing conditions due to the minor (four percent) increase in pervious surface area. Additionally, through compliance with the Phase II MS4 requirements, storm water drainage would be controlled such that the construction of new or expanded City of Los Angeles storm drainage facilities would not be necessary. Storm water management and water treatment facilities required for the proposed Project would be located within the construction impact footprint for the proposed Project.

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

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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 LADWP supplies domestic water to properties within the City of Los Angeles, including the Project site, and ensures that the water meets all applicable state water quality standards. Section 4.14, Utilities and Service Systems, of the LRDP Final SEIR, which is incorporated by reference, includes a discussion of domestic water service provided by LADWP. The Los Angeles Aqueducts (LAA), local groundwater, purchased imported water from the Metropolitan Water District of Southern California, and recycled water are the primary sources of water supplies for the City. In their 2020 Urban Water Management Plan (UWMP), LADWP developed a water demand forecast through the year 2045 with passive conservation including codes, ordinances, and conservation phases for each of the major categories of demand. LADWP is projected to have sufficient water supply to meet all demands for normal year, single-dry year, and multiple-dry year conditions through the planning period of 2025 to 2045 (LADWP, 2021).

The projected water demand for the proposed Project has been calculated at 16,224 gpd (5.92 million gallons per year [mgy]) based on per-student demand rates derived from 2022 billing records for UCLA's Centennial and Olympic Halls.[30] This is a conservative estimate as it does not take into consideration the water demand generated by the existing building on-site, which does not meet current water conservation requirements.[31] The Project's estimated water demand includes water demand reduction associated with the following water conservation measures that would be implemented as required by LRDP PP 4.14-2(9): incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands; and selecting water fixtures (e.g., taps, toilets, shower heads, and other fixtures) to achieve a reduction in water demand and increase water efficiency (consistent with and using recycled/reclaimed storm water for irrigation). Further LRDP PPs 4.14-2(b) through 4.14-(d) from the LRDP Final SEIR are incorporated into the Project and require reducing irrigation needs; promptly detecting and repairing water and irrigation pipe leaks; and minimizing the use of water to clean walkways and other hardscape, respectively.

The estimated water demand of approximately 5.92 mgy (equivalent to approximately 18.17 acre-feet per year [afy]) would represent approximately 0.002 percent of the City's 746,000 afy total projected water demand without planned additional City water conservation measures, as

[30] To calculate a realistic estimate of Project water demand, billing data from 2022 associated with recently constructed UCLA housing facilities were used. These resident halls are assumed to approximate the Project in terms of utility efficiency and resource conservation. Total water demand also accounts for the Project's estimated Maximum Applied Water Allowance (MAWA) for irrigation, as provided by Mithun, 2023.

[31] In fact, the water demand per student associated with Centennial and Olympic Halls is calculated at 10,750 gallons per year compared with 12,020 gallons per student per year at the existing Gayley Towers apartment building.

presented in the 2020 UWMP.[32] Further since the Project site has General Plan land use and zoning designations corresponding to multi-family residential development, these land uses were a factor in determining the overall water demands for the City in the UWMP. Therefore, water usage for the proposed Project would be within the established demand projections of the LADWP as outlined in the current 2020 UWMP. There would be sufficient water supplies for implementation of the Project and particularly in light of improved water conservation and efficiency with implementation of the Project, a less than significant impact related to water supply would occur.

Additional 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 availability of sufficient water supplies to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years.

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

Discussion

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

Because the amount of wastewater entering HWRP can double on rainy days, the HWRP was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day (mgd) and peak wet weather flow of 800 mgd. On average, 275 million gallons of wastewater enters the HWRP on a dry weather day (LA Sanitation, 2023). Therefore, the HWRP currently operates at approximately 61 percent of its capacity, with approximately 175 mgd of available dry weather capacity. Conservatively assuming that all water used at the Project would ultimately flow into the local sewer system, the proposed Project's estimated wastewater generation of 16,224 gpd would represent a negligible amount (0.009 percent) of the HWRP's remaining daily capacity. This estimate is further conservative in that it does not account for the wastewater generation from the existing uses that would be removed. There would be a less than significant impact related to adequate wastewater treatment capacity to serve the Project's projected demand in addition to the provider's existing commitments.

[32] (5,921,890 gallons per year / 325,851 = 18.17 acre-feet per year)

Additional 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 adequacy of wastewater treatment capacity to serve the Project's projected demand in addition to the provider's existing commitments.

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

Discussion

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

Section 4.14, Utilities and Service Systems, of the LRDP Final SEIR, which is incorporated by reference, provides a discussion of the regulatory framework for solid waste management relevant to UCLA projects. AB 939 required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal was later increased to 75 percent by 2020 per SB 341. Further, the Solid Waste Disposal Measurement Act of 2008 (SB 1016) was established to make the process of goal measurement (as established by AB 939) simpler, timelier, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. Additionally, the CALGreen Code requires all new developments to divert 65 percent of non-hazardous construction and demolition (C&D) debris.

Notwithstanding the State's requirements, the UC Policy on Sustainable Practices, previously discussed in Section V.8, Greenhouse Gas Emissions, of this IS, establishes goals addressing waste reduction and recycling, which exceeds the established state requirements. Notably, the Policy for Zero Waste indicates that the University is committed to achieving a 25 percent reduction of waste per person from FY 2015/2016 by 2025, a 50 percent reduction of waste per

person from FY 2015/2016 by 2030, and a total 90 percent solid waste diversion rate from the landfill. This requirement exceeds those established by AB 341 and the CALGreen Code.

According to the most current data available from the UCLA 2019-2021 FY Waste Report (UCLA, 2022), the UCLA campus achieved a solid waste diversion rate of 89 percent for construction waste, and the University Apartments collectively account for about 18 percent of the campus' solid waste generation. Operational waste diversion is calculated to be 83 percent for compost, 100 percent for recycling and green waste, and zero percent for landfill (trash), meaning that of the waste disposed of as trash (as opposed to disposal as compost or recycling), all of it is ultimately received at a landfill. UCLA's extensive multi-stream waste diversion is accomplished through various recycling and waste management programs, including but not limited to programs for food and beverage containers, plastics, paper, metals, green waste, food waste, construction waste, and electronics. UCLA also operates a SAFE Collection Center at an EH&S facility that accepts off-campus residential hazardous and electronic waste for recycling at no charge. UCLA is able to monitor and enforce compliance with established diversion requirements through review of waste hauler receipts.

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

- **Construction.** Based on the USEPA new construction waste generation rate of 4.38 lbs/sf for residential structures (USEPA, 2009), the proposed approximately 112,000 gsf of new construction would generate a total of approximately 245.3 tons (490,560 lbs) of solid waste. As discussed in Section II.5, Proposed Project Components, because the Project site is currently developed with an 57,075 gsf apartment building, the proposed Project's construction activities would include demolition. Demolition of the existing building and hardscape would be necessary to implement the proposed Project. Based on the USEPA demolition waste generation rate of 150 lbs/sf for residential structures, the existing building is calculated to generate approximately 4,280.6 tons (8,561,250 lbs) of demolition waste. As such, the total the construction waste generated by the Project would be approximately 4,525.9 tons.

  A minimum LEED Gold rating for the proposed Project has been established, consistent with the UC Sustainable Practices Policy. The UCLA campus is committed to ultimately achieving approximately 90 percent waste diversion, which includes demolition and other construction waste. This would reduce the Project's total amount of construction waste to be disposed to approximately 452.6 tons, with a 90 percent waste diversion.

  Inert wastes, such as construction waste, yard trimmings, and soils, are typically disposed of at inert waste landfills.[33] One inert waste landfill, Azusa Land Reclamation Landfill in Azusa, has a full solid waste facility permit, although several other inert debris facilities operate in the County, most of which are located in Irwindale. Given its average disposal rate and remaining permitted capacity, Azusa Land Reclamation Landfill is estimated to reach its capacity in 201 years, although its current permit will expire in 2045. Combined with the other inert debris facilities, adequate long-term capacity is expected to remain available.[34]

  The Project's construction waste stream would be disposed of at appropriate disposal facilities periodically over the construction period, rather than all in one day. Therefore,

[33] Inert waste is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

[34] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2020 Annual Report, October 2021.

construction of the proposed Project, which incorporates LRDP PP 4.14-3 and PP 4.15-1, would result in a less than significant impact to landfill space.

- **Operation.** Based on per-student waste disposal rates derived from 2022 billing records for UCLA's Centennial and Olympic Halls, the Project is estimated to require the disposal of 56.52 tons of trash per year, in addition to the generation of 21.96 tons of recycling and 21.02 tons of organic materials (compost) annually.[35] These estimates are considered conservative in that they do not account for the removal of the existing uses, which exhibit a lower level of diversion and do not receive composting services. As noted above, the proposed Project, although off campus, would be served by the same private waste disposal company as on-campus facilities and therefore would be provided with the same collection, diversion, and disposal programs and facilities as on-campus development.

  Continued waste diversion exceeding AB 939 requirements would be accomplished through UCLA's waste reduction and minimization efforts, as required by LRDP PP 4.14-3. This includes, but is not limited to, recycling and composting. The proposed Project would include a three-stream receptacles to facilitate these efforts. Further, compliance with the UC Policy on Sustainable Practices is required (refer to LRDP PP 4.15-1), including provisions related to waste management practices. Specifically, UCLA is committed to achieving a 90 percent solid waste diversion rate from the landfill.

  To determine the Project's operational impact on solid waste facilities, the projected solid waste disposal need was compared to the total remaining capacity at the anticipated receiving landfill, Chiquita Canyon Landfill. This landfill has a daily maximum permitted capacity of 12,000 tons (yearly equivalent of 3.1 million tons) and received an average of 6,114 tons per day in 2020.[36] It has an estimated remaining lifespan of 27 years and a permit expiration date of 2047. Based on an estimated disposal need of 56.52 tons per year, the Project's trash stream would represent approximately 0.004 percent of the landfill's remaining annual capacity. Thus, Chiquita Canyon Landfill would have sufficient permitted capacity to accommodate the Project. Therefore, with incorporation of LRDP PPs 4.14-3 and PPs 4.15-1 into the proposed Project, there would be a less than significant impact related to solid waste disposal, and no mitigation would be required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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.

[35] To calculate a realistic estimate of Project waste disposal, Athens hauling data from 2021-2022 associated with recently constructed UCLA housing facilities were used. These resident halls are assumed to approximate the Project in terms of utility efficiency and resource conservation.

[36] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2020 Annual Report, October 2021.

20. WILDFIRE

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

Discussion

The Project site is located within the limits of the City of Los Angeles and is therefore not within a State Responsibility Area where the California Department of Forestry and Fire Protection (CalFire) is responsible for fire suppression. The Project site is not located in a Wildfire Severity Zone as shown in Figure 13-8 of the City of Los Angeles LHMP (City of Los Angeles, 2018a). The nearest wildland area is the Santa Monica Mountains and associated foothills, located approximately 0.6 miles to the northwest of the Project site, with intervening urban development. Additionally, according to CalFire, the Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) (CalFire, 2022). 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.

Additional Project-Level Mitigation Measures

No additional 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 IS, 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 a less than significant impact.

As discussed under Section V.5, Cultural Resources, of this IS, the proposed Project would have a less than significant impact on historic resources. The proposed Project would involve excavation in native sediments and, although unlikely, there is a potential for previously unknown archaeological or paleontological resources to be encountered. Incorporation of LRDP PP 4.4-5, MM 4.4-2(a) through MM 4.4-2(c), MM 4.4-3(a), and MM 4.4-3(b) into the proposed Project would ensure that potential impacts would be reduced to a less than significant level.

Additional 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 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 following known projects are proposed, approved, and/or under construction either on the UCLA campus or within the residential area surrounding the Project site. Refer to the Campus Map presented in Figure 2, which identifies the location of these projects.

- **Sunset Canyon Recreation Replacement Building Project** – This project is proposed in the northwest corner of the UCLA campus and involves the replacement of a series of existing recreational buildings totaling approximately 7,000 gsf (plus 5,800 sf of covered unenclosed space), several of which have been red-tagged and are no longer occupiable due to seismic and structural deficiencies, with a single approximately 11,500-gsf building (plus 6,500 sf of covered unenclosed space). Similar recreational programming would be provided. Construction is estimated to begin in mid-2024 and end in early 2026.

- **Wooden Center Seismic Improvements** – The proposed project at the John Wooden Center, located in the center of campus, would improve the building from a seismic performance rating of VI to at least a seismic performance rating of IV, in compliance with current UC Seismic Safety Policy requirements. Also included are accessibility improvements, enclosure of the exterior loggia to add approximately 2,600 gsf of programmable space, and a new roofing membrane. Construction is estimated to last from Fall 2024 through Fall 2026.

- **Co-Generation Plant Equipment Replacement** – UCLA's co-generation plant is an 86,000-sf building that provides electric power, chilled water, and steam to the campus. The proposed project involves the replacement and upgrade of the plant's combined power generating equipment. Improvements would include, but not be limited to, the installation of two new gas turbine generators, modifications to two existing heat recovery steam generators, modification of existing piping and ductwork, and modifications to the existing structure to accommodate the new generators and mechanical and electrical equipment. These activities are projected to last from approximately Summer 2023 to Summer 2024.

- **The Mark at Los Angeles at 10915 W. Strathmore Drive** – Located directly southeast of the Project site, this project is currently under construction and consists of a new seven-story multi-family residential development containing 37 dwelling units, 36 stacked automobile parking spaces, and 166 long-term bicycle parking spaces in a subterranean garage. The building is being constructed on the site of a demolished historic resource, the University Lutheran Chapel.

- **540 Landfair Avenue/10923 Strathmore Drive Apartments** – This project is currently under construction and consists of two new multi-family residential buildings. The north building will be six stories tall, and the south building will be five stories tall. Together, the buildings will contain 21 apartment units, rooftop decks, and 160 parking stalls in a four-level subterranean garage. The new buildings will be constructed on the site of two former two-story apartment buildings, which were demolished in 2019.

- **10970 W. Le Conte Avenue** – Construction of this project is nearly complete and leasing is underway. The project involved the demolition of an existing two-story building and development of a four-story 38,639-gsf building with medical office and retail uses.

As discussed in Section V.3, Air Quality, of this IS, the proposed Project's construction and operational emissions would be less than significant. Therefore, consistent with SCAQMD policy, the cumulative construction and operational impacts of the Project would also be less than significant. With the exception of the projects adjacent to the Project site (The Mark at Los Angeles and 540 Landfair/10923 Strathmore Drive), the cumulative projects identified above are located at a sufficient distance from the Project site that noise from construction activities would not be audible to the same receptors. With respect to cumulative construction noise from the proposed Project and the adjacent projects currently under construction, the demolition and grading activities for the adjacent projects have been completed. As discussed in Section V.13, Noise, of this IS, these types of construction activities generate the highest noise levels. Additionally, the adjacent projects are subject to the City's noise ordinance requirements related to construction noise. Specifically, each project must comply with the adopted City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and LAMC Sections 41.40 and 112.05, as well as any subsequent Ordinances, which prohibit the emission or creation of noise beyond certain levels. As a result of this mandatory compliance, the City concluded that construction noise impacts associated with those projects would not be significant. Therefore, the proposed Project, which would be constructed in accordance with the LRDP PPs and MMs related to construction noise and would have a less than significant construction noise impact, similarly would not result in a cumulatively considerable contribution to any potential cumulative construction noise impacts.

With respect to historic resources, as identified in the Historic Resources Report provided in Appendix C of this IS (Page & Turnbull, 2023), several recent projects have been completed in Westwood and more are planned (per the list above). In combination with the proposed Project, the related projects have the potential to cumulatively impact known historic resources in the area, as identified in Section V.5, Cultural Resources, of this IS. The proposed new eight-story building is taller than many of the existing buildings in the area and would somewhat alter the immediate setting surrounding 565 Gayley Avenue. The area is a densely developed residential neighborhood bordering the UCLA campus, characterized primarily by two- to four-story multi-family residential buildings and fraternity houses, with a few scattered taller apartment buildings. The existing buildings were constructed over many decades and exhibit a variety of architectural styles, giving the neighborhood a varied and eclectic appearance. Although the proposed Project would introduce a taller contemporary building to the area and affect the setting of the historic resources in closest proximity, it would not impact any other aspects of integrity or the ability of nearby resources to convey their historic significance. Similarly, while other development projects have been completed recently or are planned to be completed in the near future that have added

more tall, contemporary apartment buildings to the area, the area would remain a dense, multi-family neighborhood with a varied mix of apartment buildings and fraternity houses of different ages and styles. Therefore, when combined with recent and proposed/approved projects, the proposed Project would not have a cumulative impact on existing historic resources in the area (Page & Turnbull, 2023).

With respect to other topical issues, the proposed Project would have no impact, a less than significant impact, or a less than significant impact with continued implementation of applicable PPs and MMs from the LRDP Final SEIR and/or implementation of Project-specific mitigation measures. Therefore, the proposed Project would not result in a cumulatively considerable contribution to any potential cumulative impacts, and no additional mitigation would be required.

Additional 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 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 analysis presented in Section V.1 through V.20 of this IS, potential impacts of the proposed Project would be less than significant in part due to the incorporation of relevant LRDP PPs and MMs, as well as implementation of new Project-specific MMs intended to address potential construction-related noise and vibration impacts and geology/soils impacts. No significant and unavoidable adverse environmental effects to human beings would occur as a result of the proposed Project.

Additional Project-Level Mitigation Measures

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

Level of Significance

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

California Department of Forestry and Fire Protection (CalFire). 2022. *Fire Hazard Severity Zone Viewer*. Sacramento, CA. https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=4466cf1d2b9947bea1d4269997e86553

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