UCLA Research Park Project

Final Initial Study/Mitigated Negative Declaration
State Clearinghouse No. 2026050140

Lead Agency: University of California
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Oakland, California 94607

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September 2026

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SECTION 1.0 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 21000 et seq.), the CEQA Guidelines (14, California Code of Regulations [CCR], Sections 15000 et seq.), and the Amended University Procedures for the Implementation of CEQA, effective March 17, 1989, the potential environmental effects of the proposed UCLA Research Park Project (proposed Project) have been analyzed in a Draft Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse [SCH] No. 2026050140) dated May 2026. Because the Project site is located off-campus, the Draft IS/MND is not tiered from the University of California Los Angeles (UCLA) Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (referred to herein as the LRDP Final SEIR; SCH No. 2017051024), which was certified by the University of California (UC) Board of Regents (The Regents) in January 2018. However, pursuant to CEQA Guidelines Section 15150, the LRDP Final SEIR is incorporated by reference.

Based on the Project-specific analysis presented in the Draft IS/MND, it was determined that the proposed Project would have no impact or a less than significant impact with: (1) the incorporation of relevant adopted programs, practices, and procedures (PPs) and mitigation measures (MMs) identified in the previously adopted UCLA Long Range Development Plan Mitigation Monitoring and Reporting Program (LRDP MMRP);[1] and (2) the adoption of the proposed Project-specific MMs related to tribal cultural resources (MMs RP TCR-1, TCR-2, TCR-3, TCR-4, and TCR-5) to reduce potential, but unanticipated, impacts if any resources are encountered during construction. After incorporation of the identified LRDP MMRP MMs and PPs, as well as the Project-specific MMs, the proposed Project would not result in any significant and unavoidable impacts. Therefore, in accordance with the CEQA Guidelines, an MND is the appropriate environmental document for the proposed Project.

A Notice of Intent to Adopt an MND (NOI) along with the Draft IS/MND was released on May 4, 2026, for a 30-day public review period that concluded on June 3, 2026. The NOI and Draft IS/MND were posted on the Governor's Office of Land Use and Climate Innovation (LCI) State Clearinghouse CEQAnet Web Portal, and the NOI was distributed directly to 41 public agencies, community organizations, and interested individuals. The NOI and Draft IS/MND were made available on the UCLA Capital Programs website and at the Charles E. Young Research Library on the UCLA campus. The NOI was also posted at several publicly visible locations on the Project site and e-mailed to an additional 319 individuals who requested notifications about the Project. Additionally, the NOI was published in the UCLA Daily Bruin (both print and online editions) on May 4, 2026.

Eight written comment letters on the Draft IS/MND were received by the University and are included in Attachment A and responses to the comments received are provided in Section 2.0 of this Final IS/MND.

A virtual public meeting was held on May 20, 2026, during which the public was given the opportunity to provide comments on the Project and the Draft IS/MND. The public meeting was attended by 25 members of the public, plus UCLA and UC staff and other consultants affiliated with the Project. There were eight commenters at the meeting and transcripts of the public meeting and the associated Zoom chat are provided in Attachment B of this Final IS/MND.

It should be noted that subsequent to preparation of the Draft IS/MND, a refinement to the proposed Project was made to include a fitness center amenity for employees on the Research

[1] As a general practice, UCLA incorporates all relevant, previously adopted LRDP PPs and MMs into all development projects, including those located off-campus such as UCLA Research Park.

Park East rooftop. This proposed Project refinement is further discussed in Section 3.0 of this Final IS/MND. As discussed, there would be no new significant impacts associated with this Project refinement, and no additional mitigation measures are required or proposed; therefore, no substantial revisions as defined in CEQA Guidelines Section 15073.5 have been made, and recirculation of the Draft IS/MND or preparation of an environmental impact report is not required.

This document is the Final IS/MND for the UCLA Research Park Project. This document includes:

- The comments received and the University's responses to those comments (Section 2.0);
- The Project-specific MMRP including relevant LRDP PPs and MMs included as part of the UCLA Research Park Project and Project-specific mitigation measures MMs RP TCR-1, TCR-2, TCR-3, TCR-4, and TCR-5 (Section 4.0);
- Copies of the eight written comment letters received (included in Attachment A);
- The transcript of the May 20, 2026 public meeting (included in Attachment B);
- The Zoom chat transcript of the May 20, 2026 public meeting (included in Attachment B); and
- The Draft IS/MND (May 2026) (included in Attachment C).

SECTION 2.0 PUBLIC COMMENTS AND UNIVERSITY RESPONSES

CEQA Guidelines Section 15074(b) indicates that prior to approving a project, the lead agency must consider the proposed mitigated negative declaration (MND) together with any comments received during the public review process. Responses to comments received during the public review process are not required by CEQA; however, it is the University's standard practice to provide responses to comments related to MNDs.

The University received written comment letters from four organizations and four individuals on the Draft IS/MND during the public comment period. The comment letters are included in Attachment A of this Final IS/MND.

Additionally, a total of eight individuals provided oral and/or written (chat) comments during the virtual public meeting held on May 20, 2026. The transcript of the public meeting, which includes the University's presentation of Project information, an overview of the CEQA process, and the results of the environmental analysis presented in the Draft IS/MND, as well as the associated Zoom chat transcript, are provided in Attachment B of this Final IS/MND.

Below are the comments received and the University responses to these comments.

2.1 RESPONSE TO TOPICAL ISSUES

A substantial number of the comments received during the public review process addressed similar issues. To avoid repetitiveness in the responses to these comments, the following topical response has been prepared to address common concerns:

Topical Response 1 Biosafety, Laboratories, Associated Operations, and Oversight

Topical Response 1—Biosafety, Laboratories, Associated Operations, and Oversight

As a public research university, UCLA's foundational pillars are education, research, and public service. To support the research enterprise, UCLA Research & Creative Activities provides logistical support, policy guidance, and strategic advice. The Vice Chancellor for Research & Creative Activities serves as the Chief Research Officer for the campus and is charged with stewarding its academic research and creative activities. UCLA Research Park falls under the leadership of this Vice Chancellor. Additionally, UCLA's researchers are supported by various UCLA departments as well as federal agencies including but not limited to the National Institutes of Health (NIH), the National Science Foundation (NSF), the National Aeronautics and Space Administration (NASA), and the National Endowment for the Humanities (NEH), as well as many state and private organizations.

Specific to research and teaching activities that involve the use of biohazardous materials, UCLA is required to ensure compliance with all applicable federal, state, and local regulations and industry standards. These include but are not limited to: the Centers for Disease Control and Prevention (CDC) *Biosafety in Microbiological and Biomedical Laboratories* (BMBL); the Federal Select Agent Program Regulations; the California Division of Occupational Safety and Health (Cal/OSHA) Bloodborne Pathogen Standard; and the Cal/OSHA Aerosol Transmissible Disease Standard. Further, research activities involving the use of recombinant or synthetic nucleic acid molecules must comply with the NIH *Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules* (NIH Guidelines). To ensure compliance with the applicable regulations and guidelines, UCLA Policy 992: Use of Biohazardous Materials and Recombinant or Synthetic Nucleic Acid Molecules in Research and Teaching Activities outlines the roles and responsibilities

of the UCLA Environment, Health & Safety (EH&S) Biosafety Office; the Institutional Biosafety Committee (IBC) and IBC administrative staff; and the individual Principal Investigators (PIs) and their research teams. The following discussion outlines many of the policies, procedures, and oversight structures currently in place at UCLA, primarily focused on campus operations and research, and then addresses the applicability of such policies, procedures, and oversight structures at UCLA Research Park.

UCLA Environment, Health & Safety

EH&S serves and supports the UCLA campus and community by providing collaborative, proactive, and responsive safety and compliance expertise. There are four main divisions within EH&S: Administration; Research Safety; Environmental, Occupational, and Safety Programs; and UCLA Fire. These divisions and their roles—as relevant to UCLA Research Park—are described briefly below. More information about EH&S and its divisions can be found on the EH&S website.

EH&S Research Safety

As one of the largest divisions in EH&S, Research Safety supports research activities at UCLA by providing education, oversight, and regulatory compliance guidance related to biosafety and high containment, chemical safety, laser and photobiological safety (LPS), and radiation safety. Offices focused on each of these issues are led by specialized teams comprised of experts with varied scientific backgrounds. Of most relevance to the types of research that may occur at UCLA Research Park, the Biosafety Program is designed to prevent personal, laboratory, and environmental exposure to biohazardous materials. The Biosafety Office oversees activities involving biological materials, including recombinant or synthetic nucleic acid molecules, infectious biological agents, bloodborne pathogens, and other potentially infectious materials such as bodily fluids and tissues, to ensure their safe use in research and campus facilities. Additionally, the Chemical Safety Program enables the safe use of potentially hazardous chemicals in research at UCLA laboratories by ensuring compliance with campus policies and other safety regulations.

Biosafety Laboratories and High Containment

Four biosafety containment levels (BSLs) are defined in the CDC's BMBL and the NIH Guidelines. These levels are designated in ascending order (BSL-1 through -4) by degree of protection to personnel, the community, and the environment, with each level building on those below it. BSLs define a combination of practices, safety equipment, and facilities designed to contain biological agents and protect workers and the environment. The containment zone is defined by floor-to-ceiling, wall-to-wall separation from areas with different containment levels.[2]

In determining the appropriate biosafety level for a facility, a risk assessment is conducted in accordance with the requirements of the UCLA Institutional Biosafety Plan. The first step of this process is determination of the risk group of the agent (e.g., virus, microorganism, microbial toxin) that will be handled by the lab. The NIH assigns agents to one of four risk groups based on their principal characteristics, route(s) of transmission, and availability of prophylaxis or treatment. Risk Group (RG) 1 includes agents not associated with disease in healthy human adults; RG 2 includes agents associated with human diseases that are rarely serious and for which preventive or therapeutic interventions are often available; RG 3 includes agents associated with serious or lethal human diseases for which preventive or therapeutic interventions may be available; and RG 4 includes agents that are likely to cause serious or lethal human diseases for which preventive or therapeutic interventions are not usually available. It is noted, however, that the

[2] University of California Los Angeles, UCLA Institutional Biosafety Plan, December 2019, p. 17.

appropriate biosafety level may be higher or lower than the risk group of an agent depending on the procedures, facilities, and personnel involved.[3]

Per the CDC's BMBL, Biosafety Level 1 (BSL-1) is the basic level of protection and is appropriate for defined and characterized strains of viable biological agents that are known to not cause disease in immunocompetent adult humans. Biosafety Level 2 (BSL-2) is appropriate for handling moderate-risk agents that cause human disease of varying severity by ingestion or through percutaneous or mucous membrane exposure. Biosafety Level 3 (BSL-3) is appropriate for agents for which treatment is available, but that have a known potential for aerosol transmission, for agents that may cause serious and potentially lethal infections, and that are indigenous or exotic in origin. BSL-3 laboratories are not used for exotic agents that pose a high individual risk of life-threatening disease by infectious aerosols and for which no treatment is available. Such agents are restricted to high containment laboratories that meet Biosafety Level 4 (BSL-4) guidelines.[4] No BSL-4 facilities are permitted at UCLA, nor would any operate at UCLA Research Park.

A BSL-1 facility includes standard microbiological practices such as hand washing, prohibition on eating and drinking in the lab; sharps safety and decontamination procedures; personal protective equipment (PPE) such as lab coats, gloves, and eye protection; and fixtures such as doors for access control, sinks for hand washing, and non-porous surfaces that are easily cleaned.[5] Numerous BSL-1 labs operate on the UCLA campus.

A BSL-2 facility includes all of the practices of a BSL-1 facility plus additional requirements such as the availability of a biosafety manual, access control, routine equipment decontamination, and prohibition of animals not associated with lab work. In addition to BSL-1 lab equipment recommendations, a BSL-2 lab may have a biosafety cabinet(s) or other containment device(s), aerosol-tight centrifuge rotors or safety cups, self-closing doors, an eyewash station, and potentially inward flow of air without recirculation.[6] A BSL-2+ facility is recommended for the same types of agents as for BSL-2, but includes additional protective practices such as additional hazard communication and medical surveillance, decontamination of materials, prohibition of persons under 16 years old in the lab, and the use of additional PPE such as a disposable gown and surgical mask.[7] Additionally within BSL-2+ labs, work with biological materials is not permitted outside of a biosafety cabinet.

The average BSL-2 lab at UCLA processes human blood samples, may involve handling low-risk viral vectors, and may propagate human-derived cell lines. When infectious agents are used at a BSL-2 facility, they are assessed as highly treatable with low transmissibility. These experiments pose individual exposure risks for the staff in the lab, necessitating BSL-2 containment measures, but there is no practical way that a lab accident could have a larger public health impact based on the factors described above. As such, BSL-2 labs do not have significant design features that

[3] University of California Los Angeles, UCLA Institutional Biosafety Plan, December 2019, p. 15.
[4] Centers for Disease Control and Prevention and National Institutes of Health, Biosafety in Microbiological and Biomedical Laboratories, 6th edition, 2020, p.4.
[5] University of California Los Angeles, UCLA Institutional Biosafety Plan, December 2019, p. 18.
[6] Unlike a chemical fume hood, which is used for dangerous chemicals, protects the user, lacks HEPA filtration and exhausts air outside the building, a biosafety cabinet is used for infectious biological agents, protects the user as well as the environment and the material, must have a HEPA filter, and does not exhaust air outside the building without decontaminating it first. See the Administration for Strategic Preparedness and Response's article, "Biosafety Cabinets", for further information, accessible at https://aspr.hhs.gov/S3/Pages/Biosafety-Cabinets.aspx.
[7] University of California Los Angeles, UCLA Institutional Biosafety Plan, December 2019, p. 18.

set them apart from other research laboratories.[8] As discussed further below under Existing Campus Operations, there are over 800 BSL-2 and BSL-2+ labs operating on the UCLA campus.[9]

The design and engineering of all BSL-3 facilities within the University of California (UC) system (including any to be located at UCLA Research Park), must adhere to the UC's BSL-3 Laboratory Design Standards (April 2025) which are based on CDC and NIH guidelines, as well as industry standards and best practices, and in all cases meet or exceed federal recommendations.[10] The primary objective of these facilities is to provide the best possible physical containment of research materials and agents. BSL-3 labs have the same practices and equipment of a BSL-2+ facility plus respiratory protection; self-closing double-door access; monitored and alarmed constant negative airflow with no reversal; 100 percent air exhaustion, potentially requiring HEPA filtration; sealed seams and penetrations to permit gaseous decontamination; hands-free sinks; sealed windows; and physical separation from access corridors.[11] In essence, BSL-3 labs must be designed and engineered to contain research materials, manage aerosols generated during procedures, accommodate all necessary equipment, and allow for regular decontamination. Work with highly infectious aerosol-transmissible pathogens is restricted to BSL-3 facilities. One BSL-3 lab currently operates on the UCLA campus, and one additional BSL-3 lab has been approved for construction on campus. Numerous BSL-3 labs also operate at UC Berkeley, UC Davis, UC Irvine, UC Merced, UC Riverside, UC San Diego, and UC San Francisco.[12]

EH&S's High Containment Program provides specialized expertise and management of research conducted in UCLA's BSL-3 laboratory. This program oversees the operations and maintenance of the BSL-3 lab, the BSL-3 training program, and UCLA's Tier 1 Select Agent Program. The High Containment Program is supported by the UCLA High Containment Laboratory Oversight Group (HCLOG), as well as the UC system-wide High Containment Laboratory Oversight Committee (HCLOC) operated by the UC Office of the President. The HCLOG is responsible for providing advice, guidance, and leadership regarding biocontainment, biosafety, and biosecurity oversight for all UCLA activities involving high containment laboratories, including a validated training program. The High Containment Program Director oversees UCLA's BSL-3 lab, providing administrative and operations management support, personnel training, and serves as the UCLA Responsible Official to the CDC Federal Select Agent Program.[13] In addition, the High-Containment Facility Operations, Maintenance, & Validation Standard (April 2025) establishes standards for operations and maintenance and lays out the UC system requirements for validating the effectiveness of safety controls on an ongoing basis. UC BSL-3 facilities are further required to adhere to all policy enhancements issued by the HCLOG. The UC design and engineering standards together with appropriate operation and maintenance protocols, robust training programs, administrative controls, and documented standard operating procedures (SOPs) promote, and have a demonstrated track record of achieving, safe and effective research activities.

[8] University of California Los Angeles, email correspondence with Joseph Callahan, interim Biosafety Officer, UCLA Environment, Health & Safety, June 2, 2026.
[9] University of California Los Angeles, meeting with Joseph Callahan, Interim Biosafety Officer, UCLA Environment, Health & Safety, June 1, 2026.
[10] While several authorities have published standards for the design of BSL-3 laboratories, no single agency has sole oversight or responsibility related to relevant research safety considerations. Therefore, the UC BSL-3 Laboratory Design Standards described above govern.
[11] University of California Los Angeles, UCLA Institutional Biosafety Plan, December 2019, p. 18.
[12] University of California, UC High-Containment Laboratory Oversight Committee, October 21, 2025, https://www.ucop.edu/safety-and-loss-prevention/_files/groups/membership-roster-hcloc-040419.pdf, accessed June 3, 2026.
[13] University of California Los Angeles, High Containment at EH&S, https://ehs.ucla.edu/high-containment, accessed June 3, 2026.

For general reference purposes only, it is noted that a BSL-4 facility has the same practices and equipment requirements of a BSL-3 facility, plus the BSL-4 facility itself is often housed in a separate building or completely isolated zone with complex, specialized ventilation requirements and waste management systems for both solid and liquid waste to prevent the release of hazardous biological agents into the surrounding community and the environment.[14] Such measures include enhanced containment of biological materials, daily inspection of containment systems, the use of positive-pressure suits supplied with HEPA-filtered air, and a sequential passage through both a chemical shower to disinfect the suit and a personal shower before exiting the lab.[15] As previously indicated, BSL-4 facilities are not permitted at UCLA, including at UCLA Research Park.[16, 17]

Oversight of the actual research that occurs within BSL laboratories at UCLA is provided by the Institutional Biosafety Committee, discussed below.

Biohazardous waste is handled in accordance with California Department of Public Health standards and stored in secured locations not accessible to the public. Biohazardous waste is typically decontaminated using an incinerator, an autoclave, and/or another method of decontamination, depending on the biological risk. Biohazardous waste is removed from all laboratories within seven days of generation. EH&S staff are responsible for ensuring that all biohazardous waste is handled properly, including by working in concert with building operations personnel to appropriately train staff. Additional discussion of hazardous waste is provided below.

Animal Research Laboratories

Like BSL laboratories, animal research labs may be classified as Animal BSL (ABSL) 1 through 4, based on a similar set of progressive containment classifications defined by the CDC that dictate specialized practices, safety equipment, and facility design to prevent exposure and release. ABSL-1 labs employ standard animal care and management practices and are suitable for the use of common agents that pose minimal hazard to healthy personnel and the environment. ABSL-2 labs incorporate controlled facility access, specialized PPE, and hazard warning signs, as required for work with animals infected with agents associated with human diseases of varying severity (such as moderate-risk pathogens). Building on the ABSL-2 facility requirements, ABSL-3 labs involve directional airflow (negative pressure) and exhaust air filtration to prevent agent escape, as mandated for work with animals potentially carrying transmissible foreign agents. Finally, ABSL-4 labs incorporate maximum containment features, including dedicated facility infrastructure, clothing change/shower-out routines, and positive-pressure full-body suits or specialized isolator hoods. ABSL-4 facilities are reserved for dangerous, exotic, and high-risk life-threatening pathogens that lack widely available treatments or vaccines. ABSL-4 facilities are not permitted at UCLA, including at UCLA Research Park.

Similar to BSL-3 facilities, ABSL-3 labs are subject to the UC's stringent Animal Biosafety Level 3 Laboratory Design Standards (March 2023), which incorporate relevant CDC and NIH guidelines, as well as industry standards and best practices. The design and engineering standards together with appropriate operation and maintenance protocols, robust training programs, administrative controls, and SOPs promote, and have a demonstrated track record of achieving, safe and effective research activities. ABSL-3 facility operations and maintenance requirements are set forth in the UC High-Containment Facility Operations, Maintenance &

[14] Centers for Disease Control and Prevention and National Institutes of Health, Biosafety in Microbiological and Biomedical Laboratories, 6th edition, 2020, p. 31
[15] Centers for Disease Control and Prevention and National Institutes of Health, Biosafety in Microbiological and Biomedical Laboratories, 6th edition, 2020, pp. 54-56.
[16] University of California Los Angeles, UCLA Institutional Biosafety Plan, December 2019, p. 18.
[17] University of California Los Angeles, UCLA Policy 992, June 28, 2022, p. 3.

Validation Standard (April 2025), and lab training standards are detailed in the UC Biosafety Level 3 Laboratory Training Requirements Standard (March 2021).

UCLA currently operates a single ABSL-3 lab room within a traditional in vitro BSL-3 facility on campus, and a new ABSL-3 lab has been approved but not yet constructed. UCLA also operates centralized, AAALAC-accredited animal housing and research vivaria managed by the Division of Laboratory Animal Medicine (DLAM) within the David Geffen School of Medicine.[18] DLAM leads UCLA's Animal Care Program to provide the highest standards of animal care while making scientific research and breakthroughs possible. Access to a vivarium requires an approved Animal Research Committee (ARC) protocol, completed safety and species-specific training, a cleared medical history, and facility-specific keycard authorization. EH&S administers UCLA's Animal Research Safety Program, and all facilities must follow strict Vivarium Safety Management Plans.

EH&S Chemical Safety and Hazardous Materials

The EH&S Chemical Safety team enables the safe use of potentially hazardous chemicals in research at UCLA. Services include support in setting up new laboratories, lab safety visits, experiment reviews, lab hazard assessments, chemical inventories, and maintaining various reference databases and plans.

A variety of chemicals, including hazardous materials, are routinely used for instructional and research activities during the course of campus operations. These include chemical reagents, solvents, radioisotopes, and compressed gases, among others. Laboratories and maintenance shops at UCLA are classified by type and quantity of hazardous material, as defined by the California Hazardous Materials Release Response Plan and Inventory Law (California Health and Safety Code Sections 25500–25520). Standard precautions and appropriate equipment are used to reduce the potential for exposure to airborne chemicals. For example, the proper use of fume hoods serves to maintain indoor laboratory toxic air contaminants below federal exposure limits, and EH&S Chemical Safety verifies that all fume hood certifications remain current. Additional required emergency equipment such as fire extinguishers, eyewash stations, and safety showers are available within campus laboratories to address incidents involving any potential hazardous material exposure.

The California Environmental Protection Agency (Cal-EPA) and the California Department of Toxic Substances Control (DTSC) regulate the generation, transport, treatment, storage, and disposal of hazardous waste under the Resource Conservation and Recovery Act (RCRA) and the California Hazardous Waste Control Law. The campus is registered with the Cal-EPA as a generator of hazardous waste and disposes of hazardous wastes in compliance with Titles 8, 14, 17, and 22 of the California Code of Regulations. UCLA does not treat, store (for longer than 90 days), or dispose of hazardous chemical waste on-site. EH&S Chemical Safety manages the collection of waste from campus generator sites and oversees the storage, packaging, and disposal of these materials. Small amounts of spent hazardous materials generated on a regular basis in laboratories and maintenance facilities are placed in special containers and are kept in ventilated accumulation areas. Special projects may require a department to contract directly with an approved and audited waste disposal vendor. In addition, UCLA must file reports with the State detailing waste disposal and recycling activities.

Hazardous waste is disposed of at licensed disposal facilities in California and other states. Alternative treatment and disposal technologies, including recycling and out-of-state disposal, are

[18] AAALAC International was formerly known as the American Association for Accreditation of Laboratory Animal Care.

common methods of disposing hazardous wastes, and UCLA implements several hazardous waste minimization and recycling programs.

UCLA's Hazmat Response Plan defines the roles and responsibilities of UCLA's Hazardous Materials (Hazmat) Response Team and establishes procedures for responding to spills, accidents, and disasters involving hazardous materials. Comprised of specially trained EH&S staff, the Hazmat Response Team is able to quickly contain and clean up spills before they progress, thus reducing the possibility of injuries or damage, returning the affected area to normal operations, and protecting the health and safety of the campus community.

UCLA Staff Training

The UC Biosafety Level 3 Laboratory Training Requirements Standard (March 2021) outlines the minimum requirements to be met by all UC personnel requiring access to BSL-3 and ABSL-3 facilities. The training program elements address biocontainment, biosafety, biosecurity, laboratory specific training, agent specific training, incident response, and proficiency demonstration. Additionally, annual refresher training is required for all personnel working in or supporting operations of BSL-3 laboratories. The campus High Containment Laboratory Director guides potential users through the training program.

The BSL-3 training requirements incorporate guidance from multiple federal and state agencies, including, but not limited to, the NIH Guidelines; the CDC BMBL; Cal/OSHA's Respiratory Protection Standard, Bloodborne Pathogens Standard, Aerosol Transmissible Diseases Standard, Ventilation Requirements for Biosafety Cabinet Standard, and Hazard Communication Standard; and the California Medical Waste Management Act. Additionally, each UC campus must comply with all applicable federal regulatory requirements as outlined in programs such as the Federal Select Agent Program and/or Dual Use Research of Concern. Other training programs such as the UC Irvine BSL-3 Biosafety Training Program may also be incorporated.

In particular, incident and emergency management training at UCLA addresses potential spills, general facility failures such as with HVAC and fire alarm systems, accidental exposure procedures, medical emergencies, incident response plans, security issues, and natural disasters. An emergency response training exercise is conducted annually as a component of the staff training program.

EH&S Environmental, Occupational, and Safety Programs

The EH&S Environmental, Occupational and Safety Programs encompass all aspects of permitting, compliance, and safety at UCLA. Various teams administer programs related to occupational safety and compliance (e.g., injury and illness prevention, workshop safety and high hazard operations, hazard communication); industrial hygiene (e.g., indoor air quality, hazard exposure assessment, respiratory protection); environmental health (e.g., food inspections, foodborne illness prevention and response, communicable disease pathogen testing); and environmental compliance. With specific programs covering air quality, water quality, and hazardous materials, the Environmental Compliance team assists in interpreting environmental regulations, obtaining necessary permits, ensuring proper reporting, and interfacing with government regulatory agencies. Although not necessarily applicable to UCLA Research Park, it is noted that the Environmental Compliance team also provides support services related to aboveground storage tanks, underground storage tanks, hazardous materials business plans (HMBPs), and hazardous waste.

The HMBP is a comprehensive document required by California law for facilities that handle hazardous materials in quantities at or above specific thresholds. Its purpose is to inform

emergency responders about hazardous materials stored on-site, minimize harm from accidental releases, and comply with federal and state Community Right-to-Know laws. EH&S manages HMBPs for nearly 40 buildings on campus, as well as several off-campus locations.

UCLA Fire and Police

As a California state fire agency, UCLA Fire has authority over all UCLA-owned and occupied interests on campus. UCLA Fire's 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 building and fire codes. UCLA Fire takes primary responsibility as first responder to fire alarm calls on campus, and upon assessment of a situation requests support from the Los Angeles Fire Department (LAFD), as needed, to respond to actual fire events pursuant to a memorandum of understanding (MOU) with the Office of the State Fire Marshal.

UCLA Fire's staff includes a State Fire Marshal who reviews and approves all building plans for UCLA-owned structures, including those located off-campus, as part of the building permitting process. The State Fire Marshal enforces fire code regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California, including UCLA.

With support from the Office of Emergency Management, UCLA Fire also oversees the annual preparation of Emergency Action Plans for every department on campus. Emergency action plans are required by Cal/OSHA and serve as a guide for all University departments, staff, faculty, and student assistants regarding planning for and safely evacuating the workplace during an emergency. In addition, all UCLA personnel must complete emergency evacuation training.

With regards to UCLA's off-campus properties, LAFD provides primary response to all emergencies including active fires within its municipal jurisdiction and subject to the MOU between the University of California and the Office of the State Fire Marshal. The MOU establishes communication protocols between the UC, state, and local fire agencies and delegates responsibility for compliance with fire and life safety regulations to the Campus Fire Marshal at each UC campus.

Although not a department operated by UCLA EH&S and deriving its legal authority from California Penal Code Section 830.2(b) and California Education Code Section 92600, the University of California Police Department (UCPD) has primary responsibility for police protection services on the campus as well as at UC-owned properties in proximity to the campus. UCPD has an MOU with the Los Angeles Police Department (LAPD) for response support as needed and specifically for incidents within the public right-of-way.

Institutional Biosafety Committee

Originally established under the NIH Guidelines and registered with the NIH Office of Science Policy, UCLA's Institutional Biosafety Committee (IBC) is responsible for reviewing, approving, and overseeing research and teaching activities involving the use of recombinant or synthetic nucleic acid molecules (r/sNAs) and other biohazardous materials. The IBC is a faculty-led committee appointed by the Vice Chancellor of Research & Creative Activities and consists of experts in various fields including biosafety, human gene therapy, infectious disease, recombinant DNA, animal containment, plant containment, and occupational health. The IBC is also responsible for establishing, monitoring, and enforcing policies and procedures involving

hazardous biological materials and r/sNAs to meet applicable federal, state, local, and institutional regulations and guidelines.

The EH&S Biosafety Office partners with the IBC to provide technical expertise and provides the necessary training, resources, and guidance to researchers to ensure safe laboratory practices and containment of biohazards in order to protect personnel, the public, and the environment. The Biosafety Office has the authority to temporarily suspend the conduct of specific research, teaching, or other activities and/or limit access of individuals to specific biohazardous materials or facilities in cases where there is: (a) violation of UCLA's established biosafety practices and procedures, University rules, including Policy 992, and/or applicable regulations and guidelines; or (b) a significant risk to safety and/or a threatened or actual environmental release. The IBC can continue a temporary suspension pending corrective action and can impose disciplinary measures. Ultimately, a researcher's or research project's failure to comply with applicable University rules or federal or state regulations or guidelines related to the use of biohazardous agents may result in the suspension of IBC approval, limitation or termination of funding for a non-compliant project, and/or termination of NIH funds for other research at UCLA involving biohazardous materials.

UCLA's IBC meetings are typically open to the public except when necessary to protect privacy or proprietary interests. Additionally, the approved IBC meeting minutes are publicly available in accordance with NIH Guidelines.

Existing Campus Operations

UCLA currently has 326 lab groups authorized to conduct work under BSL-2 containment conditions. Those groups work across 19 buildings in 846 rooms that are assigned a BSL-2 or BSL-2+ containment level. UCLA currently operates a single BSL-3 facility, subject to oversight by the HCLOG and High Containment Program Director under the authority of the CDC Select Agent Program. BSL-2 and 3 labs have safely operated on the UCLA campus for many decades in a densely populated area that includes residences, academic uses including multiple primary schools, vulnerable populations, and highly travelled transit corridors.

Biosafety incidents at BSL-2 labs are typically small-scale human error events, such as a single needlestick injury or cut. Safe sharps practices like retractable needles, guarded scalpels, and cut-resistant protective equipment are implemented to minimize hazards; however, when needlestick injuries occur they are reported to campus EH&S, assessed for exposure risks, and treatment is provided by the EH&S Occupational Health team. All reported incidents are investigated to identify corrective actions and implement new or revised safety controls to prevent reoccurrence.

There are no records of biosafety incidents at any of UCLA's BSL labs requiring evacuation of any building or the campus.[19] Additionally, given that UCLA's BSL-3 program relies on overlapping layers of safety controls, biosafety incidents have been limited in scope and scale. Brief, single-door airflow reversals sometimes occur outside of working hours and are automatically corrected by building management systems. Personnel are trained to respond swiftly to emergencies and must stop work immediately in the event of a critical system alarm. Small spills infrequently occur inside (and are therefore contained within) biosafety cabinets and are cleaned up by trained research personnel following official safety protocols. The EH&S Biosafety Program performs regular validation and maintenance to ensure that all systems work

[19] Personal communication, Joseph Callahan, Associate Biosafety Officer, August 21, 2026.

as intended, even in emergency situations, and each research team is drilled or retrained annually.

Oversight at UCLA Research Park

In response to public comments received regarding oversight of operations at UCLA Research Park, particularly research activities conducted at the BSL labs including by tenants and subtenants, discussion is provided regarding the oversight structure and requirements to be implemented at UCLA Research Park to ensure full compliance with all applicable federal, state, and local health and safety regulations and guidance, as well as with applicable UC/UCLA institutional health and safety policies and procedures or their equivalent. This comprehensive suite of standards will be implemented and enforced to achieve a level of safety at all BSL labs at UCLA Research Park consistent with BSL labs on the UCLA campus.

As discussed in the Draft Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the proposed Project, anchor tenants at UCLA Research Park will include the California Institute for Immunology and Immunotherapy (CIII), an independent entity affiliated with UCLA and UCLA Health, and the UCLA Quantum Innovation Hub (QIH), with space allocated to the UCLA David Geffen School of Medicine (DGSOM) and future UCLA tenants and non-UCLA partners. In addition to tenant-specific laboratories, the proposed Project would include incubator labs to house a variety of scientific uses for use by startup companies and other researchers. CIII will have the ability to sublease some of its tenant space to third parties, subject to limitations and provisions set forth in UCLA's existing lease agreement with CIII.

Any proposed BSL-2 or BSL-3 (including ABSL-3) laboratory at UCLA Research Park will be required to undergo review and permitting by UCLA in accordance with the applicable UC BSL-3 Laboratory Design Standards, ABSL-3 Laboratory Design Standards, and/or other applicable requirements, including UCLA's Design and Construction Standards and permitting process. Consistent with the provisions set forth in the lease agreement with CIII, UCLA's EH&S programs and staff, and/or a comparable qualified entity, will review planned operational parameters associated with any BSL-2 and BSL-3 laboratories to confirm compliance with applicable federal, state, and local regulations and guidance, as well as applicable UC/UCLA policies and procedures or their equivalent, before commencement of research activities. Additionally, UCLA's NIH-registered Institutional Biosafety Committee or a comparable governing body with equivalent expertise and authority will review proposed research programs involving the use of r/sNAs and other biohazardous materials at UCLA Research Park to ensure regulatory compliance and to achieve a level of safety consistent with on-campus BSL facilities.

In summary, all tenants, subtenants, and activities associated with BSL-2 and BSL-3 facilities will be subject to applicable UC/UCLA policies and standards or an equivalent level of safety, including staff training requirements. Ultimately, every BSL-2 and BSL-3 laboratory at UCLA Research Park will maintain an equivalent level of safety as the labs currently operating on the UCLA campus.

2.2 RESPONSES TO COMMENT LETTERS

This section includes responses to all public comments regarding the Draft Initial Study/Mitigated Negative Declaration (IS/MND) that have been received by the University. Below are each of the comments received followed immediately by a corresponding University response. Comments to which the Topical Response above is responsive are noted as such.

Comment Letter A – Overland Avenue Community (OAC), Lisa Morocco

Comment A-1: I am writing on behalf of the Overland Avenue Community representing households in the Rancho Park area.

OAC is very excited to have UCLA join our neighborhood. The loss of the mall really impacted our business and residential community. Waiting for Google did not help matters and now that UCLA is on the way, we hope their arrival will reactivate the site and boost our surrounding businesses.

After reading through the DEIR, many of the concerns John Sandborn [*sic*] brought up in his comments (attached) were shared by the OAC.

Response A-1: This comment indicates general support for the proposed Project and identifies that the comment letter from John Sandbrook is attached. The commenter's support for the proposed Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

John Sandbrook's comment letter is included as Comment Letter H in this Final IS/MND. Refer to Responses H-1 through H-28, below.

It should be noted that the commenter incorrectly identifies the environmental document prepared for the proposed Project as a Draft EIR. The proposed Project would not result in any impacts that cannot be mitigated to a level considered less than significant. Therefore, a Draft IS/MND was prepared for the proposed Project, not a Draft EIR.

Comment A-2: Of most importance to OAC: 1. That the four local HOAs be kept in the loop of UCLA activities and updates that may impact the community through an annual report.

Response A-2: UCLA maintains a website dedicated to UCLA Research Park (https://www3.research.ucla.edu/research-park), which will continue to be updated with news, events, and other important updates. UCLA's Government and Community Relations (GCR) team will also continue to periodically send emails to the Research Park community interest list generated through that website, as needed to share important updates or announcements. Additionally, the GCR team will continue to attend Westside Neighborhood Council (NC) meetings as schedules allow in order to keep the greater community informed. All four of the referenced homeowner associations (HOAs)—Overland Avenue Community, West of Westwood HOA, Westwood Gardens Civic Association, and Westwood South of Santa Monica Boulevard HOA—are located within the Westside NC area and have access to meeting agendas and information shared at those meetings.

Comment A-3: 2. That a portion of parking lot be available for UCLA permit holders as well as the public. Businesses near the western part of the campus have suffered greatly when a key parking lot was repurposed for housing. Making space available for local businesses would go a long way.

Response A-3: While UCLA acknowledges the value of providing parking for the local community, it is not possible for the University to do so at this time. The on-site parking supply will be needed during Project construction for staging and

materials storage, as well as construction worker parking. Further, public use of the Research Park West building, where the majority of site parking is located, is not currently permitted due to the building's non-compliance status relative to the UC Seismic Safety Policy—an issue that will be remedied as part of the Project. However, public use of site parking may be explored in the future pending the final development program, identified tenants, and their respective parking needs.

Comment A-4: 3. It is so very important that a portion of the ground floor of the UCLA Park be activated by retail. We understand serious research will be going on at this facility, but carving out some storefronts that serve the public will help improve pedestrian traffic flow and make Pico safer.

4. To the point of ground floor activation, OAC, along with other HOAs and the WNC, are standing by to help UCLA honor the past uses of this site. The history is rich here and it can only benefit everyone if we can honor that somehow in this new facility.

Response A-4: UCLA understands and respects the community's desire for the Project to include ground-floor retail uses. Research Park East will be dedicated to research uses and supportive amenities to create a secure and cohesive campus. However, publicly accessible uses may be provided at Research Park West, and such decisions will be made in the future when detailed programming of Research Park West occurs.

Comment A-5: 5. The need for a community room is great. OAC would hope that UCLA can carve out a room in the Park that can be used for public meetings. The Neighborhood Council enjoyed having such a space for many years at the mall and since its closure, they have cobbled together meeting spaces. Please consider a space inside the Park to accommodate a meeting space with a small closet for storage of meeting materials.

Response A-5: This comment requests that the proposed Project include a community room for public use and does not pertain to the environmental analysis or conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The currently planned UCLA Research Park space allocation is presented in Table 1, UCLA Research Park Program Summary, of the Draft IS/MND. As identified in Table 1, Research Park West is anticipated to include 15,400 gross square feet (GSF) of meeting and assembly space, in addition to the 15,600-GSF conference center proposed at Research Park East. As discussed in the Draft IS/MND, some of the uses at Research Park West may serve as community resources.

Refer also to Response A-4 regarding publicly accessible uses.

Comment A-6: We are submitting this letter as well as John Sandbrook's document as we support his comments. OAC would like this to be entered into the file. We welcome UCLA Research Park as our new neighbor and look forward to working in partnership with them.

Response A-6: This comment transmits a letter from John Sandbrook dated May 26, 2026, which is included as Comment Letter H of this Final IS/MND. Refer to Responses H-1 through H-28, below.

Comment Letter B – West of Westwood HOA (WOWHOA), Terri Tippit

Comment B-1: I am writing on behalf of the West of Westwood HOA, representing 1200 households in Rancho Park. John Sandbrook, WOWHOA board member and secretary, and I attended the May 20, 2026, public hearing on the Draft EIR for the UCLA Research Park, 10800 W. Pico Blvd.

WOWHOA is very excited and happy to have UCLA at this site but we also want to ensure that our members' quality of life will not be impacted and we all are good neighbors.

Response B-1: This comment provides introductory remarks and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

It is noted that the commenter incorrectly identifies the environmental document prepared for the proposed Project as a "Draft EIR." As the proposed Project would not result in any impacts that cannot be mitigated to a less than significant level, an IS/MND has been appropriately prepared for the proposed Project.

Comment B-2: John was kind enough to share the document he submitted with the WOWHOA board. After reading his detailed and thoughtful document, the board felt his observations, comments and questions mirrored the issues and concerns that the WOWHOA would raise. We are submitting this letter supporting John Sandbrook's document and would like it entered into the file.

Response B-2: This comment transmits a letter from John Sandbrook dated May 26, 2026, which is included as Comment Letter H of this Final IS/MND. Refer to Responses H-1 through H-28, below.

Comment B-3: We look forward to working in partnership with the UCLA Research Park to have a successful project that will be a welcomed addition to our community.

Response B-3: This comment provides closing remarks and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter C – Westwood Gardens Civic Association, Inc (WGCA), Marilyn Tusher

Comment C-1: I am writing on behalf of the Board of Directors of the Westwood Gardens Civic Association, a homeowners' association in West Los Angeles representing approximately 620 homes bordering Ayres Avenue to the north, National Blvd to the south, Midvale Ave Avenue to the west and Overland Ave Avenue to the east including the Dunleer Place neighborhood. WGCA has been in existence for more than sixty years working to maintain a livable quality of life in our residential neighborhood and community.

We appreciate the opportunity to follow up on the UCLA sponsored community Zoom meeting held on May 20, 2026, 6 pm PST regarding the proposed UCLA Research Park on Pico Blvd, Los Angeles, Ca.

Our residents value UCLA's contributions to scientific advancement, education, and the broader Los Angeles community. We recognize the potential benefits of a research park focused on quantum computing, biotechnology, and immunology.

Response C-1: This comment provides introductory remarks that indicate general support for the proposed Project and do not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment C-2: At the same time, our immediate and adjacent proximity to the proposed site requires us to understand the full scope of activities planned for the facility, particularly those involving BSL-2 and BSL-3 laboratories. Our concerns are grounded in public safety, zoning compliance, security, environmental impact, and long-term community wellbeing.

We reviewed the Draft Initial Study and Mitigated Negative Declaration dated May 2026, and particularly the paragraphs related to biosafety levels, hazardous materials, and operational assumptions. Based on that review and the discussion during the UCLA May 20, 2026 Zoom call, we respectfully submit the following questions and requests for clarification.

Our goal is to ensure transparency, appropriate planning, and adequate safeguards for a densely populated residential and commercial area that includes schools, transit corridors, and vulnerable populations.

Response C-2: This comment provides additional introductory remarks related to the comments that follow. Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, associated laboratory operations, and applicable governing provisions of the UCLA Research Park, as well as the responses to the comments below.

Comment C-3: 1. Zoning and Legal Basis for BSL-2 and BSL-3 Laboratories

Primary Question: The UCLA Draft Initial Study dated May 2026 designates BSL-2 and BSL-3 laboratories within the proposed UCLA Research Park. It appears the Los Angeles Municipal Code (LAMC) requires M2 Light Industrial or M3 Heavy Industrial zoning for higher impact scientific and industrial uses. It appears that the UCLA Research Park is to be located in a mixed residential and commercial zone.

Residents request a clear explanation of the legal and regulatory basis for placing these BSL-2 and BSL-3 biotech laboratories in a mixed residential and commercial zone. This includes:

1a. Identification of any exemptions UCLA believes apply

1b. Whether UCLA intends to seek zoning changes or variances

Response C-3: As discussed in Section V.11, Land Use and Planning, of the Draft IS/MND, UCLA is part of the University of California, a constitutionally created state entity. As a constitutional entity, the UC is not subject to municipal regulations, including general plans, specific plans, and zoning regulations, for uses and activities within its educational and research mandate. In general, UCLA is not required to obtain discretionary approvals from local agencies, including the City of Los Angeles, and the UC Board of Regents or a designee approve and permit UC projects. However, UCLA will obtain required approvals and permits for any aspect of the proposed Project that occurs within the City's public right-of-way, such as roadway and infrastructure improvements. As such, no zone change, variance, or exemption from the City of Los Angeles is required for the proposed Project. Refer to Topical Response 1 for further discussion of biosafety design, engineering, and operational requirements, and associated laboratory operations.

Comment C-4: 1c. How will the UCLA and the City of Los Angeles evaluate and mitigate biosafety risks in a non-industrial zone?

1d. The Draft IS MND does not fully account for the operational realities of BSL-2 and BSL-3 labs, how does UCLA intend to amend that draft and in what time frame?

Response C-4: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations. As discussed therein, biosafety laboratories are closely regulated by a variety of public agencies including the UC, and the UC's design requirements for BSL-3 labs in particular include stringent standards to provide the best possible physical containment of research materials and agents. Additional mitigation measures beyond the PPs and MMs identified in the Draft IS/MND and existing applicable UC and UCLA policies and regulations referenced herein are not required. Further, as discussed above, no substantial revisions to the Draft IS/MND as defined in CEQA Guidelines Section 15073.5 have been made, and recirculation of the Draft IS/MND or preparation of an environmental impact report is not required.

Comment C-5: 2. Lack of Defined Partners, Projects, and Operational Oversight

During the UCLA Zoom call on May 20, 2026, UCLA Planning stated that it does not yet know which partners, government agencies, or private entities will occupy the facility or labs. This raises several concerns:

2a. How can appropriate infrastructure be designed without knowing the specific needs, requirements or testing of future tenants, especially those conducting highly sensitive, high impact biological research?

2b. How will UCLA evaluate and approve partners, including private companies, government agencies, or classified research programs?

Response C-5: California Environmental Quality Act (CEQA) Guidelines Section 15124 requires a project description to include "a general description of the project's technical, economic, and environmental characteristics" and indicates that "extensive detail beyond that needed for evaluation and review of the environmental impact" is not required. As such, it is not uncommon for CEQA

documents to be based on well-founded assumptions regarding certain aspects of a project's operations, such as future uses, tenants, and activities. Accordingly, the building infrastructure at UCLA Research Park has been planned based on a broad, robust scientific research program, taking into account both known and anticipated uses and research types. While specific equipment models needed for research in a given laboratory may not yet be identified, the infrastructure needed to support the use of lab-specific equipment is well understood. For example, based on the anticipated types of uses, tenants, and research activities to operate at UCLA Research Park, the design team assumed that upper level laboratories would include equipment such as optical microscopes, micro-balances, mechanical testing systems, benchtop X-ray diffractometers, spectrophotometers, dynamic analyzers, and scanning electron microscope (SEM) equipment, while any high-performance imaging suites could include SEM, transmission electron microscope (TEM), and Cryo-SEM/TEM equipment. Based on these assumptions, appropriate mechanical systems (among other building systems) have been planned accordingly and incorporate redundancy features where necessary. Additionally, when specific requirements have not been identified, are not yet available, or may change in the future, it is common practice to base the design on one or more generic criteria that conservatively represent entire classes of equipment or activities. UCLA and Flad Architects, the architecture firm selected for UCLA Research Park, both have a long history of planning scientific research space. Furthermore, regulatory requirements and particularly UC standards and policies will inform many of the decisions around biological research and the necessary supporting infrastructure.

UCLA Research Park is intended to be a place where problem-driven, multidisciplinary, collaborative research and creative activities of clear societal need are conducted. The evaluation and approval of prospective tenants/partners at UCLA Research Park will take into account a number of factors, including aligned missions, a commitment to high quality standards, intellectual property opportunities, research funding and space needs, etc. Aside from leases with the identified anchor tenants (CIII, QIH, and DGSOM), prospective tenants and their proposed research programs will undergo a formal proposal process including review by a committee of the Research Park Advisory Board, which is composed of members of UCLA's Academic Senate (faculty), campus administrators, and Research Park leadership.

More specifically, the evaluation criteria established by the Research Park Advisory Board Review Committee includes: alignment with the vision for UCLA Research Park; compatibility with UCLA's mission and values; the multidisciplinary aspects of the proposed research program and consistency with UCLA's research and education goals; translational impact such as the generation of intellectual property, startup companies, and societal impact; the expertise, experience, and commitment of key personnel; education, training, and workforce development components that support students and post-doctoral students; job creation and job training; financial viability; space and infrastructure needs; the adequacy of safety plans and environmental management to ensure regulatory and institutional compliance; and commitments from key participants and funders. The role of the Research Park Advisory Board Review Committee would not replace the need for IBC (or other equivalent) review, approval, and oversight of all research activities involving

the use of r/sNAs and other potentially biohazardous materials at UCLA Research Park, as further described in Topical Response 1.

Upon approval of a tenant, the UCLA offices of the Vice Chancellor for Research and Creative Activities, Asset Management, and Capital Programs would verify program funding; authorize commencement of renovation/construction activities as necessary, including UCLA's standard permitting process established as the Agency Having Jurisdiction (AHJ); and upon completion of any renovation/construction, conduct tenant onboarding including verification of insurance requirements, safety checks, facility orientation, staff training, etc.

Refer to Topical Response 1 for further discussion of biosafety design, engineering, and operational requirements, associated laboratory operations, and relevant oversight provisions at UCLA Research Park.

Comment C-6: 2c. What oversight mechanisms will govern daily operations, access control, and security?

Response C-6: The UCLA Research Park property will continue to be managed by UCLA Asset Management, as under existing conditions. Oversight of specific types of Project operations, such as BSL laboratories, is discussed in Topical Response 1 of this Final IS/MND.

Regarding access control and security at the Project site, as discussed in Section II.6, Proposed Project Components, of the Draft IS/MND, primary vehicular access would be from the existing Westwood Boulevard driveways which would remain open during business hours, with access control gates for after-hours entry. Each Westwood Boulevard driveway would include a staffed security kiosk in order to control access to the site and the loading docks. A roll-down gate would be installed at the existing Pico Boulevard driveway at Research Park East in order to restrict after-hours access to employees only, and fencing would be provided at key locations to facilitate lock down of the building in the event of an emergency. At Research Park West, the existing Pico Boulevard driveway would remain open to the public pursuant to a City easement in order to provide access to the public alley to the west; this driveway would also provide egress from the Research Park West parking structure and loading dock.

In addition, each building's main lobby would be staffed with security personnel, and visitors would be required to check in at the security checkpoint to gain authorized access to the buildings. There would be security staff on-site 24 hours per day, seven days per week to monitor the buildings and property, including through regular site patrols. Surveillance and supplemental access control such as electronic or biometric entry would be implemented for areas where sensitive research occurs, such as high containment facilities. Further, the proposed Project would incorporate crime prevention-related design features including, but not limited to: security cameras, electronic access/controls, appropriate wayfinding and security lighting, and other environmental design features to support security.

During Phase 1 construction, a staffed security gate would be located at the Research Park East driveway at Westwood Boulevard, and construction

fencing would be installed around portions of the site perimeter for safety, security, and screening. Comparable measures would be implemented during subsequent construction phases.

Comment C-7: 2d. How will UCLA ensure that inexperienced vendors, trainees, or external collaborators do not introduce safety risks?

Response C-7: Refer to Topical Response 1 regarding biosafety protection measures, staff training, and associated laboratory design, engineering, and operations. It is also noted that the standard UC Laboratory Safety Training policies expressly apply to all personnel, regardless of title and role, and specifically include, without limitation, students, graduate students, postdoctoral scholars, faculty or other academic appointees, staff, visitors, and volunteers. These requirements would therefore apply to all vendors, trainees, and external collaborators working on-site.

Comment C-8: 2e. The community requests a detailed framework describing how partners will be selected, vetted, and monitored. With what frequency and how will UCLA make this report available to the public?

Response C-8: Refer to Response C-5 regarding the evaluation and approval of prospective tenants/partners at UCLA Research Park and Topical Response 1 of this Final IS/MND regarding the oversight of tenants and research. UCLA will provide information regarding prospective tenants consistent with its obligations under the California Public Records Act and related law. It is further noted that UCLA's IBC meetings (where specific types of research activities involving hazardous biological materials and/or recombinant/synthetic nucleic acids are reviewed and approved) are typically open to the public except when necessary to protect privacy or proprietary interests. Additionally, the approved IBC meeting minutes are publicly available in accordance with NIH Guidelines.

Comment C-9: 3. Adequacy of Planning for BSL-2 and BSL-3 Operations

The Draft IS MND focuses heavily on construction and retrofit planning for quantum computing infrastructure. However, it does not provide sufficient detail for the BSL-2 and BSL-3 labs regarding:

3a. Air containment systems

3b. Negative pressure controls

3c. Hazardous waste handling and transport

3d. Water and chemical waste management

3e. Personal protective equipment disposal

3f. Emergency response protocols

3g. Vendor and visitor access procedures: strict 24/7 365 days a week procedures

3h. Given the density of the surrounding neighborhood, on what basis and frequency will these operational details be available for public review?

Response C-9: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations. As discussed therein, biosafety laboratories are closely regulated by a variety of public agencies including the UC, and the UC's design requirements for BSL-3 labs in particular include stringent standards to provide the best possible (also referred to as 'highest attainable") physical containment of research materials and agents.[20] In addition to the design and engineering standards focused on containment, decontamination, and the protection of human health, the UC promulgates strict operational protocols to ensure appropriate protections, manage hazardous materials, and establish emergency procedures, as also discussed in Topical Response 1.

Refer to Response C-6 regarding access control and security at the Project site. Regular communications with the community will continue as discussed in Response A-2, and UCLA will comply with its public disclosure obligations consistent with the California Public Records Act and related law.

Comment C-10: 4. Existing UCLA BSL-2 and BSL-3 Facilities and Safety Record

To understand UCLA's experience with high containment laboratories, we request:

4a. A list of all existing UCLA BSL-2 and BSL-3 laboratories, including those on the Westwood campus or elsewhere.

4b. The year each laboratory was constructed and if still under operation. Copy of guidelines for security and operation.

4c. The state and federal agencies responsible for permitting and oversight.

4d. A summary of any safety incidents and dates, including:

- Airflow failures
- Containment breaches
- Waste handling issues
- Human error events
- Any reportable incidents involving airborne pathogens

4e. Please state when this information can be provided to the public before final planning for the project is completed?

Response C-10: Refer to Topical Response 1 for further discussion of biosafety design, engineering, and operational requirements, as well as associated laboratory

[20] Per the UC design standards, best practices for the design and construction of BSL-3 facilities are based on the NIH Guidelines, NIH Design Requirements Manual, ANSI/ASSE Z9.14-2020 Testing and Performance-Verification Methodologies for Ventilation Systems for Biosafety Level 3 and Animal Biosafety Level 3 Facilities, and the UC EH&S Laboratory Safety Design Guide.

operations, including discussion of existing campus operations and a summary of BSL lab safety records.

Comment C-11: 5. Other Local BSL-2 and BSL-3 Facilities

Please identify any non-UCLA research facilities in West Los Angeles or Beverly Hills that operate BSL-2 and BSL-3 laboratories, including Cedars-Sinai or others. For each facility, please clarify:

5a. Whether they conduct airborne pathogen research

5b. Their proximity to residential neighborhoods

5c. Their safety and compliance history

This will help contextualize the proposed UCLA Research Park within the broader regional biosafety landscape.

Response C-11: Biosafety laboratories are a relatively common type of facility used in biomedical research and teaching throughout the region and California. This comment requests information regarding non-UCLA BSL-2 and BSL-3 laboratories in the West Los Angeles or Beverly Hills area. The University does not have information unrelated to UCLA or the proposed Project, and such information is not relevant to the analysis of the potential environmental impacts resulting from the proposed Project. No further response is required. However, it is noted that Comment H-4 below includes a list of known BSL-3 laboratories located throughout California, although UCLA has not independently verified this information.

Comment C-12: 6. Quantum Computing Facilities and Noise Containment

Residents request clarification on UCLA's experience with quantum computing facilities:

6a. Does UC or UCLA currently operate any quantum computing centers?

6b. Does UC or UCLA currently operate any quantum computing centers with biotech with BSL-2 or BSL-3 labs?

6c. If so, where are they located and how long have they been operational?

6d. Are they currently being used for biotechnology or biological modeling?

6e. Please describe how low frequency noise and vibration from quantum computing equipment, cooling systems, and airflow systems will be contained to avoid impacts on nearby residents, homes and businesses.

Response C-12: To clarify, BSL lab operations at the Project site would be separate and distinct from research and activities conducted by UCLA's Quantum Innovation Hub. There is no plan to use the quantum facility for biotechnology or biological modeling.

With respect to potential noise and vibration impacts, low frequency noise and vibration generated by quantum computing equipment, cryogenic cooling systems, and associated airflow systems would be contained within the building envelope. Vibration-sensitive equipment would be installed on vibration isolated mounts that provide even greater protection than what would be needed to fully contain noise and vibration within the building. This design feature was included to ensure that there would be no vibration impacts on sensitive equipment within UCLA Research Park. This results in a highly protective design that minimizes noise and vibration and avoids potential impacts to off-site locations caused by the equipment and systems identified above.

From a noise and vibration standpoint, the design of UCLA Research Park is based on industry-accepted noise and vibration performance standards established for groups of scientific uses (e.g., office and lab support, research laboratories and sensitive lab support spaces, vivarium spaces, quantum/laser laboratories, high performance imaging/electron microscopy suite, etc.). The NIH also has published design guidelines that contain recommended floor vibration velocity limits and background noise criteria for various types of biomedical research facilities. Additionally, the building facade and interior partitions would be designed with sound insulation sufficient to prevent transmission of low frequency noise and structural vibration within the building as well as to the exterior. As a result, noise and vibration from these research activities would not be noticeable outside the buildings. [21]

Comment C-13: 7. Emergency Response, Evacuation, and Public Safety

The Draft IS MND does not provide sufficient detail on emergency procedures.

Example: Recently on May 22, 2026, in Garden Grove, California[1], just 30 miles south of West Los Angeles, a biohazard evacuation of 40,000+ people has been conducted due to insufficient human planning and preparedness involving toxic fumes from a chemical leak. This serves as an example of how a chemical bio safety incident can impact residents severely. A potential biological airborne pathogen leak at the UCLA Research Park could be even more devastating than a chemical leak. Chemical leaks can be contained more easily than airborne pathogen(s).

[1] May 22, 2026 "*More the 40,000 asked to evacuate due to chemical leak in Southern California" YouTube link:* https://youtu.be/uSOgO5YViD4.

To be clear: All areas of West Los Angeles and all surrounding communities such as Beverly Hills, Cheviot Hills, Santa Monica, Brentwood to name a few could be immediately impacted by an airborne pathogen leak from the UCLA Research Park which would devast [*sic*] the entire City of Los Angeles in unimaginable ways. With rapid transit nearest to the proposed UCLA Research facility, airborne biological containment is even more important to reduce spread.

Response C-13: Refer to Topical Response 1 for discussion of biosafety design, engineering, and operational requirements, and associated laboratory operations. As

[21] Flad Architects, UCLA Research Park Masterplan, 2026.

discussed therein, biosafety laboratories are closely regulated by a variety of public agencies including the UC, and the UC's design requirements for BSL-3 labs in particular include stringent standards to provide the best possible physical containment of research materials and agents. In addition to the design and engineering standards focused on containment, decontamination, and the protection of human health, the UC promulgates strict operational protocols to ensure appropriate protections, manage hazardous materials, and establish emergency procedures, as also discussed in Topical Response 1.

Refer to Response C-10 and Topical Response 1 regarding relevant safety records related to BSL lab operations at the UCLA campus. As indicated, no biosafety incidents requiring campus or community evacuations have been recorded at UCLA.

While UCLA Research Park would include robust fire and life safety systems based on the proposed occupancy types and California Building Code and Fire Code requirements, in the event of an incident involving accidental exposure or unintentional release of infectious agents, toxins, or other biological hazards, UCLA's emergency procedures would be implemented, including appropriate notification to and response by the UCLA Fire Department (UCLA Fire) and the University of California Police Department (UCPD), in addition to the Los Angeles Fire Department (LAFD) and Los Angeles Police Department (LAPD) as warranted. While extremely unlikely, any need for a shelter in place order or evacuation of areas under the City's jurisdiction would be coordinated by LAFD and LAPD, as UCLA does not have jurisdiction in areas that are not under UC ownership or control. Refer to Topical Response 1 for additional discussion of incident response, associated staff training, and the relationship between UCLA Fire/UCPD and LAFD/LAPD. Also refer to Response D-5.

With respect to the referenced incident in Garden Grove, that chemical leak involved a large tank filled with thousands of gallons of methyl methacrylate, a volatile liquid used in making plastics, that began to react and overheat. The extreme heat caused the liquid to expand and off-gas, forcing the tank to bulge and vent dangerous fumes. Aside from differences in the types of materials, equipment, infrastructure, and safety mechanisms at UCLA Research Park, potentially hazardous materials at the Project site will be subject to the UC's maximum allowable quantities (MAQs), which is the maximum amount of hazardous material allowed to be stored or used within a control area inside a building or an outdoor control area. The MAQs are comparatively extremely small compared to the amount of methyl methacrylate at the Garden Grove facility. The California Fire Code and California Building Code establish the MAQ limits, which are broken down by hazard class and physical state (solid, liquid, or gas). Compliance with Fire Code hazardous materials regulations ensures that fire and life safety needs are met, and the UC Chemical Storage MAQ Task Force establishes systemwide standards and recommendations to facilitate compliance with MAQs.

Comment C-14: Residents request detailed planning for:

> 7a. Evacuation plans, routes and facilities for nearby homes and businesses in the event of a biohazard leak

Response C-14: Refer to Topical Response 1 for discussion of facility design, operational protocols, and staff training, which collectively minimize the potential for an evacuation, as well as UCPD and UCLA Fire's role in incident response. While extremely unlikely, any need for a shelter in place order or evacuation of areas under the City's jurisdiction would be coordinated by LAPD and LAFD, as discussed in Response C-13. The City designates evacuation routes within its boundaries, and the Safety Element of the City of Los Angeles General Plan addresses hazard mitigation and disaster response for City areas. UCLA does not have jurisdiction in areas that are not under UC ownership or control. However, UCPD and UCLA Fire would coordinate with and assist LAPD and LAFD, as needed, pursuant to their existing MOU agreements.

Comment C-15: 7b. Detailed transportation and containment protocols, governance process and updates to the public based upon BLS-2 [*sic*] and BSL-3 levels of biological material brought ongoingly into the Research Park for quantum study.

Response C-15: Refer to Topical Response 1 for discussion of biosafety design, engineering, and operational requirements, and associated laboratory operations. Also refer to Response A-2 regarding communication with the community and Responses C-12 and F-3 regarding quantum activities.

Comment C-16: 7c. Protocols for security breaches, including drone threats, increased cybersecurity attacks from malicious actors and other countries that could impact the physical facility and labs, electric grid, etc.

7d. Coordination plans with LAPD, LAFD, LA County Public Health, and federal agencies

7e. Communication procedures for notifying residents and schools. Given the proximity of a pre-school, multiple elementary and grade schools, including but not excluding others [*sic*] schools in the nearby area:

a. WorldSpeak School, pre-school – 1639 Westwood, 2387 Malcolm
b. Notre Dame Academy - 2911 Overland
c. Overland Avenue Elementary - 10650 Ashby
d. Le Lycee Francais de Los Angeles - 3261 Overland

Response C-16: Refer to Topical Response 1 for discussion of biosafety design, engineering, and operational requirements, and associated laboratory operations. As discussed therein, biosafety laboratories are closely regulated by a variety of public agencies including the UC, and the UC's design requirements for BSL-3 labs in particular include stringent standards to provide the best possible physical containment of research materials and agents. In addition to the design and engineering standards focused on containment, decontamination, and the protection of human health, the UC promulgates strict operational protocols to ensure appropriate protections, manage hazardous materials, and establish emergency procedures, as also discussed in Topical Response 1.

Refer to Topical Response 1, Response C-13, and Response D-5 regarding the roles and responsibilities of and coordination between UCLA Fire, UCPD, LAFD, and LAPD. Also refer to Response A-2 regarding communication with the community. It is noted that coordination with the Los Angeles County

Department of Public Health is not required, other than for the reporting and contact tracing of infectious diseases. The County Department of Public Health does not promulgate any regulatory standards or guidance applicable to UCLA's BSL laboratories or biomedical research.

The potential for attacks on the proposed Project is speculative and is not relevant to the analysis of the physical environmental impacts resulting from the proposed Project. It is noted, however, that all employees, tenants, subtenants, vendors or contractors, and visitors would be subject to UC Policy BFB-IS-3: Electronic Information Security, which establishes a framework to reduce and manage cyber risk, protect information, and support the proper functioning of IT resources, including cyber security.

Comment C-17: 8. Earthquake Preparedness and Seismic Safety

Los Angeles is an active seismic region. Residents request clarification on:

8a. Do the seismic retrofits for quantum computing also apply to BSL-2 and BSL-3 laboratory areas?

8b. How will pathogens, hazardous materials, test animals (if used) and cold storage be protected during a major earthquake?

8c. How will emergency power systems (off-grid) be designed to maintain containment during outages and for how long?

Response C-17: To clarify, the proposed biosafety laboratories and the UCLA Quantum Innovation Hub will be located in Research Park East. In its present condition, the Research Park East structure has a Seismic Performance Rating (SPR) of IV thereby meeting the seismic requirements set forth in the UC Seismic Program Guidelines, which are generally more stringent than local code requirements and are sufficient to protect research materials and facilities during a seismic event.[22] However, *structural* (emphasis added) retrofits are planned at the Research Park East building in order to support the conversion to scientific research space, as detailed in Section II.6, Proposed Project Components, of the Draft IS/MND. All building improvements would also comply with applicable California Building Code (CBC) and California Fire Code (CFC) requirements.

It is Research Park West that would be seismically upgraded to improve the building's SPR from VI to IV;[23] however, neither quantum computing nor BSL lab uses are proposed at the West building. As discussed in Section II.6, Proposed Project Components, of the Draft IS/MND, the seismic work at Research Park West would include but not be limited to: retrofit of existing welded beam-to-column connections, incorporation of dampers along the connection retrofits, reinforcement of steel moment frames, and

[22] Seismic evaluations were conducted by KPFF in 2024 and 2025 based on the UC Seismic Program Guidelines. Research Park East was assigned a SPR rating of IV, which meets specified performance criteria.

[23] Seismic evaluations were conducted by KPFF in 2024 and 2025 based on the UC Seismic Program Guidelines. Research Park West was assigned a SPR rating of VI, which does not meet specified performance criteria but does not pose an immediate life-safety hazard.

strengthening/thickening of concrete footings to meet necessary performance requirements.

Additionally, as discussed in Threshold (c) of Section V.3, Air Quality, and Threshold (c) of Section V.9, Hazards and Hazardous Materials, of the Draft IS/MND, the proposed laboratories would be designed to meet stringent UC and other regulatory requirements regarding ventilation, air filtering, hazardous material handling and storage, containment, personal protective gear, etc. Refer also to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations.

The Project includes a robust system of emergency generators designed to keep all essential facilities operational during a power outage. As detailed in Section II.6, Proposed Project Components, of the Draft IS/MND, 10 new generators are planned at Research Park East, in addition to replacement of the existing generator at Research Park West. The generators would have a fuel capacity to allow 24 hours of run time, with opportunities to bring in additional fuel or supplemental generators as needed. In the event of an emergency such as a major seismic event, non-essential operations and building areas would be progressively shut down to reduce loads, as needed to maintain safe operations within any labs with hazardous or biohazardous materials. Comparable biosafety research facilities with emergency power support have operated on the UCLA campus for decades, including through major seismic events such as the 1994 Northridge earthquake.

Comment C-18: 9. Noise, Traffic, and Environmental Quality

Although secondary to biosafety concerns, noise and traffic are significant quality of life issues. Residents request:

9a. Plans to mitigate noise from emergency vehicles, construction, and increased traffic

Response C-18: Section V.13, Noise, of the Draft IS/MND evaluates potential noise impacts resulting from construction and operation of the proposed Project. As discussed, the proposed Project would be subject to various adopted PPs and MMs identified in the previously adopted UCLA LRDP MMRP related to noise. These PPs and MMs are presented in Section 4.0, Mitigation Monitoring and Reporting Program, of this Final IS/MND.

With respect to construction-related noise, as noted under Draft IS/MND Section V.13, Threshold (a), off-site construction noise impacts were determined to be less than significant and would not require mitigation. With respect to off-site construction-related noise impacts, the estimated noise levels during all stages of Project construction, including overlapping construction, without a noise barrier were determined to be below the 80 dB significance threshold at all off-site receptor locations, except for two receptors, which represent residential uses located south and west of Research Park West. The proposed Project incorporates LRDP MM 4.9-7, which requires solid temporary noise barriers to reduce construction-related noise levels at the nearest sensitive receptors. As shown in Table 12 in Draft IS/MND Section V.13, with incorporation of LRDP MM 4.9-7, on-site construction noise impacts to the surrounding residential uses would not exceed the significance threshold

and would be less than significant. Additionally, the proposed Project incorporates the following LRDP PPs: LRDP PP 4.9-7(a) requires construction activities to be limited to Monday through Friday 7:00 A.M. to 9:00 P.M. and Saturday 8:00 A.M. to 6:00 P.M. (with no construction on Sundays and national holidays), with a Project-specific implementing measure limiting exterior construction activities to Monday through Friday 7:00 A.M. to 7:00 P.M.; LRDP PP 4.9-7(b) requires the muffling or shielding of construction equipment; LRDP PP 4.9-7(c) requires that stationary construction equipment material and vehicle staging be placed away from sensitive receptors; and LRDP PP 4.9-8 requires the University to notify off-campus constituents of construction activities. With incorporation of LRDP PP 4.9-7(a) through PP 4.9-7(c), PP 4.9-8, and MM 4.9-7, the Draft IS/MND determined that all potential construction-related noise impacts would be less than significant.

With respect to traffic-related noise, as identified in Section V.17, Transportation, of the Draft IS/MND, the proposed Project would result in a net *decrease* (emphasis added) of 10,659 daily vehicle trips when compared to the estimated trips generated by the Westside Pavilion shopping center uses. As the off-site traffic noise levels are dependent on the traffic volumes on the roadways, a substantial reduction in daily vehicle trips would result in a reduction in traffic noise levels. Proposed Project operations would also include delivery truck trips, which would generate traffic noise. There would be up to 111 daily deliveries to the Project site. As discussed in Section V.13, Noise, of the Draft IS/MND, the estimated noise levels would be below the existing ambient noise levels. In addition, the estimated ambient noise levels with the addition of the noise levels generated by the proposed Project off-site truck trips would be below the significance criteria of 5 dBA (Leq) above the existing ambient noise levels. Therefore, noise impacts from off-site delivery truck trips would be less than significant.

The proposed Project would not introduce any uses expected to increase noise from emergency vehicles, beyond that already present in the existing urban environment where occasional emergency vehicles travel on nearby City streets.

Comment C-19: 9b. Measures to prevent vibration impacts on quantum computing and cold storage systems located in labs.

Response C-19: The proposed Project includes structural improvements at Research Park East specifically designed to minimize noise and vibration in order to accommodate highly sensitive scientific equipment and research, as described in Section II.6, Proposed Project Components, of the Draft IS/MND. As more specifically addressed in Response C-12, vibration-sensitive equipment would be installed on vibration isolated mounts, consistent with industry-accepted noise and vibration performance standards. The building facade and interior partitions would be designed with sound insulation sufficient to prevent transmission of low frequency noise or structural vibration to the exterior. As a result, noise and vibration from these research activities would not be noticeable outside the buildings.

Comment C-20: 9c. Strategies to manage increased foot traffic from transit riders and visitors.

Response C-20: As described in Section II.6, Proposed Project Components, of the Draft IS/MND, the proposed Project has been designed to facilitate pedestrian activity. As shown on Figure 14, Vehicular and Pedestrian Circulation, of the Draft IS/MND, pedestrian access to Research Park East would occur via: (1) a Westwood Boulevard entry gate (access controlled after-hours); (2) Pico Boulevard via the proposed paseo located between Blocks 1 and 2, which would provide access to the main lobby in Block 1 as well as the conference center and the main entry plaza to the south; (3) the parking area within Block 3; and (4) the adjacent GPI parking structure. Pedestrian access to Research Park West would occur via: (1) the existing subterranean parking garage; (2) the new amenity pavilion on the south side of the building near Westwood Boulevard; and (3) an existing entrance from Pico Boulevard along the north side of the building. Further, a new mid-block pedestrian crossing across Westwood Boulevard is proposed at the existing signal at the site driveways (between Pico Boulevard and Ayres Avenue) to improve safety and connectivity between Research Park East and West. The existing enclosed pedestrian bridge across Westwood Boulevard at Level 3 would also remain. It is further noted that while the proposed Project would result in a net increase in employment compared to the shopping center, there would be a substantial net reduction in the total population without shopping center visitors, as evidenced by the estimated net decrease of 10,659 daily vehicle trips to the site.

Comment C-21: 9d. Homeless and frequent crime in the area, drone detection and response measures: increased facility security measures given nature of the sensitive research.

Response C-21: As described in Section II.6, Proposed Project Components, of the Draft IS/MND, there would be security staff on-site 24 hours per day, seven days per week to monitor the building and property. Each building's main lobby would include a security checkpoint which would be staffed with security personnel, and visitors would be required to check in to gain authorized access to the buildings. Additionally, staffed security kiosks would be located at the Westwood Boulevard driveways. Laboratories would incorporate appropriate access control, physical security, and environmental protection measures, consistent with regulatory protocols and UC design standards applicable to facilities located on the UCLA campus. Additionally, as noted in Threshold (b) of Section V.15, Public Services, of the Draft IS/MND, the proposed Project would incorporate crime prevention-related design features throughout the Project site such as security cameras, electronic access/controls, appropriate wayfinding and security lighting, and other environmental design features to help prevent or deter criminal activity.

Refer also to Response C-6 regarding site security and Response C-13 regarding LAPD responsibilities.

Comment C-22: 10. Request for Detailed Operational Plan

The Draft IS/MND focuses primarily on construction and seismic retrofit activities. It does not provide adequate detail regarding:

10a. Internal BSL-2, BSL-3 operations

10b. State of the art, enhanced physical and cyber-security protocols and 24/7 operations and professional staffing

10c. Biosafety procedures

10d. Hazardous material handling

10e. Expected increased utility costs for residents: imparticular [*sic*] for water and electricity

10f. Research facilities impact to residents' electricity during brownout conditions

10g. Vendor and partner oversight

10h. Daily laboratory workflows

10i. Onsite threat level assessment, operations and procedures to thwart attempts by other countries, governments and malicious actors that will have interest in the research being conducted with quantum computing and biotech.

10j. Disaster recovery planning for all computing systems and labs that are necessary to eliminate information breaches as well as other security breaches that would impact the community.

10k. Communication plan to public: i.e a website with details updated monthly as project progresses with secure access for review of any sensitive information.

10l. Given the sensitive research being conducted in the UCLA Research Park and in BSL-2 and BSL-3 laboratories, the community requests a comprehensive operational plan before any construction approvals are granted.

Response C-22: Refer to Topical Response 1 for discussion of biosafety design, engineering, and operational requirements, associated laboratory operations, and the various UC and UCLA plans and policies in place that govern BSL lab operations and research activities. Refer also to Response C-6 regarding site security, as well as Response D-5 regarding UCPD patrols of the Project site and the role of the Research Park security team. Regular communications with the community will continue as discussed in Response A-2, and UCLA will comply with its public disclosure obligations consistent with the California Public Records Act and related law.

The proposed Project would not affect utility costs for surrounding residents. Utility rates are independently established by the Los Angeles Department of Water and Power (LADWP). Brownout conditions are likewise not anticipated. As evaluated in Section V.19, Utilities and Service Systems, of the Draft IS/MND, there are four electrical vaults on the Project site: three at Research Park East identified by LADWP as Vaults A, B, and C that respectively serve Blocks 1, 2, and 3; and one at Research Park West. Vaults A and B provide sufficient power to service the planned uses in Blocks 1 and 2, including the

UCLA Quantum Innovation Hub. Depending on the precise programming for Block 3 (which would be developed in a later construction phase) once tenant needs are identified, Vault C may be upgraded to provide additional capacity to support full buildout of the proposed Project. Any related service transformer upgrade, if necessary, would be provided by the Project and coordinated with LADWP, in order for LADWP to meet the Project's needs in addition to existing power demands while maintaining adequate levels of service throughout its service area. Refer to Response F-3 regarding the nature of quantum computing, which is distinguished from a data center.

The potential for attacks on the proposed Project is speculative and is not relevant to the analysis of the physical environmental impacts resulting from the proposed Project. That said, UCLA like other public institutions and high-tech research facilities has strict cybersecurity protections and protocols in place. Refer to Response C-16 for additional discussion.

Comment C-23: The Westwood Gardens Civic Association supports scientific progress and values UCLA's role in advancing research that benefits society.

However, the introduction of BSL-2 and BSL-3 laboratories, combined with sensitive quantum computing infrastructure, into a densely populated residential and commercial area requires full transparency, rigorous planning and enhanced threat mitigation planning at the physical and cyber-security levels most likely beyond UCLA SOP found today. This planning should address how to mitigate "new World threats" from "always on AI hacking", drone threats, any type of autonomous vehicles that could compromise safety at the Research Park.

All of this must be documented and planned so that residents and citizens can feel safe living around the UCLA Research Park Labs and that the broader global community is not impacted by a safety incident. This requires detailed, clear and regular communication by UCLA with the Westwood Gardens Civic Association and the broader community.

Please note we understand that BSL-2 and BSL-3 labs are used throughout the USA, in the State of California and even within the UC system. However, since this is a new type of research lab with a unique approach combining quantum computing with highly sensitive biotech at the BSL-2 and BSL-3 levels, located at an "off-campus" location; this would warrant even greater oversight than at current labs.

REQUEST:

We respectfully request written responses to each of the numbered questions/bullet points outlined above, along with any supporting documentation, regulatory references, or operational plans that UCLA can provide. If there are delays on certain items, please cite what dates the information will be provided.

Thank you for your attention to these important matters. We look forward to continued dialogue and collaboration.

Response C-23: This comment indicates general support for the proposed Project and the proposed scientific research uses, while summarizing the comments and concerns expressed throughout the comment letter. The responses to such comments are provided above. To reiterate an important clarification made in Response C-12, BSL lab operations at the Project site would be separate and distinct from research and activities conducted by UCLA's Quantum Innovation Hub. There is no plan to use the quantum facility for biotechnology or biological modeling. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter D – Westwood South of Santa Monica Blvd Homeowners' Association (WSSMHOA), Barbara Broide

Comment D-1: This letter is submitted on behalf of Westwood South of Santa Monica Blvd. Homeowners' Association whose property owners are located directly north of the proposed UCLA Research Park Project (proposed Project).

Response D-1: This comment provides introductory remarks and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment D-2: We have reviewed John Sandbrook's comment letter submitted to UCLA earlier and wish to incorporate his comments as those submitted on behalf of our organization. We agree with and support his comments. They were previously acknowledged by the West of Westwood HOA as well.

Response D-2: This comment transmits a letter from John Sandbrook dated May 26, 2026, which is included as Comment Letter H of this Final IS/MND. Refer to Responses H-1 through H-28, below.

Comment D-3: In his general comments, Mr. Sandbrook raised a number of important issues including the following:

1) A recommendation that UCLA needs to commit to at least annual reports on the Research Park, its activities and issues to the four HOAs in the area.

Response D-3: Refer to Response A-2 regarding communication with the community.

Comment D-4: 2) A question as to whether parking for neighborhood businesses can be accommodated in the underground parking structure. We would add as to whether they might be accommodated elsewhere on the property (such as outdoors behind the west annex).

Response D-4: Refer to Response A-3 regarding public parking.

Comment D-5: 3) Will the UCLA police force have a substation and regular staff at the proposed Project?

Response D-5: The UCPD has primary responsibility for police protection services on the Westwood campus as well as at UC-owned properties in proximity to the campus. UCPD already conducts regular patrols of the UCLA Research Park site, in addition to patrols by a 24/7 security force stationed on-site. The

proposed Project would not include a police substation or associated staffing, as the Research Park security team is trained to address a variety of incident types and has clear protocols in place to facilitate a phased approach to calls for police service depending on the nature, size, and location of incidents. As discussed in Topical Response 1, UCPD has an MOU with LAPD for response support as needed and specifically for incidents within the public right-of-way. Accordingly, UCPD would provide first response to most calls for police service at UCLA Research Park, with backup by LAPD if warranted.

Comment D-6: 4) How will traffic flow and mitigation be managed?

Response D-6: Section V.17, Transportation, of the Draft IS/MND, evaluates potential transportation impacts resulting from construction and operation of the proposed Project. As discussed, the proposed Project would be subject to various adopted LRDP PP related to traffic flow. These PPs are presented in Section 4.0, Mitigation Monitoring and Reporting Program, of this Final IS/MND.

With respect to construction-related traffic, impacts to both vehicular and non-vehicular traffic flow due to lane or sidewalk closure or alternative routes were determined to be less than significant with incorporation of LRDP PP 4.13-5, LRDP PP 4.13-6, and LRDP PP 4.13-8. LRDP PP 4.13-5 requires at least one open lane in each direction on roadways surrounding the Project site during construction activities. In the case that only one single lane is available or complete closure of a roadway segment is required (which would only occur on a short-term basis, such as to accommodate a particular delivery of equipment), the contractor would ensure temporary traffic controls and/or alternative route signage is implemented. LRDP PP 4.13-6 requires that, in the case of construction-related closure of pedestrian routes, the contractor provide accessible alternate routes and appropriate signage for these routes. LRDP PP 4.13-8 requires UCLA to consult with emergency service providers—specifically EH&S (including UCLA Fire), UCPD, LAFD, and LAPD—to address any temporary construction-related lane or roadway closures, if needed, and identify alternative travel routes.

As identified in Draft IS/MND Section V.17, Transportation, the proposed Project would not result in transportation-related impacts during operation; therefore, no Project-specific mitigation is required. With respect to traffic flow during operation, as discussed in Draft IS/MND Section II.6, Proposed Project Components, consistent with existing conditions, vehicular access to Research Park East and Research Park West would be provided from signalized driveways along Westwood Boulevard and Pico Boulevard (refer to Figure 14 of the Draft IS/MND). The Westwood Boulevard driveways would be open during business hours, with access control gates for after-hours entry. At Research Park East, primary employee access would be from the Pico Boulevard driveway, which traverses the site and connects to the GPI parking structure to the southeast, where 400 shared parking spaces would be available for staff use. The Westwood Boulevard driveway is envisioned primarily for visitors and shuttle buses which would utilize the drop-off zone at the main entry plaza, as well as for loading dock access for service vehicles. New access control would be added at the Pico Boulevard entry with a roll-down gate for after-hours access.

At Research Park West, the Westwood Boulevard driveway would serve as the primary vehicular point of access to the new drop-off area and the existing five-level subterranean parking structure, which would serve as the main parking area for all staff and visitors. The Westwood Boulevard driveway also would provide service vehicle access to the Block 4 loading dock. The existing Pico Boulevard driveway would be open to the public pursuant to a City easement, providing access to the public alley to the west. This driveway would also provide egress from the Research Park West parking structure and loading dock.

Refer also to Response C-6 regarding access control.

Comment D-7: 5) Visual impact of the exterior appearance of the proposed Project on nearby residential areas.

Response D-7: As discussed in Section V.1, Aesthetics, of the Draft IS/MND, Senate Bill 743 made several changes to CEQA for projects located in areas served by transit (i.e., transit-oriented development or TOD). SB 743 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; and (2) the project is located on an infill site within a transit priority area (TPA). The proposed Project meets these criteria. Criterion 1 is met because the proposed Project is an employment center project on a site that, prior to UCLA's acquisition, was zoned for commercial uses by the City of Los Angeles (City). Criterion 2 is met because the Project site is an infill site located in a TPA. Based on consistency with the SB 743 criteria, potential aesthetic impacts are not considered to be impacts under CEQA, and no Project impact would result. No further analysis of this issue is required.

Notwithstanding, as described in Section II.6, Proposed Project Components, of the Draft IS/MND, the limited new structures and façade modifications at Research Park East would incorporate architectural designs and materials consistent with the existing building design, and certain functions such as the existing outdoor loading area/service yard for Block 1 and the proposed central loading dock would be enclosed. Modifications to the Research Park West exterior would include architectural changes, recladding, and new glazing to modernize the façade to match the materials at Research Park East. Additionally, new landscape, wayfinding, security, and architectural lighting would be added to the entries along Westwood Boulevard.

Comment D-8: 6) Whether the alley south of Pico will be opened into the west Pico entrance and to the street and/or to the underground garage.

Response D-8: As discussed in Section II.6, Proposed Project Components, of the Draft IS/MND, the existing Pico Boulevard driveway would be open to the public pursuant to a City easement, providing access to the public alley to the west. The driveway would also provide egress from the Research Park West parking structure and loading dock.

Comment D-9: 7) Concerns related to biosecurity and the containment of biohazards. It is important that Sandbrook's report on biosecurity should be incorporated into the project's review/approval documentation. All biosecurity measures must apply not only to UCLA-affiliated researchers but must also be applied to all contractors, tenants and users of the facility. Will all contractors and lab operators commit to review, supervision, and oversight by UCLA to ensure protections needed by the community are met?

Response D-9: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations.

Comment D-10: We would like to raise a couple of additional/unaddressed issues:

A) Will overflow UCLA parking for non-Project activities be prohibited? Would any on-site excess parking capacity not needed for the proposed Project be made available to those whose destination would be the main campus? If so, what would associated impacts be?

Response D-10: Please refer to Response A-3 above with regard to parking. The Project site is not planned to serve as overflow parking for the main UCLA campus.

Comment D-11: B) I mentioned during public comment in the public meeting held in conjunction with the NOI that without knowing how the Western portion of the project will be used, it would appear to be inappropriate to have its area covered under the current NOI.

Response D-11: As identified in Section II.6, Proposed Project Components, of the Draft IS/MND, there is sufficient information available regarding preliminary programming for Research Park West for purposes of analysis. This includes identification of the estimated square footage that would be allocated to the identified program uses (i.e., laboratories, office space, meeting and assembly space, common and circulation areas, and food service) and non-program functions (i.e., mechanical areas and parking), as well as associated characteristics such as basic building systems and staffing levels. The analysis was based on conservative assumptions in order to capture the maximum foreseeable environmental impacts associated with construction and operation of the Project. As required by CEQA, once a future construction phase is defined for Research Park West, those plans, uses, and operations would be reviewed to determine if they are within the scope of the environmental analysis presented in the IS/MND. If any use or component falls outside of the scope of the environmental analysis and has the potential to result in new or substantially more severe environmental impacts, additional environmental review pursuant to CEQA would be required. Refer to Response C-5 for additional discussion.

Comment D-12: I am attaching to this email Mr. Sandbrook's comment on the DRAFT EIR for the UCLA Research Park. We look forward to further communication about the proposed Project and its relationship to our community.

Response D-12: To clarify, the environmental documentation prepared for the proposed Project is a Draft IS/MND, not a Draft EIR, as no significant and unavoidable impacts have been identified. The comment letter from John Sandbrook is included as

Comment Letter H of this Final IS/MND. Refer to Responses H-1 through H-28, below.

Comment Letter E – Annette Mercer

Comment E-1: Thank you to UCLA for bringing this project to our community. We are anxious to have the building occupied and in use. I am very pleased to see the attention to sustainability and energy efficiency in many forms, including use of heat pumps and solar panels. Thank you for the provision of EV charging stations, bike facilities, and stormwater and runoff recapture and reuse.

Response E-1: This comment indicates support for the proposed Project and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment E-2: To further the reduction of vehicle miles travelled, the provision of bike lanes on Westwood Blvd. from National Blvd (or at least the E Line Station) to UCLA is essential. LADOT is already working on this but any influence you can bring would be useful.

Response E-2: This comment does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. The implementation of bike lanes along Westwood Boulevard is not within the University's jurisdiction; however, the proposed Project would not preclude implementation of bike lanes in the future should they be implemented by the City. It is further noted for informational purposes that, separate from this Project, UCLA is planning additional bike infrastructure on campus to support City plans for additional bike lanes along Westwood Boulevard.

Comment E-3: To minimize light pollution all outdoor lighting should be shielded downward and of an appropriate color temperature and intensity.

Response E-3: Refer to Response D-7 regarding Project consistency with SB 743 criteria, which specifies that aesthetic impacts shall not be considered significant impacts on the environment. Notwithstanding, as identified in Section V.1, Aesthetics, of the Draft IS/MND, the proposed Project will comply with the following previously adopted LRDP mitigation measure, which addresses this comment:

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.*

Comment E-4: To increase the biodiversity value and sustainability of the landscaping, ALL landscaping plants should be locally native to the Los Angeles Basin. Please remove all references to non-native drought tolerant plants. Drought tolerant plants that are not native require more water and fertilizer than natives. Natives evolved here and do not "want" any water in the summer (once established) and do not require fertilizer which is one of our biggest sources of pollution in

Santa Monica Bay. Pollinator gardens with a variety of native annuals and perennials will provide year round color and interest.

Response E-4: As described in Section II.6, Proposed Project Components, of the Draft IS/MND, Project landscaping is anticipated to include native and drought-adapted species, in part to minimize water usage for irrigation. As landscape plans are still under development, the commenter's suggestions will be taken into consideration.

Comment E-5: To maximize your investment in the landscaping, maintenance must be adequately budgeted and should be done by workers trained in the care of native plants, such as those certified by the Theodore Payne Foundation program (I believe some UCLA groundskeepers have already done this.). They know and understand the appropriate time for pruning and deadheading, and the importance of keeping leaf litter mulch on the soil. They will be able to maintain the green space without use of glyphosate or other chemicals as should be required. They will also be able to selectively water replacement plants in the future once the initial establishment period is over and the irrigation system is no longer needed.

Response E-5: This comment provides suggestions regarding landscape maintenance practices and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment E-6: Thank you for replacing the oaks and sycamores at a 2:1 ratio. If any of the non native trees are replaced, they should be replaced with native species for the same biodiversity and sustainability reasons. There are native species on the City of LA list.

Response E-6: As identified in Table 9, Anticipated Tree Impact and Replacement Summary, of the Draft IS/MND, the only mature trees to be removed within the Project site are native western sycamore and coast live oak trees, which would be replaced at a 2:1 ratio as noted by the commenter.

Comment E-7: Your proposed haul route along Overland Ave. goes by 3 schools and a library and is through a residential area. While this is the shortest route to 1-10, please also consider using Pico Blvd. west to the northbound 405 (at Cotner), or Pico west to Sawtelle Blvd. south to the southbound 405 (which goes by 2 schools and fewer residences).

Response E-7: UCLA has evaluated the haul route and determined that a revision to direct haul trucks north on Westwood Boulevard and west on Pico Boulevard to the 405 freeway is viable. Based on sensitive receptor locations, their respective distance from the roadway, and existing traffic volumes along Pico Boulevard, the revised route would not introduce any new or more severe impacts compared to the previously evaluated Overland Avenue route.[24] UCLA will work with the construction contractor to implement this change.

[24] Personal communication, Sean Bui, Principal, Acoustical Engineering Services, August 21, 2026.

Comment Letter F – Brad Strumwasser

Comment F-1: Julia Brown directed me to submit questions & concerns to you regarding the Westside Pavilion Project and the upcoming community meeting. I intend to be in attendance and hope you will be more forthcoming than you have been in previous meetings. We are interested in more specifics.

Response F-1: This comment acknowledges the virtual public meeting held on May 20, 2026, and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment F-2: What are the plans for a "wet lab" as mentioned in past reports?

Response F-2: The proposed space allocations for the proposed Project are provided in Table 1, UCLA Research Park Program Summary, of the Draft IS/MND, and proposed laboratories are described in Section II.6, Proposed Project Components, therein. It is anticipated that wet and dry laboratories and associated support space would comprise approximately 271,200 gross square feet (GSF). These laboratory spaces would be consistent with the types of facilities present on the UCLA campus. Wet labs are physical experimentation spaces, typically involving the use of liquids, chemicals, and biological samples and requiring fume hoods and specialized equipment. Wet labs are designed with specialized plumbing and fixtures to accommodate research activities typical in the fields of biology, chemistry, biochemistry, and pharmacology.

Comment F-3: In the last meeting, it was revealed that an AI center would be established. We need to know what assessment have taken place and will take place to assess as well as address the local impact on our air quality.

Response F-3: To clarify, an artificial intelligence (AI) data center would not be established at UCLA Research Park. The UCLA Quantum Innovation Hub is a multidisciplinary research organization established to advance quantum science and directed by UCLA's Center for Quantum Science and Engineering, which is operated jointly by the UCLA Division of Physical Sciences and the Samueli School of Engineering. Quantum science is the study of the physical world at the smallest scales, such as atoms and subatomic particles. Quantum computing focuses on processing complex multi-variable problems at ultra-fast calculation speeds. Air quality impacts resulting from operation of the proposed uses, including the Quantum Innovation Hub, are addressed in Section V.3, Air Quality, of the Draft IS/MND, and air pollutant emissions are estimated in Table 6 and Table 8 therein. As evaluated, all air quality impacts would be less than significant.

Comment F-4: We need to know what safety measures are planned for the wet lab, the immunology lab and the AI center.

Response F-4: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations, Response F-2 regarding wet labs, and Response F-3 regarding the quantum uses (not an AI center or data center).

Comment Letter G – Jeffrey M. Ellis

Comment G-1: I am writing to follow up on the letter sent to you by Barbara Broide on June 3. The views Barbara expressed in her email are her own personal views, and were not sent at the request or with the approval of our Board -- of which I am a voting member. While I cannot say whether or not a majority of the Board would have endorsed the letter, the fact is we did not approve it.

Writing for myself, I have full confidence that UCLA will uphold the highest standards of environmental quality and safety -- as it has clearly done on its main campus for many decades. I do not believe that UCLA needs to take any special or unusual steps that might delay or compromise its planned Research Park location. It is my impression that the vast majority of our neighborhood is in agreement with my views.

We believe that UCLA will be a wonderful presence in our neighborhood, and do not want to see any delays due to overreaction by a handful of overly cautious neighbors.

The fact that UCLA is meeting with the Westside Neighborhood Council shows sufficient community involvement. I see no need for you to duplicate your efforts by meeting with individual homeowner groups. To be honest, our memberships have decreased over the years, and we do not necessarily represent the majority views of our neighbors. We only represent homeowners, not renters or area businesses.

Please let me know if I can be of any assistance with my neighbors in helping ensure there are no unnecessary delays in completing the Research Park project. I look forward to welcoming UCLA into our neighborhood!

Response G-1: This comment addresses the letter sent by the WSSMHOA (Comment Letter D). The commenter also expresses support for the proposed Project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter H – John R. Sandbrook

Comment H-1: Background

1. The California Environmental Quality Act (CEQA) was signed into law by then-Governor Ronald Reagan on September 18, 1970. Pursuant to that law, the governing board of the University of California (Board of Regents) is required to certify an environmental impact report (EIR) documenting both (1) various aspects of capital construction projects proposed to be constructed in or on property owned by the University; and (2) comments provided by the public about the EIR, including the University's response to such public comments.

2. UCLA is one of the 10 campuses of the University of California and is subject to CEQA and the procedures established by the University of California Office of the President (UCOP), located in Oakland, CA. All 10 campuses report to UCOP.

3. On May 4, 2026, the UCLA Office of Capital Programs published for public review and comment the Draft EIR for the proposed UCLA Research Park facilities.

4. Pages 114-116 of the Draft EIR discussed that: (A) up to 5,000 gross square feet in UCLA Research Park East would be constructed as laboratories classified at Biosafety Level 2 (BSL-2) and Level 3 (BSL-3) [p.114]; and (B) up to 10,000 gross square feet would be constructed as a vivarium for animal research, utilizing a to-be-constructed Animal Biosafety Level laboratory in the vivarium [p. 115].

5. The only explanatory information in the Draft EIR about BioSafety Level laboratories was provided in one sentence of footnote # 50 on page 114.

6. On May 20, 2026, the required public hearing on the Draft EIR was conducted (via ZOOM) by the UCLA Office of Capital Programs. During the public hearing, four (4) individuals expressed concern about the absence in the Draft EIR of explanatory information about BioSafety Level laboratories that would be of educational value to the neighborhood communities that are located immediately adjacent to the UCLA Research Park property (north and south of Pico Blvd.).

7. The deadline for public comments to be submitted to UCLA Capital Programs is Wednesday, June 3, 2026.

9. The UCLA Office of Capital Programs has announced a tentative plan to issue the Final EIR (including responses, if appropriate, to any public comments received) in summer 2026. Thereafter, UCLA intends to present the Final EIR to UCOP and then, in fall 2026, to request certification of the Final EIR by the UC Board of Regents, presumably at one of its two regularly-scheduled meetings (September 21-22, 2026, at UCLA Luskin Conference Center; November 16-17 at UC San Francisco Mission Bay campus).

10. If approvals and certification of the Final EIR are secured, UCLA announced that construction of the multi-year, multiple-phased projects for UCLA Research Park West would begin in late 2026/early 2027.

11. To provide more information about BioSafety Level laboratories, this document has been prepared by yours truly, at my own initiative over the Memorial Day holiday weekend (and at the request of no one).....and it will be included in my public comments about the Draft EIR that I will submit by June 3. My wife (Lianna Anderson, former assistant dean of the Division of Life Sciences, UCLA College) and I are currently in our 21st year (since 2005) of home ownership within the boundaries of the West of Westwood Homeowners Association (WOWHOA).

12. The WOWHOA is one of the four HOAs immediately adjacent to the UCLA Research Park property. (For a complete description of the four HOAs immediately adjacent to the UCLA Research Park, any reader of this document is referred to the explanatory letter, dated February 4, 2025, that was submitted by the Westside Neighborhood Council to UCLA. That letter is included in this document.)

13. Since 2015, I have served as the Secretary of the WOWHOA Board of Directors. Accordingly, this document is being sent to the President of the WOWHOA. Distribution to the Board of Directors of the WOWHOA or to the Presidents of the other three HOAs is at her discretion.

No UCLA personnel were involved in or consulted about the preparation or review of this document. No UCLA personnel requested that this document be prepared or provided any information for this document.

This document has been prepared using only publicly-available information. A full disclosure about my prior UCLA background is also included in this document. I have had NO involvement of any type in the UCLA planning process for UCLA Research Park West.

–John R. Sandbrook

Response H-1: This comment provides background information regarding the environmental review process for the proposed Project, background information related to the commenter and his comment letter, and references an attached letter previously provided to UCLA by the Westside Neighborhood Council, in each case from the commenter's individual perspective. The comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

It should be noted that the commenter incorrectly identifies the environmental document prepared for the proposed Project as a Draft EIR. Since the proposed Project would not result in any impacts that cannot be mitigated to a less than significant level, a Draft IS/MND was appropriately prepared.

Comment H-2: Contents

A. Overview of 17 Facts

B. General Reference Documents -- U.S. Department of Health and Human Services

- U.S. Center for Disease Control and Prevention
  - Publication: Biosafety in Microbiological and Biomedical Laboratories (June 2020)
- U.S. Administration for Strategic Preparedness and Response
  - Biosafety Levels

C. List of Universities and Selected Other Organizations in California with BSL-3 Research Laboratories

D. University of California / Office of the President

- March 11, 2026 – Reissuance of UC Policy on High Containment Laboratories
- March 11, 2026 – Publication of Design Standards for UC BSL-3 Laboratories

- University of California High Containment Laboratory Oversight Committee

E. UCLA Information

- Vice Chancellor-Research and Creative Activities
- High Containment Program/Director, Office of Environmental Health & Safety
- UCLA High Containment Laboratory Oversight Group (HCLOG) and Chair
- UCLA Research Park executive architect—Flad Architects

F. UC Irvine and UC San Diego Information

G. Related Articles

- August 31, 2023—University of California News
- September 13, 2023--Cal Matters.org
- September 18, 2025—Scientific World Journal.org

H. Observations, Comments Questions and Suggestions for the Final EIR

I. Disclosure Statements-John R. Sandbrook

J. Letter of February 4, 2025 to UCLA identifying the four HOAs adjacent to the UCLA Research Park property.

Response H-2: This comment provides an outline of the contents of Comment Letter H and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-3: FACTS

Fact #1: Research compiled by USA Today in 2015 estimated that BSL-3 laboratories are operated at more than 200 locations in the U.S, by academic research universities, federal agencies, non-profit organizations and private companies.[1] The estimated number of BSL-3 laboratories operating in the U.S. range from 1,000 to 1,500, but no single list is available.

Fact #2: Ten (10) of the 13 research university institutions in the State of California (including the 10-campus University of California system) operate one or more BSL-3 research universities. Of the 13 institutions, only the California Institute of Technology, UC Santa Barbara and UC Santa Cruz do not operate a BSL-3 laboratory.

Fact #3: In addition to the eight (8) UC campuses that operate one or more BSL-3 laboratories, two private universities in California also operate BSL-3 laboratories, both in major residential areas of California: Stanford University

(Palo Alto) and the University of Southern California (Health Sciences campus-East Los Angeles).

Fact #4: The University of California (UC), as a single organization, reportedly has the largest portfolio of BSL-3 research laboratories of any organization in the U.S.

Fact #5: The University of California currently operates more than thirty (30) BSL-3 laboratories at eight (8) of its 10 campuses and at its five medical centers (Davis-Sacramento, Irvine, Los Angeles, San Diego, San Francisco), as well as at the Lawrence Berkeley National Laboratory (adjacent to UC Berkeley), which UC manages for the U.S. government.

Fact #6: The University of California Training Standards for Biosafety Level-3 (BSL-3) Laboratories document was published in March 2021 and available to the public.[2]

Fact #7: Specific design standards for the construction of University of California BSL-3 laboratories and environmental health protection and oversight policies were issued by the University of California Office of the President in March 2026. These standards and the related policies apply to all UC campuses, including UCLA, and are also available to the public.[3]

Fact #8: Oversight of all BSL-3 laboratories operated by any campus of the University of California is the responsibility of the 17-member High Containment Laboratory Oversight Committee (HCLOC), established on March 4, 2015 by directive from then-UC President Janet Napolitano.

- The HCLOC reports directly to the Office of the UC President[4] and, through that office, to the Board of Regents of the University of California. This committee must approve any request from any campus for a deviation to the published design standards for BSL-3 laboratories.

- The 2015 Napolitano directive also required each campus to appoint a fulltime employee to serve as head of the campus High Containment Laboratory program.

- On March 11, 2026 current UC President James Milliken updated the UC Policy on High Containment Laboratories, in tandem with the issuance of the Design Standards for High Containment Laboratories. The Milliken letter and the 2026 UC policy statement is available to the public.[5] [6]

Fact #9: As of January 2023, the University of California, Los Angeles (UCLA) operated two (2) BSL-3 laboratories on the main Westwood campus.[7]

Fact #10: Oversight of the BSL-3 laboratories on the UCLA Westwood campus is the responsibility of the UCLA Vice Chancellor-Research and Creative Activities. As required by the 2015 Napolitano directive and the 2026 Milliken restated policy, UCLA (as well as each UC campus with a BLS-3 [*sic*] laboratory) also has a local 13-member High Containment Laboratory

Oversight Group (HCLOG) that serves in an advisory capacity to the Vice Chancellor-Research and Creative Activities.[8]

- In addition, advance approval for specific research programs proposed by UCLA personnel in the UCLA BSL-3 laboratories is the responsibility of the larger Institutional Biosafety Committee (IBC).[9]

- Federal guidelines state that, when an organization receives federal funding for its bioscience operations, "when possible and consistent with protection of privacy and proprietary interests, the institution is encouraged to open its Institutional Biosafety Committee meetings to the public."[10]

- The agendas and minutes of the UCLA IBC are available to the public on its website.[11] [12] [13]

Fact #11: As of Spring 2026, (a) Professor Roger Wakimoto[14] serves as the UCLA Vice Chancellor-Research and Creative Activities; (b) Ms. Barbara Dillon[15] serves as the director of the High Containment Laboratories Program in the UCLA Office of Environmental Health and Safety; and (c) Professor Jerome Zack,[16] Professor of Medicine in the David Geffen School of Medicine and holder of the M. Philip Davis Endowed Chair in Microbiology and Immunology, serves as chair of the HCLOG.

Fact #12: Flad Architects, Inc., which has developed the masterplan for the UCLA Research Park, was ranked no. 2 nationally for science and technology (S+T) laboratory facility architecture and architecture/engineering (AE) firms, as reported in Building Design+Construction's 2025 Giants 400 Report.[17]

Fact #13: The BSL-3 Laboratory National Training Center, operated by the School of Medicine at the University of California, Irvine,[18] is considered by many to be the best in the U.S.

Fact #14: A select list of other prominent organizations that operate a BSL-3 laboratory in urban/residential locations of California include:

a) the California Department of Public Health (Richmond);

b) the Scripps Research Institute (La Jolla);[19]

c) the Lawrence Livermore National Laboratory (Livermore);[20] and

d) Gilead Sciences, a private company (Foster City).[21]

Note: many organizations choose not to disclose the existence of a BSL-3 laboratory for reasons of security and safety. No single list of all BSL-3 laboratories in the State of California is available. While it is believed that the Salk Institute (La Jolla) and the J. Craig Venter Institute (La Jolla) also operate BSL-3 laboratories in their facilities that are located adjacent to the La Jolla residential neighborhoods, the websites of those two organizations do not specifically provide that information.

Fact #15: In Pasadena, the California Institute of Technology website[22] indicates specifically that it does not operate a BSL-3 laboratory. It is believed that, pursuant to affiliation agreements, Cal Tech researchers collaborate with other institutions (e.g., UCLA) for the use of BSL-3 laboratories to support specific research initiatives at Cal Tech that require access to equipment at the level of BSL-3 laboratories.

Fact #16: In West Hollywood, the Cedars-Sinai Medical Center website does not indicate whether or not it operates a BSL-3 laboratory as one of its 100 research laboratories.

Fact # 17: No BSL-4 Laboratory is currently operated in the State of California.[23]

[1] USA Today —May 28, 2015 -- https://www.postcrescent.com/story/news/investigations/2015/05/28/state-incidents-highlight-bioterror-lab-concerns/28089943/

[2] Biosafety Level 3 (BSL-3) Laboratory Training Requirements Standard

[3] https://www.ucop.edu/safety-and-loss-prevention/_files/hcloc/uc-bsl3-design-standards-final.pdf

[4] https://www.ucop.edu/safety-and-loss-prevention/_files/groups/uchcloc_charter.pdf

[5] https://rpc.research.ucla.edu/wp-content/uploads/uc-president-milliken-issuance-letter-high-containment-research-2026-03-11.pdf

[6] https://rpc.research.ucla.edu/wp-content/uploads/high-containment-research-policy-2026-03-11.pdf

[7] Letter of January 19, 2023 from Roger Wakimoto, UCLA Vice Chancellor-Research and Creative Activities

[8] https://rpc.research.ucla.edu/hclog/

[9] UCLA IBC Website: https://rsawa.research.ucla.edu/ibc/

[10] National Institutes of Health (NIH) Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules, page 28, Section IV-B-2-a-(6): https://osp.od.nih.gov/wp-content/uploads/NIH_Guidelines.pdf

[12] [*sic*] UCLA IBC Meetings: https://rsawa.research.ucla.edu/ibc/meeting-submission-deadlines/

[13] UCLA IBC Minutes: https://ucla.app.box.com/s/n28dgqy44l9dujke30vpz2gnd952taaw

[14] https://www3.research.ucla.edu/about-vcr

[15] https://ehs.ucla.edu/people/barbara-dillon

[16] https://bioscience.ucla.edu/people/jerome-zack/ and https://profiles.ucla.edu/jerome.zack

[17] https://www.flad.com/work.php?sector=Academic and https://en.wikipedia.org/wiki/Flad_Architects

[18] https://medschool.uci.edu/research/core-facilities/bsl-3-training-program

[19] https://www.scripps.edu/news-and-events/press-room/2022/20221024-g20-grant.html

[20] https://www.llnl.gov/science-technology/facilities-centers

[21] https://www.gilead.com/stories/meet-gilead-covid-19-virus-variants-hunters

[22] https://cellsort.caltech.edu/policies

[23] According to Wikipedia, a total of 12 BSL-4 laboratories exist in the U.S. – Atlanta, GA; Betheseda, MD; Boston, MA (Boston University); Fort Detrick, MD (3); Galveston, TX (2); Hamilton, MT; Manhattan, KS; Richmond, VA; San Antonio, TX. See: https://en.wikipedia.org/wiki/Biosafety_level

Response H-3: This comment provides information and citations related to biosafety laboratory uses at the UC campuses, including UCLA, as well as other institutions, and information about UCLA and its departments and staff, individuals affiliated with the proposed Project, and the Project Architect. The information in the comment is presented by the commenter as factual and/or readily available published information and has not been independently verified by UCLA. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-4: Biosafety Laboratories (BSL)

Biosafety Laboratories are classified in four ascending risk levels (1, 2, 3 and 4) by the U.S. Department of Health and Human Services

U.S. Department of Health and Human Services Centers for Disease Control and Prevention (CDC)

“CDC partners with the U.S. National Institutes of Health to publish biosafety guidelines for protecting workers and preventing exposures in biological laboratories. In addition to the partnership with NIH and world-renowned organizations, CDC produces online training and offers other downloadable resources that may be useful to laboratorians nationally, or around the world.”

Publication:
Biosafety in Microbiological and Biomedical Laboratories.
6th Edition-June 2020 (614 pages) -- First edition published in 1984.

https://www.cdc.gov/labs/media/pdfs/2025/08/SF 19a_308133-A_BMBL6_00-BOOK-WEB-final-3.pdf

Page 4:

Biosafety Level 1 (BSL-1) is the basic level of protection and is appropriate for defined and characterized strains of viable biological agents that are not known to cause disease in immunocompetent adult humans.

Biosafety Level 2 (BSL-2) is appropriate for handling moderate-risk agents that cause human disease of varying severity by ingestion or through percutaneous or mucous membrane exposure.

Biosafety Level 3 (BSL-3) is appropriate for agents with a known potential for aerosol transmission, for agents that may cause serious and potentially lethal infections, and that are indigenous or exotic in origin.

Exotic agents that pose a high individual risk of life-threatening disease by infectious aerosols and for which no treatment is available are restricted to high containment laboratories that meet Biosafety Level 4 (BSL-4) guidelines.

U.S. Department of Health and Human Services Administration for Strategic Preparedness & Response (ASPR) Washington, D.C.

Biosafety Level Requirements

https://aspr.hhs.gov/S3/Pages/Biosafety-Level-Requirements.aspx

“Laboratory biosafety describes the application of specific practices, safety equipment and specially designed laboratories to create a safe environment, both within and outside the laboratory, for work conducted with infectious agents and toxins. In addition, there is monitoring for occupationally acquired infections and staff training, as appropriate.

“Biosafety Levels” (BSLs) are designations applied to projects or activities conducted in laboratories in ascending order of containment based on the degree of the health-related risk associated with the work being conducted. In the United States, the designations BSL-1, BSL-2, BSL-3, and BSL-4 describe the minimum safe work practices, specially designed buildings, and safety equipment required to conduct work on infectious microorganisms and other biological hazards. BSL-4 is the highest biosafety level.

“The appropriate BSL for a project is determined jointly by the principal investigator, the institutional biosafety professionals and biosafety committees. The BSL assigned to a project is based on a biological risk assessment that takes into account the nature of the infectious agent, toxin, or other biological hazard, including:

- Its ability to cause disease and the way(s) in which it causes disease (transmissibility and pathogenicity);
    - How much of it is required to cause disease (infectious dose);
    - How many different organisms are susceptible to infection (host range); and
    - Its prevalence in the community (epidemiology);
- The specific laboratory activity or activities being performed; and
- The availability of preventive medical countermeasures (i.e., vaccines) or effective treatment (i.e., post-exposure vaccination and/or use of antimicrobials, antivirals and chemotherapeutic agents).

"The BSL assigned to a project determines the controls required to conduct the work safely:

- Engineering controls, including facility construction and design elements in the laboratory space;
- Safety equipment, including Personal Protective Equipment (PPE) and biosafety cabinets;
- Administrative controls, including specific access, training, and occupational medicine policies; and
- Laboratory practices and procedures workers use when working in the laboratory.

"Every biological laboratory, regardless of biosafety level, follows standard microbiological practices. Each biosafety level builds on the controls of the next lower level. Each biosafety level has its own specific containment controls. The assignment of a biosafety level to a particular work process is made through a protocol driven risk assessment."

Biosafety Levels

https://aspr.hhs.gov/S3/Pages/Biosafety-Levels.aspx

"Biosafety levels (BSL) are used to identify the protective measures needed in a laboratory setting to protect workers, the environment, and the public. The levels are defined in Biosafety in Biomedical Laboratories (BMBL). Biosafety level designations in the BMBL outline specific practices and safety and facility requirements. There are many ways to combine equipment, practices, and laboratory design features to achieve appropriate biosafety and biocontainment. These are determined through biological risk assessments specifically conducted for each experimental protocol.

"At any given biosafety level, there will be strict requirements for laboratory design, personal protective equipment, and biosafety equipment to be used. Standard Microbiological Practices are required at all biosafety levels and are good practice for experiments below the BSL-1 threshold.

"Activities and projects conducted in biological laboratories are categorized by biosafety level. The four biosafety levels are BSL-1, BSL-2, BSL-3, and BSL-4, with BSL-4 being the highest (maximum) level of containment. There are additional specific rules and designations for animal research (ABSL), agricultural research (BSL-Ag), and other types of research. These other types of labs require their own specific set of rules and regulations, because they are dealing with larger organisms, such as plants, animals, and insects."

Biosafety Level 3

"BSL-3 laboratories are used to study infectious agents or toxins that may be transmitted through the air and cause potentially lethal infections. Researchers perform all experiments in a biosafety cabinet. BSL-3 laboratories are designed to be easily decontaminated. As an additional safety measure, these

laboratories must use controlled, or "directional," air flow to ensure that air flows from non-laboratory areas (such as the hallway) into laboratory areas.

"Other engineered safety features include a requirement for entry through two self-closing, interlocked doors, sealed windows, floors and walls, and filtered ventilation systems. BSL-3 labs must also be equipped to decontaminate laboratory waste using an incinerator, an autoclave, and/or another method of decontamination, depending on the biological risk assessment.

"In addition to BSL-2 considerations, BSL-3 laboratories have the following containment requirements:

Laboratory Practices

- An Occupational Health Program exists for medical surveillance of laboratory workers. Laboratory workers are under medical surveillance and may be offered immunizations for infectious agents or toxins they work with, if available.

- Access to the laboratory is restricted and controlled at all times.

Safety Equipment

- Appropriate PPE must be worn, and respirators might be required.

- All work with infectious agents or toxins must be performed within an appropriate biosafety cabinet.

Facility Construction

- A hands-free sink and eyewash are available near the exit.

- Exhaust air cannot be recirculated, and the laboratory must have sustained directional airflow by drawing air into the laboratory from clean areas towards potentially contaminated areas.

- Entrance to the lab is through two self-closing and interlocked doors.

Biosafety Cabinets:

https://aspr.hhs.gov/S3/Pages/Biosafety-Cabinets.aspx

"Biosafety cabinets (BSCs) are one type of biocontainment equipment used in biological laboratories to provide personnel, environmental, and product protection. Most BSCs (e.g., Class II and Class III) use high efficiency particulate air (HEPA) filters in both the exhaust and supply system to prevent exposure to biohazards.

"There are several designs of biosafety cabinets which provide different levels of protection to the worker and to the research material. There are three classes of biosafety cabinets designated in the United States: Class I, Class II, and Class III. Class I biosafety cabinets are infrequently used and provide

personnel and environmental protection but no product protection. Class II and Class III cabinets provide personnel, environmental, and product protection. Class II biosafety cabinets are widely used in biological research laboratories and are differentiated into types such as A1, A2, B1, or B2. The classification for the majority of biosafety cabinets used in the United States is Class II Type A2. The naming system given here is the one used in the United States and in CDC/NIH guidance Biosafety in Microbiological and Biomedical Laboratories (BMBL) Appendix A. Other naming conventions have been used in the past or in other countries.

"Laminar flow hoods (e.g., "clean benches") are not biosafety cabinets. Laminar flow hoods provide a clean or sterile area to protect the work product, but discharge air towards the worker. In work with infectious agents, toxins, or cultures, use of laminar flow hoods may expose the worker to the biological material. Likewise, chemical fume hoods cannot be used in place of biosafety cabinets. Chemical fume hoods are used to protect personnel from chemical exposure and are not appropriate for work involving infectious agents or toxins. Biosafety cabinets must be inspected by trained personnel on a regular basis and be "certified" as safe for work involving infectious agents or toxins."

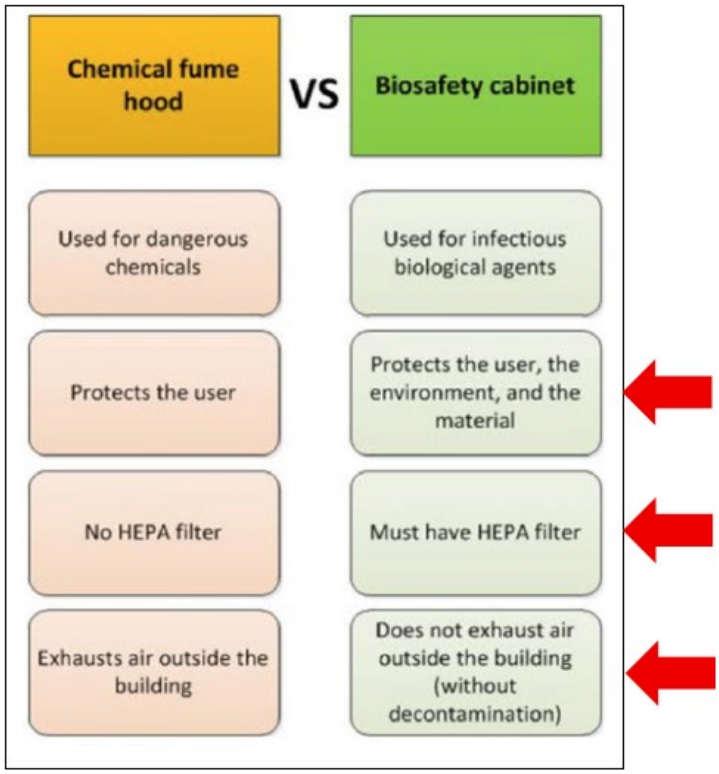
Biosafety Cabinets vs. Fume Hoods

"Both chemical fume hoods and biosafety cabinets are specialized types of laboratory equipment. While chemical fume hoods and biosafety cabinets look similar and both protect laboratory workers from laboratory hazards - their purpose, function, and operation differ significantly.

"A chemical fume hood is designed to remove chemical fumes and aerosols from the work area while a biosafety cabinet is designed to provide both a clean work environment and protection for employees who create aerosols when working with infectious agents or toxins.

"A chemical fume hood protects the user while a biosafety cabinet protects the user, the environment, and the material. Biosafety cabinets have high-efficiency particulate air (HEPA) filters while chemical fume hoods do not. The HEPA filter in the exhaust system of a biosafety cabinet will effectively trap all known infectious agents and ensure that only microbe-free exhaust air is discharged from the cabinet (i.e., 99.97% of particles 0.3 µm in diameter and 99.99% of particles of greater or smaller size).

"The chart below characterizes the differences between a chemical fume hood and a biosafety cabinet.



Research Universities in the State of California with BSL-3 Laboratories:

(10 of the 13 research universities in California operate one or more BSL-3 laboratories)

Organization	**City/Location**
Univ. of California, Berkeley	Berkeley
Univ. of California, Davis	Davis & Sacramento
Univ. of California, Irvine	Irvine
Univ. of California, Los Angeles	Los Angeles-Westwood
Univ. of California, Merced	Merced
Univ. of California, Riverside	Riverside
Univ. of California, San Diego	San Diego-La Jolla
Univ. of California, San Francisco	San Francisco-Mission Bay & Zuckerberg San Francisco General Hospital
Stanford University	Palo Alto
Univ. of Southern California	Los Angeles-East LA

Note: Of the 10 campuses of the University of California (UC), only UC Santa Barbara and UC Santa Cruz do not currently operate a BSL-3 Laboratory.

Selected Other Organizations with BSL-3 Laboratories in the State of California

Organization	City/Location
California Department of Public Health	Richmond
Scripps Research Institute	San Diego-La Jolla
Lawrence Livermore National Laboratory	Livermore
Gilead Sciences	Foster City

Response H-4: This comment provides additional information and citations related to biosafety laboratory levels and operations but does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. The information provided in this comment has not been verified by UCLA. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-5: University of California (UC) System Office of the President

(comprised of 10 campuses and 5 academic medical centers)

Letter from UC President Janet Napolitano, dated March 4, 2015:
https://rpc.research.ucla.edu/wp-content/uploads/uc-president-napolitano-letter-2015-03- 04.pdf

Letter from UC President Janet Napolitano, dated September 16, 2019:
https://www.ucop.edu/safety-and-loss-prevention/_files/hcloc/presidents-hcloc-letter.pdf

Webinar—conducted October 2020 (20 slides):
Subject: Design Standards for BSL-3 Laboratories
https://www.ucop.edu/design-construction-services/_files/cpi/bsl3labdesign1012020.pdf

Letter from UC President James Milliken – March 11, 2026
https://rpc.research.ucla.edu/wp-content/uploads/uc-president-milliken-issuance-letter-high-containment-research-2026-03-11.pdf

Policy – issued by UC President James Milliken -- March 11, 2026 (10 pages)
Title: High Containment Research (BSL-3 Laboratories)
https://policy.ucop.edu/doc/3501379/HCR

University of California High Level Containment Oversight Committee (HLCOC)
Current Membership
https://www.ucop.edu/safety-and-loss-prevention/_files/groups/membership-roster-hcloc- 040419.pdf

University of California Design Standards Publication (75 pages)
Title: Biosafety Level 3 (BSL-3) Laboratory Design Standards
https://www.ucop.edu/safety-and-loss-prevention/_files/hcloc/uc-bsl3-design-standards-final.pdf

Publication Prologue
https://www.ucop.edu/safety-and-loss-prevention/environmental/groups/hcloc/bsl-3-laboratory-design-standards.html

"Several years ago, President Napolitano formed the UC High-Containment Laboratory Oversight Committee (HCLOC) comprised of faculty and biosafety professionals with expertise in the safe use of infectious agents in biological and biomedical research. Infectious disease research involving highly pathogenic and primarily aerosol transmissible agents (i.e., Risk Group 3 agents) has the potential to present significant risk to individuals, the community, and the environment. The ability to safely conduct these research activities is largely dependent upon the highly engineered Biosafety Level 3 (BSL-3) laboratory, the highest-level containment facilities currently operated by the UC. The primary objective of these laboratories is to provide the best possible physical containment of Risk Group 3 agents. Hence, the design and engineering of these laboratories must be maintained at the highest attainable standards. "Although several authorities have published standards for the design of BSL-3 laboratories, no single agency has sole oversight or responsibility for this important research safety consideration; therefore, the development of the UC Biosafety Level 3 Laboratory Design Standards has incorporated input from several of these sources, including the following:

- CDC/NIH Biosafety in Microbiological and Biomedical Laboratories (BMBL), 6th edition, 2020
- NIH Design Requirements Manual for Biomedical Laboratories and Animal Research Facilities (DRM), 2024
- NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules (NIH Guidelines), 2024

"The information presented in the BSL-3 Laboratory Design Standards addresses facility design and engineering systems for BSL-3 containment laboratories and incorporates additional design elements to assist campuses in conducting facility risk assessments. The HCLOC has assembled and approved these design standards to serve as the foundation of BSL-3 laboratory design and construction and to support the application of consistent standards within UC. The UC BSL-3 Laboratory Design Standards provide the mandatory minimum design criteria for Biosafety Level 3 laboratories in the UC system."

Design Deviation Requests
Process Flow Chart:
https://www.ucop.edu/safety-and-loss-prevention/_files/hcloc/uc-bsl3-design-standards-deviation-request-flowchart.pdf

Response H-5: This comment provides additional information and citations related to biosafety laboratories sourced from the University of California Office of the President (UCOP) and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. The information provided in this comment has not been verified by UCLA. This comment is noted for the

administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-6: UCLA Information

UCLA Vice Chancellor-Research and Creative Activities
https://www3.research.ucla.edu/about-vcr

High Containment Program – UCLA Office of Environmental Health & Safety
https://ehs.ucla.edu/high-containment

Director, High Containment Program
https://ehs.ucla.edu/people/barbara-dillon

High Containment Laboratory Oversight Group (HCLOG)
https://rpc.research.ucla.edu/hclog/

HCLOG Chair
https://bioscience.ucla.edu/people/jerome-zack/
https://profiles.ucla.edu/jerome.zack

No Current Animal BSL-3 Laboratory at UCLA
https://ucla.app.box.com/s/2lue81t3no8qwxk5masmj1inhyzx6k31

UCLA Research Park – Executive Architects
https://en.wikipedia.org/wiki/Flad_Architects

"Flad Architects is a national architectural firm with offices in Atlanta, Boston, Gainesville (FL), New York City, Raleigh (NC), San Diego, San Francisco, Seattle, and Tampa…..The firm is involved in multiple markets and building types including: corporate, healthcare, higher education, science and technology, and the federal government, including many Department of Energy National Laboratories.

"Flad is ranked No. 2 in the nation for science and technology (S+T) laboratory facility architecture and architecture/engineering (AE) firms, as reported in Building Design+Construction's 2025 Giants 400 Report."

Response H-6: This comment provides additional information and citations related to UCLA laboratory operations and the Project Architect and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. It is noted that while no Animal BSL-3 (ABSL-3) lab currently operates on the UCLA campus, vivarium facilities are used for research purposes. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-7: Other UC Campuses

UC Irvine:

UC Irvine National BSL-3 Laboratory Training Program
https://medschool.uci.edu/research/core-facilities/bsl-3-training-program

UC Irvine High Containment Program
https://www.ehs.uci.edu/research-safety/high-containment/index.php

UC San Diego:

Biosafety Laboratory Practices Chart
https://blink.ucsd.edu/safety/research-lab/biosafety/containment/chart.html

Medical Surveillance for BSL-3 Laboratory Personnel
https://blink.ucsd.edu/safety/research-lab/occ-health/surveillance.html#exposure-control-plans

Response H-7: This comment provides additional information and citations related to biosafety laboratories sourced from other UC campuses and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-8: Related Articles

University of California News – August 31, 2023

The lab teaching the world how to safely study pathogens

By Tom Vasich, UC Irvine



Class members in the UC Irvine National BSL-3 Training Program learn proper procedures in the center's own fully-functional BLS-3 [*sic*] lab. Credit: Steve Zylius/UC Irvine

In response to the COVID-19 pandemic, research on coronaviruses and other harmful pathogens has increased in laboratories across the world — and not just any labs. Work of this sort often requires specialized, high-containment facilities known as biosafety level 3 laboratories.

These BSL-3 labs are very sophisticated and are operated under negative pressure to provide safe environments in which to study airborne viruses and

bacteria. They house some of the most important biomedical research taking place today.

Most elite research universities have BSL-3 labs (The campuses of the University of California system have over 30), as do pharmaceutical companies and federal agencies like the National Institutes of Health and the Centers for Disease Control and Prevention. There are an estimated 1,500-plus of these labs in the U.S., and to use or maintain one requires highly technical instruction.

Many who work in and manage these labs turn to the UC Irvine National Biosafety Level 3 Training Program. Gary Landucci started it in 2006, first offering a five-day course teaching scientists how to safely conduct research with high-risk infectious disease pathogens in them.

With support from corporate sponsors, the NIH and the UCI School of Medicine, the program moved in 2015 into a state-of-the-art training facility on campus, where Landucci and his team run hands-on, weeklong instructional programs year-round for researchers, operations and maintenance personnel, biosafety professionals, inspectors and first responders from all over the world. In 2016, the facility was designated as an NIH National Training Center.

Since its inception, the program has educated more than 3,000 individuals, and Landucci says that with demand increasing over the past few years, it currently serves around 300 people annually. Classes are regularly provided at UC Irvine as well as on-site at other UC campuses and additional locations.

“Based on feedback from our clients, it’s recognized as the top BSL-3 program in the country,” Landucci says.

What makes it the best? He points to the training staff of three, who, combined, have more than 45 years of BSL-3 experience. Plus, the program has a fully functional BSL-3 lab and HVAC system within a classroom setting.

“All the equipment is under one roof, and no hazardous materials or pathogens are present,” Landucci says. “It allows us to provide hands-on training in a safe environment.”

When the CDC first turned to an outside organization to teach its BSL-3 laboratory personnel, it called upon Landucci and his team. Over the last year, the UCI instructors have traveled to the CDC’s Atlanta campus (September 2022 and May 2023) and Fort Collins, Colorado, campus (August 2023).

Under former UC President Janet Napolitano, the UCI National BSL-3 Training Program in 2015 was named one of six UC Centers of Excellence, which serve in a systemwide capacity by sharing their expertise and leadership in risk management, healthcare, wellness, and environmental health and safety.

Landucci says that UC provides about half of his center’s operating expenses, which enables it to provide training to all UC campus personnel associated with BSL-3 laboratories at no additional cost to them.

His team also works with UC researchers and administrators to establish best practices and often visits the seven other UC campuses that operate BSL-3 labs to help ensure that their high-containment facilities and practices meet or exceed federal standards.

"UCI's National BSL-3 Training Program not only underscores the university's dedication to safe and robust research but also serves as a benchmark for institutions engaging in high-containment laboratory research," says Kevin Confetti, UC associate vice president for risk services, who oversees the Centers of Excellence program. "The University of California boasts the highest number of high-containment laboratories in the country. Establishing a stringent design and performance standard has become the cornerstone of our biosafety blueprint. Central to UC's biosecurity protocols is the emphasis on hands-on, immersive simulation training for BSL-3 researchers and other facility personnel. The BSL-3 Training Program is paramount in providing this not only to UC faculty, staff and students but to others across the country."

Adds Landucci: "UC is a national leader for infectious diseases research and is developing and setting standards with our BSL-3 laboratories. We are establishing the best practices for building and operating these labs along with training standards that are a role model for others to follow."

https://www.universityofcalifornia.edu/news/lab-teaching-world-how-safely-study-pathogens

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Cal Matters.org – September 13, 2023

Guest Commentary

How California can improve safety and transparency of privately run bio labs

By Allison Berke

(Dr. Allison Berke is the chemical and biological weapons non-proliferation program director at the Middlebury Institute of International Studies in Monterey.)

The discovery of an illegally operating bio lab in the Central Valley was disturbing to many, and especially frightening to the Reedley community living and working around the lab. Investigation of the samples and mice found in the facility revealed improperly stored pathogenic material, including coronavirus, malaria, dengue and HIV.

Although the Centers for Disease Control and Prevention and officials who investigated the Prestige Biotech lab do not suspect it was creating weaponized materials, if it was working with "live" or infectious pathogens like coronaviruses, it should have been operating at biosafety level 3, or BSL-3, the second-highest tier of protection.

Biosafety levels are defined by the CDC according to what pathogens are stored and used in a lab's work and what procedures are being done with those pathogens. They also describe what protective measures are needed to keep laboratory workers, the environment and local residents safe.

The levels are not legal mandates, however, only recommendations – labs can legally work with some level 3 agents without following level 3 guidelines. Since labs are not required to report their work to a federal or state regulator, we don't know how many such labs there might be.

Many people who live near legally operating labs view their situation as similar to that of Reedley prior to the discovery of the Prestige Biotech lab: they don't know, and have no way of finding out, what pathogens are being used in labs in their town or county.

In June, the San Carlos City Council banned level 3 and level 4 labs within their city. While no BSL-4 labs are operating in California, several other cities, including San Francisco, Foster City, Livermore, Pleasanton and Stanford, have level 3 labs. A U.S. Government Accountability Office report in 2017 found that 16% of level 3 labs were private or commercial labs, which operate under less federal and state oversight than government-run or academic labs.

The San Carlos ordinance passed with a 3-2 vote, demonstrating the tension between the desire to support the thriving and lucrative local biotech industry and the public frustration over the lack of information on what types of risks these labs might pose.

Alongside the proposal of a ban, council members also evaluated a permitting process for BSL-3 labs. But since they were unable to review and approve of what research might be done, and were unsure of their ability to properly evaluate technical, novel research, the city took the safer and easier option to just ban the work entirely.

Just as facilities that store potentially dangerous chemicals display a clearly visible placard with information about the hazards, labs that work with potentially dangerous pathogens should report information on their work to public officials. The easiest way to track this information may be a federal agency that can create a cohesive picture of potentially dangerous research, with information made available to local, county and state officials. Communities can then decide what protections and response plans they should implement to address potential leaks and to protect the labs and surrounding communities in the event of a natural disaster or accident.

No community wants to be the site of the next outbreak, or to be caught unaware by potentially dangerous research happening in their midst, like the town of Reedley. At the same time, biotech companies have an interest in being allowed to do a variety of types of research, in the towns and cities most economically amenable to their operations – not just the ones that haven't gotten around to banning them.

Requiring labs to report their work with potentially dangerous pathogens to a central federal repository would improve trust between labs and their communities, increase transparency around the process for protecting against

potential risks, and provide a paper trail to help future investigators and first responders.

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(From the National Library of Medicine)

The Scientific World Journal, September 18, 2025

The Role of BSL-3 Laboratories in Pandemic Preparedness: A Focus on Brazil's Infrastructure for Biosafety and Disease Control

Authors

Roni Vinhas, Fabricia Oliveira, Larissa Fonseca, Katharine Hodel, Claudio Mafra, Cintia Minafra, Marilda Goncalves, Bruna Machado

Abstract

BSL-3 laboratories are fundamental for the safe handling of infectious microorganisms that require high-containment measures. Through a literature review, this work was aimed at highlighting the importance of these laboratories in supporting research and public health responses, especially during health emergencies. The review presents an overview of the global distribution of BSL-3 facilities, the impacts of the COVID-19 pandemic on laboratory investments, and future perspectives on their role in national development. It was observed that the pandemic exposed limitations in laboratory capacity, leading many countries to operate in suboptimal environments, underscoring the need for strict biosafety standards and preparedness infrastructure. This review also identifies disparities in global BSL-3 capacity—particularly in low- and middle-income countries—and examines the Brazilian context, where the absence of a unified regulatory framework hinders progress. By synthesizing international trends and Brazil's recent initiatives, including the development of its first BSL-4 laboratory, this work contributes to understanding the challenges and opportunities for strengthening biosafety infrastructure in support of equitable pandemic preparedness.

Response H-8: This comment relays news articles and an abstract related to biosafety laboratories and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-9: Observations, Suggestions and Questions re UCLA Research Park

The scope of the Environmental Impact Report requirement from the much-discussed California Environmental Quality Act has evolved significantly since its initial 10-page format used in the early and mid-1970s, when I began my involvement with various major UCLA construction projects until my retirement from the University of California in January 2010 [*sic*] Initially a simple summary statement, the purpose of the EIR has expanded to both provide detailed scientific and quantitative impacts, detailed notifications and, in certain

instances, education about the activities to be conducted in a specific project. The cottage industry of EIR consultants and analysts that has grown over the years apparently continues to be blessed with full employment.

The Draft Initial Study/Mitigated Negative Declaration for the UCLA Research Park is comprehensive (190 pages), thorough and, in most parts, well-stated. For the most part, its authors (T&B Planning, Inc.-Irvine) have covered topics quite well. Ashley Rogers, Director of Environmental Planning, moderated the public hearing on May 20 very efficiently. The presentations by Professor Hal Monbouquette, Special Advisor to Vice Chancellor Roger Wakimoto, and Mr. Phiroze Titina, Principal Project Manager of UCLA Capital Programs, were well-organized and well-received. (Permit me also to add that I was well-acquainted with Professor Wakimoto when he served as Chair of the Department of Atmospheric Sciences in the late 1990s and I served as Assistant Provost in the UCLA College.)

Response H-9: This comment provides a summary of the commenter's experience with CEQA requirements and shares his general impressions regarding the Draft IS/MND and the associated community meeting on May 20, 2026. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-10: However, I need to raise my hand and, respectfully, state that providing only a one-sentence description – in a single footnote (#50) on page 114 of the Draft EIR -- for the discussion of BSL-3 laboratories EIR is woefully insufficient. Quite simply, the document does not meet minimum expectations for educating the reader about BSL-3 laboratories that are already in operation at eight of the ten campuses of the University of California (and elsewhere). At a minimum, such detailed information should have been included in detail in the section entitled "Wet and Dry Laboratories" on page 21.

I submit that is important for the Final EIR to proactively address the apprehension, misinformation and misunderstandings that are now associated with various bioscience initiatives as such initiatives have unfortunately become politicized and subject to the public polarization associated with that dynamic. To that end, I would describe the Draft EIR as highly deficient. Detailed explanations need to be provided about (1) the existing standards for construction, as published by the University of California Office of the President; (2) operating protocols; (3) existing standards, policies and procedures regarding oversight and safety, both for the laboratory personnel and the larger communities near such laboratories.

Having contributed to various EIR documents over the years and having commented on an even larger number during review processes both at UCLA and at the Office of the President of the University of California, I strongly urge that UCLA consider the inclusion in the Final EIR of much of the information provided in this document, so that this information can, in the future, be found to be part of the permanent public record disclosed during the review process. Were I still on "the other side of the table" and participating in the preparation and internal campus review of the Draft EIR, I would have strongly urged for either (i) an expansion of the narrative starting on page 21 titled "Wet and Dry Laboratories"; or (ii) a new Section VI or comprehensive appendix to the document to provide a full description about BSL-3 laboratories. (Further, I

believe it to be unfortunate that the only mention of BSL-3 laboratories is on page 114 in the section titled "Operational Hazards.)

Response H-10: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations. As discussed therein, biosafety laboratories are closely regulated by a variety of public agencies including the UC, and the UC's design requirements for BSL-3 labs in particular include stringent standards to provide the best possible physical containment of research materials and agents. In addition to the design and engineering standards focused on containment, decontamination, and the protection of human health, the UC promulgates strict operational protocols to ensure appropriate protections, manage hazardous materials, and establish emergency procedures, as also discussed in Topical Response 1.

Comment H-11: Before I retired from the University of California in January 2010, my last position was Chief of Staff to the University of California President in 2008 and 2009. Prior to that appointment, I spent years in various executive administration positions, during which time I was assigned as primary administrative coordinator of a lengthy list of major research and other capital projects. I also take great pride in my personal friendships with dozens, probably more than 100, of UCLA's most prominent academic deans and research faculty.

I submit these comments now, both as a UCLA retiree and as 20+ year homeowner in the residential community near the UCLA Research Park facility (an 8-minute walk from my home, one block south of Exposition Blvd. and two blocks west of Westwood Blvd.).

Furthermore, my wife, Lianna Anderson, served for 20 years as Assistant Dean for the Division of Life Sciences in the UCLA College. Her and my support for the research mission of UCLA is unquestioned.

I have also served for the past decade as a member of the Board of Directors of one of the four Homeowners Associations (HOAs) immediately adjacent to the property (and drafted the letter sent in February 2024 to UCLA to provide specific information about the four HOAs). I believe that UCLA needs to recognize and respond to the due diligence obligation of the HOAs (which, I might add, are overwhelmingly enthusiastic, in general, about the future of the UCLA Research Park as a positive presence in our neighborhoods).

Notwithstanding that enthusiasm, my concern is that misinformation about BSL-3 Laboratories could become a more visible topic within the residential neighborhoods near the UCLA Research Park. My first suggestion is that a ZOOM meeting be convened and advertised broadly to be conducted by Professor Jerome Zack, chair of the UCLA High Containment Laboratory Oversight Group, and by Ms. Barbara Dillion, director of the UCLA High Containment Program, so that interested members of the neighborhood communities might receive a "primer" course about BSL-3 laboratories and their operations, as well as answer questions that members of the residential communities might have.

Response H-11: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations, as well as

Response A-2 regarding communication with the community. UCLA will also provide information consistent with its obligations under the California Public Records Act and related law. It is further noted that UCLA's IBC meetings (where specific types of research activities involving hazardous biological materials and/or recombinant/synthetic nucleic acids are reviewed and approved) are typically open to the public except when necessary to protect privacy or proprietary interests. Additionally, the approved IBC meeting minutes are publicly available in accordance with NIH Guidelines. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-12: Further, the Draft EIR was silent as to obvious questions pertaining to the non-UCLA tenants/partners at the UCLA Research Park, i.e., the organizations that are not part of/owned by UCLA (and do not report to the Chancellor of UCLA) but which will be occupants of UCLA Research Park through lease/affiliation agreements. Again, initial questions which should be answered, in the public record, on a proactive basis are:

- Will the lease/affiliation agreement between such tenant/partner(s) and UCLA require that the supervision of the BSL-3 laboratories used by the tenants be subject to the oversight process and standards in the published University of California documents?

- Will the oversight duty of the UCLA Vice Chancellor-Research and Creatives Activities, the UCLA High Containment Program Director, and the UCLA High Containment Laboratory Oversight Group also extend to the BSL-3 laboratories used by the tenants, even though the employees of such tenants are not UCLA employees?

- Will the research initiatives proposed by such tenants be reviewed by the UCLA Institutional Biosafety Committee in advance, even if the research initiative of the tenant is not funded from federal sources? Will UCLA IBC approval be required in advance, regardless of fund source?

- Will the laboratory personnel of such tenants be required by the lease/affiliation agreement to be certified by the National Training Center at UC Irvine, or equivalent?

Response H-12: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, associated laboratory operations, and specific discussion that addresses Comment H-12.

Comment H-13: Further, page 115 also indicates that a 10,000 gsf vivarium, including an Animal BSL-3 laboratory, is to be included in the UCLA Research Park-East projects. I would strongly urge that additional information be provided about such vivarium.

I have had personal experience with animal rights protests at UCLA over the use of animals in research initiatives. I learned first-hand from my previous duties when I served, for a full year and as appointed by interim Chancellor Norman Abrams, as liaison between the UCLA Police Department and the affected UCLA faculty and their families when such protests expanded to personal residences, thereby impacting entire neighborhood communities and

causing, at a minimum, annoyance, and, in some cases, apprehension and fear for personal safety and protection of personal property. Having the permanent public record provide more expansive information about vivaria and the development of ABSL laboratories is highly recommended.

Response H-13: The UC's ABSL-3 requirements mandate strict administrative controls, specialized facility engineering, directional airflow, restricted electronic access, and comprehensive medical surveillance for research involving animals infected with high-risk or lethal aerosol-transmitted agents. Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations. Also refer to Response D-5 regarding police response by UCPD as well as LAPD when warranted.

Comment H-14: Finally, the following is a potpourri list of comments/questions.

1. Nostalgia (Page 33). For the sake of nostalgia, the narrative should also pay homage to two additional long-gone anchors of the neighborhood: (1) the Picwood Theater (similar to the Fox Village Theater in Westwood Village); and (2) Pete's on Pico Bar and Grill (a favored UCLA Athletics hangout, with 28oz. porterhouse steaks), which is the name that should be affixed to a food facility inside the UCLA Research Park. It is also suggested that, similar to what Westfield added to the former Fox Hills Mall, the lobby areas of the UCLA Research Park should include expansive displays of historical aerial and ground-level photographs of the Pico Blvd. neighborhoods that can be found in the archives of local realtors.

Further, with a chuckle, I must ask that the document should also state UCLA's commitment that no negative impact shall ever be forthcoming to The Apple Pan (smile). Certain establishments are just plain sacred.

Response H-14: This comment provides information about the history of the neighborhood and suggestions about ways to honor that history at UCLA Research Park. While it is premature in the Project planning process to make decisions regarding specific art or photographic displays, these suggestions will be taken into consideration. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. The Project will not involve any construction on properties north of Pico Boulevard, including, without limitation, the Apple Pan restaurant referenced by the commenter.

Comment H-15: 2. GPI Structure (Pages 36+39 and page 165). The document references a shared use commitment of up to 400 parking spaces in the GPI-owned parking structure. Missing from this statement is a description of the details about this commitment. Is this commitment in writing? Is there an expiration date? What is the "Plan B" if this commitment no longer exists?

Response H-15: Shared use of the adjacent GPI parking structure is set forth in a Reciprocal Easement Agreement (REA), a legally binding contractual document that does not have an expiration date.

Comment H-16: 3. Population (Pages 47, 151, 159). The data on page 47 and page 151 about population/employees appear to be inconsistent. Further, the raw totals should be better articulated by a statement about "peak," "daily" and average" projections.

Response H-16: As discussed in the Draft IS/MND, the actual employment generated by the proposed Project will depend on the future tenants, including their research programs and needs and associated support services. As such, employment estimates were calculated using various standard, published generation rates to present an anticipated employment range and provide a conservative analysis. The information presented in the Draft IS/MND is not inconsistent; rather, the Project employee estimates listed on page 47 of the Draft IS/MND (2,590 to 3,190 employees) represent total employment, while Table 23 and the associated discussion on pages 151 and 152 present both total employment and the net increase compared to the shopping center use (1,690 to 2,340 employees).

Employment is typically characterized in terms of total headcount or full-time equivalent (FTE), rather than peak, daily, or average numbers (as opposed to vehicular trips which are typically expressed in terms of daily average and peak hour counts). However, the employment analysis considers Project employment as compared to overall employment generation in the region, and the Project's net increase represents less than one percent of the anticipated employment growth in Los Angeles County. This conclusion would not change by calculating employment using a different metric. No further analysis of employment generation or revisions to the Draft IS/MND are required.

Comment H-17: 4. Police (Page 155). The statement on page 155 about the jurisdiction of UCLA Police Department and the Los Angeles Police Department for this UCLA-owned is unclear and confusing. As UCLA property, will UCLA Research Park be under the jurisdiction of the Chief of the UCLA Police Department, with UCLAPD units expected to respond to incidents or calls for assistance? Will UCLAPD establish and maintain an on-site substation at UCLA Research Park? In the event of a civil protest, does UCLA Police have primary responsibility for response and protection even if such activities affect local businesses and vehicular traffic on Pico Blvd. or Westwood Blvd.? Further, will the UCLA Research Park be subject to established UCLA policies, such as Policy #131 regarding weapons on University property.

Response H-17: Refer to Topical Response 1 and Response D-5 regarding police response by UCPD as well as LAPD when warranted.

It is noted that UCLA Policy 131: Weapons on University Property implements the California Gun-Free School Zone Act of 1995 and Amendments, codified in California Penal Codes Sections 626.9 and 626.10, which prohibit the transportation and possession of firearms and other dangerous weapons on public school properties in California, including property of the University of California. The policy prohibits firearms and weapons on the grounds of the UCLA campus, off-campus buildings owned or operated by the University, areas adjacent to University property, and to activities of or programs conducted by the University, whether on or off of University property. Policy 131 applies to all students, employees, and other members of the University community, to any vendor or contractor providing services on University property, and to any individual visiting the University or participating in or

attending University programs or activities. Accordingly, this policy would apply to all tenants and visitors at UCLA Research Park.[25]

Comment H-18: 5. Fire. Notwithstanding the unclear statement on page 155 about the jurisdiction of the City of Los Angeles Police Department, has an agreement been established with the City of Los Angeles that the UCLA Fire Marshal, and not the City of Los Angeles Fire Marshal, will have jurisdiction at UCLA Research Park? Further, since LAFD Station #92, at 10556 W. Pico Blvd. (two blocks from UCLA Research Park) will be the first-responder station in the event of a call for assistance, will UCLA provide special instruction (or even funding for special equipment) to LAFD Station #92 about the specialized aspects of the wet laboratories at UCLA Research Park?

Response H-18: As discussed in Section V.15, Public Services, of the Draft IS/MND, LAFD would provide fire suppression operations for the Project site, which is located within its municipal jurisdiction. Fire Station 92 would have primary responsibility for a first alarm call to the Project site. Additionally, as discussed in Topical Response 1, UCLA Fire's staff includes a State Fire Marshal who has delegated responsibility from the Office of the State Fire Marshal for compliance with state fire and life safety regulations, including building permit reviews. The State Fire Marshal enforces fire code regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California, including at UCLA.

At full buildout, UCLA Research Park will include Group B (business, i.e., office), Group L (laboratory suite), and Group A (assembly space) occupancies as defined in the CBC, none of which require specialized fire suppression equipment per the California Fire Code. However, CFC requirements regarding building features such as automatic sprinklers, fire alarm systems, and fire-resistance ratings for floor separations, among others, do apply. The proposed Project will therefore comply with all applicable CBC and CFC requirements, and all Project plans will be reviewed and approved by UCLA's State Fire Marshal as part of the permitting process.

Comment H-19: 6. Applicability of Other UCLA Policies. The Final EIR should clarify whether all other UCLA policies apply to the UCLA Research Park, e.g., UCLA Policy # 850—General Use of University Property, including the policies on distribution of literature, public assembly, use of amplified sound, and the installation/erection of temporary structures, particularly those who are not authorized personnel?

Response H-19: The UC and UCLA have hundreds of policies governing all aspects of facilities, operations, and activities, some with varied applicability for students, employees, affiliates, visitors, etc. Certain UCLA policies have been clearly determined applicable to UCLA Research Park facilities and operations, including for all employees, tenants, subtenants, vendors or contractors, and visitors. These include, without limitation, policies regarding gatherings and demonstrations, amplified sound, approvals for structures and equipment, and University regulations governing the conduct of non-affiliates. Regarding the latter, the University of California Regulations Governing Conduct of Non-

[25] See California Penal Code, Part 1, Title 15, Chapter 1, Section 626.9 and California Penal Code, Part 1, Title 15, Chapter 1, Section 626.10.

Affiliates in the Buildings governs all non-affiliates (i.e., anyone who is not a UC student, officer, official volunteer, employee, Regent, or emeritus) and addresses similar topics as UCLA Policy 850 which applies to UCLA employees.

Comment H-20: 7. Parking (More). Will the underground parking facilities be operated by UCLA Parking Services and accessible to faculty/staff with a UCLA parking permit? Or will it be operated as a separate parking system, similar to parking at UCLA-Santa Monica Hospital? Or, as an indication of UCLA's community relations with the business community, will use of the parking areas be available for use by customers at local businesses, e.g., local restaurants, as was the case with this underground parking during its operation by Macerich Co.

Response H-20: Refer to Response A-3 regarding site parking. It is noted that UCLA staff/faculty parking permit holders are typically assigned to a specific parking lot and thus are not permitted to park at any lot of their choosing.

Comment H-21: 8. City of Los Angeles Easement-West Pico Driveway for UCLA Research Park West/Block 4. The connection portal for the referenced city alley to the Pico Blvd. driveway has been closed for a very long time, resulting in that city alley being a dead-end. Is it UCLA's intention to open that portal?

Response H-21: As discussed in Section II.6, Proposed Project Components, of the Draft IS/MND, the existing Pico Boulevard driveway would be open to the public pursuant to a City easement, providing access to the public alley to the west. The driveway would also provide egress from the Research Park West parking structure and loading dock.

Comment H-22: 9. Exterior Maintenance. Will the exterior maintenance of UCLA Research Park (windows and exterior building glass facades, grounds/landscaping) be funded from a supplement provided by the UC Office of the President to the General Fund allocation to the UCLA Facilities Management department? Or will the exterior maintenance (e.g., window cleaning) and grounds/landscaping needs of UCLA Research Park be additive and effectively compete with existing needs on the Westwood campus?

Response H-22: The funding of maintenance efforts is not a topic that falls under the purview of CEQA, which focuses upon the potential impacts associated with physical impacts upon the environment. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-23: 10. Availability of Public Transportation. The statement on page 160 that the Sepulveda/Exposition station for the E-Line light rail train is 0.5 miles from the UCLA Research Park is not correct. The correct walking distance is 1.0 miles (personal experience and measurement).

Response H-23: As identified in Section V.1, Aesthetics, of the Draft IS/MND, a transit priority area is defined as an area that is within 0.5 mile of a major transit stop. This distance is appropriately measured as a linear distance (i.e., a radial measurement from the transit stop), not a walking distance which can vary widely depending on the route taken and intervening barriers such as buildings

or freeways.[26] As identified in the Draft IS/MND, the Project site is located within approximately 0.5 mile (i.e., within the 0.5-mile radius) of two existing Metro E Line stations, Westwood/Rancho Park and Expo/Sepulveda.

Comment H-24: 11. Communications to/with the Four Adjacent HOAs. Can UCLA commit to an annual report about the scientific activities at UCLA Research Park West, including new non-UCLA tenants/partners, to be provided to the four adjacent homeowner associations and to the Westside Neighborhood Council for the affected business communities? Can the Presidents of the four HOAs be added to the advance agenda notification list of the UCLA Institutional Biosafety Committee (and to the distribution list for minutes)? Can UCLA commit to advance notification to the Presidents of the four HOAs in the event of special events or VIP visits at UCLA Research Park West? Can UCLA commit to advance consultation with the Presidents of the four HOAs about proposed exterior design and signage (as was done by Macerich Co. when the Landmark Theaters complex opened in Westside Too in 2009?

Response H-24: Please refer to Response A-2 above regarding communication with the community. Additionally, as discussed in Topical Response 1, UCLA's IBC meetings are typically open to the public except when necessary to protect privacy or proprietary interests. The approved IBC meeting minutes are publicly available in accordance with NIH Guidelines. Comment H-3 above provides web links to this information.

Comment H-25: 12. Use of the Conference Center. Can UCLA commit to the meeting facilities of the proposed Conference Center building (when completed circa 2035) be available on a cost-only basis (no rental fee) for periodic meetings or other needs of the four HOAs?

Response H-25: As discussed above in Response A-5, publicly accessible uses may, in the future, be considered at Research Park West.

Comment H-26: 13. Ayres Avenue Perimeter. Can the document provide further clarification as to whether the southern perimeter of UCLA Research Park, along Ayres Avenue (both east and west of Westwood) will have increased/heightened fencing or separation?

Response H-26: No changes to the existing perimeter wall along Ayres Avenue are proposed. However, a temporary sound wall would be installed along the Ayres Avenue frontage in accordance with MM 4.9-7 in order to minimize noise impacts during Project construction.

Comment H-27: Full Disclosures by John Sandbrook

Enrolled at UCLA in 1967

UCLA Degrees:

- B.A., Political Science
- M.B.A., Executive MBA Program

[26] See Figure 1 in Appendix E, UCLA Research Park Vehicle Miles Traveled (VMT) Screening Assessment, of the Draft IS/MND, prepared by Fehr & Peers.

Employment-UCLA -- 1974 – 2008

- Office of the Chancellor-Special Assistant (3 years)
- Office of the Chancellor-Assistant to the Chancellor (7 years)
- Office of the Chancellor-Assistant Chancellor (10 years)
- Anderson School of Management-Associate Dean/Administration (3 years)
- College of Letters and Science-Assistant Provost (9 years)
- Office of the Administrative Vice Chancellor-Executive Officer (3 years)

Employment-Univ. of California Office of the President (UCOP)--2008 and 2009

- Chief of Staff to the President of the University of California

Retired from the University of California -- January 2010

General Manager of the Los Angeles Memorial Coliseum--2011-2013

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Both my wife and I receive a monthly pension from the University of California Retirement Plan (UCRP). UCRP is a separate trust owned by the Regents of the University of California and administered by UCOP. The assets of the pension trust are not linked to the financial operations of UCLA or any other of the 10 campuses of the University of California.

Following retirement, the University of California conferred on me the title of Assistant Chancellor Emeritus. I am now age 77.

I am not on post-retirement recall appointment to any department at UCLA and I do not receive any compensation from any department or organizational unit of UCLA. My only financial link to UCLA is my annual emeritus parking permit, which I purchase. I am a honorary lifetime member of the UCLA University Club (formerly, UCLA Faculty Club). My medical care is provided by UCLA Health, paid by Medicare and Anthem Blue Cross Insurance (the latter via the University-wide policy negotiated by and administered by UCOP).

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During my years of UCLA employment, my duties included frequent interaction with the UCLA Office of Capital Programs and its predecessor, UCLA Office of Campus Architects and Engineers (including the initial negative declaration EIR form used in 1974 that was only 10 pages long!!).

During my UCLA employment, the following is a list of my involvement with past UCLA capital projects:

<u>Primary administrative coordinator</u>

- Doris/Louis Factor Health Sciences Building (including the Jonsson Comprehensive Cancer Center)

- Jerry Lewis Neuromuscular Research Center (now the Eugene and Maxine Rosenfeld Center)
- Physics and Astronomy Research and Education Building
- Anderson Graduate School of Management Complex
- John Wooden Recreation Center
- Los Angeles Tennis Center
- Jackie Robinson Baseball Stadium, Phase I
- Westwood Central Plaza/Bruin Walk (pre-1984 OIympics)
- Haines Hall Seismic and Reconstruction Project
- Kinsey Hall Seismic and Reconstruction Project
- LaKretz Hall/Institute of the Environment and Sustainability

Limited administrative involvement

- Paul Terasaki Life Sciences Building
- Jules Stein Eye Institute, Phase II
- Doris Stein Eye Research Center
- Science and Technology Research Building
- Peter Ueberroth Office Building
- Portola Plaza Office Building

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In 2006-2007, I was the primary liaison for UCLA medical and life sciences faculty with the UCLA Police Department regarding protests at their home residences conducted by animal rights activists.

Response H-27: This comment provides disclosures related to the commenter's personal and professional history and does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment H-28: [Attachment to Comment Letter H (referenced in Comment H-1): a letter submitted to UCLA by the Westside Neighborhood Council on February 5, 2024.]

Dear Allison [Baird-James] and Rhea [Turteltaub]:

In my capacity as Chair of the Board of the Westside Neighborhood Council (WNC), I am writing to provide a formal welcome to our neighborhood community as a result of UCLA's acquisition of the former Westside Pavilion and Westside Too[1] properties from the previous owner, the joint venture of Hudson-Pacific Properties and the Macerich Co. A helpful ZOOM session earlier in January with Jennifer Poulakidas and Duane Muller of the UCLA Government and Community Relations division has preceded this letter, but I

felt a more complete and formal communication might be useful for distribution within all branches of UCLA current and future leadership to have a complete understanding of who's who in our communities and homeowner associations.

The three purposes of this letter are:

1. To provide a brief overview of the WNC;

2. To provide information of the four separate homeowner associations directly adjacent to the Westwood Pavilion properties;

3. To outline our previous relationships with Hudson Pacific and Macerich in terms of community meeting space at the Westside Pavilion for both (a) the WNC; and (b) the individual HOAs.

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1. The Westside Neighborhood Council (www.wncla.org)

The Westside Neighborhood Council was one of the 99 neighborhood councils established by the City of Los Angeles as a result of the City Charter Reform efforts in 1999. The WNC is comprised of 19 voting individual members representing 80,000 stakeholders in various areas of the residential communities and business communities within the WNC's geographical region, as defined by the Los Angeles City Council.2 The WNC Board is comprised of individuals, not the eight HOAs within the WNC geographical boundaries. The WNC Board, which meets monthly, is the entity which the Los Angeles City Council and city departments contact for formal input regarding various matters, including physical development proposals. The membership of the WNC Board and the members' specific residential and business communities can be found on the WNC website.

2. Individual Homeowner Associations

While there are eight HOAs within the overall boundaries of the WNC, four of the eight are immediately adjacent to the Westside Pavilion complex -- two north of Pico Blvd. and two south of Pico Blvd.

North of Pico Blvd. (see attached map):

A. Westwood South of Santa Monica (WSSM). Barbara Broide is the President of this HOA. The boundaries of the WSSM extend from Pico Blvd. to Santa Monica Blvd.; from Sepulveda Blvd. to Beverly Glen Blvd, except for the carve-out for the OAC (see next).

B. Overland Avenue Community (OAC). Lisa Morocco is the President of this HOA. The location of the OAC is within the general boundaries of WSSM. The boundaries of the OAC extend from Pico Blvd. to Santa Monica Blvd.; from Westwood Blvd. to Manning Avenue.

South of Pico Blvd. (see attached map):

C. Westwood Gardens Civic Association (WGCA). Marilyn Tusher is the President of this HOA. The boundaries of the WGCA extend from Ayres Avenue (the street to the south of the Westside Pavilion) to the 10 Freeway and from Midvale Avenue (one block west of Westwood Blvd.) to Overland Avenue.

D. West of Westwood (WOWHOA). I also serve as President of the WOWHOA. The WOWHOA has three different sections: (i) West Section: the Pearl-Cotner-Richland Loop west of Sepulveda; (ii) Center Section: Pico Blvd. to National Blvd; from Sepulveda Blvd. to Kelton Avenue; and (iii) East Section: Pico Blvd. to Ashby/Esther Avenue; from Overland Avenue to Patricia Avenue.

3. Community Meeting and Storage Space

The Westside Pavilion, prior to its closure, had two community meeting rooms (one in the original 1985 Westside Pavilion building and the other in the Westside Too building) which the Macerich Co. allowed, at no charge, for the HOAs and the WNC to use for their periodic meetings (along with free parking). Thus, we are hopeful that, as a public entity, UCLA will include in its buildout at least one large community meeting room (capable of seating 100+).

In the interim, the use of the Level 1 space in the Westside Too building was provided for the past 18 months, again on a no-charge basis. I hope that, for 2024 and beyond, the Level 1 space can be available to us….along with chairs and tables. Also, please know that the Macerich Co. also allowed us to have a storage unit in the basement of Westside Too, for which we have the key to the lock.

This is important for the HOAs and for the WNC to function, so I hope you and your respective teams can give this matter appropriate consideration.

In the same vein, I wish to express our appreciation for the recent communication I recently received from Jennifer that UCLA is willing to be a major sponsor of this year's Pick Pico Street Fair (pickpico.org), which for 2024 is scheduled for Sunday, May 19. This has been a very popular and successful neighborhood event since 2012; UCLA Health has participated in the past.

4. Other Thoughts

It will not surprise you that many of the residents in the four HOAs listed above have UCLA ties. Some are current UCLA employees, faculty and staff. Others are past UCLA employees (including my late husband). Some attended UCLA. And, you personally know some of them. For instance, former UCLA Vice Chancellor-Student Affairs Janina Montero is a resident in the WGCA neighborhood. And, longtime former UCLA Assistant Chancellor/Assistant Provost John Sandbrook is a resident (and member of the Board of Directors) of the WOWHOA.

Within that context, I am sure that it is no surprise as to the level of positive interest in the buildout of the Westside Pavilion/Westside Too as the UCLA

Research Park. At the same time, addressing concerns of our neighborhood communities will be paramount. The process of timely and substantive communications through the four homeowner associations will be important since it is the associations, not the WNC, that has the mailing (email) lists for all of the nearby residents (at least, for those who pay dues to the respective association).

Also, many of us in these HOAs have been homeowners for many decades, even prior to the original construction of the Westside Pavilion in 1985. We have seen many changes in Pico Blvd. over the years, many not for the better, and we are anxious that the revitalization of this area can be accelerated by the influx of UCLA activities.

Finally, one particular item of nostalgia may be of interest. One of the now-demolished buildings on Pico Blvd., west of Westwood Blvd, that had deep UCLA roots was Pete's on Pico…a bar and grill that for decades was a favorite watering hole for many in the UCLA athletic department, dating back to the times of football coach Red Sanders, Bill Barnes and Tommy Prothro in the 1950s and 1960s. If UCLA is inclined to re-build one of the two restaurant spaces in Westside Too, a nostalgic return of the moniker "Pete's on Pico" might be an appropriate touch.

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Again, I thank you for UCLA's initiative to contact us so quickly after Governor Newsom's announcement and press conference on January 3, 2024. We look forward to our further communications and discussions with both the UCLA Government and Community Relations Division and the UCLA Office of Asset Management which, I understand, will be the building manager of the UCLA Research Park. I strongly urge you to continue to contact the WNC but also, quite importantly, each of the four HOAs identified above.

Most immediately, having a prompt reply to # 3 above about the use of the space (and chairs/tables) in Westside Too for our community meeting needs would be most helpful to us as we attempt to schedule our annual homeowner association meetings, starting in Spring 2024.

If you believe that a group lunch with Barbara, Lisa, Marilyn and me would be useful, I will be happy to coordinate our four schedules.

[1] The term "Westside Too" is not a mis-spelling. This moniker was affectionally conceived by the surrounding community after the complex west of Westwood Blvd. was constructed in the 1990s, following the completion in the mid-1980s of the initial Westside Pavilion complex east of Westwood Blvd.

[2] North: Santa Monica Blvd; South: National Blvd; West: San Diego Freeway; East—Century City/Cheviot Hills

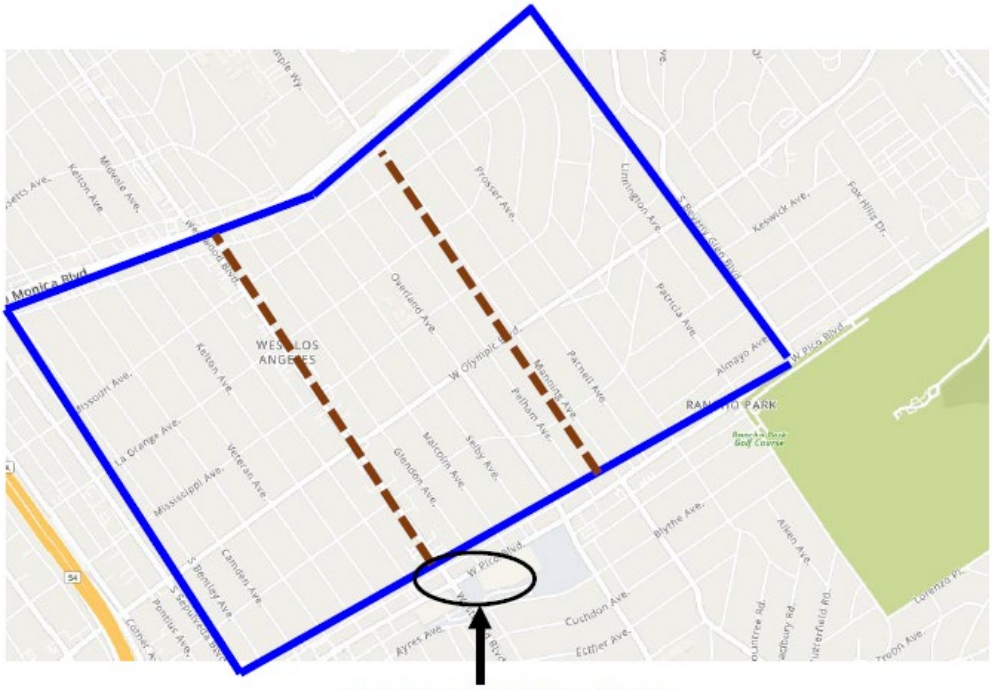
Westwood South of Santa Monica HOA (WSSM)
and
Overland Avenue Community (OAC)
Boundary Lines

WSSM:

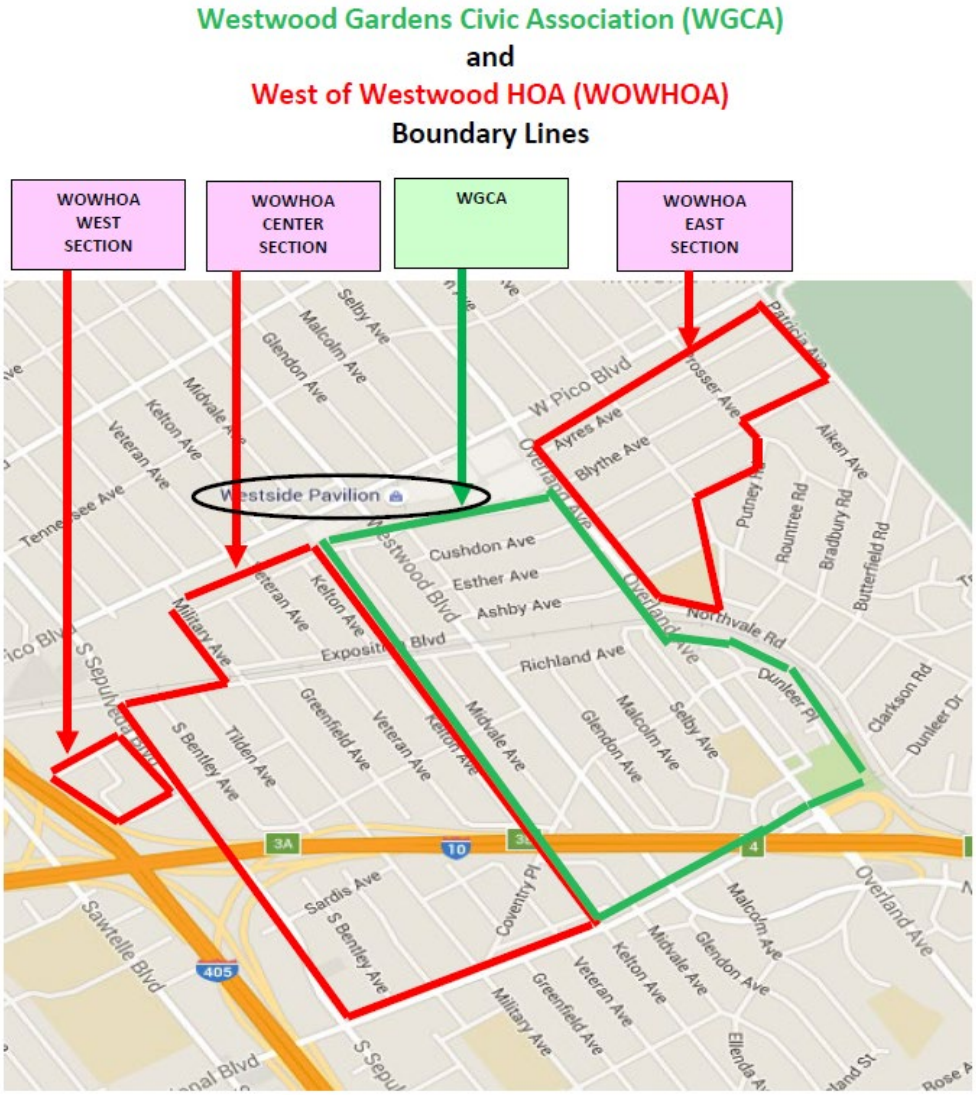
North:	Santa Monica Blvd.;	**South:**	Pico Blvd.
West:	Sepulveda Blvd.;	**East:**	Beverly Glen Blvd.

OAC (overlay, within WSSM):

North:	Santa Monica Blvd;	**South:**	Pico Blvd.
West:	Westwood Blvd;	**East:**	Manning Avenue



Westside Pavilion/Westside Too



Response H-28: This letter sent to UCLA representatives in February 2024 provides information regarding the Westside Neighborhood Council and the four HOAs which surround the Project site. The letter does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

2.2 RESPONSES TO THE MAY 20, 2026 PUBLIC MEETING COMMENTS

Public Meeting Commenter 1 – Terri Tippit

Comment 1-1: This is Terri Tippit, West Side Neighborhood Council Chair, West of Westwood HOA President; you surround our area. Some people have raised their concerns about pages 114 through 116. The BSL Level 3 lab is supposed to be going to happen here and has potential lethal disease level lab clarification.

And so they were just wondering, is this the first BSL number 3 level lab to ever be constructed at UCLA? And if not, please identify the other existing BSL Level 3 labs that exist on the Westwood Campus and what year that each of

those labs were constructed, and what is the identification of the state government and US federal agencies that were responsible for permitting a laboratory and overseeing ongoing operations?

Response 1-1: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations. As discussed therein, UCLA has operated a BSL-3 lab on campus for decades.

Comment 1-2 And we'd like a report on any safety incidents that the existing laboratories might have had, because, as you know, that classification often is airborne pathogens, which require control air for -- air flow, special ventilation, and very specific biosafety handling. So we -- that's why the people that sent these comments to me are concerned. So that's our comments for -- my comments for tonight.

Response 1-2: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations, as well as Response C-10 regarding the safety record of BSL facilities on campus.

Public Meeting Commenter 2 – Lisa Schwartz

Comment 2-1: Yes. Hi. Thank you. Lisa Schwartz here. Hey, I want to say congratulations to you guys for spinning this up. When I first read about this -- I've been in technology for over 40 years working for Oracle in a variety of different things.

And I started reading about quantum computing; it compelled me. And I live just down the street from it. So I just want to preface that with that. And so I just thought, how exciting is this? And also to be tackling the challenges of the immune system, which we know is very tricky.

So as much as my curiosity afforded me, I went ahead and read your document, UCLA Research Park Project Draft Initial Study dated May 2026. And Terri so kindly went through some of the findings, in fact, which I had highlighted. Fortunately, I've been able to take some time to read through the document, all 120 pages of it.

Response 2-1: This comment provides introductory remarks and references the public meeting comments provided by Terri Tippit (Public Meeting Commenter 1). Refer to Topical Response 1, which addresses the primary comments provided by Terri Tippit.

Comment 2-2: But my greatest concern indeed is, again, saying that the quantum computing for research and biotech is really great. What really got my eyebrows raised was this BSL-2 and BSL-3, which you guys call out on page 114 and goes through like 119.

And Terri, I'm not going to go through all your citations, which you put there. But one of the things that Terri did not mention is that we're wondering about this BSL, particularly 3, which can -- it's a wonderful thing. We can totally understand what UCLA wants to do. If they come across a pathogen or a biological thing, they run it through quantum computing, find a solution quickly. Got it.

But we know the propensity for humans to make errors, and it's sitting in our backyard. So literally we're walking distance from this place.

Response 2-2: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations. As discussed therein, biosafety laboratories are closely regulated by a variety of public agencies including the UC. The UC's design requirements for BSL-3 labs include stringent standards to provide the best possible physical containment of research materials and agents. In addition to the design and engineering standards focused on containment, decontamination, and the protection of human health, the UC promulgates strict operational protocols to ensure appropriate protections, manage hazardous materials, and establish emergency procedures, as also discussed in Topical Response 1.

As clarification, it is noted that BSL lab operations at the Project site would be separate and distinct from research and activities conducted by UCLA's Quantum Innovation Hub. Refer also to Response F-3 regarding quantum computing.

Comment 2-3: So we're wondering, bottom line is how can you bring in a BSL-2, BSL-3 level lab when LAMC -- when LAMC requires M2 or M3 Industrial zoning for higher-impact scientific and residential uses, and it is strictly restricted to M2 Light Industrial and M3 Heavy Industrial zoning?

Response 2-3: Refer to Response C-3 regarding the City's zoning for the Project site. As a constitutional entity, the UC is not subject to municipal regulations, including general plans, specific plans, and zoning regulations.

Comment 2-4: So everything you're saying and everything we're doing, we love the idea of it, but this goes a little bit far. And on one of your areas, you say that -- one of your citations, I'm trying to find the page, but you'll find it yourself.

But you're saying that you really -- it requires vendor-specific -- tenant-specific labs and incubator labs in the BSL-2 and 3 levels, 5,000 GSF and 10,000 square feet, and that's to be discussed.

My question is how can you actively create a construction project that might not be fully formed when you don't know what's going in there before we start? That is a great concern. And I'll give my time over what's left of it.

Response 2-4: Refer to Responses C-5 and D-11 regarding the sufficiency of Project information to allow adequate environmental analysis in compliance with CEQA.

Public Meeting Commenter 3 – Barbara Broide

Comment 3-1: I'm the West Side Neighborhood Council Land Use Chair and the President of Westwood South of Santa Monica Boulevard Homeowners, your neighbors just north of Pico.

I haven't read the IS yet, so this is just a very general question. It has to do with the fact that we know that much of the uses of the West side are unknown, unspecified at this point, and we'll be taking a second priority to the East

project. How then can the Mitigated Negative Declaration or the environmental clearance adequately address that part of the project if so much is unknown?

Response 3-1: Refer to Responses C-5 and D-11 regarding the sufficiency of Project information to allow adequate environmental analysis in compliance with CEQA.

Comment 3-2: I think some of us have hoped that there would be some public interfacing activities in the west side that are museum, film, whatever it might morph to be, and that if this is the document, it should open up all potential for those types of uses in the event that that's what happens.

Response 3-2: As discussed above in Responses A-4 and A-5, publicly accessible uses may, in the future, be considered at Research Park West. As stated in Section II, Project Description, of the Draft IS/MND, Research Park West is assumed to provide additional research and office space, meeting and conference spaces, food service, and other amenities, some of which may serve as community resources, and/or may ultimately include creative or arts spaces as well. Specifically, given the current space configuration at Research Park West, some of the existing vacant theaters may be converted to meeting rooms, auditoriums for instructional use, or spaces for creative activities and research related to the arts in collaboration with outside institutions and entertainment companies. Similarly, the existing unleased restaurant space may be repurposed as a new restaurant or a catering venue to support meetings and small conferences. Future programming at Research Park West, including the potential for community/public access, would depend on University needs, funding availability, and campus and Regental approvals.

Public Meeting Commenter 4 – Brian Soloway

Comment 4-1: Brian Soloway, I live in the Westside area in the neighborhood, representing just myself. No technical question. Just a very simple question, which -- no technical comment, which is obviously really excited to have you guys in here and would love to accelerate even faster when we thought Google was going to be here a decade ago, but alas.

My question is that there was a lot of discussion about spaces and eating and dining and other areas and halls. I was just curious to understand a little bifurcation between what is UCLA pride, even though it's public university specific to the school, more private, so to speak, versus what is it planned for public, like restaurants, dining, food courts, museums, whatever the heck it is. But just if there's any sense right now, what is going to be there? And maybe the answer is we don't know yet.

Response 4-1: Please refer to Responses A-4 and A-5, as well as Response 3-2 with regard to publicly accessible uses that may be considered at Research Park West.

Public Meeting Commenter 5 – John Sandbrook

Comment 5-1: Thank you, Ashley. First, for sake of self-disclosure, I have been a resident of the West of Westwood HOA for 20-plus years. Before that, however, I was Assistant Chancellor for 20 years and Assistant College Provost for nine years, and the Jonsson Cancer Center Health Sciences Building was my

responsibility and the physics and astronomy building. So I usually have been in your shoes, but I'm on the other side of the table here.

I just wanted to note that I have a series of comments that I'll be submitting in writing for the sake of the final EIR. I've been there, done that. And I think going back to Terri's comments about the BSL-3 labs, I think that there is some additional work that you need to do in the EIR to articulate the governance process and oversight process that exists on the campus with the existing BSL-3 labs in particular.

Obviously, the west -- Holmby Westwood residential area is close by, so they're used to it. And the other comments I'll be submitting in writing, and as Sue Santon can tell you, they'll be long and detailed.

Response 5-1: This comment provides background information about the commenter and indicates that the commenter will be submitting a comment letter. The referenced comment letter is included as Comment Letter H. Refer to Responses H-1 through H-28, as well as Topical Response 1 regarding BSL-3 laboratories.

Public Meeting Commenter 6 – Lisa Schwartz

Comment 6-1: I would love to hear John's approach since there is something else similar – be helpful to know**.**

Response 6-1: The commenter indicates interest in the comments referenced by Mr. Sandbrook (Public Meeting Commenter 5). John Sandbrook's referenced comment letter on the Draft IS/MND is included as Comment Letter H of this Final IS/MND. Refer to Responses H-1 through H-28, above.

Public Meeting Commenter 7 – Sean McMillan

Comment 7-1: Thank you very much. And let me jump on so you can actually see me for context. I am the Westwood Neighborhood Council board member that represents the residential area immediately south and adjoining to your Research Park between Overland and Westwood and a little bit of Midvale on the westerly side.

My comment has to do with the fact that we are -- we have a lot of wonderful anticipation for an interaction with such an amazing facility that's offering so much to the public, but we also have fear and anxiety because we're uninformed, relatively speaking, and educated in subject matter. I think Mr. Sandbrook shared it. I think Terri Tippit shared it. I think Lee shared it.

I think you all are recognizing we have to do a really good job about our public outreach, and I'm volunteering my services to actually go door-to-door with materials for you to -- so that the community can embrace it.

Response 7-1: This comment provides information about the commenter, requests additional public outreach regarding the proposed Project, and offers assistance to facilitate discussion regarding the proposed Project. Refer to Response A-2 regarding communication with the community. This comment is noted for the

administrative record and will be forwarded to the decision-makers for review and consideration.

Comment 7-2: I know there's not only the general fears associated with biological elements; there's also a concern about the tremendous strain that especially quantum computing can utilize in terms of energy. Kind of curious as how that infrastructure is being set up. Certainly don't want to be the subject of any kind of unwarranted terror-type of events/power shortages, etc.

Response 7-2: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations; Response C-22 regarding the provision of adequate electricity service by LADWP; and Response C-13 regarding LAFD and LAPD responsibilities in the event of a major incident. In addition, it is noted that energy impacts are addressed in Section V.6, Energy, of the Draft IS/MND and were determined to be less than significant.

Comment 7-3: So just want to go on record that I do represent the community south of that. They are mobilized, they are trying to figure out what's going on, and I certainly will be a conduit to communicating it on your behalf to those 670 stakeholder homes. Thank you.

Response 7-3: This comment provides concluding remarks that summarize the earlier comments. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Public Meeting Commenter 8 – Barbara Broide (Chat)

Comment 8-1: Will the public have access to the recording after the program?

Response 8-1: The public meeting presentation and a recording of the meeting have been posted on the UCLA Capital Programs website at https://www.capitalprograms.ucla.edu/EnvironmentalReview/ProjectsUnderEnvironmentalReview.

Comment 8-2: A note: Businesses along the Pico corridor will be very very concerned about the large void that remains on the street that is not pedestrian friendly and that remains unactivated. It would be nice if there could be some activity on the ground level of west side that could bring in the public -- whether or not it continues in that format permanently.

Response 8-2: Please refer to Responses A-4 and A-5, as well as Response 3-2 with regard to publicly accessible uses that may be considered at Research Park West.

Public Meeting Commenter 9 – Frida Eytan (Chat)

Comment 9-1: Can you explain about public housing?

I meant Student housing projects.

Response 9-1: The proposed UCLA Research Project is not a student housing project, and this comment does not pertain to the environmental analysis or impact conclusions presented in the Draft IS/MND. No further response is required.

Public Meeting Commenter 10 – Lisa Schwartz (Chat)

Comment 10-1: While to UCLA Research Park seems at first glance an important type of research using quantum computing for biotech. However, the square footage and specific usage of labs are a great concern in a commercially/residentially zoned area such as the Westwood Pico area. Biosafety levels BSL-2 and BSL-3 level labs carry risk and potential human error in handling of potentially infectious and/or hazardous materials and/or waste. Please ref page 114 of your Draft initial study). Particularly a BSL-3 lab can be used to study pathogens such as Covid and then also it is most likely that UCLA may want to run quantum computing on anything new biologically that potentially can be highly infectious and even airborne.

Response 10-1: Refer to Topical Response 1 regarding biosafety design, engineering, and operational requirements, and associated laboratory operations, as well as Responses C-12 and F-3 regarding quantum activities. It is noted that BSL lab operations at the Project site would be separate and distinct from research and activities conducted by UCLA's Quantum Innovation Hub.

Comment 10-2: How can you bring in at BSL-2, BSL 3 level lab when LAMC requires M2 or M3 Industrial zoning for higher impact scientific/industrial uses and are strictly restricted to M2 Light Industrial or M3 Heavy Industrial zoning?

Response 10-2: Refer to Response C-3 regarding the City's zoning for the Project site. As a constitutional entity, the UC is not subject to municipal regulations, including general plans, specific plans, and zoning regulations.

Comment 10-3: Also please answer the question about low frequency noise produced by Quantum computing.

Response 10-3: Refer to Response C-12 regarding quantum activities and associated noise and vibration impacts. As discussed therein, low frequency noise generated by quantum computing equipment would be contained within the building envelope. As a result, noise and vibration from these research activities would not be noticeable outside the buildings and would not result in significant impacts.

Public Meeting Commenter 11 – Keith Solomon (Chat)

Comment 11-1: When we attended the initial meeting, we were told that UCLA would not be providing their own food services, as to benefit the neighborhood restaurants and encourage growth. What changed?

Response 11-1: Limited, ancillary food service on-site has always been planned as a supportive amenity as part of the Project. The provision of high-quality on-site amenities is considered to be a crucial factor in attracting world-class researchers and staff. At the same time, adaptive reuse of the Project site with the proposed Project uses, including, as detailed in Draft IS/MND Section V.14, Population and Housing, the estimated 2,590 to 3,190 employees who would work at the UCLA Research Park at buildout of the Project, is anticipated to help activate the surrounding neighborhood and provide substantial support for nearby restaurants and businesses.

SECTION 3.0 PROJECT REFINEMENTS

Subsequent to preparation of the Draft IS/MND, the Project's roof plan for Research Park East was refined to accommodate a planned use. The roof plan evaluated in the Draft IS/MND anticipated that the Block 1 rooftop would accommodate new mechanical equipment areas, solar panels, and landscaped open space areas, with portions of the rooftop level to be screened with up to 18-foot-tall screen walls (which is comparable to the height of the existing elevator overruns and mechanical screens within the rooftop parking areas). With the proposed refinements, portions of the Block 1 rooftop would be configured to accommodate an enclosed approximately 1,680-square-foot fitness center for employees, which would include weight machines, cardio equipment, a locker room, showers, restrooms, and supporting circulation. The area would be accommodated within the overall common/circulation area square footage (171,000 square feet) allocated to the Research Park East in Table 1, UCLA Research Park Program Summary, of the Draft IS/MND and evaluated therein. The height of the enclosed fitness center would be a maximum of 18 feet tall, and thus there would be no change in the proposed building height. With the proposed refinements, the rooftop open space would include areas for light fitness, but the overall square footage and associated occupancy of this open space area would not change compared to what was identified and evaluated in the Draft IS/MND. The revised UCLA Research Park conceptual site plan showing the reconfigured rooftop is shown on Figure 1 provided at the end of this section.

Because the overall program square footage and open space area for the proposed Project remain the same as evaluated in the Draft IS/MND, and the physical impact area for the proposed Project would remain the same, the changes to the Block 1 roof plan would not change the environmental impact conclusions for any environmental issues evaluated in the Draft IS/MND. Specifically, with no change in square footage there would be no change in the associated operational analysis assumptions (e.g., trip generation, air quality and greenhouse gas emissions, energy demand and utility infrastructure needs, employment generation, public service demands, etc.). The proposed change in the rooftop site plan also would not change the relative distance from noise-generating rooftop uses (e.g., open space area and mechanical equipment) to any off-site sensitive receptors compared to those evaluated in the Draft IS/MND. The estimated number of people that may use the rooftop open space would not exceed that estimated and evaluated in the noise analysis (approximately 867 people based on conservative assumptions). Additionally, the fitness center facility would have a maximum height of 18 feet, which is consistent with the anticipated height of the mechanical equipment screen walls evaluated in the Draft IS/MND. Further, with no change in the physical impact area, there would be no changes related to ground-level physical impacts (e.g., impacts to biological resources, cultural/tribal cultural resources, geology and soils, paleontology, hydrology/water quality, etc.). The proposed construction schedule, activities, and construction equipment assumptions that are the basis for the analysis of construction-related air quality, greenhouse gas emissions, and noise impacts in the Draft IS/MND also would not change.

Following circulation of the Draft IS/MND, consultation regarding the proposed Project and its potential impacts on tribal cultural resources (TCRs) continued with three Native American Tribes pursuant to AB 52 (Chapter 532, Statutes of 2014), known as the Native American Historic Resource Protection Act. These Tribes included the Gabrieleño Band of Mission Indians—Kizh Nation (Kizh Nation), the Gabrielino Tongva Indians of California Tribal Council (Gabrielino Tongva Council), and the Gabrielino Tongva San Gabriel Band of Mission Indians (San Gabriel Band). During the consultation process, the mitigation measures presented in the Draft IS/MND, specifically MMs RP TCR-1, TCR-2, TCR-3, TCR-4, and TCR-5, were discussed and refined in response to input from the Tribes. The refinements adjust the tribal monitoring schedule established for each Tribe, as reflected in refined MMs RP TCR-1 and TCR-2 presented below in

the MMRP. Pursuant to CEQA Section 21080.3.2(b), tribal consultation with Kizh Nation was concluded on August 26, 2026; tribal consultation with the Gabrielino Tongva Council was concluded on August 27, 2026; and tribal consultation with the San Gabriel Band was concluded on August 28, 2026. Impacts would remain less than significant with implementation of the refined mitigation measures, consistent with the determination in the Draft IS/MND.

In addition, based on a suggestion provided in the public comments received regarding the Draft IS/MND, UCLA has evaluated the Project haul route and determined that a revision to direct haul trucks north on Westwood Boulevard and west on Pico Boulevard to the I-405 freeway is viable, in lieu of the previously identified route heading north on Westwood Boulevard, east on Pico Boulevard, and south on Overland Avenue to the I-10 freeway. Based on sensitive receptor locations, their respective distance from the roadway, and existing traffic volumes along Pico Boulevard, the revised route would not introduce any new or more severe impacts compared to the previously evaluated Overland Avenue route.[27] UCLA will work with the construction contractor to implement this change.

These limited Project refinements would not increase the environmental impacts or result in any new significant impacts compared to those evaluated in the Draft IS/MND, and no additional mitigation measures are required or proposed. Therefore, recirculation of the Draft IS/MND or preparation of an environmental impact report is not required.

[27] Personal communication, Sean Bui, Principal, Acoustical Engineering Services, August 21, 2026.

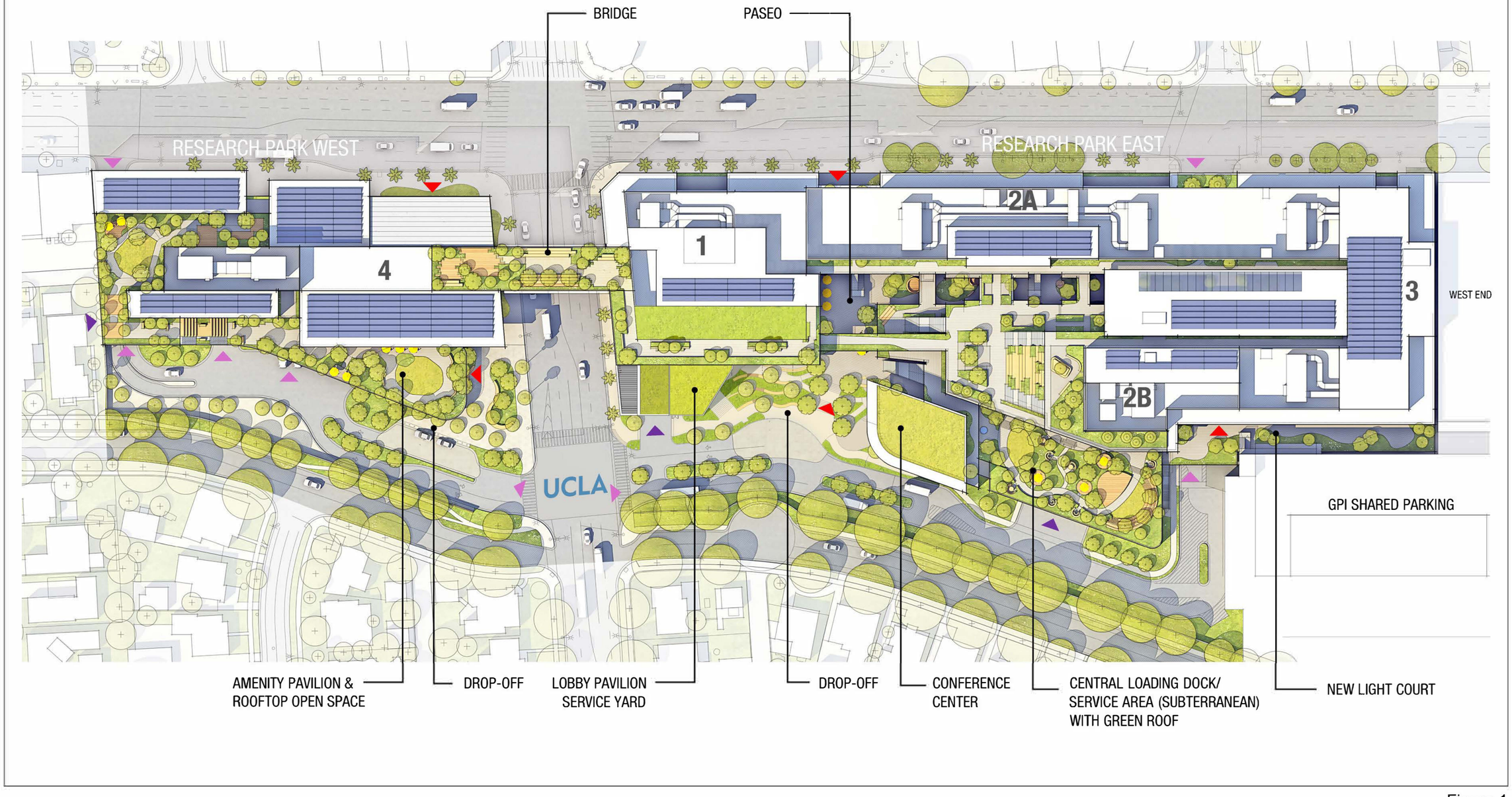


Figure 1

Not to Scale

Revised Conceptual Site Plan

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to PRC Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, CEQA Guidelines Section 15097(a) requires a public agency to adopt a program for monitoring or reporting mitigation measures and project revisions that it has required to mitigate or avoid significant environmental effects.

This Final IS/MND for the proposed UCLA Research Park Project (SCH No. 2026050140) analyzes the impacts of the proposed Project and incorporates all relevant MMs and PPs carried forward from the LRDP MMRP. This Project-specific MMRP identifies the LRDP MMs and PPs incorporated into the proposed Project and Project-specific mitigation to minimize potential impacts to tribal cultural resources. The University is required to implement the identified PPs and MMs, and this MMRP will be reviewed and adopted by the University of California in conjunction with consideration of Project approval and adoption of the MND.

4.1.1 PURPOSE

The purpose of this MMRP is to ensure compliance with all PPs and MMs to avoid or reduce adverse environmental impacts resulting from construction and operation of the proposed UCLA Research Park Project, which are identified in the Final IS/MND. Implementation of the applicable MMs and PPs shall be performed by the University, consulting architects, contractors, and appropriate agencies during the following:

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

4.1.2 MONITORING PROCEDURES

The project manager (PM) from UCLA Capital Programs, Design and Construction, shall be responsible for ensuring that all design and construction contracts contain the relevant MMs and PPs adopted in the Final IS/MND and that these are implemented during the design, construction and operational phases of the Project.

In general, monitoring will consist of demonstrating that MMs and PPs were implemented and that the responsible parties monitored or documented the implementation of the measures. Monitoring will consist of determining whether the following occurred:

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

4.1.3 REPORTING PROCEDURES

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

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

Table 1 lists the MMs and PPs from the LRDP Final SEIR relevant to and included as part of the UCLA Research Park Project, as well as the Project-specific MMs identified in the Final IS/MND. Note that there are five Project-specific MMs, which are presented in **bold** text. Table 1 also identifies the timing of each measure by indicating the phase of Project development during which implementation would occur.

TABLE 1
UCLA RESEARCH PARK PROJECT-SPECIFIC MITIGATION MEASURES, APPLICABLE LRDP MITIGATION MEASURES AND CAMPUS PROGRAMS, PRACTICES AND PROCEDURES

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
Aesthetics	MM 4.1-2(c)	Design	Projects shall include landscaping.
Aesthetics	MM 4.1-3(a)	Design	Design for specific projects shall provide for the use of textured non reflective exterior surfaces and non-reflective glass.
Aesthetics	MM 4.1-3(b)	Design	All outdoor lighting shall be directed to the specific location intended for illumination (e.g., roads, walkways, or recreation fields) to limit stray light spillover onto adjacent residential areas. In addition, all lighting shall be shielded to minimize the production of glare and light spill onto adjacent uses.
Air Quality	PP 4.2-2(a)	Construction	The University shall continue to implement dust control measures consistent with SCAQMD Rule 403—Fugitive Dust during the construction phases of new project development. The following actions are currently recommended to implement Rule 403 and may be quantified in the CalEEMod program: • Minimize land disturbance to the extent feasible. • Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer's specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days). • Apply water three times daily to all active disturbed areas. • Replace ground cover in disturbed areas as quickly as possible. • Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content. • Water active grading sites at least twice daily. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period. • All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code. • Sweep streets at the end of the day if visible soil material is carried over to adjacent roads. • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Apply water three times daily or chemical soil stabilizers according to manufacturers' specifications to all unpaved parking or staging areas or unpaved road surfaces.

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
Air Quality	PP 4.2-2(b)	Pre-Construction and Construction	The University shall continue to require by contract specifications that construction equipment engines will be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction.
Air Quality	PP 4.2-2(c)	Pre-Construction and Construction	The University shall continue to require by contract specifications that construction operations rely on the existing electricity infrastructure rather than electrical generators powered by internal combustion engines to the extent feasible.
Air Quality	PP 4.2-2(d)	Construction	The University shall purchase and apply ultra-low VOC architectural coatings with reactivity-adjusted VOC content that meets or exceeds the requirements of SCAQMD Rule 1113, thereby ensuring the limitation of VOCs during construction.
Air Quality	MM 4.2-2(a)	Pre-Construction and Construction	The University shall require by contract specifications that construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than five minutes.
Air Quality	MM 4.2-2(b)	Pre-Construction and Construction	The University shall encourage contractors to utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and low-NOx fuel) to the extent that the equipment is reasonably commercially available and cost effective.
Air Quality	MM 4.2-2(c)	Pre-Construction and Construction	The University shall require by contract specifications that construction-related equipment used on site and for on-road export of soil meet USEPA Tier III certification requirements, as feasible.
Biological Resources	PP 4.3-1(a)	Construction	Mature trees to be retained and protected in place during construction, shall be fenced at the drip-line, and maintained by the contractor in accordance with landscape specifications contained in the construction contract.
Biological Resources	PP 4.3-1(b)	Pre-Construction	Trees shall be examined by an arborist and trimmed, if appropriate, prior to the start of construction.
Biological Resources	PP 4.3-1(c)	Pre-Construction and Construction	Construction contract specifications shall include the provision for temporary irrigation/watering and feeding of these trees during construction, as recommended by the designated arborist.
Biological Resources	PP 4.3-1(d)	Pre-Construction and Construction	Construction contract specifications shall require that no building material, parked equipment, or vehicles shall be stored within the fence line of any tree.
Biological Resources	PP 4.3-1(e)	Construction	Examination of these trees by an arborist shall be performed monthly during construction to ensure that they are being adequately maintained.
Biological Resources	MM 4.3-1(a)	Pre-Construction	Prior to the onset of construction activities that occur between March and mid-August (February 1 through June 30 for raptors), surveys for nesting special status avian species and raptors shall be conducted 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.
Biological Resources	MM 4.3-1(b)	Pre-Construction and Construction	If active nests for avian species of concern or raptor nests are found within the construction footprint or within a 250-foot buffer zone around the construction site, exterior construction activities shall be delayed within the construction footprint and buffer

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
			zone until the young have fledged or appropriate mitigation measures responding to the specific situation have been developed and implemented in consultation with CDFW.
Biological Resources	MM 4.3-1(c)	Design	In conjunction with CEQA documentation 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 Project site boundaries where feasible. If it is not feasible to plant replacement trees at a 1:1 ratio within the Project site boundaries, the tree replacement plan will include the planting of native shrubs in ecologically appropriate areas within the Project site boundaries that would provide nesting, foraging or roosting habitat for birds so that the replacement number of trees and shrubs will result in a 1:1 replacement ratio.
Biological Resources	MM 4.3-4	Construction	UCLA shall replace protected trees removed for construction of projects with protected trees of the same species at a 2:1 ratio. Protected trees are defined as coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel.
Cultural Resources	MM 4.4-2(a)	Pre-Construction	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.
Cultural Resources	MM 4.4-2(b)	Construction	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 University that satisfies the requirements of Section 21083.2 and 15064.5. If the Archaeologist determines that the archaeological resource is not a “unique archaeological resource” or “historical resource,” s/he may record the site and submit the recordation form to the California Historic Resources Information System at the South-Central Coastal Information Center. The Archaeologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the University and to the California Historic Resources Information System at the South-Central Coastal Information Center.

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
Cultural Resources	MM 4.4-2(c)	Pre-Construction and Construction	Prior to initiation of construction activities for projects that require disturbance of native sediments/soils (as identified through site-specific geotechnical analyses), the University 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.
Cultural Resources	PP 4.4-5	Construction	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.
Geology and Soils	PP 4.5-1(a)	Design	During project-specific building design, a site-specific geotechnical study(ies) shall be conducted for new construction and seismic remediation activities 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.

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
Geology and Soils	PP 4.5-1(c)	Design and Operation	The University shall continue to comply with the University Policy on Seismic Safety effective May 19, 2017 or with any subsequent revision to the policy that provides an equivalent or higher level of protection with respect to seismic hazards.
Geology and Soils	PP 4.5-1(d)	Design	Development projects shall continue to be subject to structural peer review; following this review, any recommendations added as a result of the peer review, shall be incorporated in the project design as appropriate.
Geology and Soils	MM 4.4-3(a)	Pre-Construction	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.
Geology and Soils	MM 4.4-3(b)	Construction	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 University 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.
Greenhouse Gas Emissions	PP 4.15-1	Design and Operation	The University shall continue to implement provisions of the UC Policy on Sustainability Practices including, but not limited to: Green Building Design; Clean Energy Standards; Climate Protection Practices; Sustainable Transportation Practices; Sustainable Operations; Recycling and Waste Management; Environmentally Preferable Purchasing Practices; and provisions of the applicable UCLA Climate Action Plan.
Hazards and Hazardous Materials	PP 4.6-1	Construction and Operation	The University shall continue to implement the same (or equivalent) health and safety plans, programs, practices, and procedures related to the use, storage, disposal, or transportation of hazardous materials, 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

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
			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.
Hazards and Hazardous Materials	PP 4.6-4	Construction	While not expected to occur, 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.
Hydrology and Water Quality	PP 4.7-1	Construction and Operation	Construction and operation of projects 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.
Hydrology and Water Quality	MM 4.7-1	Design, Pre-Construction, and Construction	Best Management Practices (BMPs) shall be implemented for individual development projects, to the extent required by State law, to ensure compliance is maintained with all applicable NPDES requirements at the time of project construction. UCLA shall utilize BMPs as appropriate and feasible to comply with and/or exceed the current requirements under the NPDES program. BMPs that may be implemented include, but are not limited to, the following: Non-Structural/Structural • Landscape Maintenance • Catch Basin Stenciling and Clean-out • Efficient Irrigation Practices • Litter Control • Fertilizer Management

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
			• 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.
Noise	PP 4.9-6(a)	Design	The University shall continue to shield all new stationary sources of noise that would be located in close proximity to noise-sensitive buildings and uses.
Noise	PP 4.9-7(a)	Construction	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 Project site that are sensitive to noise. **Project-Specific Implementing Measure:** Exterior construction activities Monday through Friday shall be limited to 7:00 AM to 7:00 PM.
Noise	PP 4.9-7(b)	Construction	The University shall continue to require by contract specifications that construction equipment be required to be muffled or otherwise shielded. Contracts shall specify that engine-driven equipment be fitted with appropriate noise mufflers.
Noise	PP 4.9-7(c)	Construction	The University shall continue to require that stationary construction equipment material and vehicle staging be placed to direct noise away from sensitive receptors.
Noise	PP 4.9-8	Construction	The University shall continue to conduct meetings, as needed, with off-campus constituents that are affected by 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.
Noise	MM 4.9-2	Pre-Construction and Construction	The University shall require by contract specifications that large bulldozers, large heavy trucks, and other similar equipment not be used. The work shall be done with medium-sized equipment or smaller.

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
Noise	MM 4.9-7	Pre-Construction	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. A temporary 12-foot-high barrier shall be erected along the southern property line between the construction areas at Research Park East/West and the existing residential uses to the south (receptor locations R1 and R2) and along the western property line between the construction area at Research Park West and the existing residential uses to the west (receptor location R3). The barrier shall be solid from the ground to the top with no openings.
Transportation	PP 4.13-1(d)	Operation	The University shall continue to implement a TDM program that meets or exceeds all trip reduction and AVR requirements of the SCAQMD. The TDM program may be subject to modification as new technologies are developed or alternate program elements are found to be more effective.
Transportation	PP 4.13-5	Construction	The University shall maintain at least one unobstructed lane in both directions. At any time only a single lane is available, 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 contractor shall provide appropriate signage indicating alternative routes.
Transportation	PP 4.13-6	Construction	For any construction-related closure of pedestrian routes, the contractor shall provide appropriate signage indicating alternative route and provide curb cuts and street crossings to assure alternate routes are accessible.
Transportation	PP 4.13-8	Pre-Construction and Construction	To ensure adequate access for emergency vehicles when construction projects would result in temporary lane or roadway closures, UCLA shall consult with the UCPD, EH&S, LAPD and the LAFD to disclose temporary lane or roadway closures and alternative travel routes.
Tribal Cultural Resources	**MM RP TCR-1**	**Pre-Construction and Construction**	**Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities: Gabrieleño Band of Mission Indians—Kizh Nation** **A. The University shall retain and compensate for a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians—Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, any disturbance occurring from the ground surface through the full depth of demolition or subsurface intrusion, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.** **B. A copy of the executed monitoring agreements shall be submitted to the Environmental Planning section of UCLA Capital Programs prior to the earlier of the commencement of any ground-disturbing activity, or the**

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
			issuance of any permit necessary to commence a ground-disturbing activity. **~~C. The monitor will be present on-site on a rotating monthly basis during ground-disturbing activities (i.e., an alternating monthly schedule for each tribal monitor from the three consulting tribes shall be established by the University), and the University shall provide the schedule in writing to the monitor.~~** **~~D~~C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitoring logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of daily monitor logs will be provided to the Environmental Planning section of UCLA Capital Programs upon completion of monitoring activities.** **~~E~~D. In consultation with the Kizh Nation regarding project construction scheduling, on-site tribal monitoring shall be temporarily suspended once subsurface work within the project site is complete and vertical building construction begins or interior work occurs, until such time as trenching or other ground-disturbing activities recommence.** **~~F~~E. On-site tribal monitoring shall conclude upon either of the following: (1) written confirmation to the Kizh Nation from a designated point of contact for the University that all ground-disturbing activities and/or phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the Environmental Planning section of UCLA Capital Programs that no future, planned construction activity and/or development/ construction phase at the project site possesses the potential to impact Kizh Nation TCRs.**
Tribal Cultural Resources	**MM RP TCR-2**	**Pre-Construction and Construction**	**Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities: Gabrielino Tongva Indians of California Tribal Council and Gabrielino Tongva San Gabriel Band of Mission Indians** **The University shall retain and compensate for the services of a Tribal Monitor from the Gabrielino Tongva Indians of California Tribal Council and a Tribal Monitor from the Gabrielino Tongva San Gabriel Band of Mission Indians, each of whom will be present on-site on a rotating ~~monthly~~ weekly basis (i.e., an alternating ~~monthly~~ weekly schedule for each Tribal Monitor from these ~~three~~ two**

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
			consulting tribes shall be established by the University) during the construction phases that involve ground-disturbing activities. Each Tribal Monitor will complete daily monitoring logs that summarize earthwork activities, locations, soil, and any cultural materials identified. In consultation with the Tribes regarding project construction scheduling, on-site tribal monitoring shall be temporarily suspended once subsurface work within the project site is complete and vertical building construction begins or interior work occurs, until such time as trenching or other ground-disturbing activities recommence. On-site monitoring shall end when all ground-disturbing activities are complete, or sooner if the Tribal Monitors and associated Tribal Representatives indicate the site has a low potential to impact tribal cultural resources.
Tribal Cultural Resources	**MM RP TCR-3**	**Construction**	**Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial): Gabrieleño Band of Mission Indians—Kizh Nation** **Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist.**
Tribal Cultural Resources	**MM RP TCR-4**	**Construction**	**If any discovered non-funerary/non-remains resources are determined to be Native American in origin, work within a 50-foot radius shall cease and the University shall allow all consulting Tribes to evaluate the resources and determine appropriate treatment and curation. The consulting Tribes shall work in good faith to come to agreement on treatment and curation, in consultation with the University who shall implement the agreement. If consensus cannot be reached, the University shall use best efforts to facilitate a resolution. In the event resolution cannot be reached, the University shall consult with the University's Qualified Archaeologist regarding appropriate treatment, in most cases reburial in place. Work may continue on other parts of the Project site while evaluation and, if necessary, treatment takes place.**
Tribal Cultural Resources	**MM RP TCR-5**	**Construction**	**Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects** **A. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC Section 5097.98, are also to be treated according to this statute.** **B. If Native American human remains and/or grave goods are discovered or recognized on the Project site, PRC Section 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.** **C. Human remains and grave/burial goods shall be treated alike per PRC Section 5097.98(d)(1) and (2).**

Environmental Topic	MM or PP Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs) and Campus Programs, Practices, and Procedures (PPs)
			D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or grave goods. **E. Any discovery of human remains/grave goods shall be kept confidential to prevent further disturbance.**
Utilities and Services Systems	PP 4.14-2(a)	Design	New facilities and renovations shall be equipped with low-flow showers, toilets, and urinals
Utilities and Services Systems	PP 4.14-2(b)	Operation	Measures to reduce landscaping irrigation needs shall be used, such as automatic timing systems to apply irrigation water during times of the day when evaporation rates are low, installing drip irrigation systems, using mulch for landscaping, subscribing to the California Irrigation Management Information System Network for current information on weather and evaporation rates, and incorporating drought-resistant plants as appropriate.
Utilities and Services Systems	PP 4.14-2(c)	Operation	The University shall promptly detect and repair leaks in water and irrigation pipes.
Utilities and Services Systems	PP 4.14-2(d)	Operation	The University shall minimize the use of water to clean sidewalks, walkways, driveways and parking areas.
Utilities and Services Systems	PP 4.14-2(g)	Operation	The University shall educate the Project community on the importance of water conservation measures.
Utilities and Services Systems	PP 4.14-3	Operation	The University shall continue to implement a solid waste reduction and recycling program designed to limit the total quantity of Project solid waste that is disposed of in landfills.
Utilities and Services Systems	PP 4.14-9	Design and Operation	The University shall continue to implement energy conservation measures (such as energy-efficient lighting and microprocessor-controlled HVAC equipment) to reduce the demand for electricity and natural gas. The energy conservation measures may be subject to modification as new technologies are developed or if current technologies become obsolete through replacement.

ATTACHMENT A

COMMENT LETTERS RECEIVED

Comment Letter A

Ashley Rogers

Director Environmental Planning

UCLA

Re: UCLA Research Park DEIR Comments

Ms. Rogers:

I am writing on behalf of the Overland Avenue Community representing households in the Rancho Park area.

OAC is very excited to have UCLA join our neighborhood. The loss of the mall really impacted our business and residential community. Waiting for Google did not help matters and now that UCLA is on the way, we hope their arrival will reactivate the site and boost our surrounding businesses.

After reading through the DEIR, many of the concerns John Sandborn brought up in his comments (attached) were shared by the OAC. A-1

Of most importance to OAC:

1. That the four local HOAs be kept in the loop of UCLA activities and updates that may impact the community through an annual report. A-2
2. That a portion of parking lot be available for UCLA permit holders as well as the public. Businesses near the western part of the campus have suffered greatly when a key parking lot was repurposed for housing. Making space available for local businesses would go a long way. A-3
3. It is so very important that a portion of the ground floor of the UCLA Park be activated by retail. We understand serious research will be going on at this facility, but carving out some storefronts that serve the public will help improve pedestrian traffic flow and make Pico safer. A-4
4. To the point of ground floor activation, OAC, along with other HOAs and the WNC, are standing by to help UCLA honor the past uses of this site. The history is rich here and it can only benefit everyone if we can honor that somehow in this new facility.
5. The need for a community room is great. OAC would hope that UCLA can carve out a room in the Park that can be used for public meetings. The Neighborhood Council enjoyed having such a space for many years at the mall and since it's closure, they have cobbled together meeting spaces. Please consider a space inside the Park to accommodate a meeting space with a small closet for storage of meeting materials. A-5

We are submitting this letter as well as John Sandbrook's document as we support his comments. OAC would like this to be entered into the file. A-6

We welcome UCLA Research Park as our new neighbor and look forward to working in partnership with them.

Respectfully submitted,

Lisa Morocco

President Overland Avenue Community

COMMENT LETTER B

West of Westwood
Homeowners Association

May 27, 2026

Ashley Rogers
Director Environmental Planning
UCLA

Re: UCLA Research Park DEIR Comments

Ms. Rogers:

I am writing on behalf of the West of Westwood HOA, representing 1200 households in Rancho Park. John Sandbrook, WOWHOA board member and secretary, and I attended the May 20, 2026 public hearing on the Draft EIR for the UCLA Research Park, 10800 W. Pico Blvd. B-1

WOWHOA is very excited and happy to have UCLA at this site but we also want to ensure that our members' quality of life will not be impacted and we all are good neighbors.

John was kind enough to share the document he submitted with the WOWHOA board.

After reading his detailed and thoughtful document, the board felt his observations, comments and questions mirrored the issues and concerns that the WOWHOA would raise. B-2

We are submitting this letter supporting John Sandbrook's document and would like it entered into the file.

We look forward to working in partnership with the UCLA Research Park to have a successful project that will be a welcomed addition to our community. B-3

Respectfully submitted,

Terri Tippit

Terri Tippit

West of Westwood Homeowners Association • P.O. Box 64496 • Los Angeles, CA , 90064
email:wowhoa90064@ca.rr.com website: www.wowhoa.org
Phone: 310.475.2126

Comment Letter C

From: Westwood Gardens Civic Association, Inc (WGCA)

Re: Regarding the Proposed UCLA Research Park: Follow-up from Westwood Gardens Civic Association with Questions and Concerns

Primary Contact: Marilyn Tusher, President-WGCA, **mltusher@att.net**

Additional Contacts to be copied: westwoodgardens@gmail.com, leeza2020@gmail.com, sean@heyler.com

Date: May 26, 2026 v4

Note for submission of questions to UCLA: Written comments **from community must be received by June 3, 5 pm to:** ARogers@capnet.ucla.edu or mailed to Ashley Rogers, Director Environmental Planning, UCLA Capital Programs, 1060 Veteran Ave., Box 951365, LA CA 90095.

Dear UCLA Planning Team,

I am writing on behalf of the Board of Directors of the Westwood Gardens Civic Association, a homeowners' association in West Los Angeles representing approximately 620 homes bordering Ayres Avenue to the north, National Blvd to the south, Midvale Avenue to the west and Overland Avenue to the east including the Dunleer Place neighborhood. WGCA has been in existence for more than sixty years working to maintain a livable quality of life in our residential neighborhood and community.

We appreciate the opportunity to follow up on the UCLA sponsored community Zoom meeting held on May 20, 2026, 6 pm PST regarding the proposed UCLA Research Park on Pico Blvd, Los Angeles, Ca.

Our residents value UCLA's contributions to scientific advancement, education, and the broader Los Angeles community. We recognize the potential benefits of a research park focused on quantum computing, biotechnology, and immunology.

At the same time, our immediate and adjacent proximity to the proposed site requires us to understand the full scope of activities planned for the facility, particularly those involving BSL-2 and BSL-3 laboratories. Our concerns are grounded in public safety, zoning compliance, security, environmental impact, and long-term community wellbeing.

We reviewed the Draft Initial Study and Mitigated Negative Declaration dated May 2026, and particularly the paragraphs related to biosafety levels, hazardous materials, and operational assumptions. Based on that review and the discussion during the UCLA May 20, 2026 Zoom call, we respectfully submit the following questions and requests for clarification.

C-1

C-2

Our goal is to ensure transparency, appropriate planning, and adequate safeguards for a densely populated residential and commercial area that includes schools, transit corridors, and vulnerable populations.

C-2 (CONT.)

1. Zoning and Legal Basis for BSL-2 and BSL-3 Laboratories

Primary Question: The UCLA Draft Initial Study dated May 2026 designates BSL-2 and BSL-3 laboratories within the proposed UCLA Research Park. It appears the Los Angeles Municipal Code (LAMC) requires M2 Light Industrial or M3 Heavy Industrial zoning for higher impact scientific and industrial uses. It appears that The UCLA Research Park is to be located in a mixed residential and commercial zone.

Residents request a clear explanation of the legal and regulatory basis for placing these BSL-2 and BSL-3 biotech laboratories in a mixed residential and commercial zone. This includes:

C-3

1a. Identification of any exemptions UCLA believes apply

1b. Whether UCLA intends to seek zoning changes or variances

1c. How will the UCLA and the City of Los Angeles evaluate and mitigate biosafety risks in a non-industrial zone?

C-4

1d. The Draft IS MND does not fully account for the operational realities of BSL-2 and BSL-3 labs, how does UCLA intend to amend that draft and in what time frame?

2. Lack of Defined Partners, Projects, and Operational Oversight

During the UCLA Zoom call on May 20, 2026, UCLA Planning stated that it does not yet know which partners, government agencies, or private entities will occupy the facility or labs. This raises several concerns:

C-5

2a. How can appropriate infrastructure be designed without knowing the specific needs, requirements or testing of future tenants, especially those conducting highly sensitive, high impact biological research?

2b. How will UCLA evaluate and approve partners, including private companies, government agencies, or classified research programs?

2c. What oversight mechanisms will govern daily operations, access control, and security?

C-6

2d. How will UCLA ensure that inexperienced vendors, trainees, or external collaborators do not introduce safety risks?

C-7

2e. The community requests a detailed framework describing how partners will be selected, vetted, and monitored. With what frequency and how will UCLA make this report available to the public?

C-8

3. Adequacy of Planning for BSL-2 and BSL-3 Operations

The Draft IS MND focuses heavily on construction and retrofit planning for quantum computing infrastructure. However, it does not provide sufficient detail for the BSL-2 and BSL-3 labs regarding:

3a. Air containment systems

3b. Negative pressure controls

3c. Hazardous waste handling and transport

3d. Water and chemical waste management

3e. Personal protective equipment disposal

3f. Emergency response protocols

3g. Vendor and visitor access procedures: strict 24/7 365 days a week procedures

3h. Given the density of the surrounding neighborhood, on what basis and frequency will these operational details be available for public review?

C-9

4. Existing UCLA BSL-2 and BSL-3 Facilities and Safety Record

To understand UCLA's experience with high containment laboratories, we request:

4a. A list of all existing UCLA BSL-2 and BSL-3 laboratories, including those on the Westwood campus or elsewhere.

4b. The year each laboratory was constructed and if still under operation. Copy of guidelines for security and operation.

4c. The state and federal agencies responsible for permitting and oversight.

4d. A summary of any safety incidents and dates, including:

- Airflow failures
- Containment breaches
- Waste handling issues
- Human error events
- Any reportable incidents involving airborne pathogens

C-10

4e. Please state when this information can be provided to the public before final planning for the project is completed?

C-10 (CONT.)

5. Other Local BSL-2 and BSL-3 Facilities

Please identify any non-UCLA research facilities in West Los Angeles or Beverly Hills that operate BSL-2 and BSL-3 laboratories, including Cedars-Sinai or others. For each facility, please clarify:

5a. Whether they conduct airborne pathogen research

5b. Their proximity to residential neighborhoods

5c. Their safety and compliance history

C-11

This will help contextualize the proposed UCLA Research Park within the broader regional biosafety landscape.

6. Quantum Computing Facilities and Noise Containment

Residents request clarification on UCLA's experience with quantum computing facilities:

6a. Does UC or UCLA currently operate any quantum computing centers?

6b. Does UC or UCLA currently operate any quantum computing centers with biotech with BSL-2 or BSL-3 labs?

6c. If so, where are they located and how long have they been operational?

6d. Are they currently being used for biotechnology or biological modeling?

6e. Please describe how low frequency noise and vibration from quantum computing equipment, cooling systems, and airflow systems will be contained to avoid impacts on nearby residents, homes and businesses.

C-12

7. Emergency Response, Evacuation, and Public Safety

The Draft IS MND does not provide sufficient detail on emergency procedures.

Example: Recently on May 22, 2026, in Garden Grove, California[1], just 30 miles south of West Los Angeles, a biohazard evacuation of 40,000+ people has been conducted due to insufficient human planning and preparedness involving toxic fumes from a chemical leak. This serves as an example of how a chemical bio safety incident can impact residents severely. A potential biological airborne pathogen leak at the UCLA Research Park could be even more devastating than a chemical leak. Chemical leaks can be contained more easily than airborne pathogen(s).

To be clear: All areas of West Los Angeles and all surrounding communities such as Beverly Hills, Cheviot Hills, Santa Monica, Brentwood to name a few could be

C-13

immediately impacted by an airborne pathogen leak from the UCLA Research Park which would devast the entire City of Los Angeles in unimaginable ways. With rapid transit nearest to the proposed UCLA Research facility, airborne biological containment is even more important to reduce spread.

C-13 (CONT.)

Residents request detailed planning for:

C-14

7a. Evacuation plans, routes and facilities for nearby homes and businesses in the event of a biohazard leak

C-15

7b. Detailed transportation and containment protocols, governance process and updates to the public based upon BLS-2 and BSL-3 levels of biological material brought ongoingly into the Research Park for quantum study.

7c. Protocols for security breaches, including drone threats, increased cybersecurity attacks from malicious actors and other countries that could impact the physical facility and labs, electric grid, etc.

7d. Coordination plans with LAPD, LAFD, LA County Public Health, and federal agencies

C-16

7e. Communication procedures for notifying residents and schools. Given the proximity of a pre-school, multiple elementary and grade schools, including but not excluding others schools in the nearby area:

a. **WorldSpeak School**, pre-school – 1639 Westwood, 2387 Malcolm
b. **Notre Dame Academy** - 2911 Overland
c. **Overland Avenue Elementary** - 10650 Ashby
d. **Le Lycee Francais de Los Angeles** - 3261 Overland

8. Earthquake Preparedness and Seismic Safety

Los Angeles is an active seismic region. Residents request clarification on:

C-17

8a. Do the seismic retrofits for quantum computing also apply to BSL-2 and BSL-3 laboratory areas?

8b. How will pathogens, hazardous materials, test animals (if used) and cold storage be protected during a major earthquake?

8c. How will emergency power systems (off-grid) be designed to maintain containment during outages and for how long?

9. Noise, Traffic, and Environmental Quality

C-18

Although secondary to biosafety concerns, noise and traffic are significant quality of life issues. Residents request:

9a. Plans to mitigate noise from emergency vehicles, construction, and increased traffic

9b. Measures to prevent vibration impacts on quantum computing and cold storage systems located in labs.

9c. Strategies to manage increased foot traffic from transit riders and visitors

9d. Homeless and frequent crime in the area, drone detection and response measures: increased facility security measures given nature of the sensitive research

C-18 (CONT.)

C-19

C-20

C-21

10. Request for Detailed Operational Plan

The Draft IS MND focuses primarily on construction and seismic retrofit activities. It does not provide adequate detail regarding:

10a. Internal BSL-2, BSL-3 operations

10b. State of the art, enhanced physical and cyber-security protocols and 24/7 operations and professional staffing

10c. Biosafety procedures

10d. Hazardous material handling

10e. Expected increased utility costs for residents: imparticular for water and electricity

10f. Research facilities impact to residents' electricity during brownout conditions

10g. Vendor and partner oversight

10h. Daily laboratory workflows

10i. Onsite threat level assessment, operations and procedures to thwart attempts by other countries, governments and malicious actors that will have interest in the research being conducted with quantum computing and biotech.

10j. Disaster recovery planning for all computing systems and labs that are necessary to eliminate information breaches as well as other security breaches that would impact the community.

10k. Communication plan to public: i.e a website with details updated monthly as project progresses with secure access for review of any sensitive information.

10l. Given the sensitive research being conducted in the UCLA Research Park and in BSL-2 and BSL-3 laboratories, the community requests a comprehensive operational plan before any construction approvals are granted.

C-22

Conclusion

The Westwood Gardens Civic Association supports scientific progress and values UCLA's role in advancing research that benefits society.

However, the introduction of BSL-2 and BSL-3 laboratories, combined with sensitive quantum computing infrastructure, into a densely populated residential and commercial area requires full transparency, rigorous planning and enhanced threat mitigation planning at the physical and cyber-security levels most likely beyond UCLA SOP found today. This planning should address how to mitigate "new World threats" from "always on AI hacking", drone threats, any type of autonomous vehicles that could compromise safety at the Research Park.

All of this must be documented and planned so that residents and citizens can feel safe living around the UCLA Research Park Labs and that the broader global community is not impacted by a safety incident. This requires detailed, clear and regular communication by UCLA with the Westwood Gardens Civic Association and the broader community.

Please note we understand that BSL-2 and BSL-3 labs are used throughout the USA, in the State of California and even within the UC system. However, since this is a new type of research lab with a unique approach combining quantum computing with highly sensitive biotech at the BSL-2 and BSL-3 levels, located at an "off-campus" location; this would warrant even greater oversight than at current labs.

REQUEST:

We respectfully request written responses to each of the numbered questions/bullet points outlined above, along with any supporting documentation, regulatory references, or operational plans that UCLA can provide. If there are delays on certain items, please cite what dates the information will be provided.

Thank you for your attention to these important matters. We look forward to continued dialogue and collaboration.

C-23

Sincerely,

Westwood Gardens Civic Association, Inc

Marilyn Tusher, President
P.O Box 642001
Los Angeles, CA 90064

References:

[1] May 22, 2026 "*More the 40,000 asked to evacuate due to chemical leak in Southern California" Youtube link :* https://youtu.be/uSOgO5YViD4

UCLA Research Park Project Draft IS/MND

Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (MND)

ProjectsUnderEnvironmentalReview - UCLA Capital Programs Website

COMMENT LETTER D

Westwood South of Santa Monica Blvd Homeowners' Association
P.O. Box 64213, Los Angeles, CA 90064
wssmhoa.org • info@wssmhoa.org
Est. 1971

June 3, 2026

Ashley Rogers Director
Environmental Planning
UCLA Capital Programs
1060 Veteran Avenue, Box 951365
Los Angeles, CA 90095
VIA EMAIL: ARogers@capnet.ucla.edu

RE: UCLA Research Park Project NOI

Dear Ms. Rogers:

This letter is submitted on behalf of Westwood South of Santa Monica Blvd. Homeowners Association whose property owners are located directly north of the proposed UCLA Research Park Project (proposed Project). D-1

We have reviewed John Sandbrook's comment letter submitted to UCLA earlier and wish to incorporate his comments as those submitted on behalf of our organization. We agree with and support his comments. They were previously acknowledged by the West of Westwood HOA as well. D-2

In his general comments, Mr. Sandbrook raised a number of important issues including the following:
1) A recommendation that UCLA needs to commit to at least annual reports on the Research Park, its activities and issues to the four HOAs in the area. D-3
2) A question as to whether parking for neighborhood businesses can be accommodated in the underground parking structure. We would add as to whether they might be accommodated elsewhere on the property (such as outdoors behind the west annex). D-4
3) Will the UCLA police force have a substation and regular staff at the proposed Project? D-5
4) How will traffic flow and mitigation be managed? D-6
5) Visual impact of the exterior appearance of the proposed Project on nearby residential areas. D-7
6) Whether the alley south of Pico will be opened into the west Pico entrance and to the street and/or to the underground garage. D-8
7) Concerns related to biosecurity and the containment of biohazards. It is important that Sandbrook's report on biosecurity should be incorporated into the project's review/approval documentation. All biosecurity measures must apply not only to UCLA-affiliated researchers but must also be applied to all contractors, tenants and users of the facility. Will all contractors and lab operators commit to review, supervision, and oversight by UCLA to ensure protections needed by the community are met? D-9

We would like to raise a couple of additional/unaddressed issues:
A) Will overflow UCLA parking for non-Project activities be prohibited? Would any on-site excess parking capacity not needed for the proposed Project be made available to those whose destination would be the main campus? If so, what would associated impacts be? D-10
B) I mentioned during public comment in the public meeting held in conjunction with the NOI that without knowing how the Western portion of the project will be used, it would appear to be inappropriate to have its area covered under the current NOI. D-11

Comment Letter D

Westwood South of Santa Monica Blvd Homeowners' Association
P.O. Box 64213, Los Angeles, CA 90064
wssmhoa.org • info@wssmhoa.org
Est. 1971

I am attaching to this email Mr. Sandbrook's comment on the DRAFT EIR for the UCLA Research Park.

D-12

We look forward to further communication about the proposed Project and its relationship to our community.

Sincerely,

Barbara Broide

Barbara Broide
President, Westwood South of Santa Monica Blvd. HOA

Comment Letter E

Outlook

UCLA Research Park Project MND - Comments

From Annette Mercer <annette.l.mercer@gmail.com>
Date Tue 5/5/2026 4:43 PM
To Rogers, Ashley <ARogers@capnet.ucla.edu>

To Ashley Rogers, Director, Environmental Planning

Thank you to UCLA for bringing this project to our community. We are anxious to have the building occupied and in use. I am very pleased to see the attention to sustainability and energy efficiency in many forms, including use of heat pumps and solar panels. Thank you for the provision of EV charging stations, bike facilities, and stormwater and runoff recapture and reuse. E-1

To further the reduction of vehicle miles travelled, the provision of bike lanes on Westwood Blvd. from National Blvd (or at least the E Line Station) to UCLA is essential. LADOT is already working on this but any influence you can bring would be useful. E-2

To minimize light pollution all outdoor lighting should be shielded downward and of an appropriate color temperature and intensity. E-3

To increase the biodiversity value and sustainability of the landscaping, ALL landscaping plants should be locally native to the Los Angeles Basin. Please remove all references to non-native drought tolerant plants. Drought tolerant plants that are not native require more water and fertilizer than natives. Natives evolved here and do not "want" any water in the summer (once established) and do not require fertilizer which is one of our biggest sources of pollution in Santa Monica Bay. Pollinator gardens with a variety of native annuals and perennials will provide year round color and interest. E-4

To maximize your investment in the landscaping, maintenance must be adequately budgeted and should be done by workers trained in the care of native plants, such as those certified by the Theodore Payne Foundation program (I believe some UCLA groundskeepers have already done this.). They know and understand the appropriate time for pruning and deadheading, and the importance of keeping leaf litter mulch on the soil. They will be able to maintain the green space without use of glyphosate or other chemicals as should be required. They will also be able to selectively water replacement plants in the future once the initial establishment period is over and the irrigation system is no longer needed. E-5

Thank you for replacing the oaks and sycamores at a 2:1 ratio. If any of the non native trees are replaced, they should be replaced with native species for the same biodiversity and sustainability reasons. There are native species on the City of LA list. E-6

Your proposed haul route along Overland Ave. goes by 3 schools and a library and is through a residential area. While this is the shortest route to I-10, please also consider using Pico Blvd. west to the northbound 405 (at Cotner), or Pico west to Sawtelle Blvd. south to the southbound 405 (which goes by 2 schools and fewer residences). E-7

Sincerely

Annette Mercer
2647 Glendon Ave.

Comment Letter E

Los Angeles, CA. 90064

COMMENT LETTER F

Outlook

The project on pico & Westwood Blvd

From Brad Strumwasser <bradstrum7@yahoo.com>
Date Thu 5/7/2026 2:49 PM
To Rogers, Ashley <ARogers@capnet.ucla.edu>

Mr Roger

Julia Brown directed me to submit questions & concerns to you regarding the Westside Pavilion Project and the upcoming community meeting

I intend to be in attendance and hope you will be more forthcoming than you have been in previous meetings. We are interested in more specifics. What are the plans for a “wet lab” as mentioned in past reports? In the last meeting, it was revealed that an AI center would be established. We need to know what assessment have taken place and will take place to assess as well as address the local impact on our air quality. We need to know what safety measures are planned for the wet lab, the immunology lab and the AI center.

F-1
F-2
F-3
F-4

Brad Strumwasser

Sent from Yahoo Mail for iPhone

Comment Letter G

Outlook

Letter from Barbara Broide, President of WSSM

From Jeffrey Ellis <jeffrey.wssm@gmail.com>
Date Sat 6/6/2026 11:42 AM
To Rogers, Ashley <ARogers@capnet.ucla.edu>

Dear Ms. Rogers,

I am writing to follow up on the letter sent to you by Barbara Broide on June 3.

The views Barbara expressed in her email are her own personal views, and were not sent at the request or with the approval of our Board -- of which I am a voting member.

While I can not say whether or not a majority of the Board would have endorsed the letter, the fact is we did not approve it.

Writing for myself, I have full confidence that UCLA will uphold the highest standards of environmental quality and safety -- as it has clearly done on its main campus for many decades. I do not believe that UCLA needs to take any special or unusual steps that might delay or compromise its planned Research Park location . It is my impression that the vast majority of our neighborhood is in agreement with my views.

G-1

We believe that UCLA will be a wonderful presence in our neighborhood, and do not want to see any delays due to overreaction by a handful of overly cautious neighbors.

The fact that UCLA is meeting with the Westside Neighborhood Council shows sufficient community involvement. I see no need for you to duplicate your efforts by meeting with individual homeowner groups. To be honest, our memberships have decreased over the years, and we do not necessarily represent the majority views of our neighbors. We only represent homeowners, not renters or area businesses.

Please let me know if I can be of any assistance with my neighbors in helping ensure there are no unnecessary delays in completing the Research Park project.

I look forward to welcoming UCLA into our neighborhood!

Kind regards,
Jeffrey

--
Jeffrey M. Ellis
Board Member, Westwood South of Santa Monica Homeowners Association
310-890-5295

COMMENT LETTER H

Comments, Observations, Questions and Suggestions for inclusion in the Final Environmental Impact Report document for the UCLA Research Park

1. BSL-3 Laboratories
2. General Observations and Questions

May 26, 2026

Submitted to UCLA Capital Programs

Prepared by John R. Sandbrook

Residence:
2714 Kelton Avenue, Los Angeles, CA 90064
(since September 2005)

[Personal disclosure information also included]

Background

1. The California Environmental Quality Act (CEQA) was signed into law by then-Governor Ronald Reagan on September 18, 1970. Pursuant to that law, the governing board of the University of California (Board of Regents) is required to certify an environmental impact report (EIR) documenting both (1) various aspects of capital construction projects proposed to be constructed in or on property owned by the University; and (2) comments provided by the public about the EIR, including the University's response to such public comments.

2. UCLA is one of the 10 campuses of the University of California and is subject to CEQA and the procedures established by the University of California Office of the President (UCOP), located in Oakland, CA. All 10 campuses report to UCOP.

3. On May 4, 2026, the UCLA Office of Capital Programs published for public review and comment the Draft EIR for the proposed UCLA Research Park facilities.

4. Pages 114-116 of the Draft EIR discussed that: (A) up to 5,000 gross square feet in UCLA Research Park East would be constructed as laboratories classified at Biosafety Level 2 (BSL-2) and Level 3 (BSL-3) [p.114]; and (B) up to 10,000 gross square feet would be constructed as a vivarium for animal research, utilizing a to-be-constructed Animal Biosafety Level laboratory in the vivarium [p. 115].

5. The only explanatory information in the Draft EIR about BioSafety Level laboratories was provided in one sentence of footnote # 50 on page 114.

6. On May 20, 2026, the required public hearing on the Draft EIR was conducted (via ZOOM) by the UCLA Office of Capital Programs. During the public hearing, four (4) individuals expressed concern about the absence in the Draft EIR of explanatory information about BioSafety Level laboratories that would be of educational value to the neighborhood communities that are located immediately adjacent to the UCLA Research Park property (north and south of Pico Blvd.).

7. The deadline for public comments to be submitted to UCLA Capital Programs is Wednesday, June 3, 2026.

H-1

9. The UCLA Office of Capital Programs has announced a tentative plan to issue the Final EIR (including responses, if appropriate, to any public comments received) in summer 2026. Thereafter, UCLA intends to present the Final EIR to UCOP and then, in fall 2026, to request certification of the Final EIR by the UC Board of Regents, presumably at one of its two regularly-scheduled meetings (September 21-22, 2026, at UCLA Luskin Conference Center; November 16-17 at UC San Francisco Mission Bay campus).

10. If approvals and certification of the Final EIR are secured, UCLA announced that construction of the multi-year, multiple-phased projects for UCLA Research Park West would begin in late 2026/early 2027.

11. To provide more information about BioSafety Level laboratories, this document has been prepared by yours truly, at my own initiative over the Memorial Day holiday weekend (and at the request of no one).....and it will be included in my public comments about the Draft EIR that I will submit by June 3. My wife (Lianna Anderson, former assistant dean of the Division of Life Sciences, UCLA College) and I are currently in our 21st year (since 2005) of home ownership within the boundaries of the West of Westwood Homeowners Association (WOWHOA).

12. The WOWHOA is one of the four HOAs immediately adjacent to the UCLA Research Park property. (For a complete description of the four HOAs immediately adjacent to the UCLA Research Park, any reader of this document is referred to the explanatory letter, dated February 4, 2025, that was submitted by the Westside Neighborhood Council to UCLA. That letter is included in this document.)

13. Since 2015, I have served as the Secretary of the WOWHOA Board of Directors. Accordingly, this document is being sent to the President of the WOWHOA. Distribution to the Board of Directors of the WOWHOA or to the Presidents of the other three HOAs is at her discretion.

No UCLA personnel were involved in or consulted about the preparation or review of this document. No UCLA personnel requested that this document be prepared or provided any information for this document.

<u>This document has been prepared using only publicly-available information</u>. A full disclosure about my prior UCLA background is also included in this document. I have had NO involvement of any type in the UCLA planning process for UCLA Research Park West.

–John R. Sandbrook

H-1
(CONT.)

Contents

A. Overview of 17 Facts

B. General Reference Documents -- U.S. Department of Health and Human Services

- U.S. Center for Disease Control and Prevention
  - ❖ Publication: Biosafety in Microbiological and Biomedical Laboratories (June 2020)

- U.S. Administration for Strategic Preparedness and Response
  - ❖ Biosafety Levels

C. List of Universities and Selected Other Organizations in California with BSL-3 Research Laboratories

D. University of California / Office of the President
- March 11, 2026 – Reissuance of UC Policy on High Containment Laboratories
- March 11, 2026 – Publication of Design Standards for UC BSL-3 Laboratories
- University of California High Containment Laboratory Oversight Committee

E. UCLA Information
- Vice Chancellor-Research and Creative Activities
- High Containment Program/Director, Office of Environmental Health & Safety
- UCLA High Containment Laboratory Oversight Group (HCLOG) and Chair
- UCLA Research Park executive architect—Flad Architects

F. UC Irvine and UC San Diego Information

G. Related Articles
- August 31, 2023—University of California News
- September 13, 2023--Cal Matters.org
- September 18, 2025—Scientific World Journal.org

H. Observations, Comments Questions and Suggestions for the Final EIR

I. Disclosure Statements-John R. Sandbrook

J. Letter of February 4, 2025 to UCLA identifying the four HOAs adjacent to the UCLA Research Park property.

H-2

FACTS

Fact # 1: Research compiled by *USA Today* in 2015 estimated that BSL-3 laboratories are operated at more than 200 locations in the U.S, by academic research universities, federal agencies, non-profit organizations and private companies.[1] The estimated number of BSL-3 laboratories operating in the U.S. range from 1,000 to 1,500, but no single list is available.

Fact # 2: Ten (10) of the 13 research university institutions in the State of California (including the 10-campus University of California system) operate one or more BSL-3 research universities. Of the 13 institutions, only the California Institute of Technology, UC Santa Barbara and UC Santa Cruz do not operate a BSL-3 laboratory.

Fact # 3: In addition to the eight (8) UC campuses that operate one or more BSL-3 laboratories, two private universities in California also operate BSL-3 laboratories, both in major residential areas of California: Stanford University (Palo Alto) and the University of Southern California (Health Sciences campus-East Los Angeles).

Fact # 4: The University of California (UC), as a single organization, reportedly has the largest portfolio of BSL-3 research laboratories of any organization in the U.S.

Fact # 5: The University of California currently operates more than thirty (30) BSL-3 laboratories at eight (8) of its 10 campuses and at its five medical centers (Davis-Sacramento, Irvine, Los Angeles, San Diego, San Francisco), as well as at the Lawrence Berkeley National Laboratory (adjacent to UC Berkeley), which UC manages for the U.S. government.

Fact # 6: The University of California Training Standards for Biosafety Level-3 (BSL-3) Laboratories document was published in March 2021 and available to the public.[2]

Fact # 7: Specific design standards for the construction of University of California BSL-3 laboratories and environmental health protection and oversight policies were issued by the University of California Office of the President in March 2026. These standards and the related policies apply to all UC campuses, including UCLA, and are also available to the public.[3]

H-3

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[1] *USA Today* —May 28, 2015 -- https://www.postcrescent.com/story/news/investigations/2015/05/28/state-incidents-highlight-bioterror-lab-concerns/28089943/

[2] Biosafety Level 3 (BSL-3) Laboratory Training Requirements Standard

[3] https://www.ucop.edu/safety-and-loss-prevention/_files/hcloc/uc-bsl3-design-standards-final.pdf

Fact # 8: Oversight of all BSL-3 laboratories operated by any campus of the University of California is the responsibility of the 17-member High Containment Laboratory Oversight Committee (HCLOC), established on March 4, 2015 by directive from then-UC President Janet Napolitano.

- The HCLOC reports directly to the Office of the UC President[4] and, through that office, to the Board of Regents of the University of California. This committee must approve any request from any campus for a deviation to the published design standards for BSL-3 laboratories.

- The 2015 Napolitano directive also required each campus to appoint a fulltime employee to serve as head of the campus High Containment Laboratory program.

- On March 11, 2026 current UC President James Milliken updated the UC Policy on High Containment Laboratories, in tandem with the issuance of the Design Standards for High Containment Laboratories. The Milliken letter and the 2026 UC policy statement is available to the public.[5] [6]

Fact # 9: As of January 2023, the University of California, Los Angeles (UCLA) operated two (2) BSL-3 laboratories on the main Westwood campus.[7]

Fact # 10: Oversight of the BSL-3 laboratories on the UCLA Westwood campus is the responsibility of the UCLA Vice Chancellor-Research and Creative Activities. As required by the 2015 Napolitano directive and the 2026 Milliken restated policy, UCLA (as well as each UC campus with a BLS-3 laboratory) also has a local 13-member High Containment Laboratory Oversight Group (HCLOG) that serves in an advisory capacity to the Vice Chancellor-Research and Creative Activities.[8]

- In addition, advance approval for specific research programs proposed by UCLA personnel in the UCLA BSL-3 laboratories is the responsibility of the larger Institutional Biosafety Committee (IBC).[9]

H-3 (CONT.)

[4] https://www.ucop.edu/safety-and-loss-prevention/_files/groups/uchcloc_charter.pdf

[5] https://rpc.research.ucla.edu/wp-content/uploads/uc-president-milliken-issuance-letter-high-containment-research-2026-03-11.pdf

[6] https://rpc.research.ucla.edu/wp-content/uploads/high-containment-research-policy-2026-03-11.pdf

[7] Letter of January 19, 2023 from Roger Wakimoto, UCLA Vice Chancellor-Research and Creative Activities

[8] https://rpc.research.ucla.edu/hclog/

[9] UCLA IBC Website: https://rsawa.research.ucla.edu/ibc/

- Federal guidelines state that, when an organization receives federal funding for its bioscience operations, "when possible and consistent with protection of privacy and proprietary interests, the institution is encouraged to open its Institutional Biosafety Committee meetings to the public."[10]

- The agendas and minutes of the UCLA IBC are available to the public on its website.[11] [12] [13]

Fact # 11: As of Spring 2026, (a) Professor Roger Wakimoto[14] serves as the UCLA Vice Chancellor-Research and Creative Activities; (b) Ms. Barbara Dillon[15] serves as the director of the High Containment Laboratories Program in the UCLA Office of Environmental Health and Safety; and (c) Professor Jerome Zack,[16] Professor of Medicine in the David Geffen School of Medicine and holder of the M. Philip Davis Endowed Chair in Microbiology and Immunology, serves as chair of the HCLOG.

Fact # 12: Flad Architects, Inc., which has developed the masterplan for the UCLA Research Park, was ranked no. 2 nationally for science and technology (S+T) laboratory facility architecture and architecture/engineering (AE) firms, as reported in *Building Design+Construction's* 2025 Giants 400 Report.[17]

Fact # 13: The BSL-3 Laboratory National Training Center, operated by the School of Medicine at the University of California, Irvine,[18] is considered by many to be the best in the U.S.

H-3 (CONT.)

[10] National Institutes of Health (NIH) Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules, page 28, Section IV-B-2-a-(6): https://osp.od.nih.gov/wp-content/uploads/NIH_Guidelines.pdf

[12] UCLA IBC Meetings: https://rsawa.research.ucla.edu/ibc/meeting-submission-deadlines/

[13] UCLA IBC Minutes: https://ucla.app.box.com/s/n28dgqy44l9dujke30vpz2gnd952taaw

[14] https://www3.research.ucla.edu/about-vcr

[15] https://ehs.ucla.edu/people/barbara-dillon

[16] https://bioscience.ucla.edu/people/jerome-zack/ and https://profiles.ucla.edu/jerome.zack

[17] https://www.flad.com/work.php?sector=Academic and https://en.wikipedia.org/wiki/Flad_Architects

[18] https://medschool.uci.edu/research/core-facilities/bsl-3-training-program

Fact #14: A select list of other prominent organizations that operate a BSL-3 laboratory in urban/residential locations of California include:

a) the California Department of Public Health (Richmond);
b) the Scripps Research Institute (La Jolla);[19]
c) the Lawrence Livermore National Laboratory (Livermore);[20] and
d) Gilead Sciences, a private company (Foster City).[21]

Note: many organizations choose not to disclose the existence of a BSL-3 laboratory for reasons of security and safety. No single list of all BSL-3 laboratories in the State of California is available. While it is believed that the Salk Institute (La Jolla) and the J. Craig Venter Institute (La Jolla) also operate BSL-3 laboratories in their facilities that are located adjacent to the La Jolla residential neighborhoods, the websites of those two organizations do not specifically provide that information.

Fact # 15: In Pasadena, the California Institute of Technology website[22] indicates specifically that it does not operate a BSL-3 laboratory. It is believed that, pursuant to affiliation agreements, Cal Tech researchers collaborate with other institutions (e.g., UCLA) for the use of BSL-3 laboratories to support specific research initiatives at Cal Tech that require access to equipment at the level of BSL-3 laboratories.

Fact #16: In West Hollywood, the Cedars-Sinai Medical Center website does not indicate whether or not it operates a BSL-3 laboratory as one of its 100 research laboratories.

Fact # 17: No BSL-4 Laboratory is currently operated in the State of California.[23]

H-3 (CONT.)

[19] https://www.scripps.edu/news-and-events/press-room/2022/20221024-g20-grant.html

[20] https://www.llnl.gov/science-technology/facilities-centers

[21] https://www.gilead.com/stories/meet-gilead-covid-19-virus-variants-hunters

[22] https://cellsort.caltech.edu/policies

[23] According to Wikipedia, a total of 12 BSL-4 laboratories exist in the U.S. – Atlanta, GA; Betheseda, MD; Boston, MA (Boston University); Fort Detrick, MD (3); Galveston, TX (2); Hamilton, MT; Manhattan, KS; Richmond, VA; San Antonio, TX. See: https://en.wikipedia.org/wiki/Biosafety_level

Biosafety Laboratories (BSL)

Biosafety Laboratories are classified in four ascending risk levels (1, 2, 3 and 4) by the U.S. Department of Health and Human Services

U.S. Department of Health and Human Services
Centers for Disease Control and Prevention (CDC)

"CDC partners with the U.S. National Institutes of Health to publish biosafety guidelines for protecting workers and preventing exposures in biological laboratories. In addition to the partnership with NIH and world-renowned organizations, CDC produces online training and offers other downloadable resources that may be useful to laboratorians nationally, or around the world."

Publication:
Biosafety in Microbiological and Biomedical Laboratories.
6th Edition-June 2020 (614 pages) -- First edition published in 1984.

https://www.cdc.gov/labs/media/pdfs/2025/08/SF__19a_308133-A_BMBL6_00-BOOK-WEB-final-3.pdf

Page 4:

Biosafety Level 1 (BSL-1) *is the basic level of protection and is appropriate for defined and characterized strains of viable biological agents that are not known to cause disease in immunocompetent adult humans.*

Biosafety Level 2 (BSL-2) *is appropriate for handling moderate-risk agents that cause human disease of varying severity by ingestion or through percutaneous or mucous membrane exposure.*

Biosafety Level 3 (BSL-3) *is appropriate for agents with a known potential for aerosol transmission, for agents that may cause serious and potentially lethal infections, and that are indigenous or exotic in origin.*

Exotic agents that pose a high individual risk of life-threatening disease by infectious aerosols and for which no treatment is available are restricted to high containment laboratories that meet ***Biosafety Level 4 (BSL-4)*** *guidelines.*

H-4

U.S. Department of Health and Human Services
Administration for Strategic Preparedness & Response (ASPR)
Washington, D.C.

Biosafety Level Requirements

https://aspr.hhs.gov/S3/Pages/Biosafety-Level-Requirements.aspx

"Laboratory biosafety describes the application of specific practices, safety equipment and specially designed laboratories to create a safe environment, both within and outside the laboratory, for work conducted with infectious agents and toxins. In addition, there is monitoring for occupationally acquired infections and staff training, as appropriate.

"Biosafety Levels" (BSLs) are designations applied to projects or activities conducted in laboratories in ascending order of containment based on the degree of the health-related risk associated with the work being conducted. In the United States, the designations BSL-1, BSL-2, BSL-3, and BSL-4 describe the minimum safe work practices, specially designed buildings, and safety equipment required to conduct work on infectious microorganisms and other biological hazards. BSL-4 is the highest biosafety level.

"The appropriate BSL for a project is determined jointly by the principal investigator, the institutional biosafety professionals and biosafety committees. The BSL assigned to a project is based on a biological risk assessment that takes into account the nature of the infectious agent, toxin, or other biological hazard, including:

- Its ability to cause disease and the way(s) in which it causes disease (transmissibility and pathogenicity);
    - How much of it is required to cause disease (infectious dose);
    - How many different organisms are susceptible to infection (host range); and
    - Its prevalence in the community (epidemiology);

- The specific laboratory activity or activities being performed; and

- The availability of preventive medical countermeasures (i.e., vaccines) or effective treatment (i.e., post-exposure vaccination and/or use of antimicrobials, antivirals and chemotherapeutic agents).

"The BSL assigned to a project determines the controls required to conduct the work safely:

H-4
(CONT.)

- Engineering controls, including facility construction and design elements in the laboratory space;
- Safety equipment, including Personal Protective Equipment (PPE) and biosafety cabinets;
- Administrative controls, including specific access, training, and occupational medicine policies; and
- Laboratory practices and procedures workers use when working in the laboratory.

"Every biological laboratory, regardless of biosafety level, follows standard microbiological practices. Each biosafety level builds on the controls of the next lower level. Each biosafety level has its own specific containment controls. The assignment of a biosafety level to a particular work process is made through a protocol driven risk assessment."

Biosafety Levels

https://aspr.hhs.gov/S3/Pages/Biosafety-Levels.aspx

"Biosafety levels (BSL) are used to identify the protective measures needed in a laboratory setting to protect workers, the environment, and the public. The levels are defined in Biosafety in Biomedical Laboratories (BMBL). Biosafety level designations in the BMBL outline specific practices and safety and facility requirements. There are many ways to combine equipment, practices, and laboratory design features to achieve appropriate biosafety and biocontainment. These are determined through biological risk assessments specifically conducted for each experimental protocol.

"At any given biosafety level, there will be strict requirements for laboratory design, personal protective equipment, and biosafety equipment to be used. Standard Microbiological Practices are required at all biosafety levels and are good practice for experiments below the BSL-1 threshold.

"Activities and projects conducted in biological laboratories are categorized by biosafety level. The four biosafety levels are BSL-1, BSL-2, BSL-3, and BSL-4, with BSL-4 being the highest (maximum) level of containment. There are additional specific rules and designations for animal research (ABSL), agricultural research (BSL-Ag), and other types of research. These other types of labs require their own specific set of rules and regulations, because they are dealing with larger organisms, such as plants, animals, and insects."

H-4 (CONT.)

Biosafety Level 3

"BSL-3 laboratories are used to study infectious agents or toxins that may be transmitted through the air and cause potentially lethal infections. Researchers perform all experiments in a biosafety cabinet. BSL-3 laboratories are designed to be easily decontaminated. As an additional safety measure, these laboratories must use controlled, or "directional," air flow to ensure that air flows from non-laboratory areas (such as the hallway) into laboratory areas.

"Other engineered safety features include a requirement for entry through two self-closing, interlocked doors, sealed windows, floors and walls, and filtered ventilation systems. BSL-3 labs must also be equipped to decontaminate laboratory waste using an incinerator, an autoclave, and/or another method of decontamination, depending on the biological risk assessment.

"In addition to BSL-2 considerations, BSL-3 laboratories have the following containment requirements:

Laboratory Practices

- An Occupational Health Program exists for medical surveillance of laboratory workers. Laboratory workers are under medical surveillance and may be offered immunizations for infectious agents or toxins they work with, if available.
- Access to the laboratory is restricted and controlled at all times.

Safety Equipment

- Appropriate PPE must be worn, and respirators might be required.
- All work with infectious agents or toxins must be performed within an appropriate biosafety cabinet.

Facility Construction

- A hands-free sink and eyewash are available near the exit.
- Exhaust air cannot be recirculated, and the laboratory must have sustained directional airflow by drawing air into the laboratory from clean areas towards potentially contaminated areas.
- Entrance to the lab is through two self-closing and interlocked doors.

H-4 (CONT.)

Biosafety Cabinets:

https://aspr.hhs.gov/S3/Pages/Biosafety-Cabinets.aspx

"Biosafety cabinets (BSCs) are one type of biocontainment equipment used in biological laboratories to provide personnel, environmental, and product protection. Most BSCs (e.g., Class II and Class III) use high efficiency particulate air (HEPA) filters in both the exhaust and supply system to prevent exposure to biohazards.

"There are several designs of biosafety cabinets which provide different levels of protection to the worker and to the research material. There are three classes of biosafety cabinets designated in the United States: Class I, Class II, and Class III. Class I biosafety cabinets are infrequently used and provide personnel and environmental protection but no product protection. Class II and Class III cabinets provide personnel, environmental, and product protection. Class II biosafety cabinets are widely used in biological research laboratories and are differentiated into types such as A1, A2, B1, or B2. The classification for the majority of biosafety cabinets used in the United States is Class II Type A2. The naming system given here is the one used in the United States and in CDC/NIH guidance Biosafety in Microbiological and Biomedical Laboratories (BMBL) Appendix A. Other naming conventions have been used in the past or in other countries.

"Laminar flow hoods (e.g., "clean benches") are not biosafety cabinets. Laminar flow hoods provide a clean or sterile area to protect the work product, but discharge air towards the worker. In work with infectious agents, toxins, or cultures, use of laminar flow hoods may expose the worker to the biological material. Likewise, chemical fume hoods cannot be used in place of biosafety cabinets. Chemical fume hoods are used to protect personnel from chemical exposure and are not appropriate for work involving infectious agents or toxins. Biosafety cabinets must be inspected by trained personnel on a regular basis and be "certified" as safe for work involving infectious agents or toxins."

Biosafety Cabinets vs. Fume Hoods

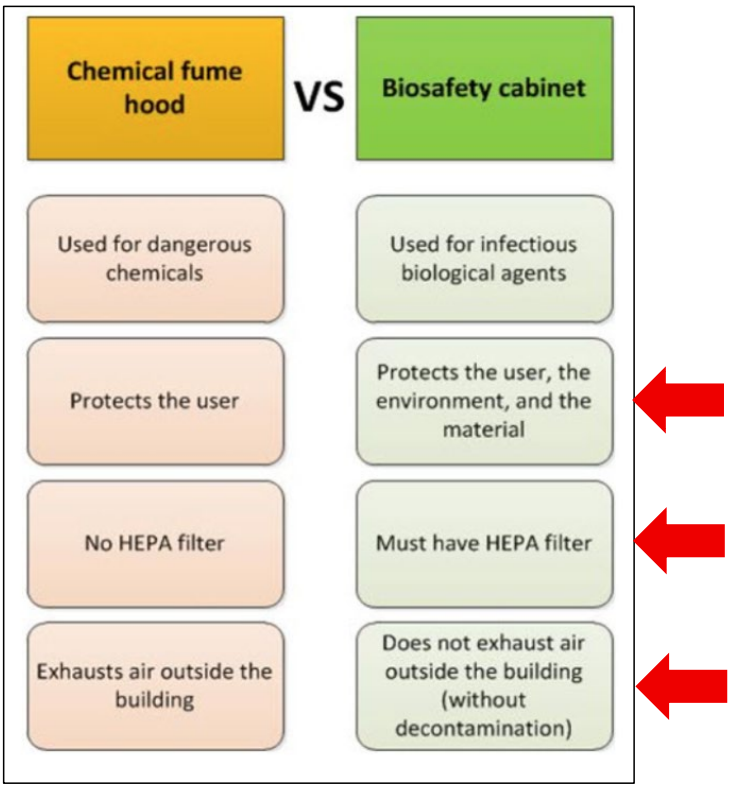
"Both chemical fume hoods and biosafety cabinets are specialized types of laboratory equipment. While chemical fume hoods and biosafety cabinets look similar and both protect laboratory workers from laboratory hazards - their purpose, function, and operation differ significantly.

"A chemical fume hood is designed to remove chemical fumes and aerosols from the work area while a biosafety cabinet is designed to provide both a clean work environment and protection for employees who create aerosols when working with infectious agents or toxins.

H-4 (CONT.)

"A chemical fume hood protects the user while a biosafety cabinet protects the user, the environment, and the material. Biosafety cabinets have high-efficiency particulate air (HEPA) filters while chemical fume hoods do not. The HEPA filter in the exhaust system of a biosafety cabinet will effectively trap all known infectious agents and ensure that only microbe-free exhaust air is discharged from the cabinet (i.e., 99.97% of particles 0.3 µm in diameter and 99.99% of particles of greater or smaller size).

"The chart below characterizes the differences between a chemical fume hood and a biosafety cabinet.



H-4 (CONT.)

Research Universities in the State of California with BSL-3 Laboratories:

(10 of the 13 research universities in California operate one or more BSL-3 laboratories)

Organization	City/Location
Univ. of California, Berkeley	Berkeley
Univ. of California, Davis	Davis & Sacramento
Univ. of California, Irvine	Irvine
Univ. of California, Los Angeles	Los Angeles-Westwood
Univ. of California, Merced	Merced
Univ. of California, Riverside	Riverside
Univ. of California, San Diego	San Diego-La Jolla
Univ. of California, San Francisco	San Francisco-Mission Bay & Zuckerberg San Francisco General Hospital
Stanford University	Palo Alto
Univ. of Southern California	Los Angeles-East LA

Note: Of the 10 campuses of the University of California (UC), only UC Santa Barbara and UC Santa Cruz do not currently operate a BSL-3 Laboratory.

Selected Other Organizations with BSL-3 Laboratories in the State of California

Organization	City/Location
California Department of Public Health	Richmond
Scripps Research Institute	San Diego-La Jolla
Lawrence Livermore National Laboratory	Livermore
Gilead Sciences	Foster City

H-4
(CONT.)

University of California (UC) System
Office of the President
(comprised of 10 campuses and 5 academic medical centers)

Letter from UC President Janet Napolitano, dated March 4, 2015:
https://rpc.research.ucla.edu/wp-content/uploads/uc-president-napolitano-letter-2015-03-04.pdf

Letter from UC President Janet Napolitano, dated September 16, 2019:
https://www.ucop.edu/safety-and-loss-prevention/_files/hcloc/presidents-hcloc-letter.pdf

Webinar—conducted October 2020 (20 slides):
Subject: Design Standards for BSL-3 Laboratories
https://www.ucop.edu/design-construction-services/_files/cpi/bsl3labdesign1012020.pdf

Letter from UC President James Milliken – March 11, 2026
https://rpc.research.ucla.edu/wp-content/uploads/uc-president-milliken-issuance-letter-high-containment-research-2026-03-11.pdf

Policy – issued by UC President James Milliken -- March 11, 2026 (10 pages)
Title: High Containment Research (BSL-3 Laboratories)
https://policy.ucop.edu/doc/3501379/HCR

University of California High Level Containment Oversight Committee (HLCOC)
Current Membership
https://www.ucop.edu/safety-and-loss-prevention/_files/groups/membership-roster-hcloc-040419.pdf

University of California Design Standards Publication (75 pages)
Title: Biosafety Level 3 (BSL-3) Laboratory Design Standards
https://www.ucop.edu/safety-and-loss-prevention/_files/hcloc/uc-bsl3-design-standards-final.pdf

H-5

Publication Prologue
https://www.ucop.edu/safety-and-loss-prevention/environmental/groups/hcloc/bsl-3-laboratory-design-standards.html

"Several years ago, President Napolitano formed the UC High-Containment Laboratory Oversight Committee (HCLOC) comprised of faculty and biosafety professionals with expertise in the safe use of infectious agents in biological and biomedical research. Infectious disease research involving highly pathogenic and primarily aerosol transmissible agents (i.e., Risk Group 3 agents) has the potential to present significant risk to individuals, the community, and the environment. The ability to safely conduct these research activities is largely dependent upon the highly engineered Biosafety Level 3 (BSL-3) laboratory, the highest-level containment facilities currently operated by the UC. The primary objective of these laboratories is to provide the best possible physical containment of Risk Group 3 agents. Hence, the design and engineering of these laboratories must be maintained at the highest attainable standards.

"Although several authorities have published standards for the design of BSL-3 laboratories, no single agency has sole oversight or responsibility for this important research safety consideration; therefore, the development of the UC Biosafety Level 3 Laboratory Design Standards has incorporated input from several of these sources, including the following:

- CDC/NIH Biosafety in Microbiological and Biomedical Laboratories (BMBL), 6th edition, 2020
- NIH Design Requirements Manual for Biomedical Laboratories and Animal Research Facilities (DRM), 2024
- NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules (NIH Guidelines), 2024

"The information presented in the BSL-3 Laboratory Design Standards addresses facility design and engineering systems for BSL-3 containment laboratories and incorporates additional design elements to assist campuses in conducting facility risk assessments. The HCLOC has assembled and approved these design standards to serve as the foundation of BSL-3 laboratory design and construction and to support the application of consistent standards within UC. The UC BSL-3 Laboratory Design Standards provide the mandatory minimum design criteria for Biosafety Level 3 laboratories in the UC system."

H-5 (CONT.)

Design Deviation Requests
Process Flow Chart:
https://www.ucop.edu/safety-and-loss-prevention/_files/hcloc/uc-bsl3-design-standards-deviation-request-flowchart.pdf

H-5
(CONT.)

UCLA Information

UCLA Vice Chancellor-Research and Creative Activities
https://www3.research.ucla.edu/about-vcr

High Containment Program – UCLA Office of Environmental Health & Safety
https://ehs.ucla.edu/high-containment

Director, High Containment Program
https://ehs.ucla.edu/people/barbara-dillon

High Containment Laboratory Oversight Group (HCLOG)
https://rpc.research.ucla.edu/hclog/

HCLOG Chair
https://bioscience.ucla.edu/people/jerome-zack/
https://profiles.ucla.edu/jerome.zack

No Current Animal BSL-3 Laboratory at UCLA
https://ucla.app.box.com/s/2lue81t3no8qwxk5masmj1inhyzx6k31

UCLA Research Park – Executive Architects
https://en.wikipedia.org/wiki/Flad_Architects

"Flad Architects is a national architectural firm with offices in Atlanta, Boston, Gainesville (FL), New York City, Raleigh (NC), San Diego, San Francisco, Seattle, and Tampa…..The firm is involved in multiple markets and building types including: corporate, healthcare, higher education, science and technology, and the federal government, including many Department of Energy National Laboratories.

"Flad is ranked No. 2 in the nation for science and technology (S+T) laboratory facility architecture and architecture/engineering (AE) firms, as reported in *Building Design+Construction's* 2025 Giants 400 Report."

H-6

Other UC Campuses

UC Irvine:

UC Irvine National BSL-3 Laboratory Training Program
https://medschool.uci.edu/research/core-facilities/bsl-3-training-program

UC Irvine High Containment Program
https://www.ehs.uci.edu/research-safety/high-containment/index.php

UC San Diego:

Biosafety Laboratory Practices Chart
https://blink.ucsd.edu/safety/research-lab/biosafety/containment/chart.html

Medical Surveillance for BSL-3 Laboratory Personnel
https://blink.ucsd.edu/safety/research-lab/occ-health/surveillance.html#exposure-control-plans

H-7

Related Articles

University of California News – August 31, 2023

The lab teaching the world how to safely study pathogens

By Tom Vasich, UC Irvine



Class members in the UC Irvine National BSL-3 Training Program learn proper procedures in the center's own fully-functional BLS-3 lab. *Credit: Steve Zylius/UC Irvine*

In response to the COVID-19 pandemic, research on coronaviruses and other harmful pathogens has increased in laboratories across the world — and not just any labs. Work of this sort often requires specialized, high-containment facilities known as biosafety level 3 laboratories.

These BSL-3 labs are very sophisticated and are operated under negative pressure to provide safe environments in which to study airborne viruses and bacteria. They house some of the most important biomedical research taking place today.

Most elite research universities have BSL-3 labs **(The campuses of the University of California system have over 30)**, as do pharmaceutical companies and federal agencies like the National Institutes of Health and the Centers for Disease Control and Prevention. **There are an estimated 1,500-plus of these labs in the U.S., and to use or maintain one requires highly technical instruction.**

Many who work in and manage these labs turn to the UC Irvine National Biosafety Level 3 Training Program. Gary Landucci started it in 2006, first offering a five-day course teaching scientists how to safely conduct research with high-risk infectious disease pathogens in them.

With support from corporate sponsors, the NIH and the UCI School of Medicine, the program moved in 2015 into a state-of-the-art training facility on campus, where Landucci and his team run hands-on, weeklong instructional programs year-round for researchers, operations and maintenance personnel, biosafety professionals, inspectors and first responders from all over the world. In 2016, the facility was designated as an NIH National Training Center.

Since its inception, the program has educated more than 3,000 individuals, and Landucci says that with demand increasing over the past few years, it currently serves around 300 people annually. Classes are regularly provided at UC Irvine as well as on-site at other UC campuses and additional locations.

"Based on feedback from our clients, it's recognized as the top BSL-3 program in the country," Landucci says.

H-8 (CONT.)

What makes it the best? He points to the training staff of three, who, combined, have more than 45 years of BSL-3 experience. Plus, the program has a fully functional BSL-3 lab and HVAC system within a classroom setting.

"All the equipment is under one roof, and no hazardous materials or pathogens are present," Landucci says. "It allows us to provide hands-on training in a safe environment."

When the CDC first turned to an outside organization to teach its BSL-3 laboratory personnel, it called upon Landucci and his team. Over the last year, the UCI instructors have traveled to the CDC's Atlanta campus (September 2022 and May 2023) and Fort Collins, Colorado, campus (August 2023).

Under former UC President Janet Napolitano, the UCI National BSL-3 Training Program in 2015 was named one of six UC Centers of Excellence, which serve in a systemwide capacity by sharing their expertise and leadership in risk management, healthcare, wellness, and environmental health and safety.

Landucci says that UC provides about half of his center's operating expenses, which enables it to provide training to all UC campus personnel associated with BSL-3 laboratories at no additional cost to them.

His team also works with UC researchers and administrators to establish best practices and often visits the seven other UC campuses that operate BSL-3 labs to help ensure that their high-containment facilities and practices meet or exceed federal standards.

"UCI's National BSL-3 Training Program not only underscores the university's dedication to safe and robust research but also serves as a benchmark for institutions engaging in high-containment laboratory research," says Kevin Confetti, UC associate vice president for risk services, who oversees the Centers of Excellence program. "The University of California boasts the highest number of high-containment laboratories in the country. Establishing a stringent design and performance standard has become the cornerstone of our biosafety blueprint. Central to UC's biosecurity protocols is the emphasis on hands-on, immersive simulation training for BSL-3 researchers and other facility personnel. The BSL-3 Training Program is paramount in providing this not only to UC faculty, staff and students but to others across the country."

Adds Landucci: "UC is a national leader for infectious diseases research and is developing and setting standards with our BSL-3 laboratories. We are establishing the best practices for building and operating these labs along with training standards that are a role model for others to follow."

https://www.universityofcalifornia.edu/news/lab-teaching-world-how-safely-study-pathogens

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Cal Matters.org – September 13, 2023

Guest Commentary

How California can improve safety and transparency of privately run bio labs

By Allison Berke
(Dr. Allison Berke is the chemical and biological weapons non-proliferation program director at the Middlebury Institute of International Studies in Monterey.)

The discovery of an illegally operating bio lab in the Central Valley was disturbing to many, and especially frightening to the Reedley community living and working around the lab. Investigation of the samples and mice found in the facility revealed improperly stored pathogenic material, including coronavirus, malaria, dengue and HIV.

H-8
(CONT.)

Although the Centers for Disease Control and Prevention and officials who investigated the Prestige Biotech lab do not suspect it was creating weaponized materials, if it was working with "live" or infectious pathogens like coronaviruses, it should have been operating at biosafety level 3, or BSL-3, the second-highest tier of protection.

Biosafety levels are defined by the CDC according to what pathogens are stored and used in a lab's work and what procedures are being done with those pathogens. They also describe what protective measures are needed to keep laboratory workers, the environment and local residents safe.

The levels are not legal mandates, however, only recommendations – labs can legally work with some level 3 agents without following level 3 guidelines. Since labs are not required to report their work to a federal or state regulator, we don't know how many such labs there might be.

Many people who live near legally operating labs view their situation as similar to that of Reedley prior to the discovery of the Prestige Biotech lab: they don't know, and have no way of finding out, what pathogens are being used in labs in their town or county.

In June, the San Carlos City Council banned level 3 and level 4 labs within their city. **While no BSL-4 labs are operating in California, several other cities, including San Francisco, Foster City, Livermore, Pleasanton and Stanford, have level 3 labs**. A U.S. Government Accountability Office report in 2017 found that 16% of level 3 labs were private or commercial labs, which operate under less federal and state oversight than government-run or academic labs.

H-8 (CONT.)

The San Carlos ordinance passed with a 3-2 vote, demonstrating the tension between the desire to support the thriving and lucrative local biotech industry and the public frustration over the lack of information on what types of risks these labs might pose.

Alongside the proposal of a ban, council members also evaluated a permitting process for BSL-3 labs. But since they were unable to review and approve of what research might be done, and were unsure of their ability to properly evaluate technical, novel research, the city took the safer and easier option to just ban the work entirely.

Just as facilities that store potentially dangerous chemicals display a clearly visible placard with information about the hazards, labs that work with potentially dangerous pathogens should report information on their work to public officials. The easiest way to track this information may be a federal agency that can create a cohesive picture of potentially dangerous research, with information made available to local, county and state officials. Communities can then decide what protections and response plans they should implement to address potential leaks and to protect the labs and surrounding communities in the event of a natural disaster or accident.

No community wants to be the site of the next outbreak, or to be caught unaware by potentially dangerous research happening in their midst, like the town of Reedley. At the same time, biotech companies have an interest in being allowed to do a variety of types of research, in the towns and cities most economically amenable to their operations – not just the ones that haven't gotten around to banning them.

Requiring labs to report their work with potentially dangerous pathogens to a central federal repository would improve trust between labs and their communities, increase transparency around the process for protecting against potential risks, and provide a paper trail to help future investigators and first responders.

(From the National Library of Medicine)
The Scientific World Journal, September 18, 2025

The Role of BSL-3 Laboratories in Pandemic Preparedness: A Focus on Brazil's Infrastructure for Biosafety and Disease Control

Authors
Roni Vinhas, Fabricia Oliveira, Larissa Fonseca, Katharine Hodel, Claudio Mafra, Cintia Minafra, Marilda Goncalves, Bruna Machado

Abstract
BSL-3 laboratories are fundamental for the safe handling of infectious microorganisms that require high-containment measures. Through a literature review, this work was aimed at highlighting the importance of these laboratories in supporting research and public health responses, especially during health emergencies. The review presents an overview of the global distribution of BSL-3 facilities, the impacts of the COVID-19 pandemic on laboratory investments, and future perspectives on their role in national development. It was observed that the pandemic exposed limitations in laboratory capacity, leading many countries to operate in suboptimal environments, underscoring the need for strict biosafety standards and preparedness infrastructure. This review also identifies disparities in global BSL-3 capacity—particularly in low- and middle-income countries—and examines the Brazilian context, where the absence of a unified regulatory framework hinders progress. By synthesizing international trends and Brazil's recent initiatives, including the development of its first BSL-4 laboratory, this work contributes to understanding the challenges and opportunities for strengthening biosafety infrastructure in support of equitable pandemic preparedness.

H-8
(CONT.)

Observations, Suggestions and Questions re UCLA Research Park

The scope of the Environmental Impact Report requirement from the much-discussed California Environmental Quality Act has evolved significantly since its initial 10-page format used in the early and mid-1970s, when I began my involvement with various major UCLA construction projects until my retirement from the University of California in January 2010 Initially a simple summary statement, the purpose of the EIR has expanded to both provide detailed scientific and quantitative impacts, detailed notifications and, in certain instances, education about the activities to be conducted in a specific project. The cottage industry of EIR consultants and analysts that has grown over the years apparently continues to be blessed with full employment.

The Draft Initial Study/Mitigated Negative Declaration for the UCLA Research Park is comprehensive (190 pages), thorough and, in most parts, well-stated. For the most part, its authors (T&B Planning, Inc.-Irvine) have covered topics quite well. Ashley Rogers, Director of Environmental Planning, moderated the public hearing on May 20 very efficiently. The presentations by Professor Hal Monbouquette, Special Advisor to Vice Chancellor Roger Wakimoto, and Mr. Phiroze Titina, Principal Project Manager of UCLA Capital Programs, were well-organized and well-received. (Permit me also to add that I was well-acquainted with Professor Wakimoto when he served as Chair of the Department of Atmospheric Sciences in the late 1990s and I served as Assistant Provost in the UCLA College.)

H-9

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However, I need to raise my hand and, respectfully, state that providing only a one-sentence description – in a single footnote (#50) on page 114 of the Draft EIR -- for the discussion of BSL-3 laboratories EIR is woefully insufficient. Quite simply, the document does not meet minimum expectations for educating the reader about BSL-3 laboratories that are already in operation at eight of the ten campuses of the University of California (and elsewhere). At a minimum, such detailed information should have been included in detail in the section entitled “Wet and Dry Laboratories” on page 21.

H-10

I submit that is important for the Final EIR to proactively address the apprehension, misinformation and misunderstandings that are now associated with various bioscience initiatives as such initiatives have unfortunately become politicized and subject to the public polarization associated with that dynamic. To that end, I would describe the Draft EIR as highly deficient. Detailed explanations need to be provided about (1) the existing standards for construction, as published by the University of California Office of the President; (2) operating protocols; (3) existing standards, policies and procedures regarding oversight and safety, both for the laboratory personnel and the larger communities near such laboratories.

Having contributed to various EIR documents over the years and having commented on an even larger number during review processes both at UCLA and at the Office of the President of the University of California, I strongly urge that UCLA consider the inclusion in the Final EIR of much of the information provided in this document, so that this information can, in the future, be found to be part of the permanent public record disclosed during the review process. Were I still on "the other side of the table" and participating in the preparation and internal campus review of the Draft EIR, I would have strongly urged for either (i) an expansion of the narrative starting on page 21 titled "Wet and Dry Laboratories"; or (ii) a new Section VI or comprehensive appendix to the document to provide a full description about BSL-3 laboratories. (Further, I believe it to be unfortunate that the only mention of BSL-3 laboratories is on page 114 in the section titled "Operational Hazards.)

H-10 (CONT.)

Before I retired from the University of California in January 2010, my last position was Chief of Staff to the University of California President in 2008 and 2009. Prior to that appointment, I spent years in various executive administration positions, during which time I was assigned as primary administrative coordinator of a lengthy list of major research and other capital projects. I also take great pride in my personal friendships with dozens, probably more than 100, of UCLA's most prominent academic deans and research faculty.

I submit these comments now, both as a UCLA retiree and as 20+ year homeowner in the residential community near the UCLA Research Park facility (an 8-minute walk from my home, one block south of Exposition Blvd. and two blocks west of Westwood Blvd.). Furthermore, my wife, Lianna Anderson, served for 20 years as Assistant Dean for the Division of Life Sciences in the UCLA College. Her and my support for the research mission of UCLA is unquestioned.

H-11

I have also served for the past decade as a member of the Board of Directors of one of the four Homeowners Associations (HOAs) immediately adjacent to the property (and drafted the letter sent in February 2024 to UCLA to provide specific information about the four HOAs). I believe that UCLA needs to recognize and respond to the due diligence obligation of the HOAs (which, I might add, are overwhelmingly enthusiastic, in general, about the future of the UCLA Research Park as a positive presence in our neighborhoods).

Notwithstanding that enthusiasm, my concern is that misinformation about BSL-3 Laboratories could become a more visible topic within the residential neighborhoods near the UCLA Research Park. My first suggestion is that a ZOOM meeting be convened and advertised broadly to be conducted by Professor Jerome Zack, chair of the UCLA High Containment Laboratory Oversight Group, and by Ms. Barbara Dillion, director of the UCLA High Containment Program, so that interested members of the neighborhood communities might receive a "primer" course about BSL-3 laboratories and their operations, as well as answer questions that members of the residential communities might have.

H-11 (CONT.)

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Further, the Draft EIR was silent as to obvious questions pertaining to the non-UCLA tenants/partners at the UCLA Research Park, i.e., the organizations that are not part of/owned by UCLA (and do not report to the Chancellor of UCLA) but which will be occupants of UCLA Research Park through lease/affiliation agreements. Again, initial questions which should be answered, in the public record, on a proactive basis are:

- Will the lease/affiliation agreement between such tenant/partner(s) and UCLA require that the supervision of the BSL-3 laboratories used by the tenants be subject to the oversight process and standards in the published University of California documents?

- Will the oversight duty of the UCLA Vice Chancellor-Research and Creatives Activities, the UCLA High Containment Program Director, and the UCLA High Containment Laboratory Oversight Group also extend to the BSL-3 laboratories used by the tenants, even though the employees of such tenants are not UCLA employees?

- Will the research initiatives proposed by such tenants be reviewed by the UCLA Institutional Biosafety Committee in advance, even if the research initiative of the tenant is not funded from federal sources? Will UCLA IBC approval be required in advance, regardless of fund source?

H-12

- Will the laboratory personnel of such tenants be required by the lease/affiliation agreement to be certified by the National Training Center at UC Irvine, or equivalent?

H-12 (CONT.)

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Further, page 115 also indicates that a 10,000 gsf vivarium, including an Animal BSL-3 laboratory, is to be included in the UCLA Research Park-East projects. I would strongly urge that additional information be provided about such vivarium.

I have had personal experience with animal rights protests at UCLA over the use of animals in research initiatives. I learned first-hand from my previous duties when I served, for a full year and as appointed by interim Chancellor Norman Abrams, as liaison between the UCLA Police Department and the affected UCLA faculty and their families when such protests expanded to personal residences, thereby impacting entire neighborhood communities and causing, at a minimum, annoyance, and, in some cases, apprehension and fear for personal safety and protection of personal property. Having the permanent public record provide more expansive information about vivaria and the development of ABSL laboratories is highly recommended.

H-13

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Finally, the following is a potpourri list of comments/questions.

1. **Nostalgia (Page 33).** For the sake of nostalgia, the narrative should also pay homage to two additional long-gone anchors of the neighborhood: (1) the Picwood Theater (similar to the Fox Village Theater in Westwood Village); and (2) Pete's on Pico Bar and Grill (a favored UCLA Athletics hangout, with 28oz. porterhouse steaks), which is the name that should be affixed to a food facility inside the UCLA Research Park. It is also suggested that, similar to what Westfield added to the former Fox Hills Mall, the lobby areas of the UCLA Research Park should include expansive displays of historical aerial and ground-level photographs of the Pico Blvd. neighborhoods that can be found in the archives of local realtors.

   Further, with a chuckle, I must ask that the document should also state UCLA's commitment that no negative impact shall ever be forthcoming to The Apple Pan (smile). Certain establishments are just plain sacred.

H-14

2. **GPI Structure (Pages 36+39 and page 165)**. The document references a shared use commitment of up to 400 parking spaces in the GPI-owned parking structure. Missing from this statement is a description of the details about this commitment. Is this commitment in writing? Is there an expiration date? What is the "Plan B" if this commitment no longer exists? H-15

3. **Population (Pages 47, 151, 159).** The data on page 47 and page 151 about population/employees appear to be inconsistent. Further, the raw totals should be better articulated by a statement about "peak," "daily" and average" projections. H-16

4. **Police (Page 155).** The statement on page 155 about the jurisdiction of UCLA Police Department and the Los Angeles Police Department for this UCLA-owned is unclear and confusing. As UCLA property, will UCLA Research Park be under the jurisdiction of the Chief of the UCLA Police Department, with UCLAPD units expected to respond to incidents or calls for assistance? Will UCLAPD establish and maintain an on-site substation at UCLA Research Park? In the event of a civil protest, does UCLA Police have primary responsibility for response and protection even if such activities affect local businesses and vehicular traffic on Pico Blvd. or Westwood Blvd.? Further, will the UCLA Research Park be subject to established UCLA policies, such as Policy #131 regarding weapons on University property. H-17

5. **Fire**. Notwithstanding the unclear statement on page 155 about the jurisdiction of the City of Los Angeles Police Department, has an agreement been established with the City of Los Angeles that the UCLA Fire Marshal, and not the City of Los Angeles Fire Marshal, will have jurisdiction at UCLA Research Park? Further, since LAFD Station #92, at 10556 W. Pico Blvd. (two blocks from UCLA Research Park) will be the first-responder station in the event of a call for assistance, will UCLA provide special instruction (or even funding for special equipment) to LAFD Station #92 about the specialized aspects of the wet laboratories at UCLA Research Park? H-18

6. **Applicability of Other UCLA Policies.** The Final EIR should clarify whether all other UCLA policies apply to the UCLA Research Park, e.g., UCLA Policy # 850—General Use of University Property, including the policies on distribution of literature, public assembly, use of amplified sound, and the installation/erection of temporary structures, particularly those who are not authorized personnel? H-19

7. **Parking (More).** Will the underground parking facilities be operated by UCLA Parking Services and accessible to faculty/staff with a UCLA parking permit? Or will it be operated as a separate parking system, similar to parking at UCLA-Santa Monica Hospital? Or, as an indication of UCLA's community relations with the business community, will use of the parking areas be available for use by customers at local businesses, e.g., local restaurants, as was the case with this underground parking during its operation by Macerich Co.

H-20

8. **City of Los Angeles Easement-West Pico Driveway for UCLA Research Park West/Block 4.** The connection portal for the referenced city alley to the Pico Blvd. driveway has been closed for a very long time, resulting in that city alley being a dead-end. Is it UCLA's intention to open that portal?

H-21

9. **Exterior Maintenance**. Will the exterior maintenance of UCLA Research Park (windows and exterior building glass facades, grounds/landscaping) be funded from a supplement provided by the UC Office of the President to the General Fund allocation to the UCLA Facilities Management department? Or will the exterior maintenance (e.g., window cleaning) and grounds/landscaping needs of UCLA Research Park be additive and effectively compete with existing needs on the Westwood campus?

H-22

10. **Availability of Public Transportation.** The statement on page 160 that the Sepulveda/Exposition station for the E-Line light rail train is 0.5 miles from the UCLA Research Park is not correct. The correct walking distance is 1.0 miles (personal experience and measurement).

H-23

11. **Communications to/with the Four Adjacent HOAs**. Can UCLA commit to an annual report about the scientific activities at UCLA Research Park West, including new non-UCLA tenants/partners, to be provided to the four adjacent homeowner associations and to the Westside Neighborhood Council for the affected business communities? Can the Presidents of the four HOAs be added to the advance agenda notification list of the UCLA Institutional Biosafety Committee (and to the distribution list for minutes)? Can UCLA commit to advance notification to the Presidents of the four HOAs in the event of special events or VIP visits at UCLA Research Park West? Can UCLA commit to advance consultation with the Presidents of the four HOAs about proposed exterior design and signage (as was done by Macerich Co. when the Landmark Theaters complex opened in Westside Too in 2009?

H-24

12. **Use of the Conference Center.** Can UCLA commit to the meeting facilities of the proposed Conference Center building (when completed circa 2035) be available on a cost-only basis (no rental fee) for periodic meetings or other needs of the four HOAs? H-25

13. **Ayres Avenue Perimeter.** Can the document provide further clarification as to whether the southern perimeter of UCLA Research Park, along Ayres Avenue (both east and west of Westwood) will have increased/heightened fencing or separation? H-26

Full Disclosures by John Sandbrook

Enrolled at UCLA in 1967

UCLA Degrees:

- B.A., Political Science
- M.B.A., Executive MBA Program

Employment-UCLA -- 1974 – 2008

- Office of the Chancellor-Special Assistant (3 years)
- Office of the Chancellor-Assistant to the Chancellor (7 years)
- Office of the Chancellor-Assistant Chancellor (10 years)
- Anderson School of Management-Associate Dean/Administration (3 years)
- College of Letters and Science-Assistant Provost (9 years)
- Office of the Administrative Vice Chancellor-Executive Officer (3 years)

Employment-Univ. of California Office of the President (UCOP)--2008 and 2009

- Chief of Staff to the President of the University of California

Retired from the University of California -- January 2010

General Manager of the Los Angeles Memorial Coliseum--2011-2013

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Both my wife and I receive a monthly pension from the University of California Retirement Plan (UCRP). UCRP is a separate trust owned by the Regents of the University of California and administered by UCOP. The assets of the pension trust are not linked to the financial operations of UCLA or any other of the 10 campuses of the University of California.

Following retirement, the University of California conferred on me the title of Assistant Chancellor Emeritus. I am now age 77.

I am not on post-retirement recall appointment to any department at UCLA and I do not receive any compensation from any department or organizational unit of UCLA. My only financial link to UCLA is my annual emeritus parking permit, which I purchase. I am a honorary lifetime member of the UCLA University Club (formerly, UCLA Faculty Club). My medical care is provided by UCLA Health, paid by Medicare and Anthem Blue Cross Insurance (the latter via the University-wide policy negotiated by and administered by UCOP).

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During my years of UCLA employment, my duties included frequent interaction with the UCLA Office of Capital Programs and its predecessor, UCLA Office of Campus Architects and Engineers (including the initial negative declaration EIR form used in 1974 that was only 10 pages long!!).

During my UCLA employment, the following is a list of my involvement with past UCLA capital projects:

Primary administrative coordinator

- Doris/Louis Factor Health Sciences Building
  (including the Jonsson Comprehensive Cancer Center)
- Jerry Lewis Neuromuscular Research Center
  (now the Eugene and Maxine Rosenfeld Center)
- Physics and Astronomy Research and Education Building
- Anderson Graduate School of Management Complex
- John Wooden Recreation Center
- Los Angeles Tennis Center
- Jackie Robinson Baseball Stadium, Phase I
- Westwood Central Plaza/Bruin Walk (pre-1984 OIympics)
- Haines Hall Seismic and Reconstruction Project
- Kinsey Hall Seismic and Reconstruction Project
- LaKretz Hall/Institute of the Environment and Sustainability

Limited administrative involvement

- Paul Terasaki Life Sciences Building
- Jules Stein Eye Institute, Phase II
- Doris Stein Eye Research Center
- Science and Technology Research Building
- Peter Ueberroth Office Building
- Portola Plaza Office Building

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In 2006-2007, I was the primary liaison for UCLA medical and life sciences faculty with the UCLA Police Department regarding protests at their home residences conducted by animal rights activists.

H-27
(CONT.)

COMMENT LETTER H

WESTSIDE NEIGHBORHOOD COUNCIL
P.O. Box 64370 Los Angeles CA 90064
www.wncla.org (310) 474-2326

February 5, 2024

Allison Baird-James
UCLA Interim Vice Chancellor and Chief Financial Officer
2107 Murphy Hall
Box 951405
Los Angeles, CA 90095-1405
Email: abaird-james@conet.ucla.edu

Rhea Turteltaub
UCLA Vice Chancellor-External Affairs
2224 Murphy Hall
Box 951405
Los Angeles, CA 90095-1405
Email: rheat@support.ucla.edu

Dear Allison and Rhea:

In my capacity as Chair of the Board of the Westside Neighborhood Council (WNC), I am writing to provide a formal welcome to our neighborhood community as a result of UCLA's acquisition of the former Westside Pavilion and Westside Too[1] properties from the previous owner, the joint venture of Hudson-Pacific Properties and the Macerich Co. A helpful ZOOM session earlier in January with Jennifer Poulakidas and Duane Muller of the UCLA Government and Community Relations division has preceded this letter, but I felt a more complete and formal communication might be useful for distribution within all branches of UCLA current and future leadership to have a complete understanding of who's who in our communities and homeowner associations.

The three purposes of this letter are:

1. To provide a brief overview of the WNC;

2. To provide information of the four separate homeowner associations directly adjacent to the Westwood Pavilion properties;

[1] The term "Westside Too" is not a mis-spelling. This moniker was affectionally conceived by the surrounding community after the complex west of Westwood Blvd. was constructed in the 1990s, following the completion in the mid-1980s of the initial Westside Pavilion complex east of Westwood Blvd.

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3. To outline our previous relationships with Hudson Pacific and Macerich in terms of community meeting space at the Westside Pavilion for both (a) the WNC; and (b) the individual HOAs.

****

1. **The Westside Neighborhood Council** (www.wncla.org)

The Westside Neighborhood Council was one of the 99 neighborhood councils established by the City of Los Angeles as a result of the City Charter Reform efforts in 1999. The WNC is comprised of 19 voting individual members representing 80,000 stakeholders in various areas of the residential communities and business communities within the WNC's geographical region, as defined by the Los Angeles City Council.[2] The WNC Board is comprised of individuals, not the eight HOAs within the WNC geographical boundaries. The WNC Board, which meets monthly, is the entity which the Los Angeles City Council and city departments contact for formal input regarding various matters, including physical development proposals. The membership of the WNC Board and the members' specific residential and business communities can be found on the WNC website.

2. Individual Homeowner Associations

While there are eight HOAs within the overall boundaries of the WNC, four of the eight are immediately adjacent to the Westside Pavilion complex -- two north of Pico Blvd. and two south of Pico Blvd.

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(CONT.)

North of Pico Blvd. (see attached map):

A. Westwood South of Santa Monica (WSSM). Barbara Broide is the President of this HOA. The boundaries of the WSSM extend from Pico Blvd. to Santa Monica Blvd.; from Sepulveda Blvd. to Beverly Glen Blvd, except for the carve-out for the OAC (see next).

B. Overland Avenue Community (OAC). Lisa Morocco is the President of this HOA. The location of the OAC is within the general boundaries of WSSM. The boundaries of the OAC extend from Pico Blvd. to Santa Monica Blvd.; from Westwood Blvd. to Manning Avenue.

South of Pico Blvd. (see attached map):

C. Westwood Gardens Civic Association (WGCA). Marilyn Tusher is the President of this HOA. The boundaries of the WGCA extend from Ayres Avenue (the street to the south of the Westside Pavilion) to the 10 Freeway and from Midvale Avenue (one block west of Westwood Blvd.) to Overland Avenue.

D. West of Westwood (WOWHOA). I also serve as President of the WOWHOA. The WOWHOA has three different sections: (i) West Section: the Pearl-Cotner-Richland Loop west of Sepulveda; (ii) Center Section: Pico Blvd. to National Blvd; from Sepulveda Blvd. to Kelton Avenue; and (iii) East Section: Pico Blvd. to Ashby/Esther Avenue; from Overland Avenue to Patricia Avenue.

[2] North: Santa Monica Blvd; South: National Blvd; West: San Diego Freeway; East—Century City/Cheviot Hills

3. Community Meeting and Storage Space

The Westside Pavilion, prior to its closure, had two community meeting rooms (one in the original 1985 Westside Pavilion building and the other in the Westside Too building) which the Macerich Co. allowed, at no charge, for the HOAs and the WNC to use for their periodic meetings (along with free parking). Thus, we are hopeful that, as a public entity, UCLA will include in its buildout at least one large community meeting room (capable of seating 100+).

In the interim, the use of the Level 1 space in the Westside Too building was provided for the past 18 months, again on a no-charge basis. I hope that, for 2024 and beyond, the Level 1 space can be available to us….along with chairs and tables. Also, please know that the Macerich Co. also allowed us to have a storage unit in the basement of Westside Too, for which we have the key to the lock.

This is important for the HOAs and for the WNC to function, so I hope you and your respective teams can give this matter appropriate consideration.

In the same vein, I wish to express our appreciation for the recent communication I recently received from Jennifer that UCLA is willing to be a major sponsor of this year's Pick Pico Street Fair (pickpico.org), which for 2024 is scheduled for Sunday, May 19. This has been a very popular and successful neighborhood event since 2012; UCLA Health has participated in the past.

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(CONT.)

4. Other Thoughts

It will not surprise you that many of the residents in the four HOAs listed above have UCLA ties. Some are current UCLA employees, faculty and staff. Others are past UCLA employees (including my late husband). Some attended UCLA. And, you personally know some of them. For instance, former UCLA Vice Chancellor-Student Affairs Janina Montero is a resident in the WGCA neighborhood. And, longtime former UCLA Assistant Chancellor/Assistant Provost John Sandbrook is a resident (and member of the Board of Directors) of the WOWHOA.

Within that context, I am sure that it is no surprise as to the level of positive interest in the buildout of the Westside Pavilion/Westside Too as the UCLA Research Park. At the same time, addressing concerns of our neighborhood communities will be paramount. The process of timely and substantive communications through the four homeowner associations will be important since it is the associations, not the WNC, that has the mailing (email) lists for all of the nearby residents (at least, for those who pay dues to the respective association).

Also, many of us in these HOAs have been homeowners for many decades, even prior to the original construction of the Westside Pavilion in 1985. We have seen many changes in Pico Blvd. over the years, many not for the better, and we are anxious that the revitalization of this area can be accelerated by the influx of UCLA activities.

Finally, one particular item of nostalgia may be of interest. One of the now-demolished buildings on Pico Blvd., west of Westwood Blvd, that had deep UCLA roots was Pete's on Pico…a bar and grill that for decades was a favorite watering hole for many in the UCLA athletic department, dating back to the times of football coach Red Sanders, Bill Barnes and Tommy Prothro in the 1950s and 1960s. If UCLA is inclined to re-build one of the two restaurant spaces in Westside Too, a nostalgic return of the moniker "Pete's on Pico" might be an appropriate touch.

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Again, I thank you for UCLA's initiative to contact us so quickly after Governor Newsom's announcement and press conference on January 3, 2024. We look forward to our further communications and discussions with both the UCLA Government and Community Relations Division and the UCLA Office of Asset Management which, I understand, will be the building manager of the UCLA Research Park. I strongly urge you to continue to contact the WNC but also, quite importantly, each of the four HOAs identified above.

Most immediately, having a prompt reply to # 3 above about the use of the space (and chairs/tables) in Westside Too for our community meeting needs would be most helpful to us as we attempt to schedule our annual homeowner association meetings, starting in Spring 2024.

If you believe that a group lunch with Barbara, Lisa, Marilyn and me would be useful, I will be happy to coordinate our four schedules.

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(CONT.)

Sincerely,

Terri M. Tippit

Terri Tippit
President, WNC

Attachments (2)
Boundary Map of WSSM and OAC
Boundary Map of WGCA and WOWHOA

cc: Barbara Broide, WSSM
Lisa Morocco, OAC
Marilyn Tusher, WGCA
Katy Young-Yaroslavsky, City of Los Angeles Councilmember, 5th District
Jennifer Poulakidas, UCLA Government and Government Relations
Duane Muller, UCLA Government and Community Relations
Michelle Morales, UCLA Asset Management

Westwood South of Santa Monica HOA (WSSM)
and
Overland Avenue Community (OAC)
Boundary Lines

WSSM:

North:	Santa Monica Blvd.;	**South:**	Pico Blvd.
West:	Sepulveda Blvd.;	**East:**	Beverly Glen Blvd.

OAC (overlay, within WSSM):

North:	Santa Monica Blvd;	**South:**	Pico Blvd.
West:	Westwood Blvd;	**East:**	Manning Avenue



Westside Pavilion/Westside Too

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(CONT.)

Westwood Gardens Civic Association (WGCA)

and

West of Westwood HOA (WOWHOA)

Boundary Lines



H-28
(CONT.)

ATTACHMENT B

MAY 20, 2026, PUBLIC MEETING TRANSCRIPT AND ZOOM CHAT

PUBLIC MEETING TRANSCRIPT

IN RE: UCLA RESEARCH PARK

AUDIO TRANSCRIPTION OF RECORDED UCLA RESEARCH PARK PROJECT PUBLIC MEETING

SPEAKERS

ASHLEY ROGERS

HAROLD MONBOUQUETTE

PHIROZE TITINA

TERRI TIPPIT

LISA SCHWARTZ

BARBARA BROIDE

BRIAN SOLOWAY

JOHN SANDBROOK

SEAN MCMILLAN

MAGNA LEGAL SERVICES

(RECORDED AND TRANSCRIBED)

ASHLEY ROGERS: Hello and welcome to this public meeting for the UCLA Research Park Project. My name is Ashley Rogers, and I'm the Director of Environmental Planning at UCLA Capital Programs.

The purpose of tonight's meeting is to share information about the environmental review of our project, Research Park, and to receive public comments about the project and the environmental analysis prepared for the project pursuant to the California Environmental Quality Act, or CEQA.

I am going to share our presentation. I'm going to start with a few brief introductions, and then we'll have a presentation regarding the project, the development timeline, and the CEQA analysis, followed by time for members of the public to provide comments.

If you'd like to speak tonight after the presentation, please indicate that in the chat or use the raise hand function during our public comment period, and I'll call on you. Written comments may also be submitted in the chat. Please note that we will not be responding to comments this evening. Written responses to every comment received will be provided in a final. Initial Study to be prepared and

published this summer.

This meeting is being recorded and a written transcript will be appended to the final Initial Study. We have a number of UCLA and University of California representatives here tonight.

I'd first like to introduce Hal, or Harold, who goes by Hal Monbouquette, representing the project sponsor. He is a Professor of Chemical and Biomolecular Engineering at UCLA and serves as special liaison regarding Research Park to our Vice Chancellor of Research and Creative Activities, Roger Wakimoto.

Hal?

HAROLD MONBOUQUETTE: Hello, everyone. Welcome.

ASHLEY ROGERS: Thank you.

And Phiroze Titina, Principal Project Manager at UCLA Capital Programs, who is managing the design and construction of the project for UCLA.

PHIROZE TITINA: Good evening, everyone. Welcome.

ASHLEY ROGERS: Thank you both. And now I will turn things over to Hal.

HAROLD MONBOUQUETTE: Okay. So I hope to give you a really good general idea of what we plan to do and why this project is so important for UCLA.

Back in 2022, the State of California allocated funds to bring the California Institute for Immunology and Immunotherapy -- we call it CIII, which is a nonprofit organization -- to UCLA to promote collaboration between UCLA and CIII researchers and the translation of innovation in this important area to the marketplace. We feel as though it's in a very important, impactful area.

Many of you have heard of advances recently in immunotherapy to treat cancer, but the potential impact goes well beyond that to heart disease, bowel disorders, and other things. After all, your immune system is responsible for inflammation in the body, which isn't always a good thing.

So you can imagine there are wide-ranging advances here that could really influence the progress of health care not just in California, but the nation and across the world. So the impact of this project promises to be huge just on the basis of collaboration with CIII.

So in 2023, UCLA purchased what we're calling the project site. It formerly was known as the Westside Pavilion Mall. We didn't purchase quite all of it. There's a piece that remains that was the Macy's store -- department store that was not part of

the purchase.

So this project -- with this project and the development of the Research Park, we propose adaptive reuse of approximately 744,400 gross square feet -- so we refer to as gross square feet as GSF; you may hear that acronym throughout this presentation -- of occupiable floor area within the existing buildings with interior improvements and limited new construction. So we'll see slides and we'll talk more about what that's all about in just a moment.

So it's a good idea, right, to renovate an existing building because it reduces environmental impact, especially during construction. And also UCLA conducted a study to show that it's actually more cost effective for us to purchase an existing building, even though it's a mall, and repurpose it as our research facility, the new UCLA Research Park.

It has a really strategic location for us, just two miles south of campus. So it's not that far away, yet it is separate because we want to do something different here at this location. We want to encourage collaboration with external institutions, including industry, working shoulder to shoulder with industry in this facility with the hope of translating innovation -- UCLA innovation in collaboration with our

partners -- to the marketplace.

This is an image of the location. So you see the UCLA campus in the upper left-hand corner and that little blue piece towards the lower right; that is the project site. So it's located at the intersection of Pico and Westwood Boulevards. There are actually two buildings, and they're connected on either side of Westwood Boulevard by an overhead bridge. As some of you may remember, that was a configuration of the mall, the Westside Pavilion.

So the surrounding area is developed with both commercial and residential uses, including the adjacent West End office campus. There's a parking structure there, the recently completed Overland & Ayres residential community site, that were previously the Macy's department store and garage and part of the Westside Pavilion Mall.

This site is about half a mile northeast of the I-405/I -10 interchange and about a quarter mile northwest of the LA Metro E line, Westwood Rancho Park station, which is really convenient. So this slide shows a little bit of a blowup zoom in of the 9.3-acre site. There are two buildings, and you can see the linkage between them across Westwood Boulevard. That's the overhead bridge.

So again, it's about 744,400 gross square feet that we're going to be converting mostly into scientific research space. Google once held a lease to the East building and then initiated plans to renovate substantial portions of this part of the mall as creative office space, along with related common areas including food, service, and other amenities.

However, with the disruption of the pandemic, Google decided to pull out to not complete the office renovations and terminate its lease on the -- for the property, which made it available to UCLA for purchase.

In the next slide we've got a couple of images of the existing site. So the one on the left is standing at the north side of the site looking southeast. This is the Research Park East building, we call it. And the roadway there paralleling the long building extending to the left is Pico Boulevard, and you can see a bit of the bridge that goes across Westwood Boulevard on the right side of the image.

And then the image on the right is a view of the site looking southwest at the Research Park West building. On the corner was a storefront. At one time it was a bookstore, and the theater entrance also is visible. There is a multi-theater complex in this

portion of the building.

Beginning over a year ago, I worked with UCLA administration as well as a committee of faculty from across campus to define a vision for the park. We envision that this is going to be a really dynamic place where UCLA faculty, staff, students, postdoctoral scholars conduct what we call problem-driven -- driven towards solution of a particular problem, a technological need, perhaps -- multidisciplinary collaborative research with external, industrial, institutional, academic, maybe even USC, who knows, and government researchers. We hope that this will serve as a really vibrant interface between innovators and the public, and as I mentioned before, we want to amplify the translation of innovation to the marketplace.

If we do this right, it could really be transformative both intellectually and economically for UCLA, the immediately surrounding community, California, and probably beyond. And we hope that this will really invigorate external relations, including with the surrounding community; with the neighborhood that we know we're dropping into, the greater Los Angeles area; local, state, and national government industry, and, of course, the broad academic community.

And ultimately this will, we hope, strengthen and grow the support of a constituency for UCLA locally and statewide, especially.

Next slide. Here's a top-down view of the site. So the East building is on the right. The West building is on the left, and you can see the bridge connecting the two, shown here with plantings. This is an architectural rendering.

So it's going to provide -- this building will provide us with over 800,000 gross square feet of program space -- scientific program space with 29,000 square feet of open space and outdoor amenity areas, you can see them in the lower part of the image; and approximately 1,100 existing parking spaces on site, for a total of up to approximately 1.35 million gross square feet of Research Park uses, taking everything into account.

The project also includes improvements to the on-site building systems, accessibility, as we'll show in subsequent slides, utility infrastructure as well as seismic upgrades. So Google did a lot of that in the East building, but we still have substantial work seismically to do in the West building.

Anchor tenants, of course, will include CIII. I mentioned CIII earlier, the Immunology

Institute, and also importantly, the UCLA Quantum Innovation Hub. As you know, this is a very important area of technological innovation nationwide. And UCLA has leaders in this area, both in qubits and quantum communication, quantum sensing, and other areas.

There'll also be space allocated to the UCLA David Geffen School of Medicine, primarily for collaborators to work with CIII in the immunology and immunotherapy area. And there will be future UCLA tenants and non-UCLA partners. But all the partners that come in will be -- will have to be partners who want to collaborate with UCLA researchers. And that's something that's really going to set this Research Park apart from other university research parks across the country.

So key new facilities include a two-story, approximately 1,500 gross square foot lobby pavilion to establish a primary entry for CIII; a two-story, approximately 15,600 GSF ancillary conference center; a subterranean single level, approximately 18,900 GSF central loading dock facility and service area; and a roughly 5,000 GSF amenity pavilion to provide a main entrance and lobby at the West building.

Additionally, a new mid-block pedestrian crossing across Westwood Boulevard is proposed at the

existing signal at the site driveways to improve safety and connectivity between Research Park East and West. Most of these features I will point out in subsequent slides that are architectural renderings.

So based on preliminary programming, the range of proposed uses would include wet and dry laboratories, of course; some office space; meeting and assembly spaces, including instructional spaces; food service; common and circulation areas, including amenities; existing subterranean parking; and outdoor open space.

Research Park East would primarily serve as a scientific research building with supporting uses that includes offices, conference spaces, and limited amenities such as food service. Research Park West is planned to provide additional research and office space, meeting and conference spaces, food service, and other amenities, some of which may serve as community resources and/or may ultimately include creative or art spaces as well.

This makes particular sense in that West building that formerly housed the multi-theater complex. The project will include phased development of all necessary building shell and core improvements; seismic improvements, of course; essential

infrastructure upgrades; interior tenant improvements; and site improvements necessary to accommodate the anticipated tenants and research activities.

The full program also includes the conversion of some areas of subterranean parking to usable floor area in order to create vibration-sensitive laboratories. This is particularly important for the Quantum Innovation Hub, for example.

New construction in limited areas of the project site to provide necessary support functions. A new pedestrian paseo -- a pass through that you'll see in images in a moment from Pico Boulevard through the Research Park East building, and modifications to the building facades, primarily at Research Park West.

Very importantly, the project will achieve a minimum Leadership in Energy and Environmental [Design] -- that is known as LEED -- design gold rating.

So, next slide. This is an aerial rendering -- architectural rendering. Looking south down Westwood Boulevard, program space at UCLA Research Park includes open collaborative research for research and creative activities. Also, some lease start-up company incubator spaces. We expect to facilitate the translation of new technology to the marketplace. There will be spin-off startup companies, and there

will be a certain amount of incubator space within the Research Park.

There'll be makerspace and shared equipment rooms, shared office space for bench researchers, private office space for project leaders, as mentioned before, conference rooms, spaces leased to outside entities such as established companies. Although these established companies that come in will have to be collaborators with UCLA.

There may be government labs leased, and other outside institutions may lease space, auditoriums, and gathering space to support seminars, performances, and small gatherings. We'll be translating concepts and prototypes from the academic laboratory to the marketplace. I keep repeating this theme because it's so important to us.

So this incubator space I've mentioned -- and it's going to be nurtured by a supporting ecosystem of world-class researchers from UCLA and collaborating scientists and engineers from resident partners. So this is going to be a space where we hope that startup companies will absolutely flourish and eventually leave the nest of the Research Park and go out on their own.

So there'll be a number of different types of opportunities for collaborators. As I mentioned

briefly, this lease space for startups, early-stage, and established companies; as long as they're UCLA collaborators. There'll be limited space for confidential research and development activities. Collaboration with UCLA researchers as an imperative. And we have this early emphasis on immunology and immunotherapy as well as quantum technology.

Collaborators of the Research Park importantly will have access to state-of-the-art core research facilities, both in the Park and on the main campus. And something we're really proud of recently: UCLA is accelerating the number of agreements that we're generating with industry collaborators regarding intellectual property.

So next slide here.

So this is looking -- we're standing on the south side of the Research Park now, looking northwest. This is part of the East building here still -- the building addition is kind of an extension that appears on the left part of the image there -- will be CIII's lobby pavilion. And just beyond it, you can see a bit of an existing loading dock that's mostly hidden from view here.

The architecture of this addition, this CIII lobby, will be consistent with the existing Research

Park East design, incorporating a glass curtain [wall] as shown over a steel structural frame, and may feature a green roof. So this area will be developed as part of the first phase of construction, which will be described later on here.

So in this next image, we're still standing on the south side of what we envision for the Research Park. But now we're looking northeast, and you can see a bit of an entry of the paseo if you follow your eyes up the stairs there in the middle of the image. We'll show a close up -- better close-up of it in just a moment.

The structure on the right of this image is the proposed new conference center, and it will provide a 200 to 300 seat conference room that could be divided into multiple 100 to 120 seat meeting rooms, several boardrooms with supporting back-of-house facilities, and a small grab-and-go cafe.

This two-story structure will screen a new central loading dock facility from view from Westwood Boulevard. You really can't see that envisioned central loading dock because it's on the other side of this conference center, shown on the image.

So we can go to the next slide. This is a rendering looking northeast again from the south side

of the Park, and towards the left you can see the proposed paseo. And this will provide a pedestrian pathway from Pico Boulevard, which is on the other side of the paseo here -- so we're on the south side of the building now -- through the Research Park East building to the main entry plaza -- excuse me, as well as the existing open atrium towards the right. So those of you who remember the former Westside Pavilion Mall, remember there was an open area within the mall that has been fully opened up , now in this -- in the existing structure. And so it's shown here on the right side of the image looking into your screen.

Okay. Next slide. At Research Park West, looking northeast, we're still on the south side of the building. This is going to be -- this is Research Park West now, and this is going to be reconfigured to provide a new point of arrival and to streamline vehicular access to the existing subterranean parking structure, which many of us used to park when we went to the -- to a movie here in the former mall.

An amenity pavilion will be added on the south side of the building to provide a new main entrance lobby. This multi-purpose space would feature a rooftop landscaped terrace. As you can see in the image, modifications to the Research Park West exterior

would include architectural changes, recladding, and new glazing to modernize the facade and match Research Park East as well as a major seismic retrofit.

As I mentioned earlier, Google worked to do seismic upgrading on the East building, but not on the West building. And we need to do that to meet our stringent requirements for the University of California.

So full programming and tenancy at Research Park West are not yet precisely defined. Given the current space configuration, some of the existing vacant theaters may be converted to meeting rooms, auditoriums for instructional use, or spaces for creative activities and research related to the arts. We hope that happens.

After all, Southern California really is a center for the movie business, and that might be a natural collaborating set of companies, industry for our campus researchers to do work in the area of the arts and other creative activities. So the unleased -- similarly, the existing unleased restaurant space may be repurposed.

So that concludes my portion of the presentation. Thank you all for your attention.

PHIROZE TITINA: Thank you, Hal.

I'm going to talk to the preliminary development timeline for the project. Construction at UCLA Research Park is anticipated to occur in phases beginning later this year, with Research Park East, core and shell improvements and Phase 1 tenant improvements scheduled to be completed in late 2027.

Subsequent phases would involve additional tenant improvements in Research Park East; associated support functions, such as buildout of the central loading dock and rooftop mechanical areas; construction of the new conference center; and a full seismic retrofit of Research Park West. Full buildout is anticipated by 2035.

Although implementation of the proposed project would be phased over an approximately ten-year time frame, for purposes of the environmental impact analysis, construction is conservatively assumed to occur in a single phase beginning in 2026 and concluding in 2030. More on that analysis in a moment.

This slide talks to the project disturbance limits and earthwork. The physical impact area for exterior improvements totals 3.2 acres and is the area shaded in yellow. There is no mass grading anticipated for the site. A maximum depth of excavation will be ten feet in areas of new construction; a little under

four feet, 3.75 feet below parking level P5 at Research Park West for seismic work.

We estimate 8,145 cubic yards of soil to be exported away from the site. No soil imported. All protected trees, right now those are sycamores and oaks, that will be removed or impacted will be replaced at a minimum 2:1 ratio. Some of these were most recently planted by the Google project.

ASHLEY ROGERS: Thank you, Phiroze.

Regarding the environmental review for the project, CEQA requires the lead agency, in this case UCLA acting on behalf of the University of California, to evaluate the potential environmental impacts that may result from a project.

If there are significant impacts, the lead agency is required to identify mitigation measures or alternatives to reduce those impacts to the extent feasible. If all of the impacts can be mitigated, then the lead agency may prepare a mitigated negative declaration or MND. If any significant impacts cannot be fully mitigated, then an Environmental Impact Report, or EIR, is required.

As most of you know, we've prepared an Initial Study for the UCLA Research Park Project, which determined that for all environmental topics, the

project would result in no impacts or less than significant impacts with the implementation of a variety of programs, practices, and procedures, or PPs, as well as mitigation measures, or MMs.

The majority of these PPs and MMs mirror those previously adopted by UCLA as part of its Long-Range Development Plan, or LRDP, which guides campus growth and development. As a standard practice, UCLA implements all of the relevant PPs and MMs for all of its campus projects, including those located off campus, such as at this site.

When necessary to reduce potentially significant impacts, project-specific mitigation measures are also proposed. Based on the project Initial Study's conclusion of less than significant impacts with mitigation, a mitigated negative declaration, or MND, is proposed for adoption by the UC Board of Regents, and all of the projects PPs and MMs will be adopted as well as part of a Mitigation Monitoring and Reporting Program, or MMRP, which will ensure implementation of those measures.

Note that the CEQA process shown in this diagram is specific to UCLA's process for MNDs and includes steps that go beyond CEQA requirements.

Regarding the Initial Study that we

prepared, this list shows the 20 environmental topics required to be analyzed under CEQA. Note that even for those topics where impacts were determined to be less than significant, UCLA's standard PPs and MMs from the Long-Range Development Plan have been incorporated into the project.

As shown, the Initial Study analysis determined there would be no impacts or less than significant impacts for nearly all topics. The only project-specific mitigation measures, TCR-1 through TCR-5, are proposed to minimize potential impacts to any tribal cultural resources that could be unearthed during the limited grading and trenching that will occur during construction.

Additionally, a few project-specific revisions to UCLA's previously adopted measures are proposed, largely to tailor them to be more site-specific. These include limiting the construction hours and providing a sound wall along much of the site perimeter in order to reduce noise impacts during construction.

As I mentioned previously, with all impacts being less than significant with the incorporation of these measures, a Mitigated Negative Declaration is proposed for adoption. The Initial Study and a Notice

of Intent to Adopt an MND have been distributed for the required 30-day public review period, which extends until June 3rd.

Public comments may be submitted until that time, and all comments received will be responded to in a final Initial Study, which will be prepared over the summer and go to the UC Board of Regents for consideration.

Here are further details regarding those project-specific measures. First, the tribal cultural resources measures. Given the limited extent and depth of grading and trenching, the potential to unearth tribal cultural resources is considered fairly low. Nonetheless, mitigation is proposed to require tribal monitoring during all earthwork and to specify procedures in the event of any resource discoveries.

This mitigation was developed in consultation with three of the local Native American tribes that have ancestral ties to the project area. As also previously shared, project-specific revisions are proposed to two of UCLA's previously adopted measures to help reduce noise impacts during construction.

So now we'll move on to public comments. I'm going to call on names in the order that I see

them. Each speaker will have up to two minutes to talk. As your allotted time comes to an end, I'll give you a gentle reminder to wrap up. Please begin by stating your name for the record and any group or organization that you're representing or affiliated with.

We may have a lot of speakers tonight, and so I'll ask that if some of your same comments are voiced by speakers before you, please try to limit your comments to new or different issues. You are also free to email your full comments to me at arogers@capnet.ucla.edu, which I'll enter into the chat shortly, and we will respond to all comments in full in the final Initial Study.

So now for our speakers, I will start with Terri Tippit, followed by Lee S., and I will ask each of you to unmute as we go.

TERRI TIPPIT: Are we ready for me? This is Terri Tippit.

ASHLEY ROGERS: Yes. Go ahead, Terri. Thank you.

TERRI TIPPIT: This is Terri Tippit, Westside Neighborhood Council Chair West of Westwood HOA President; you surround our area. Some people have raised their concerns about pages 114 through 116. The

1-1

BSL Level 3 lab is supposed to be going to happen here and has potential lethal disease level lab clarification.

And so they were just wondering, is this the first BSL number 3 level lab to ever be constructed at UCLA? And if not, please identify the other existing BSL Level 3 labs that exist on the Westwood campus and what year that each of those labs were constructed, and what is the identification of the state government and US federal agencies that were responsible for permitting a laboratory and overseeing ongoing operations?

1-1 (CONT.)

And we'd like a report on any safety incidents that the existing laboratories might have had, because, as you know, that classification often is airborne pathogens, which require controlled air for -- air flow, special ventilation, and very specific biosafety handling. So we -- that's why the people that sent these comments to me are concerned. So that's our comments for -- my comments for tonight.

1-2

ASHLEY ROGERS: Thank you, Terri. I will answer quickly that we do have a number of BSL labs at various levels on the UCLA campus, and we'll respond fully regarding your different comments in our final document.

TERRI TIPPIT: And I'll just send to you what I said tonight just so you have it in writing. Thank you.

ASHLEY ROGERS: Right. Lee S., followed by Barbara Broide.

LISA SCHWARTZ: Yes. Hi. Thank you. Lisa Schwartz here. Hey, I want to say congratulations to you guys for spinning this up. When I first read about this -- I've been in technology for over 40 years working for Oracle in a variety of different things.

And I started reading about quantum computing; it compelled me. And I live just down the street from it. So I just want to preface that with that. And so I just thought, how exciting is this? And also to be tackling the challenges of the immune system, which we know is very tricky.

So as much as my curiosity afforded me, I went ahead and read your document, UCLA Research Park Project Draft Initial Study dated May 2026. And Terri so kindly went through some of the findings, in fact, which I had highlighted. Fortunately, I've been able to take some time to read through the document, all 120 pages of it.

But my greatest concern indeed is, again, saying that the quantum computing for research and

2-1

2-2

biotech is really great. What really got my eyebrows raised was this BSL-2 and BSL-3, which you guys call out on page 114 and goes through like 119.

And Terri, I'm not going to go through all your citations, which you put there. But one of the things that Terri did not mention is that we're wondering about this BSL, particularly 3, which can -- it's a wonderful thing. We can totally understand what UCLA wants to do. If they come across a pathogen or a biological thing, they run it through quantum computing, find a solution quickly. Got it.

But we know the propensity for humans to make errors, and it's sitting in our backyard. So literally we're walking distance from this place.

So we're wondering, bottom line is how can you bring in a BSL-2, BSL-3 level lab when LAMZ -- when LAMC requires M2 or M3 Industrial zoning for higher-impact scientific and residential uses, and it is strictly restricted to M2 Light Residential Industrial and M3 Heavy Industrial zoning?

So everything you're saying and everything we're doing, we love the idea of it, but this goes a little bit far. And on one of your areas, you say that -- one of your citations, I'm trying to find the page, but you'll find it yourself.

2-2 (CONT.)

2-3

2-4

But you're saying that you really -- it requires vendor-specific -- tenant-specific labs and incubator labs in the BSL-2 and 3 levels, 5,000 GSF and 10,000 square feet, and that's to be discussed.

My question is how can you actively create a construction project that might not be fully formed when you don't know what's going in there before we start? That is a great concern. And I'll give my time over what's left of it just --

ASHLEY ROGERS: You're out of time, actually.

LISA SCHWARTZ: Thank you.

ASHLEY ROGERS: But thank you.

LISA SCHWARTZ: I got you. It's an important concept, though, I mean.

ASHLEY ROGERS: Absolutely. Okay. Barbara Broide followed by Brian Soloway.

BARBARA BROIDE: Thank you. Barbara Broide.

ASHLEY ROGERS: Broide, thank you.

BARBARA BROIDE: I'm the Westside Neighborhood Council Land Use Chair and the President of Westwood South of Santa Monica Boulevard Homeowners, your neighbors just north of Pico.

I haven't read the IS yet, so this is just a

2-4 (CONT.)

3-1

very general question. It has to do with the fact that we know that much of the uses of the West side are unknown, unspecified at this point, and we'll be taking a second priority to the East project. How then can the Mitigated Negative Declaration or the environmental clearance adequately address that part of the project if so much is unknown?

ASHLEY ROGERS: Right. Is that the end of your comments, Barbara?

BARBARA BROIDE: Yeah. That's it.

ASHLEY ROGERS: Okay. Great. And I'll answer real quickly that all tenants will have to comply with very stringent UC safety protocols, and we'll get into the details of that in our formal response.

BARBARA BROIDE: I think some of us have hoped that there would be some public interfacing activities in the Westside that are museum, film, whatever it might morph to be, and that if this is the document, it should open up all potential for those types of uses in the event that that's what happens.

ASHLEY ROGERS: Okay. Thank you.

BARBARA BROIDE: Thank you.

ASHLEY ROGERS: Brian Soloway. I'm sorry.

BRIAN SOLOWAY: Oh, no. Great. Ready to

3-1 (CONT.)

3-2

rock

ASHLEY ROGERS: Okay.

BRIAN SOLOWAY: Thank you very much. Yeah.

ASHLEY ROGERS: Great, go ahead.

BRIAN SOLOWAY: Just eager here. Brian Soloway, I live in the Westside area in the neighborhood, representing just myself. No technical question. Just a very simple question, which -- no technical comment, which is obviously really excited to have you guys in here and would love to accelerate even faster when we thought Google was going to be here a decade ago, but alas.

My question is, there was a lot of discussion about spaces and eating and dining and other areas and halls. I was just curious to understand a little bifurcation between what is UCLA pride, even though it's public university specific to the school, more private, so to speak, versus what is it planned for public, like restaurants, dining, food courts, museums, whatever the heck it is. But just if there's any sense right now, what is going to be there? And maybe the answer is we don't know yet.

ASHLEY ROGERS: Yeah, I think in general, the answer is we don't know yet. We are leaving that

4-1

public space open. But planning -- as we mentioned, planning for the West building is still in the future for -- to some extent. And you know, we'll figure that out as we go.

BRIAN SOLOWAY: Sure. Okay. Thank you.

ASHLEY ROGERS: I'm not seeing other hands raised. Are there others who would like to make comments? Going once.

JOHN SANDBROOK: This is John Sandbrook. I would like to make a comment.

ASHLEY ROGERS: Okay. Go ahead.

JOHN SANDBROOK: Thank you, Ashley. First, for sake of self-disclosure, I have been a resident of the West of Westwood HOA for 20-plus years. Before that, however, I was Assistant Chancellor for 20 years and Assistant College Provost for nine years. And the Jonsson Cancer Center Health Sciences Building was my responsibility and the physics and astronomy building. So I usually have been in your shoes, but I'm on the other side of the table here.

I just wanted to note that I have a series of comments that I'll be submitting in writing for the sake of the final EIR. I've been there, done that. And I think going back to Terri's comments about the BSL-3 labs, I think that there is some additional work

5-1

that you need to do in the EIR to articulate the governance process and oversight process that exists on the campus with the existing BSL-3 labs in particular.

Obviously, the west -- Holmby Westwood residential area is close by, so they're used to it. And the other comments I'll be submitting in writing, and as Sue Santon can tell you, they'll be long and detailed.

ASHLEY ROGERS: Okay, I'll look forward to that one. Thank you, John. We do have another comment that came up in the chat from Frida Eytan saying, "Can you explain about public housing?" Again, we'll fully address comments in our final document, but this is not a housing project. This is -- you know, we're only contemplating research park uses at this time. Another comment from Lee S. I'll read aloud. While the UCLA Research Park seems to first --

LISA SCHWARTZ: That one we addressed already. I just put it there for your purposes.

ASHLEY ROGERS: Oh, okay.

LISA SCHWARTZ: Thank you.

ASHLEY ROGERS: Okay. Yeah. And we'll have a transcript both of the oral -- the audio portion of this presentation, this meeting -- as well as the chat included.

5-1 (CONT.)

LISA SCHWARTZ: Yeah. I forgot to send -- the sand and would love to hear John's approach since there is something else similar -- be helpful to know.

ASHLEY ROGERS: Great.

LISA SCHWARTZ: Yeah.

ASHLEY ROGERS: Sean McMillan.

SEAN MCMILLAN: Thank you very much. And let me jump on so you can actually see me for context. I am the Westwood Neighborhood Council board member that represents the residential area immediately south and adjoining to your Research Park between Overland and Westwood and a little bit of Midvale on the westerly side.

My comment has to do with the fact that we are -- we have a lot of wonderful anticipation for an interaction with such an amazing facility that's offering so much to the public, but we also have fear and anxiety because we're uninformed, relatively speaking, and educated in subject matter. I think Mr. Sandbrook shared it. I think Terri Tippit shared it. I think Lee shared it.

I think you all are recognizing we have to do a really good job about our public outreach, and I'm volunteering my services to actually go door-to-door with materials for you to -- so that the community can

6-1

7-1

embrace it.

I know there's not only the general fears associated with biological elements; there's also a concern about the tremendous strain that especially quantum computing can utilize in terms of energy. Kind of curious as how that infrastructure is being set up. Certainly don't want to be the subject of any kind of unwarranted terror-type of events/power shortages, etc.

So just want to go on record that I do represent the community south of that. They are mobilized, they are trying to figure out what's going on, and I certainly will be a conduit to communicating it on your behalf to those 670 stakeholder homes. Thank you.

ASHLEY ROGERS: Okay. Thank you. We have another comment in the chat from Keith Solomon. "When we attended the initial meeting, we were told that UCLA would not be providing their own food services as to benefit the neighborhood restaurants and encourage growth. What changed?"

We've always contemplated some ancillary services on site to support the researchers and staff there. But it is the goal of the project to support the local commercial community, retail community, and the area restaurants. So we're hoping that there's a

7-1 (CONT.)

7-2

7-3

strong partnership there.

Do we have any other commenters tonight? Frida Eytan added in the chat, "I meant student housing projects." You know, we do have student housing projects. Those are not our topic of discussion tonight, but happy to chat offline about that, Frida, if you'd like.

Barbara Broide also commented in the chat, "Note businesses along Pico corridor will be very concerned about the large void that remains on the street that is not pedestrian friendly and remains unactivated. It would be nice if there could be some activity on the ground level of west side that could bring in the public, whether or not it continues in that format permanently."

Okay. That's a great idea. Thank you. Anyone else? Okay. Going once. Going twice. All right. Thank you. Thank you, everyone.

Oh, also, Please answer the question about the low-frequency noise produced by quantum computing. Okay. We will look into that with our noise consultant. Thank you.

Thank you, everyone, for your comments. The public comment period will continue until June 3rd, and written comments can be emailed to me at

arogers@capnet.ucla.edu. I did enter that a little earlier into the chat. So if you scroll up, you'll find that.

Before we close, I'd like to acknowledge a few people who are here with us tonight over Zoom from UCLA. We have Sue Santon, Associate Vice Chancellor of Capital Planning and Finance, as well as Peter Hendrickson, Associate Vice Chancellor of Design and Construction, and our Campus Architect. And both of them are from UCLA Capital Programs.

We also have a few professors associated with the Quantum Innovation Hub and/or the School of Engineering, as well as the UCLA David Geffen School of Medicine, some of whom may eventually work at UCLA Research Park. Thank you all for joining us tonight.

Our project partner, CIII and its team, which includes Jonathan Parot and others at Breakthrough Properties and Ben Saltsman, legal counsel from Gibson Dunn & Crutcher. We also have here tonight Steven Ryder, and I think Ian Doherty and Mauricio Ortega, who are some of the project architects, and we'd like to thank them and the entire design team at Flad, along with the many consultants and engineers who have helped get us to this point.

Also, Tina Andersen and her team at T&B

Planning. They are an independent consultant who prepared our CEQA analysis. Thank you also to all of our staff from UCLA and the UC Office of the President, including the Office of General Counsel, who have worked on and supported this project.

And finally, to our community members, thank you so much for joining us tonight, and thank you for providing your comments. We appreciate your input, and we look forward to moving forward with you. Have a nice evening, everyone.

PHIROZE TITINA: Thank you all.

ASHLEY ROGERS: Thank you. Have a good night.

LISA SCHWARTZ: Thank you.

(Meeting Adjourned.)

CERTIFICATE

I Steven Thomas certify that I was authorized to and did transcribe the above audio and that the transcript is a true and correct record of the audio provided.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Steven Thomas

Steven Thomas

Transcriber

May 28, 2026

Zoom Chat

May 20, 2026 Public Meeting Chat Comments

Commenter 8 - Barbara Broide

Will the public have access to the recording after the program? 8-1

A note: Businesses along the Pico corridor will be very very concerned about the large void that remains on the street that is not pedestrian friendly and that remains unactivated. It would be nice if there could be some activity on the ground level of west side that could bring in the public -- whether or not it continues in that format permanently. 8-2

Commenter 9 - Frida Eytan

Can you explain about public housing? 9-1

I meant Student housing projects.

Commenter 10 - Lee S (Lisa Schwartz)

While to UCLA Research Park seems at first glance an important type of research using quantum computing for biotech. However, the square footage and specific usage of labs are a great concern in a commercially/residentially zoned area such as the Westwood Pico area. Biosafety levels BSL-2 and BSL-3 level labs carry risk and potential human error in handling of potentially infectious and/or hazardous materials and/or waste . Please ref page 114 of your Draft initial study). Particularly a BSL-3 lab can be used to study pathogens such as Covid and then also it is most likely that UCLA may want to run quantum computing on anything new biologically that potentially can be highly infectious and even airborne. 10-1

How can you bring in at BSL-2, BSL 3 level lab when LAMC requires M2 or M3 Industrial zoning for higher impact scientific/industrial uses and are strictly restricted to M2 Light Industrial or M3 Heavy Industrial zoning? 10-2

Also please answer the question about low frequency noise produced by Quantum computing. 10-3

Commenter 11 - Keith Solomon

When we attended the initial meeting, we were told that UCLA would not be providing their own food services, as to benefit the neighborhood restaurants and encourage growth. What changed? 11-1

ATTACHMENT C

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

UCLA Research Park Project

Draft Initial Study/Mitigated Negative Declaration

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

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

May 2026

UCLA Research Park Project

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May 2026

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Appendix

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UCLA RESEARCH PARK PROJECT
UNIVERSITY OF CALIFORNIA, LOS ANGELES

Project No. 940041.01

Initial Study and Environmental Checklist Form

I. PROJECT INFORMATION

1. PROJECT TITLE

UCLA Research Park 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, 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

10800/10850 West Pico Boulevard
Los Angeles, California 90064
(Refer to Figure 1)

5. PROJECT SPONSOR'S NAME AND ADDRESS

Roger Wakimoto, Vice Chancellor for Research
UCLA Research & Creative Activities
2248 Murphy Hall
Los Angeles, CA 90095

6. CUSTODIAN OF THE ADMINISTRATIVE RECORD FOR THIS PROJECT

Same as listed under No. 3 above.

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

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



Source(s): Esri, Nearmap Imagery (October 2025), Psomas (December 2025), Los Angeles County (2025)

Figure 1

Regional and Local Vicinity Map

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

Introduction

The California Environmental Quality Act (CEQA) requires that government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. Therefore, in accordance with CEQA (Public Resources Code [PRC] Sections 21000 et seq.), the CEQA Guidelines (14, California Code of Regulations [CCR], Sections 15000 et seq.), and the Amended University Procedures for the Implementation of CEQA, effective March 17, 1989, this Initial Study has been prepared to support a Mitigated Negative Declaration (MND) and analyzes the potential environmental effects of the proposed UCLA Research Park Project (proposed Project). This Initial Study includes a description of the proposed Project and location of the Project site, evaluation of the potential environmental impacts of Project implementation, a proposed finding that the proposed Project would 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 the PPs and MMs that are the responsibility of the University of California are implemented in a timely manner. Although the Project site is not located within the UCLA campus and is therefore not subject to the LRDP, as a standard practice UCLA implements all relevant previously adopted PPs and MMs for all of its development projects, including projects located off campus, as collectively they support UCLA's education, research, and service missions. Accordingly, this Initial Study identifies relevant PPs and MMs from the LRDP MMRP that would reduce the potential impacts of the proposed Project and also includes new Project-specific MMs identified to reduce any potentially significant environmental impacts to a less than significant level, as necessary. The relevant LRDP PPs and MMs have been incorporated into the proposed Project and will be included in the Project-specific MMRP, along with any Project-specific measures. Throughout the Initial Study, where applicable LRDP PPs or MMs have been identified, the PPs and/or MMs are referenced verbatim from the LRDP Final SEIR, with minor clarifying revisions to reflect the Project's off-campus location and/or other Project characteristics and to ensure appropriate implementation of the measures. The previous PP and MM 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.

[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.

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

This Initial Study, along with a Notice of Intent to Adopt an MND, has been posted on the State Office of Land Use and Climate Innovation (LCI) 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 in Summer 2026.

II. PROJECT DESCRIPTION

The proposed Project involves the development and operation of a state-of-the-art, multidisciplinary research and innovation hub, referred to as UCLA Research Park, located on the site occupied by the Westside Pavilion shopping center, which operated for over 35 years. The Project site includes Research Park East located at 10800 W. Pico Boulevard and Research Park West located at 10850 W. Pico Boulevard in the City of Los Angeles (City). Research Park East and West are connected by an existing enclosed pedestrian bridge across Westwood Boulevard.

As further described below, the proposed Project involves adaptive reuse of the approximately 744,400 gross square feet (GSF) of existing occupiable floor area within Research Park East and West via interior improvements to the existing buildings and limited new construction to provide over 800,000 GSF of scientific program space with approximately 29,000 square feet (SF) of open space and outdoor amenity areas and approximately 1,100 parking spaces on-site, for a total of up to approximately 1.35 million GSF of research park uses.[2] The proposed Project also includes improvements to the on-site building systems, accessibility, and utility infrastructure. Anchor tenants would include the California Institute for Immunology and Immunotherapy (CIII) and the UCLA Quantum Innovation Hub (QIH), with space allocated to the UCLA David Geffen School of Medicine (DGSOM) and future UCLA tenants and non-UCLA partners.

The Project site encompasses approximately 9.3 acres (not including the pedestrian bridge overcrossing). While the majority of the proposed improvements would be associated with the existing building interiors, the exterior areas within which select improvements would occur encompasses a total of approximately 3.2 acres on-site (1.1 acres at Research Park East and 2.1

[2] Total square footage of 1.35 million GSF includes approximately 489,200 GSF of existing multi-level subterranean parking.

acres at Research Park West). More detailed information regarding the Project characteristics is provided in Section II.5, Proposed Project Components, below.

1. PROJECT LOCATION

The proposed Project is located at 10800 and 10850 W. Pico Boulevard[3] in the City of Los Angeles, approximately two miles south of the UCLA main campus in Westwood. The Project site is located approximately 0.5 mile northeast of the Interstate (I) 405 and I-10 interchange and approximately 0.25 mile northwest of the Los Angeles (LA) Metro E Line Westwood/Rancho Park Station. Refer to Figure 1, which depicts the regional location and local vicinity.

2. ENVIRONMENTAL SETTING

As shown on the aerial photograph provided on Figure 2, the northern portion of the Project site is developed with two existing buildings originally developed and occupied by the indoor Westside Pavilion shopping mall (as modified to accommodate high-tech office uses prior to UCLA's property acquisition), and the connecting enclosed pedestrian bridge. The southern portion of the site is configured for vehicular circulation, with outdoor terraces and landscaping on the Research Park East site associated with prior renovation activities.

The existing eastern building, referred to herein as Research Park East, comprises approximately 611,000 GSF of occupiable floor area that includes three floors of partially renovated space, plus two basement levels (one for parking and one with a loading dock/service area) and a rooftop parking level with several mechanical penthouses. The existing western building, referred to herein as Research Park West, comprises approximately 133,400 GSF of occupiable floor area that includes three floors of currently unleased commercial space, plus five subterranean parking levels (accommodating over 1,000 parking spaces) and a roof level accommodating mechanical equipment and additional parking.

Vehicular access to Research Park East is provided from the southwest via a driveway along Westwood Boulevard and from the north via a signalized driveway along Pico Boulevard. Vehicular access to Research Park West is provided from the southeast via a driveway along Westwood Boulevard, from the northwest via a signalized driveway along Pico Boulevard. Existing sidewalks surround the Project site along the adjacent roadways. The roof of the enclosed bridge across Westwood Boulevard accommodates vehicular traffic between Research Park East and Research Park West.

The Project site is relatively flat with an elevation of approximately 176 feet above mean sea level (AMSL). As further discussed in Section V.10, Hydrology and Water Quality, the Research Park East site is located within the 100-year floodplain. As further discussed in Section II.6 under Utilities/Infrastructure below, existing utility infrastructure is located within and adjacent to the Project site.

There is no natural vegetation and there are no stream channels or otherwise sensitive hydrologic or biological resources within or near the Project site. However, as further discussed in Section V.4, Biological Resources, of this Initial Study, there are mature trees within and adjacent to the Project site.

[3] These addresses corresponded to Assessor Parcel Numbers (APNs) 4255-028-014 and 4256-001-030 as of November 2023; the current APNs are 4255-028-900 and 4256-001-900.



Source(s): Esri, Nearmap Imagery (October 2025), Psomas (December 2025), Los Angeles County (2025)

Figure 2

0 112.5 225 450 Feet

Aerial Photograph

The Project site is bounded by Pico Boulevard to the north and Ayres Avenue to the south. The Project site is surrounded by commercial uses to the north (across Pico Boulevard) and single-family residential uses farther to the north; the West End office campus and GPI parking structure to the immediate east (west of Overland Avenue); single-family residential uses to the south (across Ayres Avenue); and commercial uses and single-family residential uses to the west (east of Veteran Avenue). The recently completed Overland & Ayres residential community is located to the southeast, fronting Overland Avenue. There is an existing concrete masonry unit (CMU) wall topped with metal railing (8 feet high total) along the southern boundary of the Project site that provides a physical barrier between the Project site and the residential uses to the south. Existing conditions of the site and surrounding area are depicted on the site photographs provided on Figure 3a and Figure 3b.

3. PROJECT SITE BACKGROUND

The earliest development at the Project site consisted of the Pico Drive-in movie theater, which was the first of its type in California and was located in the central portion of the Project site at the intersection of Westwood and Pico Boulevards. The drive-in theater operated from approximately 1934 to 1944 and was demolished in 1947. The Project site was subsequently developed with various retail uses, including a free-standing May Company department store. More recently, the site was occupied by the Westside Pavilion shopping center, a large indoor retail mall that incorporated the previously developed May Company store and was devoted to traditional retail space and associated common areas, eventually adding a mix of entertainment, theater, and food service spaces. The original Westside Pavilion (sometimes referred to as Westside I, located on the Research Park East site) opened in 1985, and Westside Too (Research Park West site) was added in 1991.[4] Throughout its over 30-year operational history, leasing and occupancy at the mall fluctuated in response to market conditions. As summarized below, corresponding physical and operational changes were made to both the interior and exterior portions of the Westside Pavilion in order to respond to and proactively remain current with evolving market conditions.

Westside Too operated as an indoor/outdoor retail mall until 2006, when it was renovated to accommodate new restaurants and a larger 12-screen movie theater (relocated from Westside I), thus expanding Westside Pavilion into an approximately 956,855 GSF shopping center.[5] The relocated theater and renovations opened in 2007. In 2018 in response to a challenging retail environment, plans to renovate substantial portions of the mall for use as high-tech/creative office space, along with related common areas, food service, and other amenities, were initiated. Consistent with the commercial zoning of the Project site, no discretionary approvals were required for this renovation, and the original entitlements for the mall remain in effect. Google was intended to be the main tenant, and renovations at Westside I commenced, as further described below. However, following the disruption caused by the COVID-19 pandemic, Google decided not to complete the office renovations and terminated its lease for the property. The theater and some of the restaurant and retail uses at Westside Too remained open, comprising roughly 100,000 square feet of commercial/retail space, demonstrating the continuation and evolution of retail uses at the Project site. However, these retail leases ultimately were not renewed and UCLA acquired the property in late 2023. As part of the ongoing planning efforts and environmental review of the proposed Project and in anticipation of potential Project approval, no new retail leases have been executed.

[4] This expansion of the shopping center was evaluated in an environmental impact report (EIR) (SCH No. 1987020418) and was subject to City approvals of zoning variances and related approvals which run with the land.

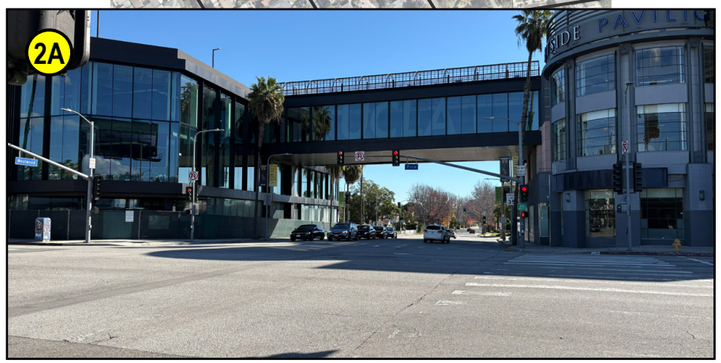
[5] These renovations were evaluated in a Mitigated Negative Declaration (MND) (City of Los Angeles Case No. ENV-2003-6052), October 2003.



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



Site Photo 1: North of the Project Site along W Pico Boulevard looking east.



Site Photo 2A: North of the Project Site at the intersection of W Pico Boulevard and Westwood Boulevard looking south.



Site Photo 2B: North of the Project Site at the intersection of W Pico Boulevard and Westwood Boulevard looking southeast.



Site Photo 3: North of the Project Site at the intersection of W Pico Boulevard and Westwood Boulevard looking southwest.



Site Photo 4: North of the Project Site along W Pico Boulevard looking southwest.



Site Photo 5: South of the Project Site along Ayres Avenue looking northwest.

Figure 3a

Not to Scale

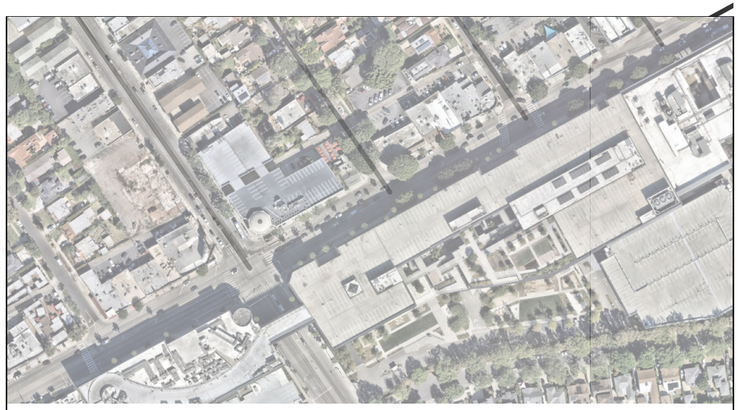
Site Photographs



Site Photo 6: South of the Project Site along Aryes Avenue looking northwest.



Site Photo 7: South of the Project Site at the intersection of Aryes Avenue and Westwood Boulevard looking northwest.



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



Site Photo 8: South of the Project Site at the intersection of Aryes Avenue and Westwood Boulevard looking northeast.



Site Photo 9: South of the Project Site along Aryes Avenue looking northeast.



Site Photo 10: South of the Project Site along Aryes Avenue looking northeast.

Figure 3b

Not to Scale

Site Photographs

To the immediate east of Research Park East, a former Macy's department store (originally constructed as a stand-alone structure that pre-dated the Westside Pavilion) was converted into creative office space, now referred to as West End, in 2022. Additionally, the eastern portion of the Macy's parking structure located at the northwest corner of Overland and Ayres Avenues was demolished and redeveloped as the Overland & Ayres residential community, which opened in 2025. The western portion of the Macy's parking structure (referred to herein as the GPI parking structure) remains, and 400 of the spaces are available as shared parking for the Project site.

4. PURPOSE AND NEED FOR THE PROPOSED PROJECT

In 2022, the State of California included an allocation in the General Fund to establish the Institute for Immunology and Immunotherapy at UCLA with the intent to bring together academics and researchers for collaborative scientific research to maintain California's leading edge in biotechnology. To further this effort, in December 2023, UCLA purchased the Project site to create a state-of-the-art, multidisciplinary research and innovation hub, referred to as UCLA Research Park. Given the scarcity of sizeable development sites within UCLA's main campus, acquisition of the property provided UCLA a unique opportunity to secure substantial additional institutional capacity adjacent to Westwood. The affiliation between these entities combines the strengths of UCLA's existing biomedical research infrastructure and human capital with the philanthropic support and vision of CIII's key founders, as well as the State's funding contribution for the creation of a new flagship research facility. These programs have cross-disciplinary research approaches that make them well-suited to a location where academia and industry can collaborate in the development of critically important scientific fields. Furthermore, UCLA Research Park would allow the development of open laboratory environments that are distinct from the isolated, single-investigator-driven research occurring on the main campus.

Accordingly, UCLA Research Park is intended to bring scholars, research institutions, industry partners, government agencies, and startup companies together to conduct scientific research and advance scientific knowledge. Working collaboratively with UCLA academics and researchers from the fields of biomedical science, information science, engineering, computer science, human genetics and genomics, among others, anchor tenants would include CIII and QIH, with space allocated to DGSOM and future UCLA tenants and non-UCLA partners. These tenants and their combined proposed programs are further discussed in Section II.5, Proposed Project Components, of this Initial Study.

To meet the objectives established for the proposed Project, the program space would include open, collaborative areas for research and creative activities; leased startup company incubator spaces; makerspace and shared equipment rooms; shared office space for bench researchers; private office space for project leaders; conference rooms; spaces leased to outside entities such as established companies, government laboratories, and outside institutions; and auditoriums and gathering spaces to support seminars, performances, and small conferences, all of which can be accommodated within the repurposed existing buildings at the Project site. UCLA Research Park would also facilitate the translation of concepts and prototypes from the academic laboratory bench to the marketplace. This emphasis on translation would be supported by well-resourced incubator space where biotech startup companies can be nurtured by a supportive ecosystem of world-class researchers from UCLA and collaborating scientists and engineers from resident partners.

To accommodate the UCLA Research Park, the proposed Project involves adaptive reuse of approximately 744,400 GSF of occupiable floor area within the existing buildings, with interior improvements and limited new construction. The renovations at Research Park East that occurred prior to UCLA's acquisition of the property in 2023 involved core and shell upgrades, including modernization of building systems, updated elevator cores, seismic upgrades, and a new exterior

enclosure. More specifically, these past renovations included interior demolition and commencement of limited tenant improvements, reconfiguration of the rear (south) side of the building to bring daylight into the interior space, substantial façade changes, creation of a series of outdoor terraces, and landscaping. As the core and shell requirements for the proposed scientific facilities are more stringent than those for office and retail spaces, the proposed improvements at Research Park East would address design issues such as floor-to-floor heights to accommodate laboratories, floor slab vibration characteristics, and the need for robust mechanical, plumbing, and electrical systems and infrastructure, with emergency backup. Relatively limited modifications have been made to Research Park West and primarily involved the removal of interior fixtures and furnishings. Therefore, Research Park West would require substantial building upgrades to accommodate the proposed Project, as discussed further below.

5. PROJECT OBJECTIVES

The underlying purpose of the UCLA Research Park Project is to create a state-of-the-art urban research and innovation hub designed to support multidisciplinary, collaborative scientific research and academic inquiry. The specific objectives of the proposed Project are to:

- Develop an interdisciplinary research facility that fosters innovation and collaboration based on a master planned design incorporating a synergistic mix of uses and activities, shared spaces and resources, centralized support facilities, and opportunities for internal and external engagement.
- Create open, collaborative research spaces conducive to partnerships with external entities and located in proximity to the UCLA main campus such that they serve as a campus resource and complement rather than compete with the single principal investigator-driven research occurring on campus.
- Facilitate the translation of scientific concepts and prototypes from the laboratory bench to the marketplace by creating well-resourced incubator space where startup companies can be nurtured by a supportive ecosystem of world class researchers from UCLA and from resident collaborating partners.
- Deepen engagement with relevant industries and build philanthropic partnerships to support the development of intellectual property, accelerate technology transfer, and expand industry-sponsored research.
- Support ongoing education, training, and career building for students, postdoctoral scholars, faculty, etc. by providing opportunities for UCLA researchers to work directly alongside industry researchers, thus fostering a translational research perspective distinct from the research opportunities on campus.
- Adaptively reuse existing buildings to achieve cost and space efficiencies compared to new development and to bring the buildings into compliance with current seismic and accessibility codes while incorporating a flexible, modular design for research space that minimizes renovation needs related to future tenant turnover.
- Allow for phased, independent construction, tenant improvements, and occupancy by UCLA Research Park tenants.
- Incorporate sustainable practices into all elements of the project, including a LEED Gold, all-electric design with a highly efficient utility plant and rooftop solar panels, in order to minimize carbon emissions, maximize building system efficiencies, conserve water, optimize daylight, and offset electricity use while meeting varied tenant needs.

- Capitalize on the site's transit-rich location, allowing for multi-modal commuting and non-single occupant vehicle travel between UCLA Research Park and the main Westwood campus, thereby minimizing vehicular traffic.
- Provide localized public benefits in the form of opportunities for community exposure to UCLA research and creative activities (e.g., through lectures, demonstrations, exhibits, and performances) and staff patronage of surrounding businesses.
- Strengthen the University's external relations with Los Angeles and the broader academic and business communities while boosting the regional economy.
- Support the University's broad educational and research objectives, including UCLA's Strategic Plan Goal 3 to enhance research and creative activities, as well as the UCLA Research and Innovation Blueprint, a plan to create a more integrated and collaborative innovation ecosystem across Southern California.[6]
- Support the objectives set forth in UC Regents Policy 5105: Policy on Innovation Transfer and Entrepreneurship, including the attraction of talented scholars, the translation of discoveries to benefit society, and the promotion of intellectual property, all of which strengthen UC's scholarship, research, and global impact.[7]

6. PROPOSED PROJECT COMPONENTS

UCLA Research Park Tenants

As previously discussed, the UCLA Research Park anchor tenants would include CIII and QIH, with space allocated to DGSOM and future UCLA tenants and non-UCLA partners. Each of the tenants and their respective improvements may proceed independently depending on each tenant's funding availability and organizational readiness. However, to provide decision makers and the public with a wholistic view of the long-term vision for UCLA Research Park as a synergistic scientific research facility, full buildout is described and evaluated herein based on conservative program assumptions.

CIII is an independent, nonprofit, public benefit corporation focused on translational immunology research to advance immunotherapies and spawn startup companies. CIII would maintain a strong connection with UCLA and UCLA Health through previously approved lease and affiliation agreements involving shared resources and active participation from UCLA faculty. It would also collaborate with industry experts and external institutions through sublease agreements at UCLA Research Park, aiming to establish a leading research and industry ecosystem addressing a wide range of human health challenges.

QIH is a multidisciplinary research organization directed by UCLA's Center for Quantum Science and Engineering, which is operated jointly by the UCLA Division of Physical Sciences and the Samueli School of Engineering. Established to advance quantum science, QIH aims to translate fundamental developments in quantum science and engineering into practical applications. QIH's goal is to advance the nation's economic interests by establishing the greater Los Angeles area as a driver of technological innovation and growth in quantum science and engineering, building a quantum-ready workforce, and bolstering the regional economy.

[6] Refer to https://strategic-plan.ucla.edu for further discussion of the UCLA Strategic Plan 2023-2028, including the purpose and priorities of Goal 3; and https://chancellor.ucla.edu/messages/one-ucla-renewed-focus-on-our-future regarding the UCLA Research and Innovation Blueprint initiative set forth in the Chancellor's One UCLA plan.

[7] Refer to https://regents.universityofcalifornia.edu/governance/policies/5105.html for the text of the policy.

At UCLA Research Park, DGSOM would create a hub for immunology and immune-oncology research and translation, featuring a mix of junior and senior faculty selected to collaborate with CIII and QIH. Supported by research cores specializing in cell imaging, sorting, and molecular characterization, the hub would focus on two or three scientific areas, potentially including oncology, transplant, infectious disease, neuro-immunology, and computational immunology. A key goal of DGSOM's proposed program is to ensure continuity in education and training between UCLA Research Park and the Westwood campus.

Additional tenants at the UCLA Research Park may include startup and established companies in biomedical, quantum science, engineering, and related fields; other higher education and research institutions; as well as government laboratories committed to collaborating with UCLA researchers.

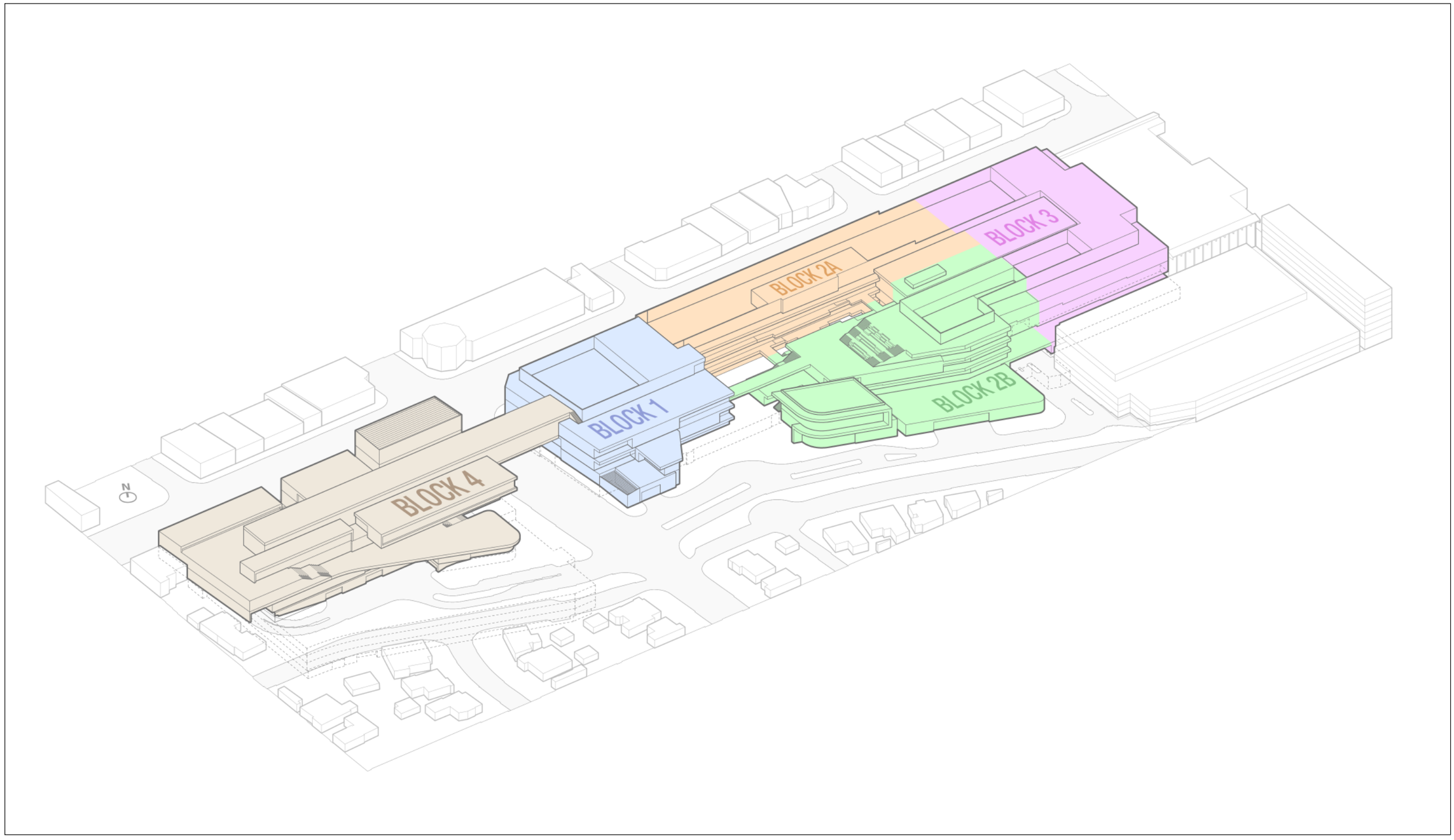
At full potential buildout, UCLA Research Park would offer a synergistic scientific research facility designed with the necessary support functions and amenities to allow the resident partners to explore new areas of inquiry and achieve groundbreaking discoveries. The proposed Project would support the translation of innovation to the marketplace through its collaborative ecosystem and incubator space. Additionally, space for research and creative activities involving the arts, humanities, music, and social sciences, as well as UCLA's professional schools, may be provided depending on future needs, activities, and funding.

Physical Development Components

The proposed improvements would convert the existing buildings to scientific research space supporting a variety of activities and fields of inquiry. The proposed Project is considered an adaptive reuse project, which is classified as a major renovation pursuant to the University of California (UC) Policy on Sustainable Practices.[8] The proposed Project would involve phased development of all necessary building shell and core improvements, seismic improvements, essential infrastructure upgrades, interior tenant improvements, and site improvements necessary to accommodate the anticipated tenants and programs, such as loading dock facilities. The full program would also include the conversion of some areas of subterranean parking to usable floor area in order to create vibration-sensitive laboratories; new construction in limited areas of the Project site to provide necessary support functions; a new pedestrian paseo from Pico Boulevard through the Research Park East building; and modifications to the building façades, primarily at Research Park West. In addition, existing rooftop parking would be removed to reduce vibrations to the structure and electromagnetic fields, address security issues, and to accommodate mechanical equipment at the roof level.

To accommodate the primary tenants and to facilitate the planned phasing of proposed improvements, the existing buildings have been divided into "Blocks" as shown on Figure 4. Research Park East consists of Block 1, Blocks 2A and 2B, and Block 3. Research Park West comprises Block 4. The anchor tenants would occupy the majority of Research Park East, while UCLA programs and departments may occupy much of Research Park West.

[8] Major Renovations are defined as projects that require replacement of 100 percent of mechanical, electrical, and plumbing systems and replacement of over 50 percent of all non-shell areas (interior walls, doors, floor coverings, and ceiling systems).



Source(s): Flad Architects (2026)

Figure 4

Not to Scale

Block Configurations

A summary of the proposed UCLA Research Park program based on preliminary programming is provided in Table 1. As identified, the proposed Project would provide over 800,000 GSF of scientific program space plus approximately 29,000 SF of open space and outdoor amenity areas and approximately 1,100 parking spaces on-site, for a total of up to approximately 1.35 million GSF of research park uses.[9] A conceptual site plan is provided on Figure 5.

TABLE 1 UCLA RESEARCH PARK PROGRAM SUMMARY[1]

Proposed Uses	Research Park East Blocks 1, 2A, 2B and 3 (GSF)	Research Park West Block 4 (GSF)	Total Floor Area (GSF)
Program Floor Area			
Wet and Dry Laboratories	233,500	37,700	271,200
Office	189,300	25,100	214,400
Meeting and Assembly Space	37,000	15,400	52,400
Common and Circulation Areas	171,100	87,600	258,700
Food Service	4,300	10,400	14,700
Total Program Area	***635,200***	***176,200***	***811,400***
Non-Program Area			
Central Loading Dock	18,900	0	18,900
Mechanical Areas[2]	20,100	10,000	30,100
Subterranean Parking (Area)	54,700	434,500	489,200
Subterranean Parking (Spaces)	84 spaces	1,029 spaces	1,113 spaces
Total Non-Program Area	***93,700***	***444,500***	***538,200***
Other Uses			
Open Space	25,700	3,300	29,000
Additional Parking — Per Use Agreement at Adjacent Structure			400 spaces

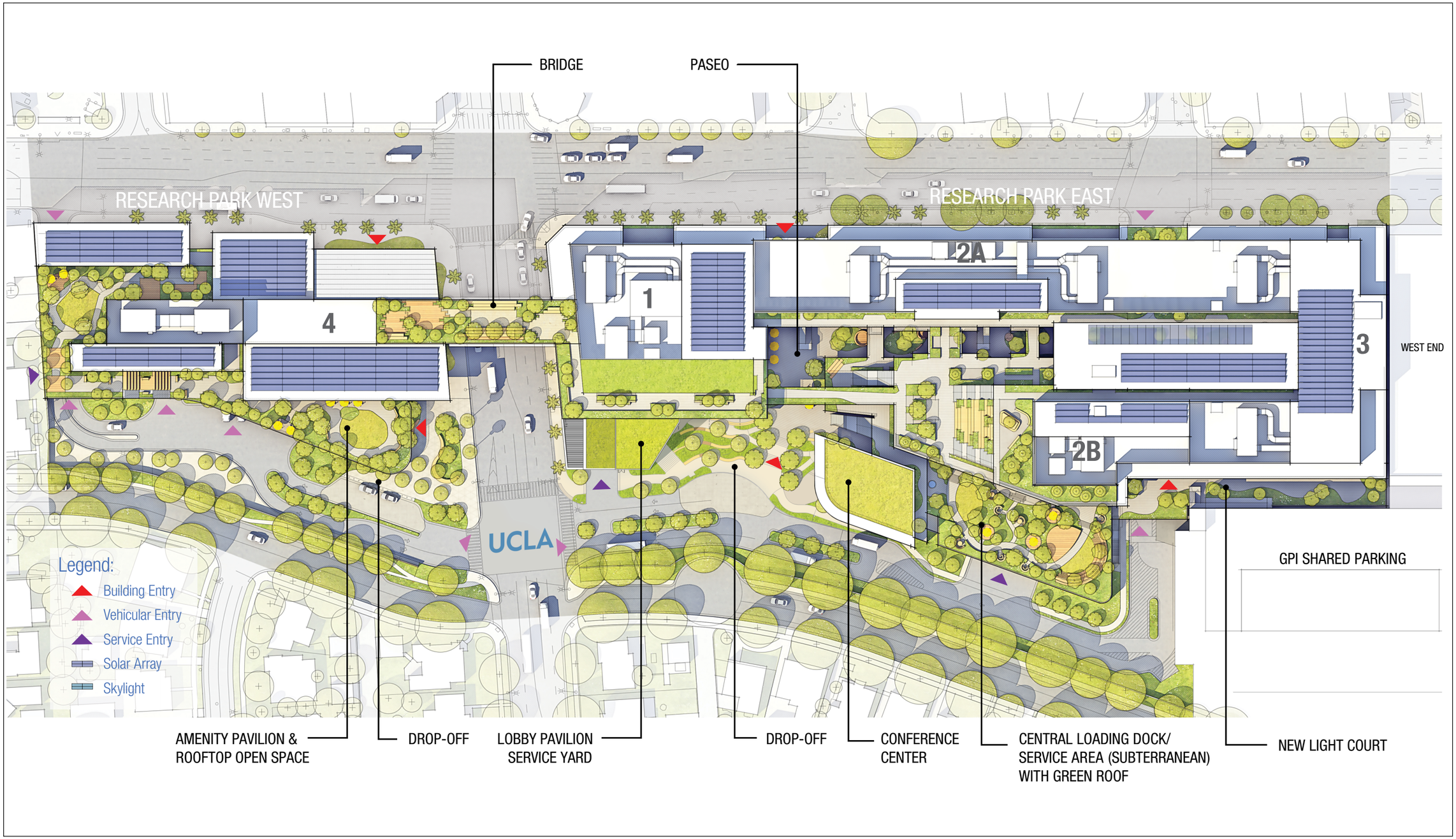
[1] This conceptual program is based on preliminary programming and may change over time as phased development occurs, tenant and research needs change, and funding becomes available. Using broad land use categories, the program identified herein is considered conservative insofar as more intensive land uses have been assumed for analysis purposes.

[2] Includes rooftop mechanical areas and an enclosed service/loading area at Block 1.

Source: (Flad, 2026)

Space and infrastructure planning for tenant facilities would utilize a modular approach to accommodate a wide variety of activities as independent tenants and research needs change over time. As identified in Table 1, the range of proposed uses would include wet and dry laboratories; office space; meeting and assembly spaces, including instructional spaces; food service; common and circulation areas, including amenities; existing subterranean parking; and outdoor open space. Research Park East would primarily serve as a scientific research building with supporting uses that include offices, conference spaces, and limited amenities (e.g., food service). Research Park West is assumed to provide additional research and office space, meeting and conference spaces, food service, and other amenities, some of which may serve as community resources, and/or may ultimately include creative or arts spaces as well.

[9] Total square footage of 1.35 million GSF includes approximately 489,200 GSF of existing multi-level subterranean parking.



Source(s): Flad Architects (2026)

Figure 5

Not to Scale

Conceptual Site Plan

While the precise land use program at UCLA Research Park would depend on individual tenant work efforts and could evolve over time, each of the types of uses and facilities contemplated as part of the proposed Project are consistent with those already present at UCLA and/or at comparable advanced research universities. The key proposed program elements are described below.

- **Wet and Dry Laboratories.** Based on preliminary space programming, it is anticipated that wet and dry laboratories and associated support space would comprise approximately 271,200 GSF at UCLA Research Park. These lab spaces would be consistent with the types of facilities present on the UCLA campus. Wet labs are physical experimentation spaces, typically involving the use of liquids, chemicals, and biological samples and requiring fume hoods and specialized equipment, while dry labs allow for experimental work involving optics and micro/electronics or comprise virtual or computational spaces that focus on data modeling, computational analysis, computer simulations, coding, etc. Lab support uses would include, but not be limited to, technical rooms for tissue culture, microscopes, cold rooms, and refrigerated storage rooms, which may be housed in centralized support cores to maximize efficiency and promote collaboration. Within Research Park East, wet and/or dry lab uses would be located in all Blocks (Blocks 1 through 3), while primarily dry labs would be located at Research Park West (Block 4).

  In addition to tenant-specific laboratories, the proposed Project would include incubator labs ranging in size from approximately 5,000 to 10,000 GSF each that could house a variety of scientific uses for use by startup companies and other researchers. The ultimate allocation of lab space would depend on University and tenant needs based on future research activities and would include research space designed to meet stringent design standards and regulations for various levels of biological safety. The proposed Project also would accommodate an in-vivo research facility of up to 10,000 GSF to support biomedical research and pre-clinical trial studies. This lab space would incorporate appropriate access control, physical security, and environmental protection measures, including a dedicated bay within the loading dock, consistent with regulatory protocols and UC design standards applicable to facilities located on the UCLA campus. Appropriate cleanrooms and soiled rooms also would be incorporated into floorplans, as appropriate, depending on specific scientific activities and tenant needs. Further discussion of potential research operations, mandatory safety protocols based on regulatory requirements and stringent UC design standards, and related building systems at the Project site is provided in applicable sections of this Initial Study.

  The lab component of the proposed Project may include a Good Manufacturing Practices (GMP) or Current GMP (cGMP) facility to support the development of novel therapeutics (e.g., treatments, drugs, and procedures to address diseases). These facilities include strict environmental controls, including HEPA-filtered air, proper air pressure gradients, temperature and humidity control, and unidirectional movement of products and personnel to prevent contamination. Research Park West may also incorporate facilities for government-sponsored restricted research (e.g., classified projects and proprietary research).

  Chemical storage on-site would comply with maximum allowable quantities (MAQs) per the California Building Code (CBC) for both business (Group B) and laboratory (Group L) occupancies. As on the UCLA campus, the UCLA Office of the Environment, Health & Safety (EH&S) would oversee research safety and provide support related to regulatory compliance, guidance, and education. Various tenants within the proposed Project may qualify as small quantity generators (SQG) of hazardous waste based on the temporary storage and containment of chemical waste on-site prior to transport to a permitted

treatment, storage, or disposal facility.[10] Biohazardous waste would not be treated on-site; it would collected in special red biohazard bags and autoclaved (i.e., sterilized using a high-pressure steam sterilizer), making the bags safe for disposal or further handling.

- **Office, Meeting, and Assembly Space.** These types of spaces would be provided in all Blocks at Research Park East and West, with a total of approximately 214,400 GSF of office uses and approximately 52,400 GSF of meeting and assembly spaces. These areas would include offices for principal investigators, research staff, faculty, industry partners, administrative support, and building operations staff, as well as numerous formal and informal meeting spaces including instructional spaces, conference rooms, small huddle rooms, and lounges. If government restricted research occurs on-site, one or more Sensitive Compartmented Information Facilities (SCIFs) could be provided.[11]

  The proposed Project includes the construction of a new two-story, approximately 15,600-GSF conference center adjacent to the main entry plaza on the south side of Research Park East. This facility would provide ancillary support to the primary uses within UCLA Research Park and include approximately 10,000 GSF of meeting and exhibition space, as described further below. At Research Park West, some of the existing theaters could potentially be repurposed as instructional or performance spaces. Additionally, an amenity pavilion of approximately 5,000 GSF would be constructed on the south side of the West building to provide a main entrance and lobby that could function as communal/multipurpose space.

- **Common and Circulation Areas.** These areas totaling approximately 258,700 GSF include building lobbies, elevator lobbies, restrooms, IT server rooms, mechanical rooms, corridors and hallways, and stairwells and would be located throughout Research Park East and West. Each building's main lobby would include a welcome center/security checkpoint and could be used for informal gatherings, pre-function activities, or gallery/exhibit space. Shared facilities such as workplace amenities (e.g., fitness and wellness spaces) also would be provided. As discussed below under Open Space/Landscaping and Amenities, a substantial portion of pedestrian circulation at Research Park East would occur within the existing outdoor walkways which form part of the "Research Loop" connecting the various research facilities and tenant areas.

- **Food Service.** Ancillary food service areas would be provided at both Research Park East and West, with the primary dining amenities located at Research Park West to take advantage of existing food service facilities associated with the retail uses previously operating on-site. A total of approximately 14,700 GSF of food service uses is anticipated, including an approximately 1,800 GSF grab-and-go café located within the proposed conference center and an approximately 2,500 GSF limited service cafe within Block 2A.

Open space and associated outdoor amenities are described below under Open Space/Landscaping and Amenities.

Conceptual renderings of the building exteriors are provided on Figure 6 through Figure 9.

[10] Regulated by the U.S. Environmental Protection Agency (EPA), SQGs generate between 100 and 1,000 kilograms (kg) of hazardous waste per month and must meet specified requirements. While large quantity generators (i.e., entities generating more than 1,000 kg of hazardous waste per month or more than 1 kg of acutely hazardous waste per month; LQGs) are not anticipated based on the tenants identified to date, should any tenants qualify as LQGs, they would be subject to additional regulatory requirements.

[11] A SCIF is a highly secure, accredited area or room designed for the discussion, storage, and processing of classified information.



Source(s): Flad Architects (2026)

Figure 6

Not to Scale

Rendering – Research Park East Main Entry



Source(s): FLAD Architects (04-14-2026)

Figure 7

Not to Scale

Rendering – Research Park East Lobby Pavilion



Source(s): Flad Architects (2026)

Figure 8

Not to Scale

Rendering – Research Park West Amenity Pavilion and Rooftop Garden



Source(s): Flad Architects (2026)

Figure 9

Not to Scale

Rendering – Aerial View from the North

The following physical components of the proposed Project are described below and evaluated in this Initial Study:

- Building and Site Improvements
- Building System Improvements and Amenities
- Circulation and Parking
- Utilities and Infrastructure
- Sustainable Features

Building and Site Improvements

The proposed building and site improvements for Research Park East and West are described below. These improvements would be required to accommodate UCLA Research Park programs and to comply with the UC Seismic Safety Policy (UC, 2024a), the Americans with Disabilities Act (ADA), the UC Policy on Sustainable Practices, and applicable CBC and California Fire Code (CFC) requirements.

Research Park East

The primary building improvements proposed at Research Park East are summarized below.

Structural & Interior Modifications

- In its present condition, the Research Park East structure has a Seismic Performance Rating (SPR) of IV thereby meeting the minimum seismic requirements per the UC Seismic Program Guidelines.[12] Nonetheless, conversion of the existing spaces to scientific research space would require structural retrofits to accommodate the change of use and associated mechanical systems and building loads. Minimal structural modifications are anticipated for Block 1, while several notable interventions are planned for Blocks 2A, 2B, and 3.
    - Most areas of Research Park East would require floor strengthening/stiffening to reduce vibration effects. Changes in vertical circulation such as the addition of passenger and service elevators and stairwells would also require structural modifications. Additionally, the proposed rooftop mechanical and utility equipment would introduce new loads that would require localized strengthening of the roof structure (e.g., beam reinforcement and/or additional secondary steel members below the existing roof slab).
    - The structural retrofit of Blocks 2 and 3 would also involve the relocation of several lateral braces and dampers to maintain lateral force resistance.
    - The southern portion of the existing Block 3 structure would be modified to create a lightwell setback to allow for natural light and views. A total of approximately 12,700 GSF of floor area (Levels 1 through 3) would be removed. Steel moment frames and dampers in this area would be relocated to maintain the integrity of the lateral force-resisting system.
    - The floor heights within portions of Blocks 2A, 2B, and 3 would be adjusted to meet laboratory clearance requirements. Within Blocks 2A and 2B, these improvements would primarily involve the removal of the existing built-up floor slabs, while Block

[12] Seismic evaluations were conducted by KPFF in 2024 and 2025 based on the UC Seismic Program Guidelines. Research Park East was assigned a SPR rating of IV, which meets specified performance criteria.

3 would necessitate more extensive interior construction activity. Skylights would also be added in these blocks.

- To accommodate sound- and vibration-sensitive research activities, much of the existing subterranean parking on Level B1 in Blocks 1, 2A, and 2B would be converted from parking to usable floor area. Specifically, up to approximately 118,000 GSF would be built out for use by CIII, QIH, and other tenants.
- Within Block 3, approximately 41,200 GSF of occupiable space on Level B1 would be converted to parking, with new pedestrian connections to the adjacent GPI parking structure and the central outdoor atrium at Research Park East.
- All of the existing rooftop parking at Research Park East would be removed to minimize vibration and accommodate new mechanical equipment areas, solar panels, and potentially landscaped amenity areas. Portions of the rooftop level would be screened with approximately 18-foot-tall screen walls to provide a visual barrier and sound attenuation for equipment and other rooftop facilities. The added screening would extend the measured building height to a maximum of 74 feet above grade, which is comparable to the height of the existing elevator overruns (within the existing rooftop parking areas) and existing mechanical screens.

New Construction

- The proposed Project includes a new two-story, approximately 1,500 GSF lobby pavilion that would be constructed on the south side of Block 1 to establish a primary entry for CIII. The lobby would comprise approximately 1,400 SF at Level 1 and a mezzanine of roughly 100 GSF at Level 2. In conjunction with the new entry, the existing outdoor loading area/service yard for Block 1 located adjacent to Westwood Boulevard would be enclosed (as a single story) and architecturally integrated with the lobby pavilion. Together, these components would encompass a total of approximately 5,000 GSF. The architecture of the addition would be consistent with the existing Research Park East design, incorporating a glass curtain wall system over a steel structural frame, as shown on Figure 7. Both the single-story and two-story portions of the addition may feature green roofs, while the bulk gas tank storage portion of the service yard would have a vented roof.
- The proposed Project also contemplates the construction of a two-story, approximately 15,600 GSF conference center adjacent to the entry plaza on the south side of Research Park East, south of Block 2B. This facility would provide a 200- to 300-seat conference room that could be divided into multiple 100- to 120-seat meeting rooms; several boardrooms with supporting back-of-house facilities; and a small grab-and-go café. The two-story structure would visually screen the new central loading dock facility from view from Westwood Boulevard.
- In addition to the existing loading dock at Block 1, a subterranean (single level), approximately 18,900 GSF central loading dock facility and service area is proposed at the rear of Research Park East, south of Block 2B. This structure would accommodate six truck loading spaces; equipment rooms; enclosed, code-compliant spaces for lab support/utilities; compressed air and other gas storage; storage for small quantities of hazardous materials of a type consistent with the research and medical facilities located on the UCLA campus; waste management; and back-of-house support. The loading dock facility would be screened with a green roof with heavy landscaping.
- A new pedestrian bridge would be constructed on Level 3 to provide an additional outdoor circulation connection between Block 1 and Blocks 2/3. The bridge would consist of two spans of approximately 60 feet each.

Exterior Modifications

- The existing drop-off zone and adjacent landscape area on the south side of Research Park East would be redesigned as the main entry plaza. This area would provide an enhanced passenger drop-off zone; accessible access to various Research Park East components such as the paseo, main lobby and conference center; and usable landscaped open space, as shown in the rendering in Figure 6.
- In addition to the new Block 1 lobby pavilion and loading area/service yard enclosure, modifications to the Research Park East building envelope and façade would include a new pedestrian paseo on Level 1 between Blocks 1 and 2, extending from Pico Boulevard to the main entry plaza. A portion of the paseo would be enclosed, and a portion would be open air, connecting to the central outdoor atrium. The paseo would provide a defined entrance to Research Park East with access to the main lobby. Refer to the conceptual site plan on Figure 5 and building elevations provided on Figure 10.
- Service areas (e.g., for trash/recycling and storage), loading activities, and various on-site equipment (e.g., bulk gas tanks and compressed air) would be located within the new central loading dock facility and the Block 1 loading area/service yard, both of which would be enclosed. Roof venting would be provided, as needed, for bulk gas tank storage.
- Since public access to the GPI parking structure would be maintained via the Pico Boulevard driveway, a new 8-foot fence with gated vehicular access would be installed near the southeastern site boundary to provide a secure perimeter.
- The existing pole lighting along the Westwood Boulevard driveway would be retained, although several poles would be relocated to accommodate a proposed pedestrian crosswalk and the revised layout for the drop-off area and main entry plaza. New landscape, wayfinding, security, and architectural lighting would be added throughout this area and would include low-voltage LED handrail lighting, illuminated bollards, light poles, and soffit accents. Public art may also be provided at select locations throughout the Project site.

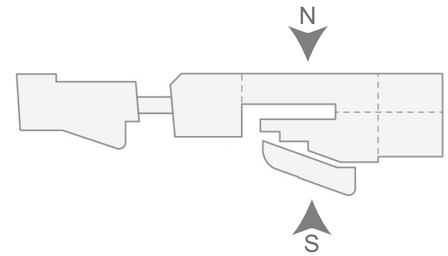
Research Park West

While programming and tenancy at Research Park West are not yet precisely defined, the primary building improvements are described below.

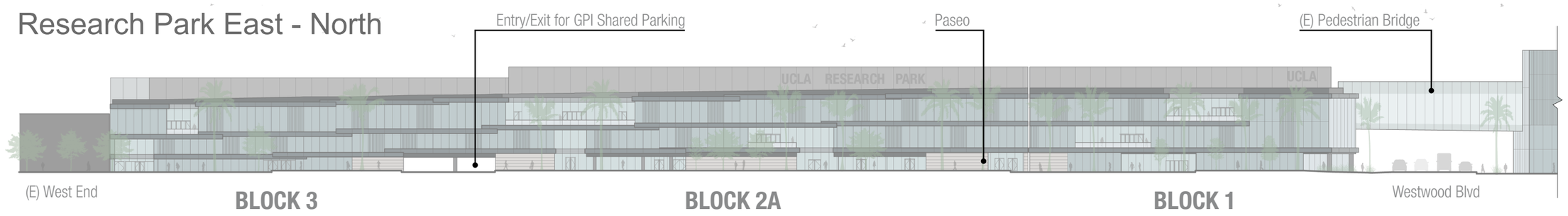
Structural & Interior Modifications

- Research Park West would require a full seismic upgrade to improve the building's SPR from VI to IV.[13] This work would include but not be limited to: retrofit of existing welded beam-to-column connections, incorporation of dampers along the connection retrofits, reinforcement of steel moment frames, and strengthening/thickening of concrete footings to meet necessary performance requirements. A phased approach to the seismic upgrades would be implemented to allow for continued use of the subterranean parking levels to support initial operations at Research Park East, followed by full retrofit activities as part of buildout of Research Park West (refer to the construction phasing discussion below).

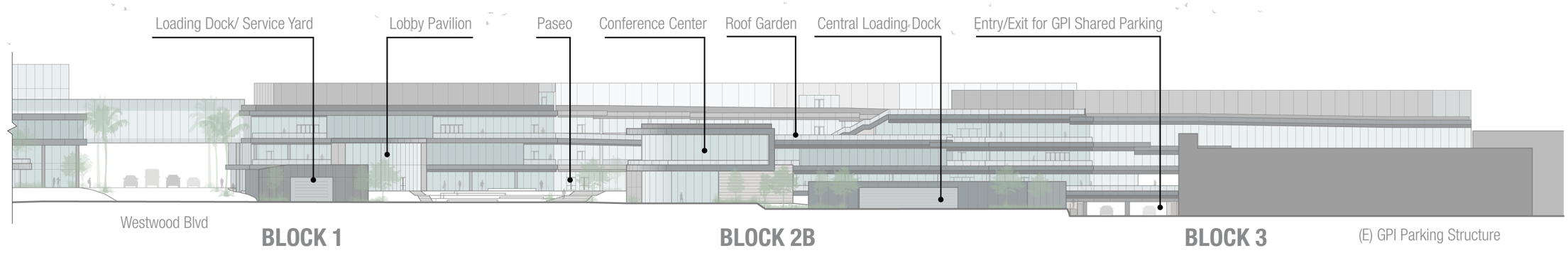
[13] Seismic evaluations were conducted by KPFF in 2024 and 2025 based on the UC Seismic Program Guidelines. Research Park West was assigned a SPR rating of VI, which does not meet specified performance criteria but does not pose an immediate life-safety hazard.



Research Park East - North



Research Park East - South



Source(s): Flad Architects (2026)

Figure 10

Not to Scale

Building Elevations – Research Park East

- All rooftop parking would be removed to accommodate mechanical equipment, solar panels, and potentially landscaped amenity areas. The rooftop level would be screened with screen walls. The pedestrian bridge between Research Park West and East would be maintained; however, vehicular travel across the bridge rooftop would be eliminated.

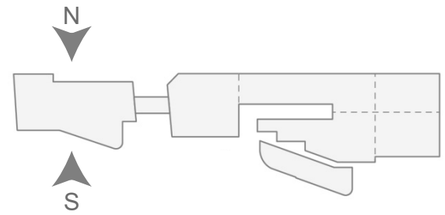
- Interior modifications would include the removal of some of the existing theaters, as well as removal of the enclosed vehicular ramp along the southern side of the building and its conversion to usable floor area.
- Given the current space configuration at Research Park West, some of the existing vacant theaters may be converted to meeting rooms, auditoriums for instructional use, or spaces for creative activities and research related to the arts in collaboration with outside institutions and entertainment companies. Similarly, the existing unleased restaurant space may be repurposed as a new restaurant or a catering venue to support meetings and small conferences. Future programming at Research Park West, including the potential for community/public access, would depend on University needs, funding availability, and campus and Regental approvals.

New Construction & Exterior Modifications

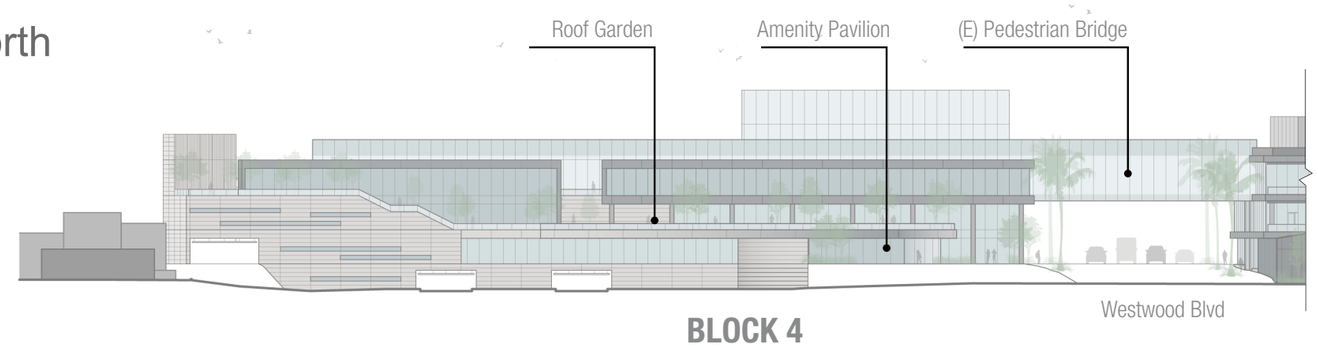
- The southern portion of the Research Park West site would be reconfigured to provide a point of arrival for visitors, students, faculty, and community members and to streamline vehicular access to the existing subterranean parking structure. This area would include a new landscaped plaza adjacent to Westwood Boulevard.
- A single-story, approximately 5,000 GSF amenity pavilion would be added on the south side of the building to provide a new main entrance and lobby. This communal/multipurpose space would feature a rooftop landscaped terrace.
- Modifications to the Research Park West exterior would include architectural changes, recladding, and new glazing to modernize the façade, match the façade materials at Research Park East, and bring daylight into the interior spaces (refer to the conceptual building elevations provided on Figure 10 and Figure 11).
- The existing pole lighting along the Westwood Boulevard driveway would be retained, although a few poles would be relocated to accommodate a revised layout for the drop-off area and main entry. New landscape, wayfinding, security, and architectural lighting would be added throughout this area and would include low-voltage LED handrail lighting, illuminated bollards, light poles, and soffit accents.

It is noted that the five subterranean levels of existing parking as well as the existing loading dock in Block 4 would remain largely unchanged, and public access to the enclosed Pico Boulevard driveway along the west side of the site would be maintained.[14] Refer to the discussion of Circulation and Parking below for additional information, including a description of the proposed pedestrian crosswalk across Westwood Boulevard.

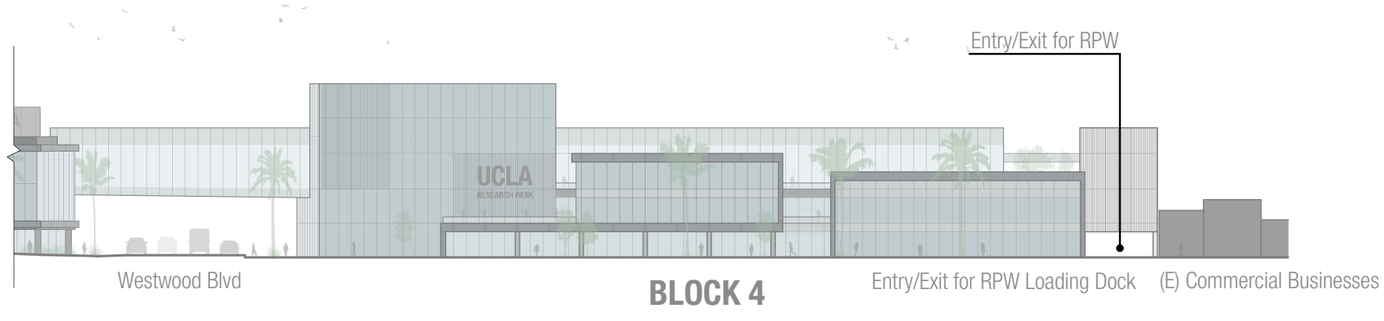
[14] An easement in favor of the City of Los Angeles was granted in 1990 to allow public use of this driveway. An opening in the exterior wall of the Research Park West building provides vehicular access between the driveway and an adjacent public alley.



Research Park West - North



Research Park West - South



Source(s): Flad Architects (2026)

Figure 11

Not to Scale

Building Elevations – Research Park West

Building System Improvements and Equipment

The existing building mechanical, electrical, and plumbing systems, including the existing boilers, would be replaced with an all-electric utility plant meeting UC requirements for carbon neutrality and sustainability. This system would provide a local and efficient source of heating and cooling with the benefit of a shared energy circulation loop for redundancy, resiliency, and energy efficiency. This system would also distribute the structural load, electrical demands, and space requirements across the blocks. For purposes of analysis in this Initial Study, the following equipment is anticipated to be installed:

- Heat Recovery Chillers: Nine 80-ton cooling/1,100 thousands of British thermal units per hour (MBH) heating
- Air Source Heat Pumps: Eleven 200-ton cooling/2,000 MBH heating
- Air Cooled Chillers: Four 250-ton cooling
- Buffer Tanks: Four heating and two cooling (tanks to be provided per block/central plant)
- Electric Boiler: One 2,000 MBH (optional for redundancy)
- Primary Pumps: Pump set, run, and standby for each block
- Secondary Pumps: Three chilled water and three hot water (pumps per block and serving the campus)

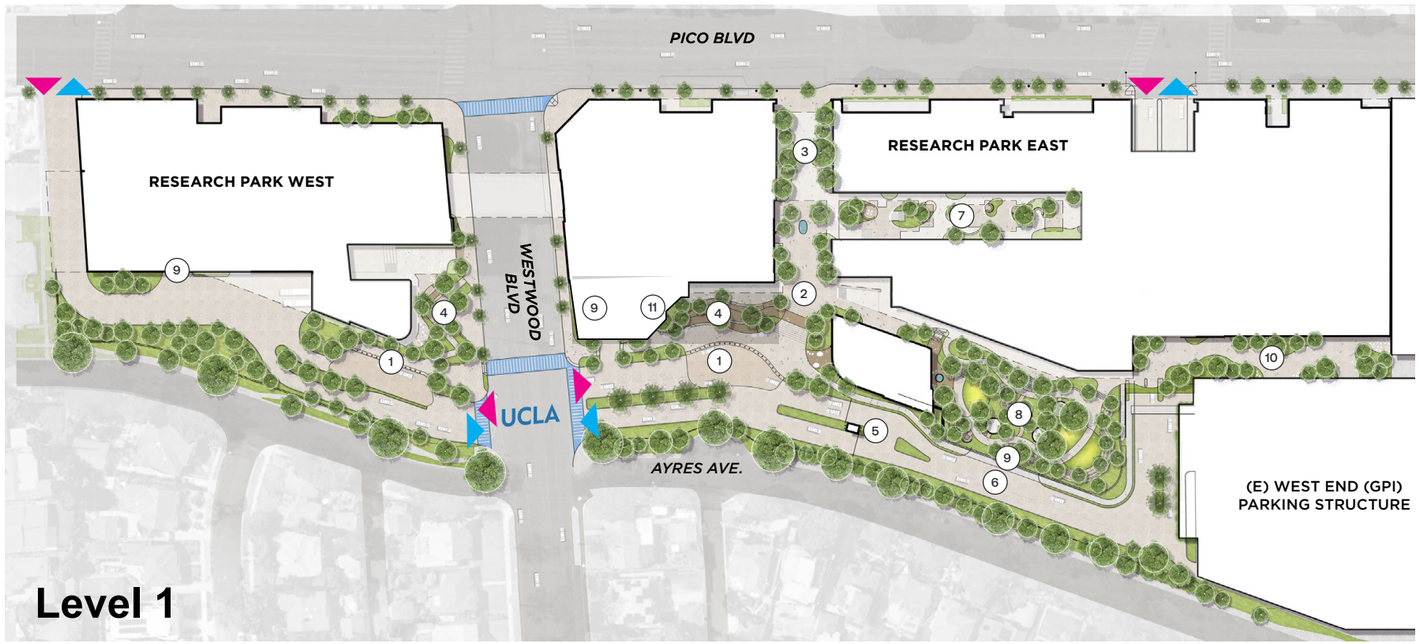
Diesel-powered emergency generators and associated support equipment would be installed for use during power outages. New emergency generators for Research Park East would be located on the roof and would include four 1 megawatt (MW) house generators, four 750 kilowatt (kW) generators to serve CIII's spaces, and two 1 MW generators to serve other tenants. The existing emergency generator at Research Park West, located outside near the southwest corner of the building, would be replaced in the same location with similar sized equipment.

Open Space/Landscaping and Amenities

The proposed Project includes the creation of useable open space and associated amenity areas for the UCLA Research Park community. These areas would serve as an extension of the interior programming with flexibility to accommodate both intimate and larger gatherings. The proposed exterior open space areas at Levels 1, 2, 3, and the Roof Level would encompass approximately 29,000 GSF and are conceptually depicted on Figure 12 and Figure 13.[15]

As shown on Figure 12, Level 1 would include various landscaped open space areas open to the public and private outdoor spaces that could serve as gathering areas. At Research Park East, these spaces include the main entry plaza and the paseo connecting to Pico Boulevard, the central outdoor atrium running east-west between Blocks 2A and 2B, and the rooftop of the central loading dock facility. At Research Park West, the new landscaped plaza adjacent to Westwood Boulevard would pay homage to the former Pico Drive-in, which historically operated at the Project site (prior to construction of the Westside Pavilion), and could be used as a community gathering space.

[15] The open space square footage is not included in the program GSF calculations but would be available for programmatic use.

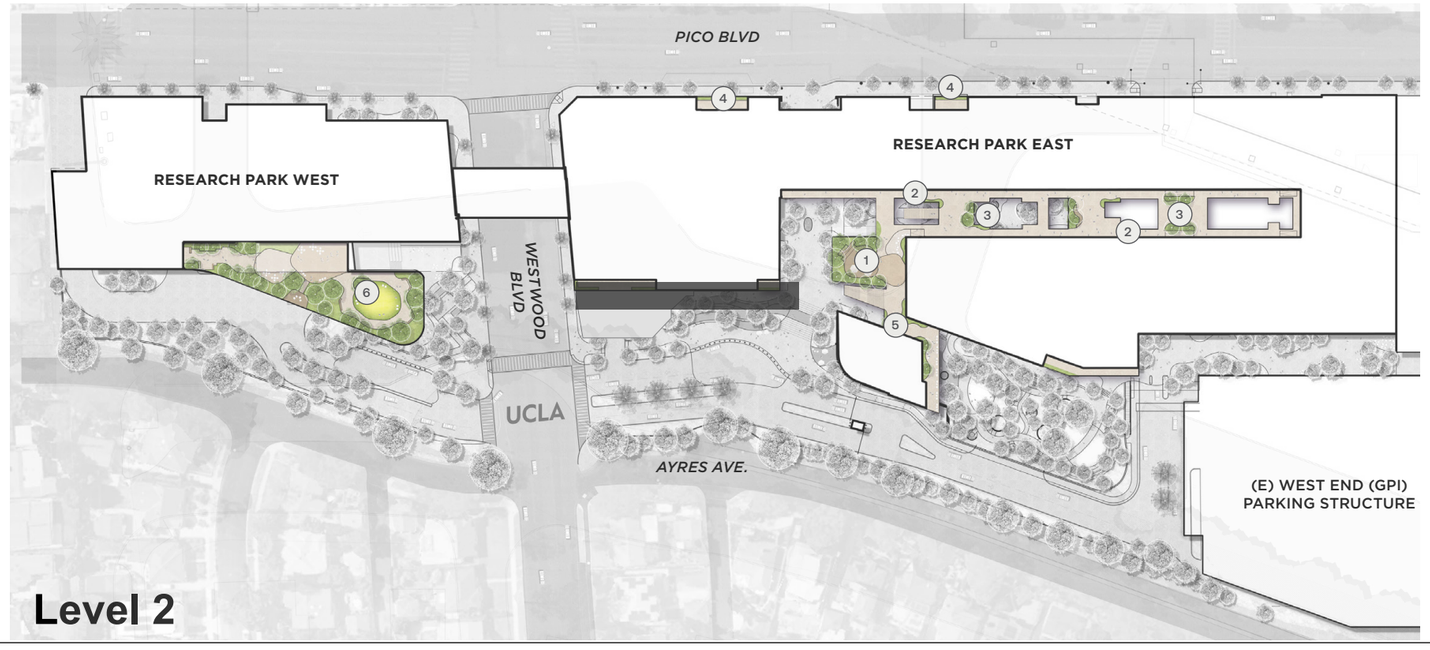


LEGEND

1. Drop-Off Area
2. Main Entry Plaza
3. Paseo
4. Public Shared Outdoor Terraces
5. Guard Booth
6. Fire Lane/Access Road
7. LVL 01 Atrium
8. Green Roof/Garden
9. Service Yard
10. Light Court
11. Lobby Pavilion

Entry Points

Exit Points



LEGEND

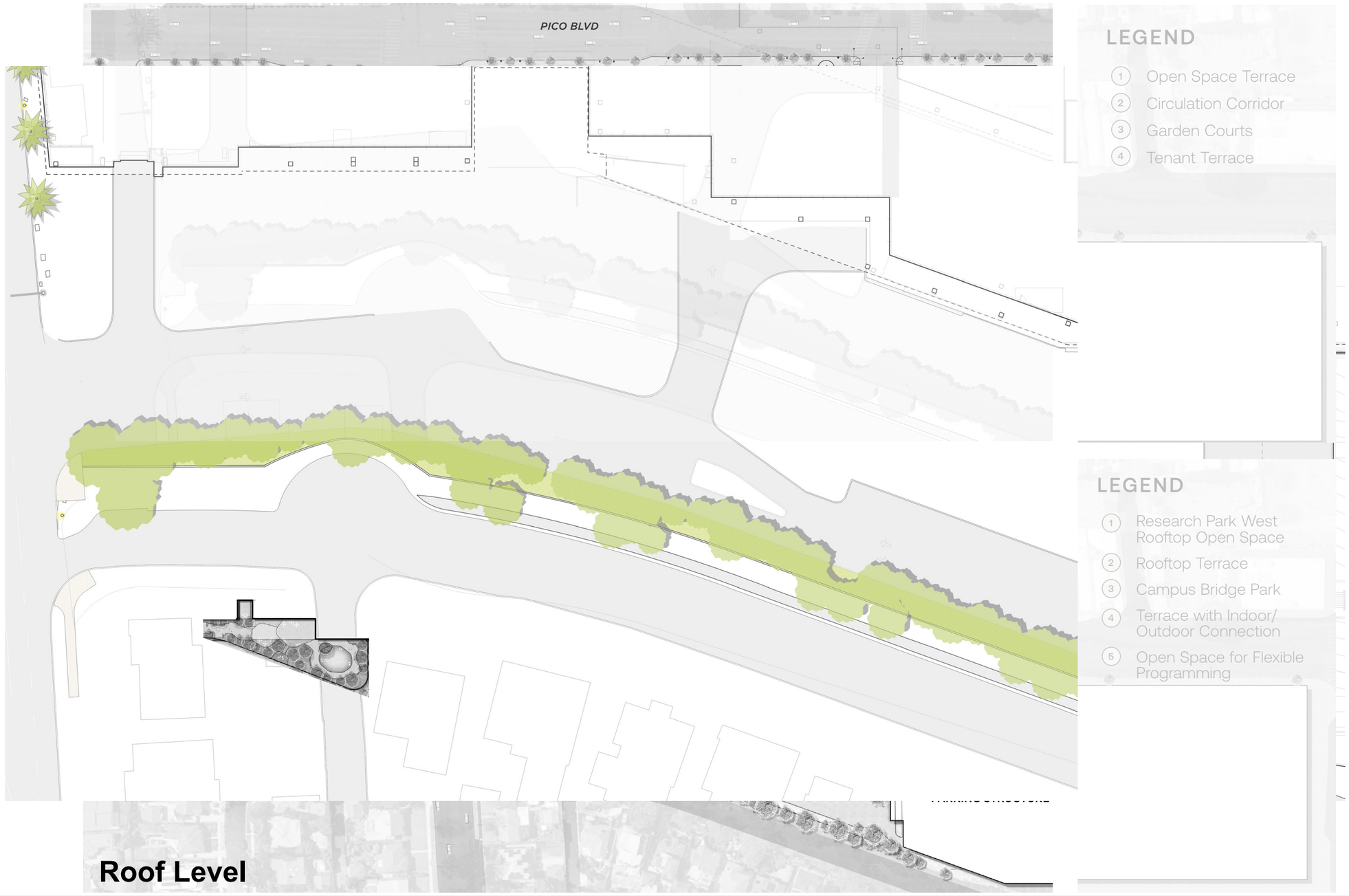
1. Open Space Terrace
2. Circulation Corridor
3. Garden Courts
4. Tenant Terrace
5. Connection to Amenity Bldg.
6. West Research Park Open Space

Source(s): OJB Landscape Architecture (2026)

Figure 12

Not to Scale

Level 1 and 2 Open Space and Amenities



Source(s): OJB Landscape Architecture (2026)

Figure 13

Not to Scale

Level 3 and Roof Level Open Space and Amenities

As shown on Figure 12 and Figure 13, the open-air atrium at Research Park East would feature circulation corridors on Levels 2 and 3 that include garden courts and terraces along the elevated walkways. At Level 2, the terrace would connect to the conference center. Additionally, several small tenant balconies would be provided along Pico Boulevard. At Research Park West, a landscaped open space area would be provided on the roof of the amenity pavilion at Level 2.

As shown on Figure 13, multiple rooftop terraces with landscaping/gardens would be introduced at Research Park East and West, connected by the pedestrian bridge over Westwood Boulevard.

The exterior site surfaces would include a combination of poured in place concrete, wood decking, and concrete pavers for accent areas. The outdoor areas would be landscaped with native and drought-adapted species. All planters would be on an irrigation system; stormwater would be collected on-site and reused for irrigation. New landscape lighting would be added with low-voltage LED lights to illuminate the entry plaza trees, shrubs, and the underside of seating elements. Other lighting elements would include integrated handrail lighting, illuminated bollards, light poles in public areas, and surface mounted soffit accent lighting.

As further discussed in Section V.4, Biological Resources, a total of 96 regulated trees are located on-site, including 30 trees that meet the LRDP definition of a protected tree species and 66 trees that are considered mature per the LRDP. The protected trees include 22 western sycamores (*Platanus racemosa*) and eight coast live oaks (*Quercus agrifolia*). These are established trees, but are moderately small in size, generally ranging from 4 to 10 inches in trunk diameter. The proposed Project would involve the relocation of 11 trees, including six western sycamores and five coast live oaks; and the removal of 10 trees, including eight western sycamores and two coast live oaks. Tree replacements would comply with UCLA's adopted requirements. The remaining mature trees and protected species would be retained, protected in place during construction, as warranted, and incorporated into the Project landscape and open space plan.

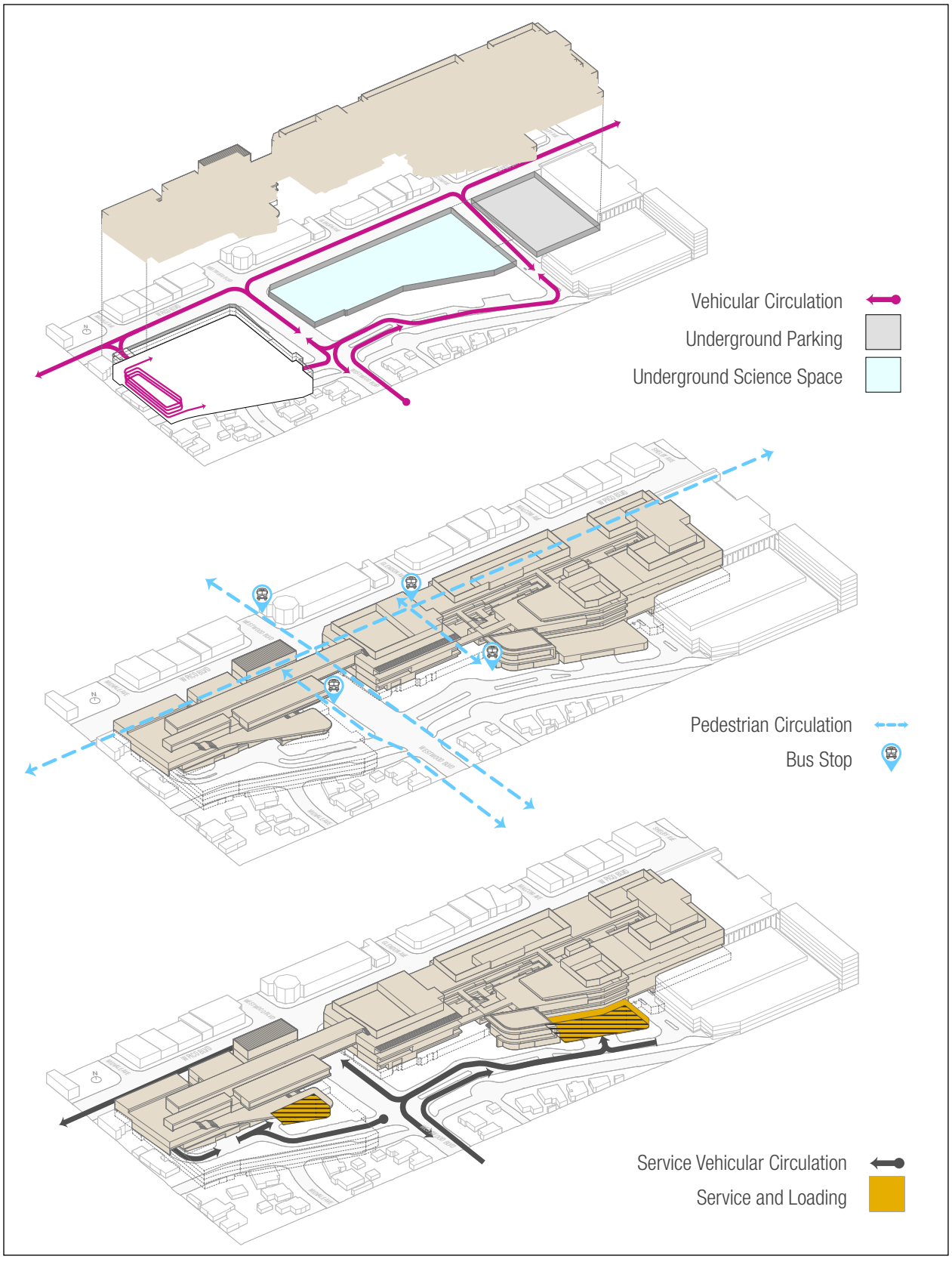
Circulation and Parking

Vehicular Circulation

Consistent with existing conditions, vehicular access to Research Park East and Research Park West would be provided from signalized driveways along Westwood Boulevard and Pico Boulevard (refer to Figure 14). The Westwood Boulevard driveways would be open during daytime hours, with access control gates for after-hours entry.

At Research Park East, primary employee access would be from the Pico Boulevard driveway, which traverses the site and connects to the GPI parking structure to the southeast, where 400 shared parking spaces would be available for staff use. The Westwood Boulevard driveway is envisioned primarily for visitors and shuttle buses which would utilize the drop-off zone at the main entry plaza, as well as for loading dock access for service vehicles. New access control would be added at the Pico Boulevard entry with a roll-down gate for after-hours access.

At Research Park West, the Westwood Boulevard driveway would serve as the primary vehicular point of access to the new drop-off area and the existing five-level subterranean parking structure, which would serve as the main parking area for all staff and visitors. The Westwood Boulevard driveway also would provide service vehicle access to the Block 4 loading dock. The existing Pico Boulevard driveway would continue to be open to the public pursuant to a City easement, providing access to the public alley to the west. This driveway would also provide egress from the Research Park West parking structure and loading dock.



Source(s): Flad Architects (2026)

Figure 14

Not to Scale

Vehicular and Pedestrian Circulation

The existing staffed security kiosk at the Westwood Boulevard driveway at Research Park East would be relocated east of the publicly accessible main entry plaza and drop-off area in order to control access to the central loading dock and adjacent GPI parking structure, while providing adequate entry queueing. A staffed security kiosk would be constructed at the Westwood Boulevard driveway at Research Park West as well.

Research Park East and West would both incorporate drop-off areas that would be accessed from Westwood Boulevard and allow for sufficient on-site queuing space. Service vehicle access to all loading docks would also be provided from the Westwood Boulevard driveways.

Pedestrian Circulation

There are existing sidewalks along the roadways surrounding the Project site. Pedestrian access to Research Park East would occur via: (1) a Westwood Boulevard entry gate (access controlled after-hours); (2) Pico Boulevard via the paseo located between Blocks 1 and 2, which would provide access to the main lobby in Block 1 as well as the conference center and the main entry plaza to the south; (3) the parking area within Block 3; and (4) the adjacent GPI parking structure. Pedestrian access to Research Park West would occur via: (1) the subterranean parking garage; (2) the new amenity pavilion on the south side of the building near Westwood Boulevard; and (3) an entrance from Pico Boulevard along the north side of the building. Pedestrian circulation is depicted on Figure 14.

A new mid-block pedestrian crossing across Westwood Boulevard is proposed at the existing signal at the site driveways (between Pico Boulevard and Ayres Avenue) to improve safety and connectivity between Research Park East and West. The existing enclosed pedestrian bridge across Westwood Boulevard at Level 3 would also remain. Pedestrian circulation within portions of the rooftop level would provide access to terrace gardens and amenities.

To encourage bicycle travel, short-term bike parking, long-term bike storage, showers, and locker facilities would be provided on-site. Depending on final program requirements, an estimated 21 short-term and 136 long-term bike parking spaces would be provided throughout the site, plus 14 showers with lockers. These improvements would promote use of the existing local bicycle network, including the City's planned bike lane extension along Westwood Boulevard which would facilitate connectivity to the UCLA main campus.

Transit

As further discussed in Section V.17, Transportation, of this Initial Study, various transit facilities are located within walking distance of the Project site. Notably, the Project site is located approximately 0.25 mile from the Metro E Line Westwood/Rancho Park Station and approximately 0.5 mile from the Metro E Line Expo/Sepulveda Station. The E Line provides light rail service between East Los Angeles and Santa Monica, and these stations are considered major transit stops. The City of Santa Monica's Big Blue Bus is the primary bus transit provider with the largest number of bus routes and stops in close proximity to the Project site. LA Metro, Culver CityBus, and the LA Department of Transportation (LADOT) also provide bus transit service within the Project vicinity. Bus stops are located adjacent to the Project site along Pico Boulevard and Westwood Boulevard, with additional bus stops along Overland Avenue.

UCLA Research Park employees would be eligible for many of UCLA's Transportation Demand Management (TDM) programs, including but not limited to: subsidized transit passes, carpooling assistance, and potential shuttle services.

Parking

Parking would be provided in multiple locations within UCLA Research Park. The existing five-level below grade parking structure at Research Park West would serve as the primary parking facility, providing 1,029 parking spaces. All of the existing rooftop parking would be removed. Research Park West would also provide one loading dock space, consistent with existing conditions.

Following the removal of all existing rooftop parking and conversion of the Level B1 parking in Blocks 1, 2A, and 2B to occupiable floor area, limited parking would remain at Research Park East; a total of 84 parking spaces (including five ADA spaces) would be provided on Level B1 in Block 3. Additionally, shared use of 400 spaces within the adjacent GPI parking structure would remain available for employees. There would be six loading dock spaces in the new central loading dock facility, and the single loading dock space in Block 1 would remain.

Electric vehicle (EV) charging infrastructure would meet or exceed California Green Building Standards Code, Title 24, Part 11 (CALGreen) requirements. Specifically, a minimum of 20 percent of the total on-site parking supply would be capable of supporting EV charging, and at least 50 percent of those spaces would include EV chargers. This would yield at least 111 EV-ready spaces and at least 112 EV charging stations.

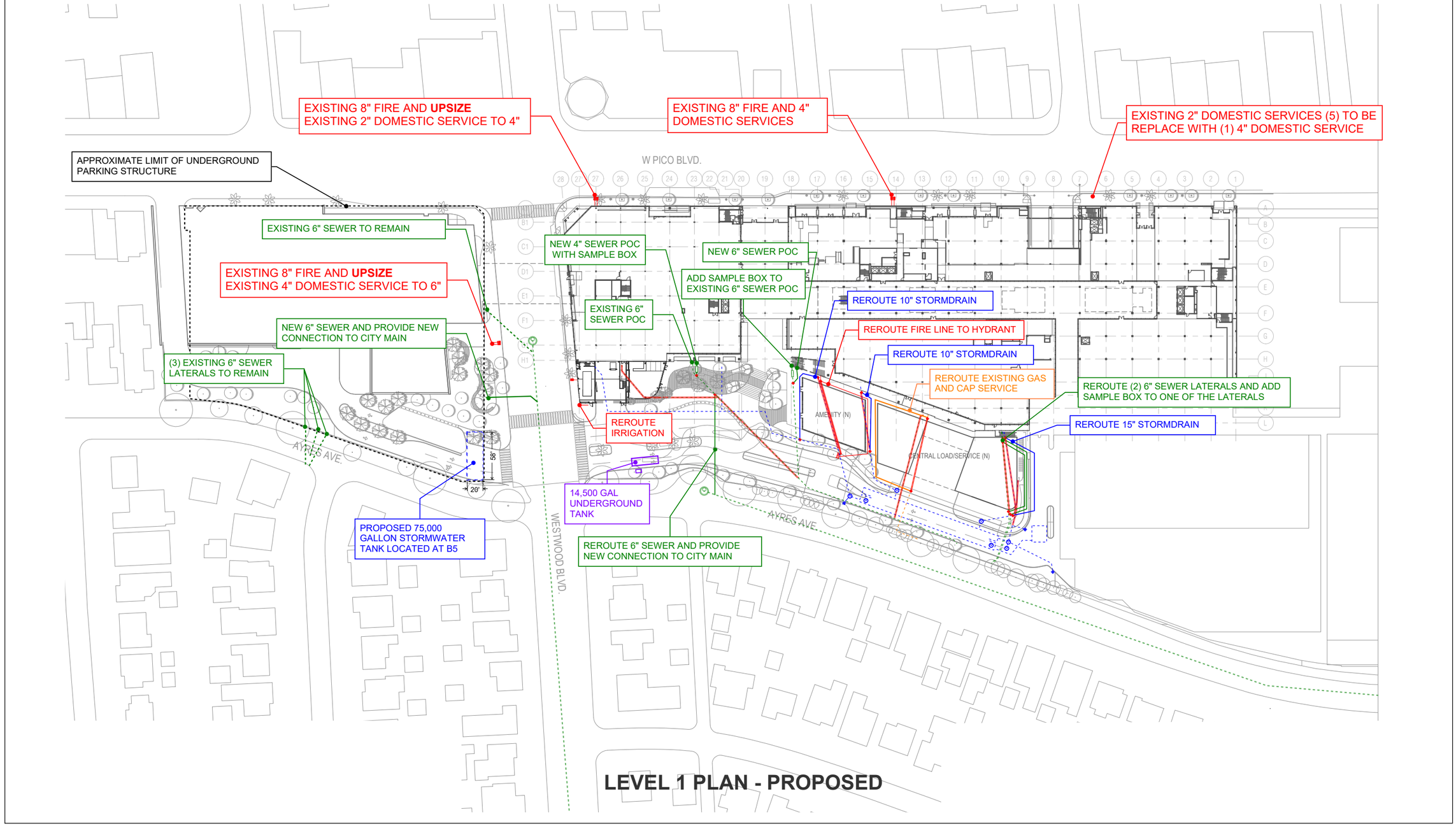
Utilities/Infrastructure and Floodproofing

The Project site is served by existing water, sanitary sewer, storm drain, electric, and telecommunications utility infrastructure within the surrounding roadways. In general, the existing off-site infrastructure has sufficient capacity to accommodate the demands associated with the proposed uses; any modifications to these systems are described below. As the proposed Project would not involve the use of natural gas, the existing gas service to the site would be capped.[16] Figure 15 denotes the proposed on-site water, sewer, and storm drain improvements that would occur as part of the proposed Project.

- **Water.** The Los Angeles Department of Water and Power (LADWP) provides domestic water service to the Project site. Research Park East is surrounded by the following water main lines: 24-inch main in Pico Boulevard; 8-inch main in Westwood Boulevard; and 6-inch main in Ayres Avenue. Research Park West is surrounded by the following water main lines: 16-inch and 8-inch mains in Pico Boulevard; the 8-inch main in Westwood Boulevard; and 4-inch and 6-inch mains in Ayres Avenue. Public fire hydrants are located along Pico Boulevard, Westwood Boulevard, and Ayres Avenue and would not be affected. One on-site private fire hydrant may be relocated.

  As shown on Figure 15, at Research Park East, one existing 2-inch domestic water line would be upsized to a 4-inch line, and five existing 2-inch domestic water lines would be replaced with one 4-inch domestic water line. Additionally, one existing underground fire protection line as well as the irrigation lines located at Research Park East would be rerouted. At Research Park West, one existing 4-inch domestic water line would be upsized to a 6-inch line.

[16] Should any future tenant request limited gas service, that request would require separate environmental evaluation and approval.



Source(s): FLAD Architects (04-14-2026)

Figure 15

Not to Scale

Proposed Utility Infrastructure

- **Wastewater.** LA Sanitation & Environment (LASAN) provides sewer service to the Project site. Research Park East is served by an 8-inch sewer main in Ayres Avenue. On-site there are six sewer connections to the Research Park East building, which manifold into two 6-inch laterals connecting to the City main in Ayres Avenue. As shown on Figure 15, the two easternmost 6-inch sewer laterals would be rerouted around the proposed central loading dock facility, and a sample box would be required for one of the rerouted laterals. The existing 6-inch service located west of the proposed conference center would have a sample box added and a new 6-inch sewer point of connection. The westernmost 6-inch service would remain, and a new 4-inch service with a sample box would be added. This 6-inch service would be rerouted to a new connection to the City main in Ayres Avenue.

  There are two 8-inch sewer mains adjacent to Research Park West (one in Westwood Boulevard and one in Midvale Avenue). On-site there are four existing 6-inch sewer points of connection serving the Research Park West building. Three of the existing sewer laterals discharge to the City sewer main in Midvale Avenue, and one discharges to the main in Westwood Boulevard. An additional 6-inch sewer lateral is proposed and would discharge to the Westwood Boulevard main.

  The proposed Project may incorporate the use of greywater (i.e., non-contaminated wastewater from sinks, showers, and washing machines) for landscape irrigation and toilet flushing purposes. Appropriate supportive infrastructure, including separate piping, filters, and treatment facilities, would be included as part of such a system. For purposes of providing a conservative analysis of wastewater capacity and water conservation, such reuse has not been accounted for in the wastewater generation estimates provided herein.

- **Drainage and Water Quality.** Stormwater runoff from Research Park East would be routed to catch basins with filter inserts and hydrodynamic separators for pre-treatment,[17] and then to an existing stormwater system located near the southern site boundary that includes four drywells and an approximately 131,600-gallon underground storage tank. An additional underground storage tank with a capacity of approximately 14,500 gallons is proposed within the driveway near Westwood Boulevard. Stored water would be used for landscape irrigation. As shown on Figure 15, the proposed Project would also involve rerouting segments of a 15-inch and two 10-inch storm drain lines to accommodate the new conference center and central loading dock at Research Park East.

  Stormwater runoff from Research Park West would likewise be routed to catch basins with filter inserts and hydrodynamic separators for pre-treatment, and then to a new approximately 75,000-gallon underground storage tank located at Basement Level 5. Stored water would be used for landscape irrigation.

- **Electricity and Telecommunications.** Electricity service is provided by LADWP via four on-site electrical vaults (three at Research Park East and one at Research Park West). The three vaults serving the East building are located adjacent to Westwood Boulevard, with one each serving Block 1, 2, and 3, which are identified by LADWP as A, B, and C. Vault C may be upgraded to provide additional capacity to support full buildout of the proposed Project. Vault access for maintenance is from the sidewalk along Pico Boulevard. The LADWP vault in Research Park West is located on the second floor and would be maintained. Any related service transformer upgrade, if necessary, would be coordinated with LADWP.

[17] Hydrodynamic separators trap and separate trash, debris, and sediment from stormwater flows.

- **Floodproofing.** Research Park East is located within a 100-year flood plain as currently mapped by the Federal Emergency Management Agency (FEMA). The proposed Project would introduce dry floodproofing improvements to allow for occupation of the basement level and to protect portions of the street level space along Pico Boulevard.[18] Dry floodproofing improvements are anticipated to include, but may not be limited to, improvements to the south property line wall, active devices to control flooding from the adjacent GPI property to the east, and improvements along Pico Boulevard (Level 1). The latter would include both fixed improvements such as flood mitigation curbs (i.e., raising the concrete curb along the exterior wall, with sections of storefront replacement to match existing) and temporary improvements such as physical controls at doorways.

Sustainability Features

The proposed Project would meet the University of California Policy on Sustainable Practices, which establishes goals for green building, clean energy, transportation, climate protection, facilities operations, zero waste, procurement, food service, and water systems. In support of UCLA's commitment to leadership in regional sustainability, the proposed Project would prioritize meeting applicable goals from the Policy on Sustainable Practices to the fullest extent possible, consistent with budgetary constraints and regulatory and programmatic requirements. Accordingly, a minimum Gold rating pursuant to the Leadership in Energy and Environmental Design (LEED™) for Building Design and Construction (BD+C) has been established for the proposed Project, which qualifies as a major renovation of existing buildings. LEED is a green building rating system that contains prerequisites and credits in five areas: (1) environmentally sensitive site planning; (2) water conservation; (3) energy efficiency; (4) conservation of materials and resources; and (5) indoor air quality. To achieve the required LEED Gold rating, a full range of sustainability practices related to building design and operations would be included in the proposed Project. The proposed Project incorporates a series of green building strategies including, but not limited to, the following:

- Adaptive reuse of the existing structures, repositioning from a retail mall/partial office conversion to scientific research, within an area adjacent to existing amenities, public transportation facilities, and existing urban infrastructure;
- Outperformance of CBC Title 24 energy efficiency requirements by at least 20 percent;
- All-electric buildings where all new mechanical systems including boilers and autoclaves would be electric powered, and the existing gas service would be capped;
- Commitment to the use 100 percent green (renewable) electricity through LADWP's Green Power for a Green L.A.™ Program;
- Installation of an on-site photovoltaic (PV) solar array (18,100 SF) with battery storage providing approximately 1,515,000 kilowatt-hours per year (kWh/yr);
- Installation of highly efficient HVAC systems;
- Installation of wind response exhaust systems (i.e., exhaust design accounts for local wind patterns) and sound attenuation for equipment;
- Incorporation of construction materials that have a lower embodied carbon in line with the California Green Building Standards Code (CALGreen) embodied carbon requirements and in accordance with the Buy Clean California Act (AB 262, codified in California Public

[18] Dry floodproofing seals a building to make it watertight, preventing floodwaters from entering by sealing openings like doors and windows with flood shields or membranes, waterproofing walls with sealants, and protecting utility equipment. Dry floodproofing meets National Flood Insurance Program (NFIP) requirements.

Contract Code [PCC] Section 3500 et seq.) in an effort to reduce greenhouse gas emissions associated with the manufacture and transport of such materials;

- Incorporation of environmentally preferred and healthy materials that have environmental product declarations, recycled content, and health product declarations to earn specific LEED credits;
- Installation of an approximately 14,500-gallon tank at Research Park East and an approximately 75,000-gallon tank at Research Park West that would be used to store stormwater, and use of the existing approximately 131,600-gallon holding tank at Research Park East, all of which would be used for on-site irrigation.
- Use of native and drought-tolerant plant species to reduce landscape irrigation demands and installation of a high-efficiency irrigation system;
- Selection of energy- and water-efficient equipment and fixtures;
- Provision of substantial open space with landscaping for cooling (natural shading), wellness, and comfort;
- Use of low, ultra-low, and zero volatile organic compound (VOC)-emitting adhesives, sealants, paints, coatings, and carpets in order to reduce air quality emissions, at minimum consistent with South Coast Air Quality Management District (SCAQMD) Rule 1113;
- Diversion of a minimum of 65 percent of construction waste from landfills to reduce solid waste disposal; and
- Strive to achieve diversion of 90 percent of operational waste from landfills to support the zero waste goals established by UCLA and the UC Policy on Sustainable Practices.

The proposed Project also involves sustainable transportation features as part of UCLA's TDM programs, described previously under Circulation and Parking.

Phasing and Construction Activities

Construction of the proposed Project would occur in phases beginning in 2026, with the Research Park East core and shell improvements and Phase 1 tenant improvements (TIs) anticipated to be complete in late 2027. Subsequent phases would involve additional tenant improvements in Research Park East, associated support functions such as the central loading dock and rooftop mechanical areas, construction of the new conference center, and a full seismic retrofit of Research Park West. Full buildout is anticipated by 2035. Table 2 summarizes the anticipated phasing for key components of the proposed Project.

Although implementation of the proposed Project would be phased over an approximately 10-year time frame, for purposes of analysis in this Initial Study, construction is conservatively assumed to occur in a single phase beginning in 2026 and concluding in 2030. This hypothetical four-year timeframe would involve a more rapid and intense construction period than is anticipated to occur. Accordingly, the environmental impacts associated with each individual construction phase would be less than those predicted herein for a single more intensive phase.

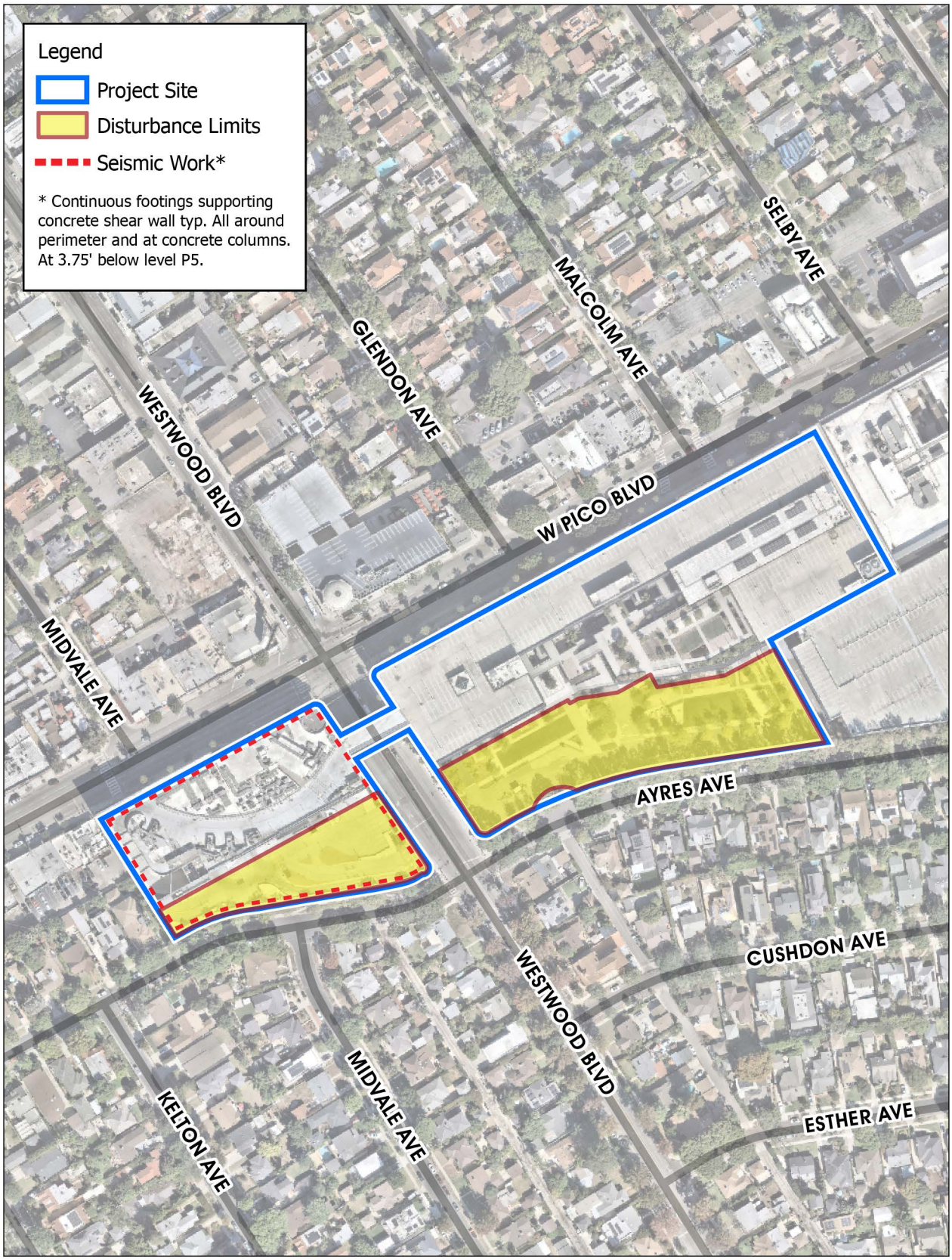
Construction activities would include limited demolition, limited grading/excavation (primarily for the Block 1 lobby pavilion, central loading dock, new conference center, and Research Park West amenity pavilion), seismic upgrades, tenant improvements, and paving/landscaping. Off-site construction activities would be limited to minor driveway improvements and installation of the Westwood Boulevard crosswalk.

The majority of work would occur within the building interiors, including the initial core and shell work followed by tenant improvements. The physical impact area for the exterior improvements, which would occur in the southern portions of the Project site, is approximately 3.2 acres, as shown on Figure 16. Additionally, seismic improvements at Research Park West would involve subterranean retrofits of the existing footings around the building perimeter and at the existing concrete columns.

TABLE 2 UCLA RESEARCH PARK ANTICIPATED DEVELOPMENT PHASING

Phase / Location	Project Components	Approximate Area (GSF)	Construction	Occupancy
Phase 1				
Research Park East	Core/Shell: Blocks 1, 2A, 2B TIs: Block 1 (Levels 1-3) New lobby pavilion	270,400	2026-2028	Late 2027-2028
	Mechanical areas & initial buildout of central loading dock	28,300	2026-2028	Late 2027-2028
Research Park West	Preliminary seismic work to allow parking to be used in support of Research Park East	-	2026-2028	Late 2027-2028
Phase 2				
Research Park East	TIs: Block 1 (Level B1), Block 2A (Levels 2 & 3), Block 2B (Levels 1-3)	160,000	2027-2028	2028-2029
	Rooftop mechanical areas	6,700	2027-2028	2028-2029
Phase 3				
Research Park East	TIs: Block 2A (Levels B1 & 1), Block 2B (Level B1)	57,200	2028-2029	2029-2030
Phase 4				
Research Park West	TIs: Block 4 New amenity pavilion	176,200	2029-2031	2032
	Rooftop mechanical areas	10,000	2029-2031	2032
	Full seismic retrofit to SPR IV	-	2029-2031	2032
Phase 5				
Research Park East	TIs: Block 3	133,500	2031-2034	2035
	New conference center	14,100	2031-2034	2035
	Rooftop mechanical areas	4,000	2031-2034	2035
	Remaining (interior) buildout of central loading dock	-	2031-2034	2035

Project construction generally would require common construction equipment. Since mass grading is not required, there would be no use of excavators or crawler tractors. Because of the limited scope of exterior construction, the number of pieces of equipment on-site at any given time would also be limited. On an average day, one to two pieces of equipment would be used for each activity, with the exception of interior demolition activities which would involve the use of four air compressors and six jackhammers. Exterior demolition activities would require the average daily use of only one air compressor and two jackhammers. Construction equipment assumptions are outlined in the air quality analysis included in Appendix A of this Initial Study.



Source(s): Esri, Nearmap Imagery (October 2025), Psomas (December 2025), Los Angeles County (2025)

Figure 16

0 57.5 115 230 Feet

Disturbance Limits

Limited excavation would be required for construction of the new conference center, central loading dock, amenity pavilion, and the seismic improvements as well as limited shallow grading for the new Westwood Boulevard crosswalk. The maximum depth of excavation would be approximately 10 feet for most Project components, and a depth of approximately 3.75 feet below the finished floor of parking Level P5 for seismic retrofits at Research Park West. Grading is not expected to encroach into groundwater.[19]

It is estimated that the proposed Project would require approximately 8,645 cubic yards of soil export and would generate an estimated 1,176 cubic yards (cy) of demolition material. The maximum number of truck trips per day would occur when the limited grading and limited demolition activities overlap (estimated to be a maximum of 56 trips per day). Other construction phases would require fewer daily truck trips.

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

Construction debris and limited soil export would be transported to a facility operated by Athens Services. It is anticipated that construction traffic would travel north along Westwood Boulevard, east on Pico Boulevard to Overland Avenue, south on Overland Avenue to the I-10 freeway, and then to the regional transportation facilities providing access to the landfill.

Phase 1 Construction Logistics

Primary contractor parking would be accommodated on-site at Research Park West. Visitor parking during construction would be located at the existing GPI parking structure adjacent to Research Park East. Pedestrian access to the site would be provided via the existing sidewalks and crosswalks along Westwood and Pico Boulevards, with the primary pedestrian entrances to both buildings from the existing driveways at Westwood Boulevard. Alternative pedestrian access between the buildings would be provided via the existing bridge over Westwood Boulevard on Level 3. A staffed security gate would be located at the Research Park East driveway at Westwood Boulevard.

Haul trucks would follow the haul route identified above (Westwood Boulevard north to Pico Boulevard east to Overland Avenue south to the freeway system). Use of any crane during construction would comply with UCLA's and the California Division of Occupational Safety (Cal/OSHA) requirements, with oversight by EH&S. Flaggers and traffic control would be used, as necessary, and any temporary lane closures would be coordinated with the City, as required.

Laydown areas would be established on-site within the Research Park East building on Level B1 to avoid spillover onto adjacent streets and minimize exterior noise. Construction fencing would be installed around portions of the Project site perimeter for safety, security, and screening.

Operations

As previously discussed, the proposed Project involves the development of a state-of-the-art, multidisciplinary research and innovation hub. The UCLA Research Park anchor tenants would

[19] Groundwater is estimated to occur at a depth exceeding 40 feet below the ground surface (bgs). Refer to Section V.10, Hydrology and Water Quality, of this Initial Study, for further discussion.

include the CIII, QIH, and DGSOM, with additional space allocated to future UCLA tenants and non-UCLA partners.

The proposed Project facilities would have varying hours of operations. It is anticipated that the laboratory uses would operate 24 hours per day, seven days per week, while most office and support uses would operate five days per week (Monday through Friday) generally from 8:00 a.m. to 5:00 p.m. There would be security staff on-site 24 hours per day, seven days per week to monitor the building and property. The lobbies would be staffed with security personnel, and visitors would be required to check in to gain authorized access to the buildings. Additionally, staffed security kiosks would be located at the Westwood Boulevard driveways.

Total employment at UCLA Research Park is estimated to range from an estimated 2,590 to 3,190 employees at full buildout.[20]

7. ANTICIPATED DISCRETIONARY APPROVALS

The UC Regents or its designee, and the responsible agencies identified below, are expected to use the information contained in this Initial Study for consideration of approvals related to and involved in implementation of the proposed UCLA Research Park Project. This Initial Study has been prepared to inform all discretionary and ministerial state, regional, and local agency 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 MND, including a Mitigation Monitoring and Reporting Program and CEQA Findings
- Approval of the UCLA Research Park Project

Responsible Agencies

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

[20] As discussed in Section V.14, Population and Housing, of this Initial Study, these estimates are based on published employment generation factors and exceed those from the Project architect, Flad, whose experience designing scientific laboratory and research projects indicates recent employment rates of roughly 450 SF/employee, which would equate to approximately 1,800 employees at the Project site. Total employment would vary depending on future tenants.

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
Ashley Rogers, Director, Environmental Planning

May 1, 2026
Date
UCLA Capital Programs

V. EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

IMPACT QUESTIONS AND RESPONSES

1. AESTHETICS

The Project site is developed with two existing three-story buildings associated with the Westside Pavilion shopping mall (as modified prior to UCLA's property acquisition), and an enclosed connecting pedestrian bridge. The southern portion of the site is configured for vehicular circulation, with outdoor terraces and landscaping on the Research Park East site associated with prior renovation activities. Relevant elements of the proposed Project related to aesthetics/visual character primarily include proposed construction in limited areas of the Project site to provide necessary support functions; a new pedestrian paseo from Pico Boulevard through the Research Park East building; and modifications to the building facades, primarily at Research Park West. The main components involving new exterior construction would include a new two-story conference center and a single-story, largely subterranean central loading dock/service area with a green roof at the south side of Research Park East, a new pedestrian bridge on Level 3 of Research Park East, and a new single-story amenity pavilion with a rooftop terrace at the south side of Research Park West. Exterior open space areas with landscaping and amenities would be created at each level of the proposed Project. In addition, a screened service yard would be introduced at ground level at Research Park East, and screened mechanical equipment would be installed at the roof level. New wayfinding and landscape lighting would be added with low-voltage LED lights in exterior areas.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (refer to the Introduction section of this Initial Study for related discussion), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed. Minor

clarifying changes have been made, as needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

MM 4.1-2(c) *Projects ~~proposed under the 2002 LRDP~~ shall include landscaping.*

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

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

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

Senate Bill 743, signed in September 2013, made several changes to CEQA for projects located in areas well served by transit (i.e., transit-oriented development or TOD). With respect to this analysis, 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.[21]

[21] "Employment center project" means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.

2. The project is located on an infill site[22] within a transit priority area.[23]

The proposed Project meets these criteria. Criterion 1 is met because the proposed Project is an employment center on a site that, prior to UCLA's acquisition, was zoned for commercial uses by the City of Los Angeles (City).[24] Specifically, the Research Park West site was zoned [Q]C2-1D, which is a commercial zone. Research Park East was zoned MU(EC)-O, which is a mixed-use commercial/residential zone within the Exposition Corridor Transit Neighborhood Plan. Further, the proposed Project has a floor area ratio (FAR) of 2.0, which exceeds the 0.75 criterion.[25] Criterion 2 is met because the Project site is an infill site located in a transit priority area (TPA). Specifically, as further discussed in Section V.17, Transportation, of this Initial Study, the Project site is located approximately 0.25 mile from the Westwood/Rancho Park Metro Station served by Metro's E Line, which provides light rail service between East Los Angeles and Santa Monica. Based on consistency with the SB 743 criteria, potential aesthetic impacts are not considered to be Project impacts under CEQA, and no impact would result. No further analysis of this issue is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

As indicated above, based on consistency with the SB 743 criteria, potential aesthetic impacts are not considered to be Project impacts under CEQA, and no impact would result. Accordingly, the proposed Project would not have a substantial adverse effect on a scenic vista or scenic resources within a state scenic highway; would not substantially degrade the existing visual character or quality of public views of the site and its surroundings; and would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

[22] 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.

[23] 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.

[24] It is noted that as a UC-owned property, the Project site is no longer subject to municipal zoning regulations.

[25] The FAR is calculated based on an approximately 9.3-acre site and approximately 811,400 GSF of program uses (i.e., excluding parking, the proposed central loading dock, and rooftop mechanical areas).

2. AGRICULTURAL RESOURCES

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

Project Impact Analysis

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

Discussion

The Project site is within an area that is mapped as Urban and Built-Up Land by the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP), as confirmed by review of the 2020 FMMP Important Farmland Map for Los Angeles County (DOC, 2025a). No farmland, agricultural activity, forest land, or timberland exists on or in the vicinity of the Project site. Although the University is not subject to local land use regulations due to its constitutional autonomy, the Project site is not designated in the City of Los Angeles Zoning Code for agricultural, forest land, or timberland use; and the Project site is not under a Williamson Act Contract. Therefore, the proposed Project would not result in the conversion of agricultural or forest land, and there would be no impact to agricultural or forest land resources with implementation of the proposed Project.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

3. AIR QUALITY

Relevant elements of the proposed Project related to air quality include the adaptive reuse of the approximately 744,400 GSF of existing occupiable floor area within Research Park East and West to provide over 800,000 GSF of scientific program space with approximately 29,000 SF of open space and outdoor amenity areas and approximately 1,100 parking spaces on-site, for a total of up to approximately 1.35 million GSF of research park uses. The proposed Project also includes improvements to the on-site building systems, accessibility, and utility infrastructure. The proposed Project would achieve a minimum LEED BD+C Gold rating. To achieve this, a full range of sustainability practices related to building design and operations would be included in the proposed Project as outlined in Section II.6, Proposed Project Components. The sustainability features for which emission reductions have been quantified in this analysis include the purchase of 100 percent renewable energy, all-electric design, and a PV array. Additionally, as further discussed in Section V.17, Transportation, of this Initial Study, there would be an overall reduction in trip generation with implementation of the proposed Project compared to the trip generation associated with the shopping center.

Construction activities would include limited demolition, limited grading/excavation, seismic upgrades, tenant improvements, and paving/landscaping. Off-site construction activities would be limited to minor driveway improvements and installation of the Westwood Boulevard crosswalk. The use of diesel-powered construction equipment would contribute to local and regional emissions.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (refer to the Introduction section of this Initial Study for related discussion), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Minor clarifying changes have been made, as needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

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

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

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

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

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

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

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

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

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

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

Air Quality Background

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

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

Regulatory Framework

A discussion of the regulatory framework for assessing air quality impacts is provided in Appendix AQ-1 of the Air Quality and Greenhouse Gas Emissions Technical Report (Air Quality and GHG Report) prepared by Eyestone Environmental, LLC (Eyestone, 2026), which is included in Appendix A of this Initial Study. A summary of key regulations is provided below.

The federal Clean Air Act (CAA) (42 U.S.C. Section 7401) requires the adoption of National Ambient Air Quality Standards (NAAQS) to protect the public health, safety, and welfare from known or anticipated effects of air pollution. These pollutants are called criteria pollutants. The State of California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS) for the federal criteria pollutants that are generally more restrictive than the NAAQS plus additional standards for atmospheric sulfates, vinyl chloride, hydrogen sulfide, and visibility. Specific geographic areas are classified as either “attainment” or “nonattainment” areas for each pollutant based on the comparison of measured data with federal and state standards. The NAAQS and CAAQS currently in effect and the associated attainment status for the Basin are presented in the Air Quality and GHG Report included in Appendix A of this Initial Study and summarized below. The criteria pollutants for which federal standards have been promulgated and that are most relevant to this air quality impact analysis are discussed below and include: O_3, carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter (PM_{10} and $PM_{2.5}$), and sulfur oxides (SO_X). O_3 is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NOx)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Thus, VOCs and NO_x are O_3 precursors.

As part of its enforcement responsibilities, the United States Environmental Protection Agency (USEPA) requires each state with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and maintain the federal standards. The California Clean Air Act (CCAA) also requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the CAAQS.

The AQMPs from each district are compiled into the California SIP. AQMPs are updated regularly in order to effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy.

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

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

Criteria Pollutants and Health Effects

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

- **O_3** is a highly reactive and unstable gas that is formed when VOCs and NO_X undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects.
- **PM_{10}** consists of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles, about 0.0004 inches or less, allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Particulate matter pollution is a major cause of reduced visibility (i.e., haze) which is caused by the scattering of light and consequently reductions in air clarity.
- **$PM_{2.5}$** is a subgroup of PM_{10} that consists of smaller particles that have an aerodynamic diameter of 2.5 micrometers or less. $PM_{2.5}$ is also formed in the atmosphere from gaseous emissions from power plants, industrial facilities, automobiles and other combustion sources. A consistent correlation between elevated ambient fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and

severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children and to school absences.

- **NO_2** is typically created during combustion processes and is a major contributor to smog formation and acid deposition. NO_2 absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. The strongest health evidence, and the health basis for the ambient air quality standard for NO_2, results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.
- **CO** is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or from wildfires. Because CO is emitted directly from internal combustion engines, motor vehicles operating at slow speeds are the primary source of CO in the urban environment. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. The most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects.

Related Pollutants

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

Existing Air Quality Setting

As previously indicated, specific geographic areas are classified as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with federal and state standards. The USEPA and California Environmental Protection Agency (CalEPA) have established NAAQS and CAAQS, respectively, for six of the most common criteria air pollutants:

CO, Pb, O_3, particulate matter (PM_{10} and $PM_{2.5}$), NO_2, and SO_2. The attainment designations for the Basin are presented in Table 3.

TABLE 3 ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE AIR BASIN[1]

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

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

Source: (Eyestone, 2026)

The Project site is occupied by two existing buildings that were originally developed and operated as a shopping center. The criteria pollutant emissions associated with operation of the shopping center uses are discussed in the analysis of Threshold (b) below.

Sensitive Receptors

As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) childcare centers; and (9) athletic fields. The nearest residential uses are located adjacent to the Project site along the western boundary of Research Park West. Residential uses are also located adjacent to the Project site along the southeastern boundary at Overland Avenue and Ayres Avenue.

Project Impact Analysis

The following analysis is based on the Air Quality and GHG Report (Eyestone, 2026) included in Appendix A of this Initial Study.

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

Discussion

As identified above, the applicable AQMP for the proposed Project is the SCAQMD 2022 AQMP, which is informed in part by regional planning efforts. SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. With regard to future growth, SCAG prepared the 2020-2045 RTP/SCS which provides population, housing, and employment projections for cities under its jurisdiction.[26] The growth projections in the 2020-2045 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2022 AQMP. The 2022 AQMP was adopted by the SCAQMD as a program to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided by SCAG's 2020-2045 RTP/SCS. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies." Projects whose growth is included in the projections used in the formulation of the AQMP are considered consistent with the plan and would not interfere with its attainment. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

As described in Section II, Project Description, the proposed Project involves the adaptive reuse and renovation of existing structures, along with limited exterior improvements, on the Project site. The proposed uses include wet and dry laboratories, office space, meeting and assembly spaces, ancillary food service, common and circulation areas, existing subterranean parking, and outdoor open space. As further discussed in Section V.14, Population and Housing, of this Initial Study, the proposed Project would increase the employee population within the area. Based on employment generation rates published by the Los Angeles Unified School District (LAUSD) and SCAG it is estimated that the proposed Project would generate a net increase in employees (compared to operation of the shopping center) ranging from approximately 1,690 employees to 2,340 employees. The net increase in employees at the Project site would thus represent approximately 0.5 percent to 0.7 percent of the employment increase projected in the 2020-2045 RTP/SCS for Los Angeles County during the period between 2020 and 2035.[27] This level of growth would be well within the employment projections for the region. Furthermore, while the

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

[27] According to the Demographic & Growth Forecast technical report included in SCAG's 2020-2045 RTP/SCS, the number of employees in Los Angeles County is estimated to increase from approximately 4,838,000 in 2020 to 5,172,000 in 2035 (an increase of approximately 334,000 employees).

proposed Project would generate jobs associated with construction of the proposed Project, those employment opportunities would be short-term in nature during construction and comprised of positions that circulate throughout the region based on the location of each construction site. Therefore, the proposed Project would be consistent with the demographic projections set forth in SCAG's 2020-2045 RTP/SCS, which were used as the basis for the 2022 AQMP.

As presented in the analysis for Threshold (b) below, implementation of the proposed Project would not exceed the SCAQMD thresholds of significance for criteria pollutants and therefore would not exceed established CAAQS of NAAQS. As the proposed Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$, the proposed Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2022 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP. Therefore, the proposed Project would not conflict with or obstruct implementation of the SCAQMD's AQMP, and this impact would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

As discussed in the Air Quality and GHG Report, land uses such as the proposed Project affect air quality through construction-source and operational-source emissions. As discussed in the Regulatory Framework section above, the Basin is a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The proposed Project would generate PM_{10}, $PM_{2.5}$, and O_3 precursors (NO_X and VOC) during short-term construction and long-term operations. As such, the proposed Project would have an incremental, cumulative contribution to O_3, PM_{10}, and $PM_{2.5}$ levels in the region. SCAQMD's policy with respect to cumulative impacts associated with criteria pollutants and their precursors is that Project-specific impacts which are less than significant would also be cumulatively less than significant. UCLA utilizes the SCAQMD recommended thresholds that are in place at the time development projects are proposed to assess the significance of quantifiable emissions. The current SCAQMD thresholds for regional emissions are identified in Table 4.

TABLE 4 SCAQMD MAXIMUM MASS DAILY REGIONAL EMISSIONS THRESHOLDS

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

Source: (Eyestone, 2026)

Regional Construction Impacts

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

It is estimated that construction would occur in phases beginning in 2026, with the Research Park East core and shell improvements and Phase 1 tenant improvements anticipated to be complete in late 2027. Full buildout is expected by 2035. However, in order to analyze a worst-case scenario, this analysis assumes that the proposed Project would be built in a single phase over 48 months, with buildout as early as 2030. This is a conservative assumption in terms of the intensity of construction activity and since construction equipment and trucks are expected to emit less pollutants in future years due to more stringent emissions regulations and technological advancement.

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD-recommended California Emissions Estimator Model (CalEEMod) Version 2022.1. Model results are provided in Appendix AQ-3 of the Air Quality and GHG Report included in Appendix A of this Initial Study. The emissions estimates include reductions associated with adherence to SCAQMD Rule 403 (refer to LRDP PP 4.2-2[a]), use of a minimum USEPA Tier III-rated construction equipment (refer to LRDP MM 4.2-2[c]), and use of low VOC architectural coatings (refer to LRDP PP 4.2-2[d]). Compliance with LRDP PPs 4.2-2(b), 4.2-2(c), and LRDP MMs 4.2-2(a) and 4.2-2(b) would further reduce construction-related emissions; however, these reductions were not quantified. As shown in Table 5, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Therefore, the proposed Project would result in a less than significant impact with regard to regional construction emissions, and no mitigation is required.

TABLE 5 DAILY REGIONAL CONSTRUCTION EMISSIONS[1]

Construction Year	Pollutant Emissions (pounds per day)					
	VOC[2]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Winter						
Year 2026	3	26	38	<1	13	2
Year 2027	14	27	80	<1	14	4
Year 2028	14	26	77	<1	14	4
Year 2029	13	25	73	<1	14	4
Year 2030	15	35	86	<1	14	4
Maximum Unmitigated Construction Emissions	**15**	**35**	**86**	**<1**	**14**	**4**
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under) Threshold	**(60)**	**(65)**	**(464)**	**(150)**	**(136)**	**(51)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Summer						
Year 2026	3	26	39	<1	13	2
Year 2027	14	26	89	<1	14	4
Year 2028	14	25	85	<1	14	4
Year 2029	13	24	81	<1	14	4
Year 2030	17	49	114	<1	16	5
Maximum Unmitigated Construction Emissions	17	49	114	<1	16	5
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under) Threshold	**(58)**	**(51)**	**(436)**	**(150)**	**(134)**	**(50)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not sum exactly due to rounding.

[1] Compiled using the CalEEMod emissions model. The equipment mix and use assumptions for each phase are provided in Appendix AQ-3 of the Air Quality and GHG Report provided in Appendix A to this Initial Study. CalEEMod modeling outputs are also provided in Appendix AQ-3.

[2] Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.

Source: (Eyestone, 2026)

Regional Operational Impacts

SCAQMD has established separate significance thresholds to evaluate potential impacts due to the incremental increase in criteria air pollutants associated with long-term operations. Calculation of the incremental changes in criteria pollutant emissions during operation takes into account the removal of baseline (shopping center) uses and subtracts those emissions from the proposed Project's operational emissions. Regional operational emissions were calculated using CalEEMod. Inputs into the CalEEMod model include Project-related vehicle trips, as well as land uses and square footage to determine energy, water usage, and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the trip generation. The proposed land uses would result in limited increases in emissions generated by area sources (e.g., landscape equipment fuel combustion,[28] consumer products, and architectural coatings). The proposed Project would also replace existing equipment at the Project site with 11 emergency

[28] CalEEMod landscape equipment emission rates are developed using CARB's Small Off-Road Engines (SORE) Model which assumes equipment would be combustion powered (gasoline, propane, diesel). Although the proposed Project would use electric powered landscaping equipment, it was conservatively assumed that landscape equipment would be combustion powered.

generators, boilers, and heat pumps as part of the utility upgrades. Emissions for emergency generators were calculated for the proposed Project's operational emissions inventory USEPA Tier IV emission factors for emergency generators. The boilers and heat pumps would be powered by electricity and would not emit criteria pollutants during operations.

The results of the modeled emissions calculations are provided in Table 6, and the CalEEMod model output files are provided in Appendix AQ-3 of the Air Quality and GHG Report included in Appendix A of this Initial Study. Emissions presented in Table 6 represent a net change in emissions (proposed Project minus emissions from operation of the shopping center). As shown, the proposed Project would result in a net decrease in criteria pollutant emissions for VOC, CO, SO_X, PM_{10}, and $PM_{2.5}$ and a net increase in NOx emissions. The net change in operational emissions would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

TABLE 6 REGIONAL OPERATIONAL EMISSIONS – PROJECT BUILDOUT (2030)[1]

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Baseline—Winter						
Area	18	<1	<1	<1	<1	<1
Energy (Natural Gas)[2]	<1	<1	<1	<1	<1	<1
Mobile	45	23	232	<1	48	12
Stationary (Emergency Generators)	<1	<1	<1	<1	<1	<1
Total	**63**	**24**	**233**	**<1**	**48**	**13**
Buildout—Winter						
Area	21	<1	<1	<1	<1	<1
Energy (Natural Gas)	0	0	0	0	0	0
Mobile (Non-Truck)	22	15	155	<1	41	10
Delivery Trucks and Loading Docks[3]	<1	8	4	<1	<1	<1
Stationary (Emergency Generators)	5	3	14	<1	<1	<1
Total	**49**	**26**	**173**	**<1**	**41**	**11**
Project (Buildout less Baseline Operations)—Winter						
Area	3	<1	<1	<1	<1	<1
Energy (Natural Gas)[2]	(0)	(1)	(1)	(0)	(0)	(0)
Mobile (Non-Truck)	(23)	(8)	(77)	(0)	(7)	(2)
Delivery Trucks and Loading Docks[3]	<1	8	4	<1	<1	<1
Stationary (Emergency Generators)	5	3	14	0	0	1
Total Proposed Uses Net Emissions	**(14)**	**2**	**(60)**	**0**	**(7)**	**(2)**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under) Threshold	**(69)**	**(53)**	**(610)**	**(150)**	**(157)**	**(57)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Baseline—Summer						
Area	27	<1	54	< 0.005	<1	<1
Energy (Natural Gas)[2]	<1	<1	<1	<1	<1	<1
Mobile	46	21	237	<1	48	12
Stationary (Emergency Generators)	<1	<1	<1	<1	<1	<1
Total	**73**	**23**	**291**	**<1**	**48**	**13**
Buildout—Summer						
Area	30	<1	59	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile (Non-Truck)	22	14	166	<1	41	10
Delivery Trucks and Loading Dock	<1	8	4	<1	<1	<1
Stationary (Emergency Generators)	5	3	14	<1	<1	<1
Total	**58**	**25**	**243**	**<1**	**41**	**11**
Project (Buildout less Baseline Operations)—Summer						
Area	3	<1	5	<1	<1	<1
Energy (Natural Gas)[2]	(0)	(1)	(1)	(0)	(0)	(0)
Mobile (Non-Truck)	(24)	(7)	(71)	(0)	(7)	(2)
Delivery Trucks and Loading Docks[3]	<1	8	4	<1	<1	<1
Stationary (Emergency Generators)	5	3	14	<1	<1	<1
Total Proposed Uses Net Emissions	**(15)**	**2**	**(48)**	**<1**	**(7)**	**(2)**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under) Threshold	**(70)**	**(53)**	**(598)**	**(150)**	**(157)**	**(57)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not sum exactly due to rounding.
[1] The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix AQ-3 (CalEEMod Output) of the Air Quality and GHG Report provided in Appendix A to this Initial Study.
[2] Includes natural gas usage from existing boilers.
[3] To provide a conservative analysis, baseline operations were assumed to have minimal heavy duty truck trips. Thus, the proposed Project's total incremental emissions did not take credit for baseline loading dock activity.
Source: (Eyestone, 2026)

As shown in Table 5 and Table 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.

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

The localized effects from daily construction emissions resulting from on-site improvements, including interior work and limited new construction, as well as minor off-site improvements (specifically, the proposed crosswalk across Westwood Boulevard) were evaluated at sensitive receptor locations potentially impacted by the proposed Project according to SCAQMD's localized significance threshold (LST) methodology, which uses on-site mass emissions rate lookup tables and project-specific modeling, where appropriate. SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, or $PM_{2.5}$. The mass rate look-up tables can be used to determine whether a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to five acres. While the total Project site is approximately 9.3 acres, the majority of construction activities would occur within the existing building interiors, with limited exterior construction occurring in a maximum disturbance area of up to 3.2 acres in the southern portion of the Project site; accordingly, the active work area outdoors would be less than five acres. All construction equipment operated indoors for tenant improvements would be electric powered. The SCAQMD LST methodology is further described in the Air Quality and GHG Report provided in Appendix A of this Initial Study.

Estimates of maximum construction-related localized (on-site) daily emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ are presented in Table 7. Based on the construction site acreage and distance to the closest off-site sensitive receptors, localized construction emissions thresholds were obtained from the LST look-up tables and are also listed in Table 7. As previously identified, the nearest residential uses are located adjacent to the Project site along the western boundary of Research Park West. Residential uses are also located adjacent to the Project site along the southeastern boundary at Overland Avenue and Ayres Avenue. Additional sensitive uses include receptors south of the Project site across Ayres Avenue. While the majority of construction activities would occur indoors for tenant improvements, limited construction activities such as equipment staging/installation and vehicle travel may occur at or near the Project boundary, inside the perimeter wall. The SCAQMD LST mass rate look-up tables provide a minimum receptor distance of 25 meters for evaluating localized air quality impacts. Based on SCAQMD LST methodology, projects with activities located closer than 25 meters to the nearest receptor (such as the proposed Project) should use the LSTs for receptors located at 25 meters. Therefore, LSTs based on a 25-meter receptor distance were used. As presented in Table 7, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO_X, CO, PM_{10}, or $PM_{2.5}$. Therefore, localized construction emissions associated with the proposed Project would result in less than significant impacts, and no mitigation measures are required.

TABLE 7 LOCALIZED PROJECT CONSTRUCTION EMISSIONS[1]

Construction Year	Pollutant Emissions (pounds per day)			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
Winter				
Year 2026	22	31	10	2
Year 2027	22	28	<1	<1
Year 2028	21	28	<1	<1
Year 2029	20	28	<1	<1
Year 2030	31	43	<1	<1
Maximum Unmitigated Daily Localized Emissions	**31**	**43**	**10**	**2**
SCAQMD Localized Significance Thresholds[3]	**216**	**1,535**	**13**	**6**
Over/(Under) Threshold	**(185)**	**(1,492)**	**(3)**	**(4)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Summer				
Year 2026	22	31	10	2
Year 2027	22	28	<1	<1
Year 2028	21	28	<1	<1
Year 2029	20	28	<1	<1
Year 2030	44	62	1	1
Maximum Unmitigated Daily Localized Emissions	**44**	**62**	**10**	**2**
SCAQMD Localized Significance Thresholds[3]	**216**	**1,535**	**13**	**6**
Over/(Under) Threshold	**(172)**	**(1,473)**	**(3)**	**(4)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not sum exactly due to rounding.

[1] Compiled using the CalEEMod emissions model. The equipment mix and use assumptions for each phase are provided in Appendix AQ-3 of the Air Quality and GHG Report provided in Appendix A of this Initial Study. CalEEMod modeling outputs are also provided in Appendix AQ-3.

[2] PM_{10} and $PM_{2.5}$ emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

[3] SCAQMD LSTs are based on Source Receptor Area No. 2 (Northwest Los Angeles County Coastal) for a 5-acre area of disturbance or less with a 25-meter receptor distance. The closest sensitive receptors are residential uses located adjacent and west of the Project site. Refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.

Source: (Eyestone, 2026)

Operation of the proposed Project would not introduce any major new sources of air pollution within the Project site. Localized emissions estimates for criteria air pollutants from on-site sources are presented in Table 8. Emissions presented in Table 8 represent a net change in emissions (proposed Project minus emissions from operation of the shopping center). The SCAQMD LST mass rate look-up tables were also used to evaluate potential operational localized impacts. As shown, the proposed Project would result in a net decrease of localized operational emissions compared to operation of the shopping center. The proposed Project localized operational emissions would not exceed any of the LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. Therefore, localized on-site operational emissions resulting from the proposed Project would be less than significant, and no mitigation measures are required.

TABLE 8 LOCALIZED PROJECT OPERATIONAL EMISSIONS – PROJECT BUILDOUT (2030)[1]

Emission Source	Pollutant Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Baseline—Winter				
Area[2]	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Stationary (Emergency Generators)	<1	<1	<1	<1
Total	**<1**	**<1**	**<1**	**<1**
Buildout—Winter				
Area[2]	<1	<1	<1	<1
Energy (Natural Gas)	0	0	0	0
Stationary (Emergency Generators)	3	14	<1	<1
Total	3	15	<1	1
Project (Buildout less Baseline Operations)—Winter				
Area[2]	<1	<1	<1	<1
Energy (Natural Gas)	(1)	(1)	0	0
Delivery Trucks and Loading Docks[3]	2	2	<1	<1
Stationary (Emergency Generators)	3	14	<1	<1
Project Emissions[3]	**3**	**15**	**<1**	**1**
SCAQMD Significance Threshold[4]	**216**	**1,535**	**3**	**2**
Over/(Under) Threshold	**(212)**	**(1,519)**	**(3)**	**(1)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Baseline—Summer				
Area[2]	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Stationary (Emergency Generators)	<1	<1	<1	<1
Total	**<1**	**<1**	**<1**	**<1**
Buildout—Summer				
Area[2]	<1	5	<1	<1
Energy (Natural Gas)	0	0	0	0
Delivery Trucks and Loading Docks[3]	2	2	<1	<1
Stationary (Emergency Generators)	3	14	<1	1
Total	**3**	**20**	**<1**	**1**
Project (Buildout less Baseline Operations)—Winter				
Area[2]	<1	5	<1	<1
Energy (Natural Gas)	(1)	(1)	(0)	(0)
Delivery Trucks and Loading Docks[3]	2	2	<1	<1
Stationary (Emergency Generators)	3	14	<1	1
Project Emissions	**3**	**20**	**<1**	**1**
SCAQMD Significance Threshold[4]	**216**	**1,535**	**3**	**2**
Over/(Under) Threshold	**(212)**	**(1,514)**	**(3)**	**(1)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not sum exactly due to rounding.

[1] Compiled using the CalEEMod emissions model. Worksheets and CalEEMod modeling outputs are also provided in Appendix AQ-3 of the Air Quality and GHG Report provided in Appendix A of this Initial Study.

[2] Area sources include consumer products, architectural coatings, and landscaping activities. During winter, CalEEMod assumes minimal landscaping activities. However, worst-case emissions during the summer are used to evaluate impacts.

[3] To provide a conservative analysis, baseline operations were assumed to have minimal heavy duty truck trips. Thus, the proposed Project's total incremental emissions did not take credit for baseline loading dock activity.

[4] SCAQMD LSTs are based on Source Receptor Area No. 2 (Northwest Los Angeles County Coastal) for a 5-acre site with a 25-meter receptor distance. The closest sensitive receptors are residential uses located adjacent and west of the Project site. Refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.

Source: (Eyestone, 2026)

CO Hotspot Analysis

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

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

As discussed in the Air Quality and GHG Report, SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. At buildout of the proposed Project, the proposed Project is projected to result in a net decrease of 10,659 daily trips compared to operation of the existing buildings with shopping center uses. The proposed Project would not add trips to any intersections and would not result in an average daily traffic volume anywhere near the volumes analyzed in the 2003 AQMP. Therefore, the proposed Project would not trigger the need for CO hotspots modeling and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant, and no mitigation measures are required.

Toxic Air Contaminant (TAC) Emissions

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

The greatest potential for TAC emissions during proposed Project construction would generally involve diesel particulate emissions associated with heavy equipment operations during utility trenching, excavation, and building construction activities. According to SCAQMD methodology, health effects from carcinogenic air toxins are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events; thus, construction activities would not result in a long-term substantial source of TAC emissions. Additionally, SCAQMD's CEQA Air Quality Handbook and SCAQMD's supplemental online guidance/information do not require an HRA for short-term construction emissions. It is, therefore, not required or meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. Particularly in the case of the proposed Project, the construction duration ranges from 48 months to approximately 10 years (with intermittent activities), with the majority of construction activities occurring within the building interiors. As such, given the relatively short-term nature of these activities, TAC emission impacts during construction would be less than significant.

With regard to operational TAC emissions, the proposed Project would not include sources of TACs such as large boilers (greater than 2 million British thermal units [MMBTU]/hour) or any other non-emergency combustion sources. In terms of proposed Project research activities, the proposed laboratories would be designed to meet stringent UC and other regulatory requirements regarding ventilation, air filtering, hazardous material handling and storage, containment, personal protective gear, etc. As the proposed Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the proposed Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The Project would add 11 new/replacement emergency generators as part of the utility upgrades. Research Park West currently includes one emergency generator that would be replaced with a newer generator of similar size. New emergency generators would be located on the rooftop at Research Park East, approximately 100 meters from the closest residential uses. All generators would meet USEPA Tier IV emissions standards. For purposes of this analysis, it is conservatively assumed that testing would be performed monthly, with one generator tested for one hour per day.

The proposed Project enclose the existing loading dock at Block 1 and add a central loading dock to the existing Research Park East building, which would in turn increase the number of delivery truck trips. It is estimated that the proposed Project would generate approximately 111 delivery truck loads per day. However, approximately 20 percent of these trucks would be heavy-heavy duty, while the remaining trucks would be medium and light duty trucks. SCAQMD recommends that HRAs be conducted for substantial sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 heavy duty trucks per day) and has provided guidance for analyzing mobile source diesel emissions. Based on this guidance, the proposed Project is not considered to be a substantial source of diesel particulate matter warranting a refined HRA since daily truck trips to the Project site would not exceed 100 heavy duty trucks per day. As the proposed Project would generate a limited number of heavy-duty truck trips, loading dock related TACs would be less than significant.

As such, proposed Project-related TAC impacts during construction and operations would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

No objectionable odors are anticipated because of either construction or operation of the proposed Project. Specifically, construction of the Project would involve the use of conventional building materials and construction equipment typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include operation of any of these uses and would locate all trash and waste collection facilities within enclosed areas. These facilities would be located and maintained in a manner that promotes odor control and would not result in substantially adverse odor impacts.

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

Research using odorous materials would take place inside buildings with the appropriate laboratory hoods and ventilation equipment, as required by applicable regulations and UC requirements. In particular, the UCLA EH&S would conduct inspections and monitor compliance with UCLA's health and safety plans and procedures related to hazardous materials. Compliance with these regulations and requirements would preclude substantial odorous emissions associated with research activities.

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

4. BIOLOGICAL RESOURCES

Relevant elements of the proposed Project related to biological resources include the removal of ornamental vegetation and removal or relocation of protected trees (as defined by the LRDP) at the Project site. Protected trees to be removed would be replaced, as described below.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Minor clarifying changes have been made, as needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

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~~ **Project site** boundaries where feasible. If it is not feasible to plant replacement trees at a 1:1 ratio within the ~~campus~~ **Project site** boundaries, the tree replacement plan will include the planting of native shrubs in ecologically appropriate areas within the ~~campus~~ **Project site** boundaries that would provide nesting, foraging or roosting habitat for birds so that the replacement number of trees and shrubs will result in a 1:1 replacement ratio.*

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

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

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

The Project site is in an urban area and is fully developed with the exception of limited ground surfaces associated with on-site landscaped areas. The Project site does not contain any riparian habitat, sensitive natural community, or wetlands. Therefore, there would be no impact, and no mitigation is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

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

However, as further discussed under Threshold (e), below, the proposed Project would require the removal of existing vegetation, including trees, within the Project site. Common species of bird and raptors that occur in the general Project area may nest in these trees and vegetation.

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

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

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

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

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

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

As noted in the LRDP Final SEIR, the University of California is not subject to local zoning and planning ordinances, including the City of Los Angeles Native Tree Protection Ordinance (LANTPO). Accordingly, UCLA mitigates the loss of trees at its discretion, consistent with the LRDP. UCLA's currently adopted tree replacement mitigation presented above is consistent with the City's requirements at the time the LRDP Final SEIR was certified and, although not required, UCLA has historically met or exceeded the City of Los Angeles tree replacement requirements.[29]

The LRDP identifies "mature" trees as those with a trunk diameter at breast height (dbh) measuring at least 12 inches, and LRDP MM 3.4-1(c) requires that the loss of such trees be replaced at a 1:1 ratio. "Protected" trees as defined in the LRDP are any of the following species that have a cumulative trunk dbh measuring at least four inches: coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel. LRDP MM 4.3-4 requires the loss of protected trees to be replaced at a 2:1 ratio.

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). Trees documented during the field survey include all regulated trees within the proposed Project work limits and those that are immediately adjacent to the work limits to account for any potential indirect impacts. All mature trees whose trunk (or combined multiple trunks) measures at least 12 inches dbh were included in the survey, as well as any protected species with a trunk (or combined multiple trunks) greater than 4 inches dbh. The field survey assessed the size, height, canopy width, aesthetic value, and overall health of each tree, and their location was mapped using a hand-held Geographic Positioning System unit. Tree survey data is provided in Appendix B of this Initial Study. The locations of other trees or shrubs that occur in the tree survey area but do not meet the above-described regulatory requirements were noted but are not included in the following summary of tree resources.

The tree survey identified a total of 96 regulated trees on-site. This includes 30 trees that meet the LRDP definition of a protected tree species and 66 trees that are considered mature per the LRDP. The protected trees include 22 western sycamores (*Platanus racemosa*) and 8 coast live oaks (*Quercus agrifolia*). These are established trees, but are moderately small in size, generally ranging from 4 to 10 inches in trunk diameter. As shown on Figure 17, an estimated 10 protected trees, including 8 western sycamores and 2 coast live oaks, are expected to be removed. Another 11 protected trees, including 6 western sycamores and 5 coast live oaks, would be impacted but have been identified as suitable candidates for relocation; relocation would occur on-site as part of the Project landscape plan. Relocated trees would not require replacement. All of the protected trees along the southern property line would be retained and protected in place, as described below.

As required by LRDP MM 4.3-4, removal of the 10 protected trees would be mitigated by planting a minimum of 20 replacement trees of the same species (i.e., at least 16 western sycamores and 4 coast live oaks). A summary of trees to be impacted and tree replacement requirements is provided in Table 9. Trees would be replaced on the Project site as part of the Project landscape plan. Should any relocated trees not survive, they would be replaced in accordance with LRDP MM 4.3-4.

[29] At the time the LRDP Final SEIR was certified, UCLA's adopted tree replacement mitigation was consistent with requirements in the City of Los Angeles pursuant to Ordinance No. 177404. Since that time, the City of Los Angeles Native Tree Protection Ordinance (Ordinance No. 186873) became effective on February 4, 2021.



Source(s): Psomas (04-13-2026)

Figure 17

Not to Scale

Tree Impacts

TABLE 9 ANTICIPATED TREE IMPACT AND REPLACEMENT SUMMARY

Species		Total in Survey Area	Proposed Relocations	Proposed Removals	Tree Replacement Ratio	Tree Replacement Requirement
Common Name	**Scientific Name**					
Mature Tree Species						
king palm	*Archontophoenix cunninghamiana*	2	0	0	1:1	0
Indian laurel fig	*Ficus microcarpa*	5	0	0	1:1	0
jacaranda	*Jacaranda mimosifolia*	16	0	0	1:1	0
southern magnolia	*Magnolia grandiflora*	1	0	0	1:1	0
paperbark	*Melaleuca quinquenervia*	20	0	0	1:1	0
Mexican fan palm	*Washingtonia robusta*	22	0	0	1:1	0
	Subtotal	*66*	*0*	*0*		*0*
Protected Tree Species						
western sycamore	*Platanus racemosa*	22	6	8	2:1	16
coast live oak	*Quercus agrifolia*	8	5	2	2:1	4
	Subtotal	*30*	*11*	*10*		*20*
	Total	**96**	**11**	**10**		**20**

Source: (Psomas, 2026)

Mature trees within the Project site include 2 king palms (*Archontophoenix cunninghamiana*), 5 Indian laurel figs (*Ficus macrocarpa*), 16 jacarandas (*Jacaranda mimosifolia*), 1 southern magnolia (*Magnolia grandiflora*), 20 paperbark trees (*Melaleuca quinquenervia*), and 22 Mexican fan palms (*Washingtonia robusta*). None of these are proposed for removal. Aside from two king palms that are located in planters in the central atrium at Research Park East, most of these trees are street trees located around the perimeter of the Project site, all of which would be retained during construction.

To ensure that the trees to be retained on-site are not impacted, the proposed Project incorporates LRDP PP 4.3-1(a) (fencing at the drip line); PP 4.3-1(b) (examination and trimming of trees prior to construction); PP 4.3-1(c) (temporary irrigation and feeding); PP 4.3-1(d) (no storing or construction equipment or vehicles in the fence line of any tree); and PP 4.3-1(e) (monthly examination of trees).

Implementation of the LRDP PPs and MMs as part of the proposed Project would reduce potential impacts to trees to a level considered less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

5. CULTURAL RESOURCES

Relevant elements of the proposed Project related to cultural resources include limited excavation associated with construction of the new conference center and central loading dock/service area at Research Park East, the new amenity pavilion and seismic improvements to the existing building foundation at Research Park West, as well as limited shallow grading for the new Westwood Boulevard crosswalk and utility installations. The maximum depth of excavation would be approximately 10 feet for most components, and a depth of approximately 3.75 feet below the finished floor of parking Level P5 at Research Park West.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Clarifying changes in the text from the LRDP MMRP 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. Minor clarifying changes have been made, as needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

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

Construction personnel shall also be informed that unauthorized collection of archaeological resources is prohibited.

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

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

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

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~~ **University** 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.*

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

Project Impact Analysis

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

Discussion

The existing buildings on-site were constructed between approximately 1985 and 1991, are less than 50 years old, and have been subject to various modifications since they were constructed. 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). The Project site is not listed on the Los Angeles Historic Resources Inventory, California Register, or National Register (City of Los Angeles, 2025a; OHP, 2025; NPS, 2025). Additionally, based on the records search conducted by the South Central Coastal Information Center (SCCIC) for the proposed Project and included in Appendix C of this Initial Study, there are no historic resources listed on the California Register, National Register, or local register within the Project site or within 0.25 mile of the Project site (SCCIC, 2026). Therefore, the proposed Project would not directly or indirectly impact a historic resource pursuant to CEQA Guidelines Section 15064.5.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

Based on the records search conducted by the SCCIC for the proposed Project included in Appendix C of this Initial Study, there are no known archaeological resources within the Project site, and three archaeological resources within a 0.5-mile radius of the Project site (SCCIC, 2026).

Based on review of a geotechnical investigation conducted by Geotechnologies, Inc. (Geotechnologies) in 2018 for past renovations at the Research Park East site, and as discussed in Section V.7, Geology and Soils, of this Initial Study, exploratory borings in the southern portion of Research Park East indicate this area is underlain by fill materials ranging from 5 to 8 feet in

depth; the fill is underlain by native soils (Geotechnologies, 2018). It is estimated that the maximum depth of excavation for new foundations at Research Park East would be up to approximately 10 feet below the ground surface (bgs). At Research Park West, limited fill materials occur above the existing subterranean parking structure which underlies nearly the entire site area. Thus, any excavation needed for new construction or outdoor amenities/landscaping, would generally be limited to fill soils. However, seismic improvements at Research Park West would involve subterranean retrofits of the existing footings around the building perimeter and at the existing concrete columns, at a maximum depth of approximately 3.75 feet below the finished floor of parking Level P5.

As such, there is a remote potential for disturbance of native soils during excavation activities, which could potentially impact previously unidentified archaeological resources. This would be considered a potentially significant impact. However, the proposed Project incorporates LRDP MM 4.4-2(a), which requires an instructional program to assist construction personnel in identifying archaeological resources; LRDP MM 4.4-2(b), which describes procedures to be followed in the event that cultural resources are discovered; and LRDP MM 4.4-2(c), which requires archaeological monitoring of earthwork for projects that disturb native sediments/soils and calls for monitoring procedures in the event archaeological resources are identified. With incorporation of these LRDP MMs, the proposed Project would result in a less than significant impact.

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

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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 Project site and surrounding area did not yield evidence of known archaeological resources, including human burials within the Project site. However, because the proposed Project would involve limited excavation into native 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. Disturbance of human remains could potentially violate the health code, damage or destroy the resource, and 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 proposed Project, potential impacts related to disturbance of human remains would be less than significant. Notwithstanding, as discussed in Section V.18, Tribal Cultural Resources, of this Initial Study, as a result of the tribal consultation conducted pursuant to AB 52, Project-specific mitigation has been included to further outline the state laws pertaining to the protection of human remains, to identify preservation of human remains in place as the preferred manner of treatment, and to establish a requirement that any discovery of human remains remain confidential.

Project-Level Mitigation Measures

No mitigation measures are required, although Project-specific mitigation is proposed in Section V.18, Tribal Cultural Resources, of this Initial Study, to further detail relevant procedures.

Level of Significance

With the incorporation of the LRDP PP and Project-specific mitigation related to any potential discovery of human remains (refer to Section V.18, Tribal Cultural Resources, of this Initial Study), the proposed Project would have a less than significant potential to disturb any human remains, including those interred outside of formal cemeteries.

6. ENERGY

Relevant elements of the proposed Project related to energy include the use of construction equipment to complete the interior and exterior improvements to the existing buildings and other site improvements to accommodate the proposed uses. Additionally, as described in Section II.6, Proposed Project Components, within the Project Description of this Initial Study, with implementation of the proposed Project, the existing building mechanical, electrical, and plumbing systems, including the existing boilers, would be replaced with an all-electric utility plant. The proposed Project would comply with the UC Policy on Sustainable Practices for a major renovation project, including the requirements to achieve a minimum LEED BD+C Gold rating and to outperform CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Energy Code) energy efficiency requirements by at least 20 percent. To achieve this, a full range of sustainability features related to building design and operations would be included in the proposed Project as outlined in Section II.6, Proposed Project Components, of this Initial Study. Further, the Project site is located in proximity to various transit facilities, thus facilitating alternative transportation and reducing vehicle miles traveled (VMT) and associated fuel usage.

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

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

Project Impact Analysis

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

Discussion

Construction

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

Construction equipment used for the proposed Project would result in single event consumption of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's construction activities 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 UCLA EH&S.

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

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

Operations

The proposed Project would involve the direct use of electricity for long-term operations. Notably, the existing building mechanical, electric, and plumbing systems, including the existing boilers,

would be replaced with an all-electric utility plant, meeting UC requirements for carbon neutrality and sustainability. This system would provide a local and efficient source of heating and cooling with the benefit of a shared energy circulation loop for redundancy, resiliency and energy efficiency. This system would also distribute the structural load, electrical demands, and space requirements across the building blocks. Indirect energy use would be associated with the processing and distribution of water and wastewater and fossil-fueled and electric-powered vehicles used by employees and visitors. There are no aspects of the proposed Project that would contribute to wasteful, inefficient, or unnecessary energy consumption.

The existing buildings at the Project site do not meet current energy conservation requirements, nor the more stringent energy conservation requirements of the UC Policy on Sustainable Practices. The proposed building improvements would achieve a minimum LEED BD+C Gold rating. To achieve the LEED rating, the design, construction, and operation of the proposed Project would incorporate a series of green building strategies including, but not limited to, the following, which would serve to reduce energy demand:

- Adaptive reuse of the existing structures, repositioning from a retail mall/partial office conversion to scientific research, within an area adjacent to existing amenities, public transportation facilities, and existing urban infrastructure;
- Outperformance of CBC Title 24 energy efficiency requirements by at least 20 percent;
- All-electric buildings where all new mechanical systems including boilers and autoclaves would be electric powered, and the existing gas service would be capped;
- Commitment to the use 100 percent green (renewable) electricity through LADWP's Green Power for a Green L.A.™ Program;
- Installation of an on-site photovoltaic (PV) solar array (18,100 SF) with battery storage providing approximately 1,515,000 kilowatt-hours per year (kWh/yr);
- Installation of highly efficient HVAC systems;
- Installation of wind response exhaust systems (i.e., exhaust design accounts for local wind patterns) and sound attenuation for equipment;
- Incorporation of construction materials that have a lower embodied carbon in line with the California Green Building Standards Code (CALGreen) embodied carbon requirements and 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;
- Incorporation of environmentally preferred and healthy materials that have environmental product declarations, recycled content, and health product declarations to earn specific LEED credits;
- Installation of an approximately 14,500-gallon tank at Research Park East and an approximately 75,000-gallon tank at Research Park West that would be used to store stormwater, and use of the existing approximately 131,600-gallon holding tank at Research Park East, all of which would be used for on-site irrigation.
- Use of native and drought-tolerant plant species to reduce landscape irrigation demands and installation of a high-efficiency irrigation system;
- Selection of energy- and water-efficient equipment and fixtures;
- Provision of substantial open space with landscaping for cooling (natural shading), wellness, and comfort;

- Use of low, ultra-low, and zero volatile organic compound (VOC)-emitting adhesives, sealants, paints, coatings, and carpets in order to reduce air quality emissions, at minimum consistent with South Coast Air Quality Management District (SCAQMD) Rule 1113;
- Diversion of a minimum of 65 percent of construction waste from landfills to reduce solid waste disposal; and
- Strive to achieve diversion of 90 percent of operational waste from landfills to support the zero waste goals established by UCLA and the UC Policy on Sustainable Practices.

Relative to vehicular energy use, as described in Section V.17, Transportation, of this Initial Study, the Project site is located approximately 0.25 mile from the Metro E Line Westwood/Rancho Park Station and approximately 0.5 mile from the Metro E Line Expo/Sepulveda Station. The E Line provides light rail service between East Los Angeles and Santa Monica, and these stations are considered major transit stops. The Project site is also adjacent to several bus stops, with direct connectivity to the UCLA main campus. Additionally, various transportation demand management strategies would be implemented as part of the proposed Project to reduce vehicle trips, including but not limited to subsidized transit passes, carpooling assistance, and potential shuttle services.

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

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

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

Plans for Renewable Energy or Energy Efficiency

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

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

- **Senate Bill 350.** SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 increased the State Renewables Portfolio Standard (RPS)[30] RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 also requires the State to double Statewide energy efficiency savings in electricity and natural gas end uses by 2030 in comparison to 2015. On September 10, 2018, SB 100 provided updated RPS targets of 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030, and instructed that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by 2045.

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

  CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went into effect on August 1, 2009, and is administered by the California

[30] 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.

Building Standards Commission (CBSC). CALGreen improves public health, safety, and general welfare through enhanced design and sustainable construction of buildings while conserving natural resources. The CBC provides the minimum standard that buildings must meet in order to be certified for occupancy.

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

- **UC Policy on Sustainable Practices.** In June 2004, the UC developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the University as a leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, it has been revised several times with the most recent version becoming effective in April 2024. The UC Policy on Sustainable Practices calls for collective action across the UC system to address the climate crisis by establishing goals in 13 areas of sustainable practices including, but not limited to, green building design, clean energy, and sustainable transportation. Particularly relevant to the proposed Project, the UC Policy on Sustainable Practices, under the category of Green Building Design, requires that major building renovation projects meet a minimum rating of LEED BD+C Gold and outperform CBC Title 24 energy efficiency requirements by at least 20 percent. (UC, 2024b)

- **UCLA Sustainability Plan.** The UCLA Sustainability Plan, last updated in June 2022, builds on various 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. As many of the goals set forth in the Sustainability Plan duplicate or have been superseded by more stringent targets in the 2024 update to the UC Policy on Sustainable Practices, further discussion of this plan is not provided herein.

Consistency Analysis

Similar to existing conditions at the Project site, the proposed Project would receive electricity from LADWP.[31] LADWP was among the first electric utilities to achieve the first major state-legislated target of 20 percent renewables by 2010. LADWP also achieved the state-legislated requirement of 33 percent by 2020 (LADWP, 2022). LADWP's 2022 Power Strategic Long-Term Resource Plan (now referred to as the LA100 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, by using electricity from LADWP, the proposed Project would be consistent with the renewable energy elements of EO B-30-15, SB 350, SB 100, and AB 1279. Additionally, 100 percent green (renewable) electricity would be used for the proposed Project through LADWP's Green Power for a Green L.A.™ Program.

As discussed in Section II.6, Proposed Project Components, and further discussed in Section V.8, Greenhouse Gas Emissions, of this Initial Study, the proposed Project would meet the requirements and intent of the UC Policy on Sustainable Practices including but not limited to requirements pertaining to energy efficiency, green building design, sustainable transportation, and waste management. The proposed Project, which is considered a major renovation under the UC Policy on Sustainable Practices, would involve improvements to existing buildings including building systems and equipment; would achieve a minimum LEED BD+C Gold rating; and would outperform the required provisions of the Title 24 Energy Code by at least 20 percent.

[31] The current energy mix from LADWP is 41 percent renewables (LADWP, 2024).

Further, the proposed Project would exceed CALGreen Code Mandatory Measures and would incorporate LRDP MMs and PPs that serve to reduce energy demand. Notable features of the proposed Project to address energy efficiency are described in the response to Threshold (a) above. The proposed Project would be implemented in compliance with applicable provisions of the UC Policy on Sustainable Practices, Title 24 Energy Code, and CALGreen.

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

7. GEOLOGY AND SOILS

The existing buildings at the Project site were constructed between approximately 1985 and 1991 and have been subject to various modifications over time. Notably, renovations at Research Park East occurred prior to UCLA's acquisition of the property in 2023, involving partially completed core and shell upgrades, seismic upgrades, and façade changes. Although the existing Research Park East building complies with the UC Seismic Safety Policy (last updated in November 2024), conversion of the original retail building to scientific research space would require structural retrofits to accommodate the change of use and associated mechanical systems and building loads.[32] The existing Research Park West building does not comply with the UC Seismic Safety Policy and would require a full seismic upgrade to improve the building's Seismic Performance Rating (SPR) from VI to IV.[33] As described in Section II.6, Proposed Project Components, of this Initial Study, the proposed Project would involve phased development of all necessary building core and shell improvements, additional seismic improvements, and interior tenant improvements. The proposed Project would also involve the construction of a new two-story conference center and a single-story, largely subterranean central loading dock/service area at the south side of Research Park East, a new pedestrian bridge on Level 3 of Research Park East, and new single-story amenity pavilion at the south side of Research Park West.

Limited excavation associated with construction of the new conference center and central loading dock/service area at Research Park East, the new amenity pavilion and seismic improvements to the existing building foundation at Research Park West, as well as limited shallow grading for the new Westwood Boulevard crosswalk and utility installations. The maximum depth of excavation would be approximately 10 feet for most components, and a depth of approximately 3.75 feet below the finished floor of Level P5 at Research Park West.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP 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. Minor clarifying changes have been made, as

[32] Seismic evaluations were conducted by KPFF in 2024 and 2025 based on the UC Seismic Program Guidelines. Research Park East was assigned a SPR rating of IV, which meets specified performance criteria.

[33] SPR VI does not meet specified performance criteria but does not pose an immediate life-safety hazard.

needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

PP 4.5-1(a) *During project-specific building design, a site-specific geotechnical study**(ies)** shall be conducted **for new construction and seismic remediation activities** 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~~ **University** shall continue to comply with the University Policy on Seismic Safety effective May 19, 2017 or with any subsequent revision to the policy that provides an equivalent or higher level of protection with respect to seismic hazards.*[34]

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

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

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

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

*consultation with the ~~campus~~ **University** 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 Initial Study, which address water quality protection, would be incorporated into the proposed Project.

Section 4.5, Geology and Soils, of the LRDP Final SEIR includes a detailed discussion of the federal, state, and University regulatory framework related to geology and soils and is hereby incorporated by reference. As identified, the national model code standards (i.e., the International Building Code) adopted into Title 24, Part 2, apply to all occupancies in California except for modifications adopted by state agencies and local governing bodies. The applicable version of the CBC would be applied to each respective phase of the proposed Project based on the timing of 100% Design Development plan submittal, in accordance with the UC Facilities Manual.

Project Impact Analysis

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

Discussion

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

The Project site is in the seismically active Southern California region; thus, consistent with existing conditions, the existing buildings could be subjected to moderate to strong ground shaking in the event of an earthquake occurring at one of the many active Southern California faults. The nearest fault to the Project site is the Santa Monica Fault associated with the Santa Monica Fault Zone, which is approximately 0.8 mile to the northwest (DOC, 2025b). The existing building at Research Park East in its present condition has a SPR of IV thereby meeting the minimum seismic performance requirements per the UC Seismic Program Guidelines. The existing building at Research Park West has a SPR rating of VI, which does not meet specified performance criteria but does not pose an immediate life-safety hazard. As described in Section II.6, Proposed Project Components, of this Initial Study, the proposed Project would involve seismic upgrades at both Research Park East and West as well as other structural building improvements to accommodate the proposed uses. The proposed seismic upgrades and building improvements would adhere to applicable CBC and UC Policy on Seismic Safety requirements. Accordingly, potential impacts related to strong seismic ground shaking would be less than significant with: (1) adherence to the CBC; (2) implementation of recommendations from site-specific geotechnical investigations as required by LRDP PP 4.5-1(a); (3) incorporation of LRDP PP 4.5-1(c), which requires compliance with the current UC 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.[35] With incorporation of identified LRDP PPs, impacts would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

[35] 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.

Level of Significance after Mitigation

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

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

Discussion

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

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

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

In the long term, the Project site would increase the amount of landscaped (pervious) area on-site compared to existing conditions, particularly when accounting for green roofs and new landscaped garden areas on the various terrace levels. However, the potential for soil to be transported off-site by wind or water erosion would be similar to existing conditions due to the continued presence of development and landscaping. Consistent with existing conditions, areas of exposed soils would be minimal following construction of the proposed Project, and no potential, substantial erosion impacts would occur during operation.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

The Project site is developed with existing buildings, associated subterranean parking, and landscaped areas. As previously discussed under Threshold (a), the Project site is not located in an area subject to landslides or liquefaction. Prior to UCLA's acquisition of the property, previous site preparation, grading, and building construction was conducted in accordance with applicable CBC and City of Los Angeles requirements, including requirements to incorporate recommendations from any required site-specific geotechnical studies into the building design to address geology and soil conditions, including expansive soils. The proposed Project, which would involve interior and exterior improvements to the existing buildings, including seismic upgrades and limited areas of new construction on the south side of both Research Park East and West, would not involve any construction activities that would result in unstable soils. Based on: (1) adherence to applicable CBC regulations; (2) implementation of recommendations from site-specific geotechnical investigations as required by LRDP PP 4.5-1(a); and (3) incorporation of LRDP PP 4.5-1(d), which requires structural peer review and incorporation of peer review recommendations into project design,[36] the proposed Project would have a less than significant impact related to unstable geologic units or expansive soils.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

[36] 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.

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

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

The Project site is developed and does not contain unique geological features. Limited areas of excavation would be required for construction of the new conference center, entry lobby, central loading dock/service area, and amenity pavilion, as well as foundation improvements and the installation of utilities. Additionally, limited shallow grading may be needed for the accessible ramps associated with new Westwood Boulevard crosswalk. The maximum depth of excavation would be approximately 10 feet for most components, and a depth of approximately 3.75 feet below the finished floor of parking Level P5 at Research Park West. Excavation could potentially encroach into areas of native sediment, which was encountered between 5 and 8 feet bgs during a geotechnical investigation conducted by Geotechnologies, Inc. (Geotechnologies) in 2018 for previous renovations at the Research Park East site (Geotechnologies, 2018). Although the discovery of a unique paleontological resource or site or unique geologic feature is not anticipated, the proposed Project would incorporate LRDP MM 4.4-3(a), which requires an instructional program to assist construction personnel in identifying paleontological resources, and LRDP MM 4.4-3(b), which defines the requirements for review and recordation by a qualified Paleontologist of any paleontological resources encountered on a site. With implementation of LRDP MM 4.4-3(a) and MM 4.4-3(b), potential impacts related to paleontological resources would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

8. GREENHOUSE GAS EMISSIONS

Relevant elements of the proposed Project related to air quality include the adaptive reuse of the approximately 744,400 GSF of existing occupiable floor area within Research Park East and West to provide over 800,000 GSF of scientific program space with approximately 29,000 SF of open space and outdoor amenity areas and approximately 1,100 parking spaces on-site, for a total of up to approximately 1.35 million GSF of research park uses. The proposed Project also includes improvements to the on-site building systems, accessibility, and utility infrastructure. The proposed Project would achieve a minimum LEED BD+C Gold rating. To achieve this, a full range of sustainability practices related to building design and operations would be included in the proposed Project as outlined in Section II.6, Proposed Project Components. The sustainability features for which emission reductions have been quantified in this analysis include the purchase of 100 percent renewable energy, all-electric design, and a PV array. Additionally, as further discussed in Section V.17, Transportation, of this Initial Study, there would be an overall reduction in trip generation with implementation of the proposed Project compared to the trip generation associated with the shopping center.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PP from the LRDP MMRP has been incorporated into the proposed Project and is assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP 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. Minor clarifying changes have been made, as needed, so the stated requirement reflects the proposed Project's off-campus location and specific characteristics.

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

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

Greenhouse Gas Background

Increasing GHG emissions have led to an anthropogenic warming trend of the earth's average temperature, which is causing changes in the Earth's climate.[37] GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other operational activities; (2) deforestation; (3) agricultural activities; and (4) solid waste decomposition. The increasing temperature phenomenon is known as "global warming," and the climatic effect is known as "climate change" or "global climate change."

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

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

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

State CEQA Guidelines Regarding Greenhouse Gas Emissions

In August 2007, the California State Legislature adopted SB 97 (Chapter 185, Statutes of 2007), requiring the Office of Planning and Research (OPR)[38] to prepare and transmit new CEQA Guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, OPR adopted the new guidelines that became effective on March 18, 2010. In late 2018, OPR finalized amendments to the CEQA Guidelines, including changes to CEQA Guidelines Section 15064.4, which addresses the analysis of GHG emissions. The amendments became effective on December 28, 2018. However, neither a threshold of significance nor any specific mitigation measures are included or provided in the CEQA Guidelines. The CEQA Guidelines require a lead agency to make a good-faith effort, to the extent possible based on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether

[37] 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.

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

to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

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

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

Project Impact Analysis

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

Discussion

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

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

As a constitutionally created entity, the UC is not subject to municipal plans, policies, and regulations, including those related to GHG. However, UCLA may elect to utilize relevant standards established or recommended by other agencies or recommended by experts for purposes of analysis. Because the proposed Project is located off-campus and the proposed Project's environmental analysis is not tiered from the LRDP EIR, for purposes of this analysis,

UCLA has determined based on its discretion that the numeric screening threshold identified in the SCAQMD Guidance Document is appropriate for determining whether the proposed Project would result in a significant impact related to GHG emissions. For reasons further described in the Air Quality and GHG Report (Eyestone, 2026) included in Appendix A of this Initial Study, the SCAQMD's recommended annual non-industrial screening threshold of 3,000 $MTCO_2e$ for small projects is used as the significance threshold, in addition to qualitative thresholds of significance as set forth in the CEQA Guidelines.

GHG Emissions Impacts

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

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

CalEEMod was also used to calculate potential GHG emissions generated by operation of the shopping center and the proposed land uses at the Project site including area sources, electricity, mobile sources, stationary sources (i.e., emergency generators), solid waste generation and disposal, and water usage/wastewater generation. Detailed information about the modeling assumptions is provided in the Air Quality and GHG Report. With respect to mobile emissions, the proposed Project would result in an overall reduction in GHG emissions due to the reduction in vehicular trips (i.e., compared to operation of the shopping center).

As previously identified, the proposed Project has incorporated various features to support and promote environmental sustainability by complying with applicable State and local regulatory requirements, including the provisions set forth in the UC Policy on Sustainable Practices. Notably, the proposed Project would achieve a minimum LEED BD+C Gold rating. As the proposed Project would consist of all-electric design, sources typically associated with natural gas consumption such as boilers and HVAC were assumed in CalEEMod modeling to be powered by electricity. CalEEMod modeling for the proposed Project also takes into account relevant requirements set forth in the UC Policy on Sustainable Practices, including the installation of PV panels, exceedance of Title 24 standards by 20 percent, and the LEED BD+C Gold 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, of this Initial Study.

The estimated net change in GHG emissions resulting from the proposed Project, taking into consideration emissions from operation of the shopping center, are shown in Table 10. As shown, the proposed Project would result in a net decrease of 3,452 $MTCO_2e$ annually.

TABLE 10 ANNUAL GHG EMISSIONS SUMMARY – NET CHANGE[1]

Emissions Source	Net Project Emissions ($MTCO_2e$)
Mobile	(2,577)
Area[2]	2
Energy[3]	(1,643)
Water/Wastewater[4]	125
Solid Waste[5]	(202)
Refrigerant	1
Emergency Generators	494
Construction	348
Total Emissions	**(3,452)**
SCAQMD Project Threshold	**3,000**
Exceed Threshold?	**No**

[1] CO_2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix AQ-3 of the AQ and GHG Report included in Appendix A of this Initial Study. Emissions represent the net change (proposed Project minus the operation of shopping center uses within the existing buildings under baseline conditions).
[2] Area source emissions are from landscape equipment. Landscaping activities under the proposed Project would be generally similar to baseline operations.
[3] Energy source emissions are based on CalEEMod default electricity and natural gas usage rates. While the baseline uses involve the use of natural gas, the proposed Project would be all-electric, thus contributing to a reduction in emissions.
[4] Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.
[5] Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.
Source: (Eyestone, 2026)

As discussed above, a numeric threshold for determining the significance of GHG emissions in the Basin has not been established by the SCAQMD for projects where it is not the lead agency. UCLA has opted to use the SCAQMD's Tier 3 screening threshold of 3,000 $MTCO_2e$/yr for mixed land uses, as reflect in the proposed Project. The proposed Project's annual net reduction in GHG emissions would not exceed this threshold. Thus, the direct and indirect GHG emissions of the proposed Project would not be cumulatively considerable and would result in a less than significant impact.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

Regulatory Framework

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

University of California

- **University of California Policy on Sustainable Practices.** In June 2004, the University of California developed detailed guidelines for the Policy on Green Building Design and Clean Energy Standards. This comprehensive policy established the University as a leader in promoting environmental stewardship among institutions of higher education. Subsequently renamed the Policy on Sustainable Practices, the policy has been revised several times, most recently in April 2024, and has expanded to cover the areas of climate action, sustainable transportation, sustainable building and laboratory operations for campuses, zero waste, sustainable procurement, sustainable food services, sustainable water systems, sustainability at UC Health, general sustainability performance assessment, and health and well-being (UC, 2024b). The UC Policy on Sustainable Practices includes climate change goals for the 10 UC campuses, five academic health centers, UC Agriculture and Natural Resources locations, Lawrence Berkeley National Laboratory, and the UC Office of the President.

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

State

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

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

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

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

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

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

- **AB 1279.** In September 2022, Governor Newsom signed into law AB 1279, or the California Climate Crisis Act.[39] AB 1279 requires the State to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter.[40] The bill requires California to reduce statewide GHG emissions by 85 percent below 1990 levels by 2045 and directs CARB to work with relevant state agencies to achieve these goals and update its Scoping Plan to reflect the 2045 target.[41] In its latest 2022 Scoping Plan Update, discussed below, CARB set carbon removal/capture targets of 20 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) by 2030 and 100 $MMTCO_2e$ by 2045 (CARB, 2022).[42] Before the passage of AB 1279, California had already indicated it was headed in the direction of net-zero emissions by

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

2045 after Governor Brown signed Executive Order (EO) B-55-18 in 2018, which established an additional statewide goal of achieving carbon neutrality by 2045 (State of California, 2018).

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

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

- **California Code of Regulations Title 24.** CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Energy Code), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption. On September 11, 2024, the CEC adopted the 2025 Title 24 Energy Code, which was approved by the CBSC in December 2024. The 2025 Title 24 Energy Code incorporates the 2025 Building Energy Efficiency Standards, which focus on expanding the use of heat pumps and other efficient approaches for space conditioning and water heating; encouraging electric water heating and cooking in electric-ready buildings; and updating standards for photovoltaic and battery energy storage systems for high-rise multifamily and nonresidential buildings, standards for nonresidential building space conditioning system controls, and requirements for multifamily building ventilation (CEC, 2024). The 2025 Title 24 Energy Code and 2025 Building Energy Efficiency Standards went into effect on January 1, 2026.

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

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

- **The CARB Scoping Plan**, required by AB 32, is a GHG reduction roadmap developed and updated by CARB at least once every five years, as required by AB 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB adopted the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) in December 2022, as the third update to the initial plan

that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan Update shifted the focus to the newer SB 32 goal of a 40-percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target and also assessed progress toward achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

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

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

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

Regional

- **SCAG RTP/SCS.** To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS in September 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving

air quality, and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 with respect to meeting the State's GHG emission reduction goals.

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

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

Lack of Conflict with Applicable Plan, Policy, and/or Regulation Analysis

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

The analysis below describes the extent to which the proposed Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the proposed Project would not be in conflict with the applicable GHG reduction plans and policies.

Lack of Conflict with the UC Policy on Sustainable Practices

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

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

- At a minimum achieve a LEED BD+C Gold rating and register with the utilities' energy efficiency program, if eligible.
- Outperform CBC Title 24 energy efficiency requirements by at least 20 percent.
- By 2025, obtain 100 percent clean electricity.
- No use of on-site fossil fuel combustion (e.g., natural gas) for space and water heating (i.e., all-electric building).
- Achieve at least five points within the available credits in the LEED BD+C Water Efficiency and Sustainable Sites: Rainwater Management categories and prioritize earning waste reduction and recycling credits.

The proposed Project would be subject to the CBC Title 24 standards in effect at the time that 100 percent Design Development plans are submitted for approval by UCLA's Campus Building Official and would be designed to achieve a LEED BD+C Gold certification at minimum. As identified in Section II.6, Proposed Project Components, of this Initial Study, the sustainability features to be incorporated into the proposed Project would include but not be limited to: electrification of the entire Project site; the use of 100 percent renewable electricity through LADWP's Green Power for a Green L.A. program; enhanced commissioning of building mechanical systems to maximize efficiencies; new efficient emergency generators; and harvest and reuse of stormwater runoff. Additionally, with respect to water conservation, LRDP PPs 4.14-2(a) through 4.14-(d) are incorporated into the proposed Project and require installing low-flow water fixtures, reducing irrigation needs, promptly detecting and repairing water and irrigation pipe leaks, and minimizing the use of water to clean walkways and other hardscape, which would serve to reduce water demands. Further, as required by LRDP PP 4.14-2(g), building occupants would be educated on the importance of water conservation measures. The proposed Project would also energy conservation measures per LRDP PP 4.14-9 to reduce electricity demands, as identified above. Therefore, the proposed Project would comply with relevant UC requirements related to Green Building Design and Clean Energy.

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

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

While these goals are typically measured for each academic campus or medical center rather than individual projects, the proposed Project would support these reduction goals by promoting alternative modes of transportation both for commuting purposes and for travel between the main campus and the Project site. The proposed Project's convenient access to public transit, UCLA's TDM measures (such as discounted transit passes and carpool planning support), as well as the

provision of bicycle parking and related facilities would result in a reduction of SOVs and thus vehicle trips, VMT, and associated GHG emissions. Therefore, the Project would support Sustainable Transportation goals set forth in the UC Policy on Sustainable Practices.

With respect to solid waste generation, the Zero Waste section of the UC Policy on Sustainable Practices requires each location to reduce per capita municipal solid waste generation by 50 percent per capita from fiscal year 2015/2016 levels by 2030 and to divert 90 percent of municipal solid waste from landfills. LRDP PP 4.14-3 is incorporated into the Project and requires implementation of a solid waste reduction and recycling program designed to limit the total quantity of solid waste that is disposed of in landfills. The proposed Project would include trash and recycling facilities and would implement UCLA's solid waste management programs necessary to achieve the required diversion goals. As such, the Project would support both the waste reduction and diversion goals established within UC Policy on Sustainable Practices.

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

Lack of Conflict with CARB's 2022 Climate Change Scoping Plan

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

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." Jurisdictions that want to take meaningful climate action aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also consider the three priority areas: transportation electrification, VMT reduction, and building decarbonization. To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas.[43] An evaluation of the goals, plans, and policies implemented by UCLA as part of the proposed Project to support the GHG reduction strategies in the Scoping Plan's three priority areas is provided below.

- **Transportation Electrification.** As identified above, the proposed Project would provide at least 111 EV-ready spaces and at least 112 EV charging stations throughout the Project site, thus supporting electric vehicle transportation.

- **VMT Reduction.** The Project area is well served by transit, and the proposed Project incorporates various strategies to reduce SOV travel, vehicular trips, and associated VMT, including pedestrian access improvements, subsidized transit passes, and assistance with carpooling and vanpooling. The proposed Project would also include bicycle parking, showers, and locker facilities. Further, based on the VMT analysis prepared by Fehr & Peers (included in Appendix E of this Initial study), the Project site is located within both a TPA and a low VMT area, and the proposed Project would have a less than significant VMT impact. Additionally, the proposed Project would result in a substantial reduction in

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

daily trips compared to operation of the shopping center (net reduction of 10,659 trips), which would also reduce VMT.

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

  As previously discussed, the UC Policy on Sustainable Practices requires each campus or location to obtain 100 percent clean electricity (defined as having carbon intensity factor of less than 150 lbs CO_2e per MWh). The proposed Project would purchase 100 percent renewable electricity for proposed Project operations. In future years, the LADWP will be required to increase the amount of renewable energy in its power mix to comply with SB 100 requirements. The combination of the UC policies and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas. Additionally, the proposed Project would be all-electric by design.

  The proposed Project would further support these decarbonization strategies by achieving LEED Gold BD+C rating at minimum. LEED measures incorporated into the proposed Project include water conservation, enhanced commissioning, and energy efficiency measures. Additionally, the proposed Project would replace existing fixtures with energy-efficient LED lighting.

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

Alignment with the SCAG 2024–2050 RTP/SCS

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

- **Integrated Growth Forecast.** The RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to a specific area; these are used by SCAG in all phases of implementation and review. As discussed earlier under Section V.3 Threshold (a) of this Initial Study, the proposed Project's net increase in employees is well within the employment projections for Los Angeles County, as set forth in the 2020–2045 RTP/SCS. Similarly, the proposed Project is consistent with the regional growth projections in the 2024–2050 RTP/SCS. Specifically, the estimated net increase in employees with the proposed Project compared to operation of the shopping center would represent approximately 0.7 percent to 0.9 percent of the employment increase projected for Los Angeles County in the 2024–2050 RTP/SCS for the period between 2025 and 2035.[44]

- **VMT Reduction Strategies and Policies.** The proposed Project is designed and would be constructed to incorporate features to support and promote environmental sustainability. The proposed Project represents an adaptive reuse of existing buildings in an area well served by public transportation. Additionally, the proposed Project incorporates strategies to reduce the number of single occupancy vehicle trips to the Project site, as discussed previously. Notably, to encourage the use of transit, pedestrian access from the nearby Metro E Line Westwood/Rancho Park Station to the Project site would be provided to facilitate the 'last mile' connection to the Project site, and discounted transit passes would be available to eligible Project employees as part of UCLA's standard TDM program. The proposed Project would not conflict with the following key GHG reduction strategies in SCAG's 2024–2050 RTP/SCS, which are based on changing the region's land use and travel patterns:[45]

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

    As discussed above, the proposed Project represents an adaptive reuse of existing buildings and involves increased employment within an HQTA that is well served by public transportation.[46] This concentration of development in a highly urbanized area would avoid impacts to greenfield or rural areas and is consistent with the overall growth pattern encouraged in the RTP/SCS. In addition, the proposed Project would incorporate various strategies identified above to reduce SOV trips. These strategies would promote a reduction in VMT and a related reduction in GHG emissions, which would not conflict with the goals of SCAG's 2024–2050 RTP/SCS.

- **Increased Use of Alternative Fueled Vehicles Policy Initiative.** The second category of strategies and policies of the 2024–2050 RTP/SCS, with regard to individual development projects like the proposed Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2024–2050 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. As previously discussed, the proposed Project would provide at least 111 EV-ready spaces and at least 112 EV charging stations throughout the Project site.

[44] According to the Demographic & Growth Forecast technical report included in SCAG's 2024–2050 RTP/SCS, the number of employees in Los Angeles County is estimated to increase from approximately 5,131,000 in 2025 to 5,386,000 in 2035 (an increase of approximately 255,000 employees).
[45] SCAG, 2024–2050 RTP/SCS, Table 5.1, Connect SoCal 2024 Performance Measures.
[46] SCAG, 2024–2050 RTP/SCS, Map 3.4, Priority Development Areas.

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

- **Land Use Assumptions.** At the regional level, the 2024–2050 RTP/SCS is a plan adopted for the purpose of reducing GHGs.[47] In order to assess the proposed Project's alignment with the 2024–2050 RTP/SCS, the proposed Project's land use characteristics are considered in relation to those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and policies of applicable regional land use plans and regulations, such as the 2024–2050 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. In sum, the proposed Project is the type of land use development that is encouraged by the 2024–2050 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.[48] By furthering implementation of SB 375, the proposed Project supports regional land use and transportation GHG reductions consistent with State regulatory requirements. Therefore, the proposed Project would not conflict with the 2024–2050 RTP/SCS.

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

9. HAZARDS AND HAZARDOUS MATERIALS

Relevant elements of the proposed Project related to hazards and hazardous materials include typical construction activities and proposed operations. Construction would primarily involve

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

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

interior and exterior improvements to the existing buildings; however, there would also be some new construction and limited excavation. The existing buildings, which were constructed between 1985 and 1991 and have been subject to various modifications since they were constructed, contain a variety of environmentally regulated materials (ERMs).

The proposed Project would involve the operation of new wet and dry laboratories and related research facilities, including a vivarium, that may use hazardous materials. The proposed Project would also generate biohazardous and hazardous waste and would require chemical storage on-site.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP 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. Minor clarifying changes have been made, as needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

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

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

Project Impact Analysis

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

Discussion

Construction-Related Hazards

Building Materials

In 1978, the Consumer Products Safety Commission banned paint and other surface coating materials that contain lead, and the use of asbestos, for the most part, has been voluntarily discontinued since the late 1970s. However, some non-friable materials (e.g., wall materials and stucco, roofing material, floor tile and mastic), may have been manufactured with asbestos-containing materials (ACMs) and used into the early 1980s.

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

The existing buildings on-site were constructed between approximately 1985 and 1991 and have been subject to various modifications since they were constructed. The existing building at Research Park East was subject to extensive renovations prior to UCLA's purchase of the property in 2023, and ACMs were removed at that time. Based on the Post-Abatement Visual Inspections and Air Clearance Closeout Report prepared by Terracon, ACMs have been satisfactorily removed, and the associated work areas were appropriately cleaned (Terracon, 2019). Therefore, construction activities at Research Park East would not result in the release of ACMs during construction activities.

However, it is possible that Research Park East contains materials such as paints with detectable concentrations of lead. Further, based on an asbestos and lead survey at Research Park West, ACMs and lead-containing paint and materials are present in the existing building (Terracon, 2023). Therefore, certain construction-related activities where these materials are present could release friable asbestos fibers or lead dust and expose construction personnel without proper precautions. Because exposure to such materials can result in adverse health effects in uncontrolled situations, the proposed Project would comply with regulations pertaining to the

abatement, handling, and disposal of ACMs and lead-containing paint and materials. Per LRDP PP 4.6-1, UCLA's EH&S procedures require that all applicable federal, state, and local regulations as well as UCLA's Asbestos Management Program and Lead Compliance Program be implemented during construction activities.

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

Polychlorinated biphenyls (PCBs) were used as coolants and insulators in electrical transformers beginning in 1929; however, exposure to PCBs was found to be hazardous to humans, and the use of PCBs has been regulated since 1977. Products made before 1977 that may contain PCBs include old fluorescent lighting fixtures and electrical devices. The light ballasts within the existing buildings may contain small quantities of PCBs. In small quantities, these ballasts may be disposed of in a municipal solid waste landfill. However, the U.S. Environmental Protection Agency (USEPA) advises that an accumulation of a large number of ballasts for disposal should be handled as PCB waste and disposed of properly in accordance with local, state, and federal regulations. Based on the Phase I Environmental Site Assessment (ESA) for the Westside Pavilion conducted by Northgate Environmental Management, Inc.,[49] there are four transformers located at the Project site within transformer rooms (one at Research Park West and three at Research Park East) as well as smaller transformers in an electrical room. The on-site transformers do not contain PCBs (Northgate, 2023).

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

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 typically occur on any other similar construction site. Materials such as paints, adhesives, solvents, and other substances typically used in building construction would be present on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. Construction contractors would be required to comply with all applicable federal,

[49] The Phase I ESA (Northgate, 2023) is incorporated into this Initial Study by reference and is available for inspection at the UCLA Capital Programs office located at 1060 Veteran Avenue, Los Angeles, California 90095.

state, and local laws and regulations regarding the use, storage, and transport of hazardous construction-related materials, including but not limited to requirements imposed by the USEPA, California Department of Toxic Substances Control (DTSC), SCAQMD, Regional Water Quality Control Board (RWQCB), and University of California. With mandatory adherence to applicable hazardous materials regulations, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

Contaminated Soil and/or Groundwater

The Phase I ESA prepared for the Project site identified two recognized environmental conditions (RECs) associated with the Project site (Northgate, 2023). The first is related to a tetrachloroethene (PCE) release at a former dry-cleaning facility immediately north of the Project site, which has impacted soil, soil vapor, and groundwater at that location. This PCE release is currently being remediated under regulatory oversight. The Phase I ESA concludes that the possible presence of PCE in groundwater that has migrated from the off-site release beneath the Project site at an estimated depth of approximately 120 feet bgs, although a REC, would not significantly impact the proposed Project.

The second REC identified in the Phase I ESA is related to the location of Research Park East within a City of Los Angeles Methane Buffer Zone. New development within the Methane Buffer Zone is required to evaluate potential impacts related to methane vapors and install engineering controls if methane is present above threshold levels (Northgate, 2023). Limited subsurface soil gas sampling for methane was conducted by Terracon in 2018 (Terracon, 2018). Based on the soil gas sampling and evaluation, all methane pressure readings and methane concentrations were below DTSC and City of Los Angeles thresholds, and no further investigation is required (Terracon, 2018).

Additionally, the Phase I ESA identified one historical REC and one business environmental risk (BER) associated with the Project site. The historical REC is related to the former presence of an underground storage tank (UST) on the Project site. The UST was removed in 1999, and no further action was required. The identified BER is due to the Project site location within a special flood hazard area listed for flood depths of one foot, which is further addressed in Section V.10, Hydrology and Water Quality, of this Initial Study. The Phase I ESA did not identify any controlled RECs associated with the Project site. (Northgate, 2023)

Because there are no known current or historical hazardous materials spills at the Project site, no hazardous materials are anticipated to be encountered in the soils underlying the site during trenching and grading activities. While the historic high groundwater level in the area is estimated to be approximately 40 feet deep (Geotechnologies, 2018), groundwater monitoring in 2010 for a property located at approximately 1,800 feet north of the Project site identified a depth to groundwater ranging from approximately 79 to 119 feet bgs, with a southern or southwestern groundwater flow direction (Northgate, 2023). Therefore, groundwater is not anticipated to be encountered during the proposed trenching and grading activities, which are expected to a maximum depth of approximately 10 feet bgs in conjunction with new construction, or for seismic retrofit of the foundation footings at Research Park West occurring approximately 3.75 feet below the finished floor of parking Level P5. However, if any contaminated soil and/or groundwater is discovered, all construction activities shall stop, and an assessment would be made regarding the nature and extent of contamination and the type (if any) of remediation that would be required. The primary purpose of LRDP PP 4.6-4 is to ensure that any encounter with contaminated soil and/or groundwater or related remediation activities, if necessary, would not expose the public or construction workers to hazardous conditions. Continued compliance with all applicable federal, state, and local laws and regulations, as well as incorporation of LRDP PPs 4.6-1 and 4.6-4, would

ensure that impacts associated with the potential exposure of contaminated soil or groundwater are less than significant, and no additional mitigation is required.

Operational Hazards

Operational activities at the Project site may vary over time with changes in tenants and research. At a minimum, the proposed Project would involve the regular use of hazardous materials for cleaning and landscape maintenance purposes. Cleaning products would be disposed of either through the wastewater system (i.e., sinks and laundry machines) or evaporation. Standard cleaning products (i.e., degreasers, window cleaning products) would not be used in quantities that would result in adverse health effects either through direct exposure to the skin or inhalation. Pesticides and herbicides would be directly applied to affected areas using methods that follow applicable regulatory guidelines.

As described in Section II, Project Description, the proposed Project would convert portions of the existing building space into research laboratory facilities. Within Research Park East, wet and/or dry lab uses would be located in all Blocks (Blocks 1 through 3), while primarily dry labs would be located at Research Park West (Block 4). As is common for labs and research facilities, including various existing facilities on the UCLA campus, hazardous materials may be stored and used on-site and could include, but would not be limited to: solvents used for cleaning, extraction, or other laboratory activities; chemical reagents (i.e., chemical starting materials) and chemical reaction products; radioisotopes (i.e., elements used to stimulate or trace chemical reactions); test samples (e.g., specimens such as blood, tissue, soil, or water); medical waste and other organic agents; and compressed gases. Also typical of medical or teaching laboratories and research facilities, the potential exists for bacteria and viruses to be handled. Therefore, as with UCLA's on-campus research facilities, the proposed Project would be designed to meet all applicable regulatory requirements and stringent UC design standards. In particular, a total of up to approximately 5,000 GSF of Biosafety Level (BSL)-2 and BSL-3 lab spaces would be provided, offering varied, regulated levels of safety, security, and containment depending on future research activities and tenant needs.[50]

Chemical storage on-site would comply with maximum allowable quantities (MAQs) per the CBC for both business (Group B) and laboratory (Group L) occupancies. Various tenants within the proposed Project may also qualify as small quantity generators (SQGs) of hazardous or biohazardous waste based on the temporary storage and containment of chemical waste on-site prior to transport to a permitted treatment, storage, or disposal facility.[51] Biohazardous waste would not be treated on-site; it would instead be collected in special red biohazard bags and autoclaved (i.e., sterilized using a high-pressure steam sterilizer), making the bags safe for disposal or further handling. As at other UCLA facilities, regulated medical waste and universal hazardous waste would be processed at a transfer station and transported out of state for incineration. Appropriate cleanrooms and soiled rooms would be incorporated into floorplans, as appropriate, depending on specific scientific activities and tenant needs. As on the UCLA campus, UCLA EH&S would oversee research safety and provide support related to regulatory

[50] Biosafety Levels (BSL-1 through BSL-4) are a set of progressive containment classifications defined by the U.S. Centers for Disease Control and Prevention (CDC) that dictate specialized practices, safety equipment, and facility design to prevent exposure and release.

[51] Regulated by the USEPA, SQGs generate between 100 and 1,000 kilograms (kg) of hazardous waste per month and must meet specified requirements. While large quantity generators (i.e., entities generating more than 1,000 kg of hazardous waste per month or more than 1 kg of acutely hazardous waste per month; LQGs) are not anticipated based on the tenants identified to date, should any tenants qualify as LQGs, they would be subject to additional regulatory requirements.

compliance, guidance, and education. Research Park West may also incorporate facilities for government-sponsored restricted research (i.e., classified projects and proprietary research).

The laboratory component of the proposed Project also may include a Good Manufacturing Practices (GMP) or Current GMP (cGMP) facility to support the development of novel therapeutics (e.g., treatments, drugs, and procedures to address diseases). These facilities require strict environmental controls, including High-Efficiency Particulate Air (HEPA)-filtered air, proper air pressure gradients, temperature and humidity control, and unidirectional movement of products and personnel to prevent contamination.

Additionally, the proposed Project includes an in-vivo research facility (i.e., vivarium) of up to 10,000 GSF to support biomedical research and pre-clinical trial studies. This program would accommodate housing units, procedure rooms, and potentially specialized imaging or behavioral suites. Associated dedicated back-of-house facilities, including a dedicated bay within the central loading dock, would be provided to manage incoming and outgoing shipments, store feed, and handle waste. The facility would incorporate appropriate access control, physical security, environmental separation, and protective measures and would include Animal Biosafety Level (ABSL) lab space in accordance with CDC guidelines and UCLA EH&S requirements.[52] As with UCLA's on-campus facilities, all ABSL spaces within the proposed Project would be designed, constructed, and operated to meet applicable regulatory requirements and stringent UC design standards.

The U.S. Department of Health and Human Services (DHHS), the CDC, and the National Institutes of Health (NIH) prescribe containment and handling practices for use in microbiological, biomedical, and animal laboratories. Research involving select agents and toxins is also subject to requirements prescribed in the Code of Federal Regulations (42 CFR Park 73). Biohazardous medical waste is generally regulated in the same manner as hazardous waste, except that special provisions apply to storage, disinfection, containment, and transportation. The California Department of Public Health (CDPH) Medical Waste Management Program enforces the Medical Waste Management Act and related regulations. Other CDPH branches prescribe protective procedures and engineering controls covering a range of research activities, equipment, and byproducts. All UCLA laboratories (including those located within the proposed Project) must follow mandated hygienic practices, and UCLA EH&S has developed programs, practices, and procedures for training, monitoring, routinely inspecting, reporting, and managing hazardous materials and waste to reduce community and worker exposure to potential hazards. UCLA follows guidelines promulgated by these and various other regulatory agencies to determine the level of safety precautions that must be implemented to safely manage and reduce hazards.

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

Project-Level Mitigation Measures

No mitigation measures are required.

[52] Animal Biosafety Levels (BSL-1 through BSL-4) are a set of progressive containment classifications defined by the CDC that dictate specialized practices, safety equipment, and facility design to prevent exposure and release.

Level of Significance

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

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

Discussion

The Project site is located approximately 0.02-mile southwest of the WorldSpeak School (preschool). Accordingly, the proposed Project has the potential to handle hazardous or acutely hazardous materials, substances, and/or wastes within 0.25 mile of an existing or proposed school. As described above under the analysis for Thresholds (a) and (b), the use, storage, and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, state, and local regulations and with existing University programs and procedures, as required by LRDP PP 4.6-1, which would preclude substantial public safety hazards. Based on adherence to these stringent controls, there would be a negligible potential for individuals at the school to be exposed to substantial safety hazards associated with the emission, handling, or routine transport of hazardous substances or materials to and from the Project site, and impacts would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

Based on review of the California Environmental Protection Agency (CalEPA) Cortese List Data Resources (CalEPA, 2025) and the Phase I ESA prepared for the Project site (Northgate, 2023), the Project site is not currently located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur, and no mitigation is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

The Project site is located approximately 1.5 miles northeast of the Santa Monica Airport, outside the Airport Influence Area (AIA), including safety zones, and outside the 65 decibel (dB) community noise equivalent level (CNEL) noise contour for the airport (LA County, 2003). In addition, the Santa Monica Airport is anticipated to be closed in 2028, per City of Santa Monica City Council Resolution No. 11026 (City of Santa Monica, 2017). The Project site is located approximately 6 miles north of the Los Angeles International Airport and is, therefore, located outside of the AIA and the 65 dB CNEL noise contour for the airport (LA County, 2004). Accordingly, the proposed Project would not result in an airport-related safety hazard or excessive noise for people residing or working in the Project area. Impacts would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

According to the Los Angeles County Public Works Department's City of Los Angeles – West Area Disaster Route Map, Pico Boulevard and Westwood Boulevard are not designated as disaster routes (LA County Public Works, 2008). The nearest disaster routes to the Project site are Olympic Boulevard (approximately 0.3 miles to the northwest) and S. Sepulveda Boulevard (approximately 0.4 miles to the southwest).

Although Project construction activities and associated staging are anticipated to occur within the boundaries of the Project site, limited utility and roadway improvements would occur along Pico Boulevard and Westwood Boulevard. These would include utility connections within the existing sidewalks and construction of the pedestrian crosswalk across Westwood Boulevard. These activities may require periodic single-lane closures. UCLA would be required to obtain all necessary encroachment permits from the City of Los Angeles Department of Transportation (LADOT) prior to any activity occurring within the Pico Boulevard or Westwood Boulevard rights-of-way. Ongoing coordination between the University of California Police Department (UCPD), the Los Angeles Police Department (LAPD), the Los Angeles Fire Department (LAFD), and UCLA would occur pursuant to LRDP PP 4.13-8 (refer to Section V.17, Transportation, of this Initial Study), which requires 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 proposed Project thus incorporates LRDP PP 4.13-8 to ensure that required emergency access to and surrounding the Project site would be maintained during construction. Therefore, there would be a less than significant impact.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

As shown on the aerial photograph provided on Figure 2, the Project site is located in a developed urban area, and there are no undeveloped wildland areas in the vicinity. Based on review of the City of Los Angeles 2024 Local Hazard Mitigation Plan (LHMP), Figure 18-7, Wildfire Severity Zones in West Los Angeles APC, the Project site is not located within or near a Wildfire Severity Zone. (City of Los Angeles, 2024) Additionally, according to the California Department of Forestry and Fire Protection (CAL FIRE), the Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ); the nearest VHFHSZ is approximately 2.0 miles to the northwest (CAL FIRE, 2025). Accordingly, implementation of the proposed Project would not expose people or structures to wildland fires. No impact would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

10. HYDROLOGY AND WATER QUALITY

Relevant elements of the proposed Project related to hydrology and water quality include the exterior construction activities located south of the existing buildings (comprising a physical impact area of approximately 3.2 acres), installation of new stormwater capture/storage systems at Research Park East and West, modifications to the on-site storm drain system to accommodate the proposed uses, and the installation of floodproofing improvements at Research Park East to allow for occupation of the basement level and to protect portions of the street level along Pico Boulevard. The proposed Project would involve the installation of new landscaping at the ground level and on terraces at each building level, as well as green roofs, which would allow for increased stormwater absorption and an associated decrease in stormwater runoff from the Project site, especially when accounting for the new stormwater capture/storage systems. However, existing drainage patterns would be maintained.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), 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 MMRP are signified by strikeout (~~strikeout~~) where non-applicable text has been removed. Minor clarifying changes have been made, as needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

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

MM 4.7-1 *Best Management Practices (BMPs) shall be implemented for individual development projects, to the extent required by state law, to ensure compliance is maintained with all applicable NPDES requirements at the time of project*

construction. UCLA shall utilize BMPs as appropriate and feasible to comply with and/or exceed the current requirements under the NPDES program. BMPs that may be implemented include, but are not limited to, the following:

Non-Structural/Structural:

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

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

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

Project Impact Analysis

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

Discussion

Surface Water

Section 4.8, Hydrology and Water Quality, of the LRDP Final SEIR, includes a detailed discussion of the regulatory framework for hydrology and water quality, which is relevant to the Project site, and is incorporated by reference. In summary, the State Water Resources Control Board (SWRCB) and the nine RWQCBs are responsible for the protection of water quality in California; the Project site is within the Los Angeles Regional Water Quality Control Board (LARWQCB). The

SWRCB establishes statewide policies and regulations for implementing water quality control programs mandated by federal and state water quality statutes and regulations. The RWQCBs develop and implement Water Quality Control Plans (Basin Plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which is further discussed under Threshold (e) below, implements a number of federal and state laws for the proposed Project area, the most important of which are the State Porter-Cologne Water Quality Control Act and the Federal Clean Water Act (CWA).

Pursuant to CWA Section 402(p), which requires regulations for permitting of certain stormwater discharges, the SWRCB issued a statewide general NPDES Permit for stormwater discharges from construction sites, herein referred to as the Construction General Permit. Under this Construction General Permit, discharges of stormwater from construction sites with a disturbed area of one acre or more are required to either obtain individual NPDES permits for stormwater discharges or to be covered by the Construction General Permit. As the physical impact area for the proposed exterior improvements encompasses approximately 3.2 acres, as shown on Figure 16, the proposed Project must comply with requirements and water quality standards set forth in the current Construction General Permit (i.e., processing through the SWRCB is not required). Additionally, as required by LRDP PP 4.7-1, the proposed Project would comply with the University's Municipal Separate Storm Sewer System Permits (MS4) permit, which requires the contractor to prepare a Storm Water Pollution Prevention Plan (SWPPP), and would implement a variety of BMPs per UCLA's standard practices, which generally align with NPDES requirements.

As described in Section II.6, Proposed Project Components, of this Initial Study, the proposed Project includes interior and exterior improvements to the existing buildings, and limited areas of new construction on the south side of both Research Park East and West. In general, the types of urban pollutants generated from operations at the Project site, such as trash, dirt/sediment, and limited amounts of vehicle oil or grease, would not change compared to past operations at the site. The proposed Project would involve the installation of new landscaping at the ground level and on terraces at each building level, as well as green roofs, which would result in increased stormwater absorption. Additionally, the stormwater runoff generated at the Project site would be captured and stored in subterranean storage tanks on-site and used for on-site irrigation. The stormwater quality system installed at Research Park East as part of prior renovation activities would remain in place. Specifically, stormwater runoff from Research Park East would be captured in catch basins with filter inserts, routed to hydrodynamic separators for pre-treatment, and then to four existing drywells and an existing approximately 131,600-gallon underground storage tank. An additional approximately 14,500-gallon underground storage tank would be installed near the Research Park East driveway at Westwood Boulevard. Similarly at Research Park West, stormwater runoff would be captured in catch basins with filter inserts, routed to hydrodynamic separators for pre-treatment, and then to a new approximately 75,000-gallon underground storage tank located at basement Level 5. Additionally, Project-specific BMPs, including the BMPs listed in LRDP MM 4.7-1, would be implemented. As such, the proposed Project would not degrade surface water quality in receiving waters or groundwater quality.

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

Groundwater

As previously discussed in Section V.9, Hazards and Hazardous Materials, of this Initial Study, although the historic high groundwater level in the area is estimated to be approximately 40 feet deep (Geotechnologies, 2018), based on information for a property located approximately 1,800 feet north of the Project site, the recent depth to groundwater ranges from approximately 79 to 119 feet bgs (Northgate, 2023). Therefore, groundwater is not anticipated to be encountered during the proposed trenching and grading activities, which are expected to reach a maximum depth of approximately 10 feet bgs in conjunction with new construction, or for seismic retrofit of the foundation footings at Research Park West occurring approximately 3.75 feet below the finished floor of parking Level P5. Accordingly, Project construction activities would not degrade groundwater quality. No impact would result.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

Discussion

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

There are no natural drainage courses or streams on or near the Project site. Further, the proposed Project would introduce new landscaped areas, which would increase stormwater absorption and reduce the associated amount of stormwater runoff. The proposed Project would not change the existing drainage patterns on the Project site, including through the alteration of the course of a stream or river or through the addition of impervious surfaces.

Any erosion occurring during construction would be related primarily to disturbed soils and sediments that may enter the stormwater during rainfall events or winds, but the implementation of erosion control and sediment control BMPs as part of the required SWPPP (discussed under Threshold [a]) 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. As with existing conditions, areas of exposed soil would be limited to landscaped areas following construction of the proposed Project, and most dirt or sediment entering the storm drain system on-site would be captured by the existing hydrodynamic separators. Thus, potential erosion impacts would be less than significant during operation.

Because stormwater would be retained for reuse as landscape irrigation on-site, implementation of the proposed Project would not create runoff that would exceed the capacity of the existing storm drain system or result in flooding on- or off-site. Further, the proposed Project would generate urban pollutants similar to existing non-residential uses located both on-site and 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.

As discussed under Threshold (d) below, Research Park East is within a 100-year floodplain. This is an existing condition that periodically results in flooding on-site during major storm events. The proposed Project would involve dry floodproofing improvements at Research Park East to allow for occupation of the basement level and to protect portions of the street level space along Pico Boulevard. These improvements would redirect flood flows away from the building but would not change the general drainage patterns of the Project site. Additionally, the existing and proposed

stormwater storage tanks would capture surface flows, thus minimizing flood hazards. As such, less than significant impacts related to impeding or redirecting flood flows would result.

As discussed under Threshold (a) above, the proposed Project would not introduce new urban pollutants and would not degrade water quality. No impact related to substantial additional sources of polluted runoff would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact or a less than significant impact related to: (1) substantial erosion or siltation on or off the site; (2) a substantial increase in the rate or amount of surface runoff in a manner that would result in flooding on or off the site; (3) creation or contribution to runoff water that would exceed the capacity of existing or planned stormwater 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

Based on review of the City of Los Angeles 2024 LHMP, Figure 17-4, Mapped Tsunami Hazard Area in the West Los Angeles APC, the Project site is not within a mapped tsunami inundation area in the West Los Angeles Area Planning Commission area (City of Los Angeles, 2024). Further, the Project site is not near a body of water and would not be subject to a seiche.

The Project site is located within Federal Emergency Management Agency (FEMA) Zone AO, which is identified as a Special Flood Hazard Area with a 1 percent or greater chance of yearly shallow flooding at an average depth of 1 foot (i.e., a 100-year floodplain) (FEMA, 2018; FEMA, 2023). Additionally, the Project site is within the mapped dam inundation area for Stone Canyon Reservoir dam, which is located approximately 4.7 miles to the northwest (DSOD, 2025).

To address existing flood conditions on-site during major storm events, the proposed Project includes the installation of dry floodproofing improvements at Research Park East to allow for occupation of the basement level and to protect portions of the street level along Pico Boulevard. This would include but not be limited to improvements to the south property line wall, active devices to control flooding from the adjacent GPI property to the east, and improvements along Pico Boulevard (Level 1). Floodproofing improvements along Pico Boulevard would include both fixed improvements (i.e., raising the concrete curb along the exterior wall and replacing storefront sections to match the existing façade) and temporary improvements (i.e., physical controls at the doors).

As discussed in Section V.9, Hazards and Hazardous Materials, of this Initial Study, hazardous materials that would be used during construction activities (e.g., chemical agents, solvents, paints,

and fuel for equipment) and for landscape maintenance and cleaning (e.g., pesticides/herbicides and cleaning solvents) are common and would not be used in quantities that pose a significant hazard to the public or environment. Further, as discussed in Section V.9, Hazardous and Hazardous Materials, with adherence to UCLA's standard procedures for handling hazardous materials as required by LRDP PP 4.6-1, as well as compliance with applicable regulations and industry safety protocols, the proposed Project would not create a significant hazard to the public or the environment involving the release of hazardous materials. Therefore, the proposed Project would have a less than significant impact related to the release of pollutants due to inundation.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to the release of pollutants due to inundation.

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

Discussion

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

The 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in "high-" and "medium-priority" basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long-term sustainability. The California Department of Water Resources (DWR) currently categorizes the Coastal Plain of Los Angeles Santa Monica Basin as a "medium priority" basin; therefore, the Santa Monica Basin is subject to the requirements of the SGMA (DWR, 2025). 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 issuing regulations in accordance therewith. The GSP for the Santa Monica Basin was adopted by the SMBGSA in January 2022 (SMBGSA, 2022).

As previously discussed, the proposed Project would not entail contact with or the extraction of groundwater located beneath the site, the proposed Project would not impact groundwater quality, and the Project site is not within a groundwater recharge area. Therefore, the proposed Project would not obstruct or conflict with a sustainable groundwater management plan.

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

11. LAND USE AND PLANNING

Relevant elements of the proposed Project related to land use include the adaptive reuse of the existing buildings on-site, which were originally developed and operated as a shopping center, and limited new construction to provide a total of up to approximately 1.35 million GSF of research park uses, with over 800,000 GSF of scientific program space, approximately 30,900 SF of open space and outdoor amenity areas, and approximately 1,100 parking spaces on-site.

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

Project Impact Analysis

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

Discussion

As shown on the aerial photograph provided in Figure 2, the Project site and surrounding area are fully developed and urbanized. The existing buildings would be retained, interior and exterior improvements to the buildings would be made, and limited new construction would occur on-site in the developed area south of the existing buildings to accommodate the proposed uses. Existing residential uses are located immediately west and south of the Project site. The proposed Project does not include any changes to the interfaces with adjacent uses and would not involve any components that would divide an established community. Accordingly, no impact would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

Section 4.9, Land Use and Planning, of the LRDP Final SEIR, discusses various regional and local plans applicable to UCLA development projects and is incorporated by reference, although the Project site is not located within the LRDP area (i.e., the UCLA main campus).

Regional Planning Programs

Although the proposed Project involves the adaptive reuse of existing buildings as opposed to substantial new development and would not cause significant effects on the environment extending beyond the City or County of Los Angeles, it would conservatively be considered regionally significant based on the criteria established in CEQA Guidelines Section 15206 on the basis of floor space and number of employees. Nonetheless, as previously discussed, the UC is not subject to SCAG's regional planning processes due to its constitutional autonomy to pursue its mission. Therefore, evaluation of the proposed Project's consistency with SCAG's Connect SoCal 2024 is not required. Nonetheless, consistency with the Connect SoCal 2024 employment and planning projections is addressed where relevant, including in Section V.14, Population and Housing, of this Initial Study.

The proposed Project's lack of conflict with other regional plans and programs that address specific topical issues are discussed in the respective sections of this Initial Study. This includes, but is not limited to, the SCAQMD AQMP (Section V.3, Air Quality), the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Section V.10, Hydrology and Water Quality), energy plans and regulations (Section V.6, Energy), and GHG reduction plans (Section V.8, Greenhouse Gas Emissions). As indicated in the analyses presented in this Initial Study, the proposed Project would not conflict with the requirements outlined in these regional plans, including requirements in place to avoid or mitigate environmental effects.

UC and UCLA Plans

The UCLA 2002 LRDP, as amended through 2018, guides the physical development of the UCLA campus to serve its teaching, research, and public service mission. The Project site is not located on campus and therefore is not considered in relation to the remaining floor area allocations for campus uses or parking and trip generation limits identified in the LRDP. Nonetheless, the proposed Project incorporates relevant provisions of the UCLA LRDP and involves the

development of a state-of-the-art, multidisciplinary research and innovation hub that would support UCLA's broader education, research, and service missions. Notably, the proposed Project would support UCLA's Strategic Plan Goal 3 to enhance research and creative activities, as well as the UCLA Research and Innovation Blueprint, a plan to create a more integrated and collaborative innovation ecosystem across Southern California.

The proposed Project's consistency with UC policies adopted for the purposes of avoiding or mitigating an environmental effect is discussed in the respective sections of this Initial Study. Notably, the UC Policy on Sustainable Practices is discussed in Section V.5, Energy, and Section V.8, Greenhouse Gas Emissions. The UC Policy on Seismic Safety is discussed in Section V.7, Geology and Soils. As identified, the proposed Project does not conflict with these policies.

City of Los Angeles Plans

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

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

12. MINERAL RESOURCES

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

Project Impact Analysis

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

Discussion

The Project site and surrounding area are fully developed and urbanized, are not located in an area where mineral resources of regional or statewide significance are considered to be present or likely to be present, and are not located on a locally-important resource recovery site (City of Los Angeles, 2025b). As discussed in Section V.11, Land Use, of this Initial Study under Threshold (b), the Project site does fall within a City Oil Drilling District; however, there are no existing oil wells on-site or adjacent to the site (City of Los Angeles, 2025a). There would be no impact to mineral resources resulting from implementation of the proposed Project.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

13. NOISE

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

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs and MMs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP 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. Minor clarifying changes have been made, as

needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

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

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

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

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

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

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

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

MM 4.9-7 *A solid noise barrier that would break the line of sight between the construction site and a sensitive use area would reduce construction noise by at least 5 dBA. ~~Therefore, when detailed construction plans are complete, the campus shall review the locations of sensitive receptor areas in relation to the construction site. If it is determined that a 12-foot-high barrier would break the line of sight between an 11-foot-high noise source and adjacent sensitive use areas, a~~ **A** temporary **12-foot-high** barrier shall be erected **along the southern property line between the construction areas at Research Park East/West and the existing residential uses to the south (receptor locations R1 and R2) and along the western property line between the construction area at Research Park West and the existing residential uses to the west (receptor location R3)** ~~to the extent practicable~~. The barrier shall be solid from the ground to the top with no openings~~, and shall have a weight of at least 3 pounds per square foot, such as plywood that is ½ inch thick~~.*

Fundamentals of Sound and Environmental Noise

A detailed discussion of the fundamentals of sound and environmental noise is presented in Section 2.1 of the Noise Technical Report (Noise Report) for the proposed Project prepared by Acoustical Engineering Services, Inc. (AES) (AES, 2026) and included in Appendix D of this Initial Study. Noise is commonly defined as sound that is undesirable because it interferes with speech communication and hearing, causes sleep disturbance, or is otherwise annoying (unwanted sound). The decibel (dB) is a conventional unit for measuring the amplitude of sound because it accounts for the large variations in sound pressure amplitude and reflects the way people perceive changes in sound amplitude. The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human frequency-dependent response, the A-weighted filtering system is used to adjust measured sound levels (dBA). The term "A-weighted" refers to filtering the noise signal in a manner that corresponds to the way the human ear perceives sound. Examples of various sound levels in different environments are provided in Table 1 of the Noise Report. To a person with normal hearing, a change in sound level of 3 dB is considered "just perceptible," a change in sound level of 5 dB is considered "clearly noticeable," and a change (i.e., increase) of 10 dB is generally recognized as "twice as loud" as the original sound.

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to interference with certain activities and individual sensitivities. Interference effects interrupt daily activities and include interference with human communication activities, such as typical conversations, watching television, telephone conversations, as well as interference with sleep.

The World Health Organization's Guidelines for Community Noise detail the adverse health effects of consistent, high noise levels, which include annoyance, speech intelligibility, sleep disturbance, hearing impairment, physiological functions (e.g., hypertension and cardiovascular effects), mental illness, performance of cognitive tasks, and social and behavioral effects (e.g., feelings of helplessness, aggressive behavior).

In an outdoor environment, sound levels attenuate (reduce) through the air as a function of distance. Such attenuation is commonly referred to as "distance loss" or "geometric spreading," and is based on the noise source configuration (e.g., point source or line source). For a point source, such as a piece of mechanical/electrical/construction equipment (e.g., air conditioner, electrical transformer, or bulldozer), the rate of sound attenuation is about 6 dB per doubling of distance from the noise source. For a line source, such as a constant flow of traffic on a roadway, the rate of sound attenuation is about 3 dB per doubling of distance. These standard sound attenuation rates represent conservative assumptions because they are based on hard-ground propagation conditions (e.g., pavement), which do not account for the additional attenuation that occurs over soft ground surfaces such as grass or landscaped areas.

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

approximately 5 dBA (where a barrier just breaks the acoustic line-of-sight between the noise source and receiver) to an upper range of 20 dBA with a more substantial barrier.

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

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

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

Groundborne Vibration

Vibration is commonly defined as an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The peak particle velocity (PPV) or the root-mean square (RMS) velocity is usually used to describe vibration amplitudes. PPV is defined as the maximum instantaneous peak of the vibration signal and is typically used for evaluating potential building damage. The RMS velocity is defined as the square-root of the average of the squared amplitude of the vibration signal and is used for evaluating human response to ground-borne vibration. Decibel notation (VdB) is commonly used to express RMS vibration velocity amplitude. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to 6 times greater than RMS vibration velocity; the Federal Transit Administration (FTA) uses a crest factor of 4. Groundborne vibration generated by man-made activities (e.g., road traffic, construction operations) typically weakens with greater horizontal distance away from the source of the vibration. The vibration impact studies show in most circumstances common ground-induced vibrations related to roadway traffic and construction activities pose no threat to buildings or structures.

Noise-Sensitive Receptors

Some land uses are considered more sensitive to intrusive noise than others based on the types of activities typically engaged in at those land uses. Typically, noise-sensitive uses include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. Based on a review of the land uses in the vicinity of the Project site, seven noise receptor locations were selected to represent existing noise-sensitive uses within 500 feet of the Project site: receptor locations R1 through R7

shown on Figure 18. These locations represent areas with residential land uses that qualify as noise-sensitive uses.

Existing Ambient Daytime Noise Levels

Noise measurements were conducted at the seven off-site receptor locations on December 15, 2025, to establish baseline noise conditions in the vicinity of the Project site. In addition, the measurement locations provide an adequate basis to evaluate potential noise impacts at other sensitive receptors located beyond each measurement location in the same direction from the Project site. The results of the ambient sound measurements are summarized in Table 11.

Based on field observations, the current ambient noise at the measurement locations is dominated by local traffic and, to a lesser extent, aircraft flyovers and other typical urban noises. As indicated in Table 11, the existing daytime ambient noise levels at the off-site noise receptor location ranged from 52.1 dBA (L_{eq}) at receptor location R7 to 64.5 dBA (L_{eq}) at receptor location R2. The measured nighttime ambient noise levels ranged from 49.9 dBA (L_{eq}) at receptor location R3 to 60.6 dBA (L_{eq}) at receptor location R2. Thus, the existing ambient noise levels at all off-site locations are above the City's presumed daytime and nighttime ambient noise levels of 50 dBA (L_{eq}) and 40 dBA (L_{eq}), respectively, for residential uses. Therefore, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining the proposed Project's potential noise impacts.

TABLE 11 EXISTING AMBIENT NOISE LEVELS

Receptor Location	Approximate Distance to Project Site[1]	Measured Ambient Noise Levels (dBA L_{eq})		
		Daytime Hours (7 a.m. to 10 p.m.)	Nighttime Hours (10 p.m. to 7 a.m.)	CNEL (24-hour)
R1 – Single-family residential use on the south side of Ayres Avenue, south of the Project site	50 feet	58.5[2]	55.6[2]	62.9[3]
R2 – Single-family residential use located southwest corner of Westwood Boulevard and Ayres Avenue, south of the Project site	45 feet	64.5	60.6	66.3[4]
R3 – Single-family residential use located on the north side of Ayres Avenue, west of the Project site	Adjacent to the Project site	57.0	49.9	57.1[4]
R4 – Single-family residential use located on the east side of Midvale Avenue, north of the Project site	225 feet	59.2	54.3	60.4[4]
R5 – Single-family residential use located on the west side of Glendon Avenue, north of the Project site	230 feet	58.4	52.7	59.2[4]
R6 – Single-family residential use located on the east side of Malcom Avenue, north of the Project site	280 feet	56.7	52.5	58.4[4]
R7 – Multi-family residential use located at the northwest corner of Overland Avenue and Ayres Avenue, east of the Project site	125 feet	52.1	52.3	56.9[4]

Detailed measurement data is provided in Appendix A of the Noise Report included in Appendix D of this Initial Study.

[1] Distances are estimated based on Google Earth map and are referenced to the Project site's nearest boundary.
[2] Levels shown for R1 represent the average hourly noise levels for the entire daytime and nighttime periods.
[3] Calculated based on the measured hourly noise levels from the 24-hour noise measurement.
[4] Estimated based on short-term (15-minute) noise measurement based on FTA procedures.
Source: (AES, 2026)



Source(s): AES Acoustics (April 2026)

Figure 18

Not to Scale

Noise Sensitive Receptors

Existing Groundborne Vibration Levels

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

Project Impact Analysis

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

Discussion

UCLA is not subject to municipal regulations, such as the County and City General Plans or ordinances. However, in the absence of established noise standards, UCLA may independently elect to utilize relevant standards established by other agencies for purposes of analysis. Based on several factors, including the location of the Project site within the City of Los Angeles and expert recommendations further detailed in the Noise Report included in Appendix D of this Initial Study, for purposes of this analysis, a significant construction noise impact could occur if off-site sensitive receptors were subjected to Project-related construction noise levels in excess of the City of Los Angeles Noise Standards (specifically, the City's Construction Noise and Vibration Updates to Thresholds and Methodology Report [UTM] adopted in 2024), which are further discussed in Section 2.3, Regulatory Framework, of the Noise Report included in Appendix D of this Initial Study. Accordingly, the following thresholds apply to construction-related noise impacts:

- Daytime Construction Noise Thresholds
    - Increase Over Ambient
        - For construction activities that occur between 7:00 A.M. and 7:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on Saturdays, there is no numerical threshold above ambient noise levels.
    - Absolute Noise Level
        - On- and off-site construction noise during daytime hours (7:00 A.M. and 7:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on

Saturdays) are limited to a maximum 80 dBA $L_{eq(8\text{-hour})}$ absolute threshold at sensitive uses (at the property line or at the exterior of the building), including outdoor public recreational areas owned or maintained by a public agency. This standard does not apply to private residential balconies which may or may not extend past the exterior of a building, or to private residential recreational areas.

- Nighttime Construction Noise Thresholds
    - Increase Over Ambient
        - For construction activities that occur between 7:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturdays, and anytime on Sundays or national holidays, noise levels at sensitive uses would not exceed 5 dBA above the ambient noise level at the receptor.
        - Mat pours activities (and other types of concrete pour, which require an extended continuous pour beyond the allowable construction hours) that are required to occur during nighttime hours for less than five days are exempt from this provision.
    - Absolute Noise Level
        - For construction activities that occur between 7:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturdays, and anytime on Sundays or national holidays, the maximum exterior noise level at sensitive uses where sleep is expected will not exceed the following:
            - 55 dBA L_{eq} for sensitive uses within older buildings that would have operable windows that may be open.
            - 65 dBA L_{eq} for sensitive uses with windows closed that are not operable and are single glazed.
            - 70 dBA L_{eq} for sensitive uses that have newer construction (i.e., the structures have been designed to ensure that an interior 45 dBA is obtained with double-paned windows).
        - Mat pour activities (and other types of concrete pour, which require an extended continuous pour beyond the allowable construction hours) that are required to occur during nighttime hours for less than five days are exempt from this provision.

UCLA has elected to utilize thresholds of significance for the proposed Project's on-site (stationary) and off-site (mobile) operational noise sources based on the City's Noise Standards, as follows:

- The proposed Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (see Table 3 of the Noise Report); or
- The proposed Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 5 dBA in CNEL or greater and remain within the "normally acceptable" or "conditionally acceptable" category; or

- Proposed Project-related on-site operational noise sources, such as outdoor building mechanical equipment, loading docks, or trash compactors, exceed the ambient noise level (hourly L_{eq}) at noise-sensitive uses by 5 dBA; or
- Proposed Project-related off-site roadway traffic increases the ambient noise level by 3 dBA or 5 dBA in CNEL (depending on the noise exposure category) at noise-sensitive uses; or
- Proposed Project-related composite noise levels (including both on-site and off-site sources) increase the ambient noise level by 3 dBA or 5 dBA in CNEL (depending on the noise exposure category) at noise-sensitive uses.

Construction-related Noise Impacts

On-Site Construction Noise

As described in Section II.6, Proposed Project Components, of this Initial Study, full buildout is anticipated by 2035; however, to represent a conservative scenario, the noise analysis is based on a single-phase of construction beginning in 2026 and concluding in 2030.

As required by LRDP PP 4.9-7(a), construction activities would generally occur Monday through Friday from 7:00 a.m. to 9:00 p.m. and Saturday from 8:00 a.m. to 6:00 p.m. However, a Project-specific implementing measure is proposed to further limit construction activities Monday through Friday to 7:00 A.M. to 7:00 P.M., consistent with the daytime construction noise threshold. Construction delivery/haul trucks would travel on approved truck routes between the Project site and I-10. Trucks leaving the Project site are expected to exit on Westwood Boulevard, head north to Pico Boulevard, east to Overland Avenue, and then to I-10.

Noise impacts from Project-related construction activities occurring within or adjacent to the Project site would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Construction activities for the proposed Project would generally include limited demolition, grading, and new building construction in limited locations south of the existing buildings, internal building construction (i.e., tenant improvements), and paving. Each stage of construction would involve the use of various types of construction equipment and would, therefore, have its own distinct noise characteristics. Noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the Project site. In addition, certain Project construction phases would have the potential to overlap. Therefore, overlapping construction noise activities were evaluated to determine the full extent of potential impacts.

Individual pieces of construction equipment that would typically be used for construction produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the construction equipment, as shown in Table 5 of the Noise Report included in Appendix D of this Initial Study. These maximum noise levels occur when equipment is operating under full power conditions (i.e., the equipment engine operating at maximum speed). However, equipment used on construction sites often operates under less than full power conditions, or partial power. To characterize construction-period noise levels more accurately, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment operating simultaneously. Consistent with the UTM methodology, the on-site construction-related noise levels assume distribution of all construction equipment throughout the limits of disturbance within the Project site. The

methodology includes construction equipment operating as close to the off-site receptors as possible.

Table 12 provides the estimated construction noise levels for the proposed Project's construction phases, including potential overlapping construction activities, at the seven off-site noise-sensitive receptor locations, with and without the noise barrier required by previously adopted LRDP MM 4.9-7. As shown, the estimated noise levels during all stages of Project construction, including overlapping construction, without a noise barrier would be below the significance threshold at all off-site receptor locations, except for receptor locations R2 and R3, which represent residential uses located south and west of Research Park West. The estimated noise levels at receptor locations R2 and R3 without the noise barrier would exceed the 80 dBA significance threshold by up to 1.0 and 0.2 dBA ($L_{eq(8\text{-}hour)}$), respectively, during the demolition plus grading phases. However, in accordance with previously adopted LRDP MM 4.9-7, which would be incorporated into the proposed Project (with minor modifications to reflect site conditions), solid temporary noise barriers would be constructed to reduce the construction-related noise levels at the nearest receptors, including R2 and R3. As indicated in Table 12, the estimated construction noise levels with the required noise barrier would be reduced to a less than significant level.

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

Off-Site Construction Noise

In addition to on-site construction noise sources, other noise sources may include materials delivery and haul trucks (collectively called construction trucks), as well as construction worker vehicles accessing the Project site during construction. Typically, construction trucks generate higher noise levels than construction worker vehicles. Accordingly, the major noise sources associated with off-site construction trucks would be from the material delivery/concrete/haul trucks. With regard to haul routes, as described above, construction haul trucks would travel between the Project site and I-10 via northbound Westwood Boulevard, eastbound Pico Boulevard, and southbound Overland Avenue. There are no noise-sensitive uses along the relevant segments of Westwood Boulevard or Pico Boulevard.

Table 13 provides the estimated number of construction-related truck trips (daily and hourly trips) for the various stages of construction. The peak construction period (i.e., in terms of hourly truck trips) with the highest number of construction trucks would occur during the overlapping demolition and grading activities, with up to 10 truck trips per hour. While any single truck passing may be audible, it is expected that the noise from proposed Project-related construction truck traffic would be indistinguishable from typical traffic along the construction haul routes. The estimated noise levels from construction-related trucks would range from 49.4 dBA (L_{eq}) to 58.9 dBA (L_{eq}) along the anticipated truck routes (Westwood Boulevard adjacent to the Project site, eastbound Pico Boulevard, and southbound Overland Avenue), which would be well below the 80 dBA significance threshold and the existing ambient noise levels (64.5 dBA (L_{eq}) as measured at receptor R2 adjacent to Westwood Boulevard).

TABLE 12 ON-SITE CONSTRUCTION NOISE IMPACTS BY CONSTRUCTION PHASE

Off-Site Receptor Location	Estimated Noise Levels by Construction Phase dBA (L_{eq})						Significance Criteria[4] dBA (L_{eq})	Maximum Noise Exceedance Above Criteria dBA (L_{eq})	Significant Impact?
	Demolition[1]	Grading[2]	Building Construction	Paving	Demolition + Grading[3]	Construction + Paving[3]			
Without Noise Barrier (LRDP MM 4.9-7)									
R1	79.3	68.0	73.7	72.0	79.6	75.9	80.0	0.0	No
R2	80.7	69.4	75.0	73.3	81.0	77.2	80.0	**1.0**	**Yes**
R3	79.9	68.6	74.3	72.6	80.2	76.5	80.0	**0.2**	**Yes**
R4	51.4	40.1	45.7	44.0	51.7	47.9	80.0	0.0	No
R5	61.0	49.7	55.3	53.6	61.3	57.5	80.0	0.0	No
R6	46.8	35.5	41.2	39.4	47.1	43.4	80.0	0.0	No
R7	50.3	39.0	44.7	43.0	50.6	46.9	80.0	0.0	No
With Noise Barrier (LRDP MM 4.9-7)									
R1	74.3	63.0	68.7	67.0	74.6	70.9	80.0	0.0	No
R2	75.7	64.4	70.0	68.3	76.0	72.2	80.0	0.0	No
R3	74.9	63.6	69.3	67.6	75.2	71.5	80.0	0.0	No
R4	51.4	40.1	45.7	44.0	51.7	47.9	80.0	0.0	No
R5	61.0	49.7	55.3	53.6	61.3	57.5	80.0	0.0	No
R6	46.8	35.5	41.2	39.4	47.1	43.4	80.0	0.0	No
R7	50.3	39.0	44.7	43.0	50.6	46.9	80.0	0.0	No

[1] Consists primarily of interior demolition and limited exterior site areas. The existing building would remain.
[2] Grading activities would be limited to areas south of the existing buildings.
[3] Activities are anticipated to overlap for a total of two months.
[4] Significance thresholds are based on the City's Construction Noise and Vibration - Updates to Thresholds and Methodology, August 2024.
Source: (AES, 2026)

TABLE 13 CONSTRUCTION TRUCK NOISE BY CONSTRUCTION PHASE

Construction Stage	Estimated Number of Construction Truck Trips per Day	Estimated Number of Construction Truck Trips per Hour[1]	Estimated Truck Noise Levels Along the Project Truck Routes,[2] dBA (L_{eq})		
			Westwood Boulevard	Pico Boulevard	Overland Avenue
Demolition	16	3	54.2	54.2	54.2
Grading	40	7	57.9	57.9	57.9
Building Construction	30	4	55.4	55.4	55.4
Paving/Landscape	40	5	56.4	56.4	56.4
Demolition + Grading	56	10	59.4	59.4	59.4
Building Construction + Paving/Landscape	70	9	58.9	58.9	58.9
Off-Site Improvements	4	1	49.4	49.4	49.4
Significance Criteria			80.0	80.0	80.0
Maximum Noise Exceedance Above the Criteria, dBA (L_{eq})			0.0	0.0	0.0
Significance Impact?			No	No	No

[1] For construction trucks, the number of hourly trips is based on an hourly average, assuming a uniform distribution of trips over a 6-hour for haul trucks (demolition and grading phases) and an 8-hour workday for material delivery trucks (building construction and paving/landscape phases).

[2] Estimated truck noise levels are similar for all three haul route segments, as the distances from the roadway centerlines to the nearest noise-sensitive receptors are generally comparable.

Source: AES, 2026.

The proposed Project also includes construction of limited off-site improvements, specifically a new pedestrian crosswalk across Westwood Boulevard at the Project site driveways (includes relocation of streetlights plus new ADA ramps). Table 14 provides the estimated construction noise levels for the off-site improvements at the seven off-site receptor locations. As shown, the estimated noise levels from proposed construction of off-site improvements would be below the significance threshold at all off-site receptor locations without the noise barrier required by previously adopted LRDP MM 4.9-7, except at receptor location R2. The estimated noise levels at receptor location R2 would exceed the 80 dBA significance threshold by up to 0.7 dBA ($L_{eq(8\text{-}hour)}$) without the noise barrier. However, with the noise barrier, the construction-related noise levels at receptor location R2 would be reduced to a less than significant level, as shown in Table 14. Therefore, noise impacts associated with off-site construction (construction trucks and off-site improvements) would be less than significant. No Project-specific mitigation measures would be required.

Operational Noise Impacts

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

TABLE 14 OFF-SITE IMPROVEMENTS CONSTRUCTION NOISE IMPACTS

Off-Site Receptor Location	Estimated Off-Site Construction Noise Levels dBA (L_{eq})		Significance Criteria[1] dBA (L_{eq})	Maximum Noise Exceedance Above the Criteria dBA (L_{eq})		Significant Impact?
	Without Noise Barrier (LRDP MM 4.9-7)	With Noise Barrier (LRDP MM 4.9-7)		Without Noise Barrier (LRDP MM 4.9-7)	With Noise Barrier (LRDP MM 4.9-7)	
R1	67.6	67.6	80.0	0.0	0.0	No
R2	80.7	77.7	80.0	**0.7**	0.0	No
R3	59.9	59.9	80.0	0.0	0.0	No
R4	42.0	42.0	80.0	0.0	0.0	No
R5	42.9	42.9	80.0	0.0	0.0	No
R6	38.9	38.9	80.0	0.0	0.0	No
R7	38.4	38.4	80.0	0.0	0.0	No

[1] For construction trucks, the number of hourly trips is based on an hourly average, assuming a uniform distribution of trips over a 6-hour workday for haul trucks (demolition and grading phases) and an 8-hour workday for material delivery trucks (building construction and paving/landscape phases).
Source: (AES, 2026)

Mechanical Equipment

As part of the proposed Project, new building mechanical equipment (e.g., air ventilation equipment) would be located at the building roof level. Although operation of this equipment would generate noise, all outdoor mechanical equipment would be shielded from off-site noise-sensitive receptors, as provided in PP 4.9-6(a). Table 15 presents the estimated on-site mechanical equipment noise levels at the off-site receptor locations with the required shielding. As shown, the estimated noise levels from the mechanical equipment would range from 39.4 dBA (L_{eq}) at receptor location R7 to 56.7 dBA (L_{eq}) at receptor location R1. The estimated noise levels would be consistent with the existing ambient noise levels at all off-site receptors, and when added to the ambient noise level at each sensitive receptor location yields a noise level that would also be below the significance criteria of 5 dBA (L_{eq}) above the ambient noise levels. Therefore, noise impacts from mechanical equipment would be less than significant.

TABLE 15 MECHANICAL EQUIPMENT NOISE LEVELS

Receptor Location	Existing Ambient Noise Levels dBA (L_{eq})	Estimated Noise from Project Mechanical Equipment dBA (L_{eq})	Ambient + Project Noise Levels dBA (L_{eq})	Significance Criteria[1] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	55.6	56.7	59.2	60.6	0.0	No
R2	60.6	52.0	61.2	65.6	0.0	No
R3	49.9	41.5	50.5	54.9	0.0	No
R4	54.3	47.0	55.0	59.3	0.0	No
R5	52.7	55.5	57.3	57.7	0.0	No
R6	52.5	46.0	53.4	57.5	0.0	No
R7	52.1	39.4	52.3	57.1	0.0	No

[1] Significance criteria are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA, based on the City of Los Angeles Noise Regulations.
Source: (AES, 2026)

Loading Docks and Trash Compactors

Under the proposed Project, the existing loading docks at Block 1 and Block 4 would continue to be used. While the Block 1 dock is currently located along the southern building façade of Research Park East, an enclosed loading area/service yard would be constructed adjacent to the existing dock, thus moving all loading activities indoors. The Block 4 dock would remain in its current location inside the Research Park West parking structure. The proposed central loading dock has been designed as a subterranean facility, with truck entry at the ground level and loading activities occurring on Level B1. The primary noise sources associated with loading activities would be the delivery trucks. Additionally, trash compactors would be located within the Block 1 service yard as well as the central loading dock facility. Based on measured noise levels from comparable facilities, delivery trucks and trash compactors generate noise levels of approximately 70 dBA (L_{eq}) and 66 dBA (L_{eq}), respectively, at a distance of 50 feet. The proposed Project is estimated to receive up to 111 daily deliveries, with 98 daily deliveries at Research Park East and 13 daily deliveries at Research Park West. Table 16 presents the estimated noise levels at the off-site sensitive receptors resulting from loading dock and trash compactor operations. As shown, these estimated noise levels would range from 13.9 dBA (L_{eq}) at receptor location R6 to 47.4 dBA (L_{eq}) at receptor location R2, which would be below the existing ambient noise levels. When added to the ambient noise level at each sensitive receptor location, noise associated with the loading docks and trash compactors would be below the significance threshold of 5 dBA (L_{eq}) above the ambient noise levels. Therefore, noise impacts from loading and trash compactor operations would be less than significant.

TABLE 16 LOADING DOCKS AND TRASH COMPACTOR NOISE LEVELS

Receptor Location	Existing Ambient Noise Levels dBA (L_{eq})	Estimated Noise from Project Loading and Trash Compactors dBA (L_{eq})	Ambient + Project Noise Levels dBA (L_{eq})	Significance Criteria[1] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	55.6	47.1	56.2	60.6	0.0	No
R2	60.6	47.4	60.8	65.6	0.0	No
R3	49.9	46.6	51.6	54.9	0.0	No
R4	54.3	19.4	54.3	59.3	0.0	No
R5	52.7	19.1	52.7	57.7	0.0	No
R6	52.5	13.9	52.5	57.5	0.0	No
R7	52.1	17.7	52.1	57.1	0.0	No

[1] Significance criteria are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower, plus 5 dBA, per the City of Los Angeles Noise Regulations.
Source: (AES, 2026)

Outdoor Spaces

The proposed Project would include various outdoor spaces, some of which could be used as informal gather spaces, including a paseo, an open atrium, and a garden above the central loading dock at Research Park East; a landscaped plaza and terrace at Research Park West; and a series of terraces/gardens at Levels 1, 2, 3, and the Roof Level. As noise sources associated with outdoor uses typically include noise from people gathering and conversing, Table 12 in the Noise Report provides hypothetical occupancy estimates (numbers of people) at the outdoor spaces.

Table 17 below presents the estimated noise levels at the off-site sensitive receptors resulting from the use of the proposed Project's outdoor spaces. The estimated noise levels were

calculated based on the assumption that the outdoor spaces would be fully occupied and operating concurrently, to represent a worst-case noise analysis. As shown, the estimated noise levels from the outdoor spaces would range from 27.1 dBA (L_{eq}) at receptor location R7 to 51.3 dBA (L_{eq}) at receptor locations R1 and R2, which would be below the existing ambient noise levels. When added to the ambient noise level at each sensitive receptor location the proposed Project noise levels associated with full occupancy of the outdoor spaces would be below the significance criteria of 5 dBA (L_{eq}) above the ambient noise levels. Therefore, noise impacts from the outdoor spaces would be less than significant.

TABLE 17 OUTDOOR SPACES NOISE LEVELS

Receptor Location	Existing Ambient Noise Levels dBA (L_{eq})	Estimated Noise from Outdoor Uses dBA (L_{eq})	Ambient + Project Noise Levels dBA (L_{eq})	Significance Criteria[1] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	55.6	51.3	57.0	60.6	0.0	No
R2	60.6	51.3	61.1	65.6	0.0	No
R3	49.9	43.7	50.8	54.9	0.0	No
R4	54.3	36.7	54.4	59.3	0.0	No
R5	52.7	37.1	52.8	57.7	0.0	No
R6	52.5	33.1	52.5	57.5	0.0	No
R7	52.1	27.1	52.1	57.1	0.0	No

[1] Significance criteria are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower, plus 5 dBA, based on the City of Los Angeles Noise Regulations.
Source: (AES, 2026)

Emergency Generators

Proposed Project operations would include periodic testing of emergency generators located at the ground level of Research Park West (existing generator) and at the roof level of Research Park East. The emergency generators would be provided with a Quiet Site II Second Stage sound enclosure to minimize noise levels. Emergency generators are only operated during a major loss of power to keep critical equipment and building systems running; however, periodic testing of the emergency generators would be required and is expected to occur during the daytime hours, proceeding with one generator at a time. Table 18 presents the estimated noise levels at the off-site sensitive receptors resulting from the periodic testing of the emergency generators. As shown, the estimated noise levels from periodic testing would range from 33.4 dBA (L_{eq}) at receptor location R4 to 58.4 dBA (L_{eq}) at receptor location R3. The estimated noise levels would be consistent with the existing ambient noise levels at all off-site receptors, and when added to the ambient noise level at each sensitive receptor location yields a noise level that would also be below the significance criteria of 5 dBA (L_{eq}) above the ambient noise levels. Therefore, noise impacts from periodic testing of the emergency generators would be less than significant.

TABLE 18 EMERGENCY GENERATORS NOISE LEVELS

Receptor Location	Existing Ambient Noise Levels dBA (L_{eq})	Estimated Noise from Project Emergency Generators Testing dBA (L_{eq})	Ambient + Project Noise Levels dBA (L_{eq})	Significance Criteria[1] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	58.5	49.7	59.0	63.5	0.0	No
R2	64.5	49.4	64.6	69.5	0.0	No
R3	57.0	58.4	60.8	62.0	0.0	No
R4	59.2	33.4	59.2	64.2	0.0	No
R5	58.4	40.1	58.5	63.4	0.0	No
R6	56.7	41.2	56.8	61.7	0.0	No
R7	52.1	35.4	52.2	57.1	0.0	No

[1] Significance criteria are equivalent to the measured daytime ambient noise levels plus 5 dBA, per the City of Los Angeles Noise Regulations. It is assumed that emergency generator testing would occur during the daytime hours.
Source: (AES, 2026)

Off-Site Mobile Noise Sources

As further discussed in Section V.17, Transportation, of this Initial Study, the proposed Project would result in a net decrease of 10,659 daily vehicle trips when compared to estimated trips generated by the shopping center uses. As the off-site traffic noise levels are dependent on the traffic volumes on the roadways, a substantial reduction in daily vehicle trips would result in a reduction in traffic noise levels. As such, no further noise analysis of general off-site roadway traffic associated with Project operations is required.

Proposed Project operations would also include delivery truck trips, which would generate traffic noise. There would be up to 111 daily deliveries to the Project site. Table 19 presents the estimated noise levels associated with the proposed Project's off-site traffic (traveling along Westwood Boulevard and Pico Boulevard) at the off-site receptor locations. As shown, the estimated noise levels from the off-site delivery trucks would range from 13.7 dBA (L_{eq}) at receptor location R7 to 52.8 dBA (L_{eq}) at receptor location R2. The estimated noise levels would be below the existing ambient noise levels. In addition, the estimated ambient noise levels with the addition of the noise levels generated by the proposed Project off-site truck trips would be below the significance criteria of 5 dBA (L_{eq}) above the ambient noise levels. Therefore, noise impacts from the off-site delivery truck trips would be less than significant.

TABLE 19 OFF-SITE TRAFFIC NOISE LEVELS

Receptor Location	Existing Ambient Noise Levels dBA (L_{eq})	Estimated Noise from Project Off-Site Traffic dBA (L_{eq})	Ambient + Project Noise Levels dBA (L_{eq})	Significance Criteria[1] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	55.6	45.8	56.0	60.6	0.0	No
R2	60.6	52.8	61.3	65.6	0.0	No
R3	49.9	34.2	50.0	54.9	0.0	No
R4	54.3	39.6	54.4	59.3	0.0	No
R5	52.7	41.8	53.0	57.7	0.0	No
R6	52.5	41.6	52.8	57.5	0.0	No
R7	52.1	13.7	52.1	57.1	0.0	No

[1] Significance criteria are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA, per the City of Los Angeles Noise Regulations.
Source: (AES, 2026)

Composite Noise Impacts from Project Operations

In addition to considering the proposed Project's potential noise impacts to neighboring noise-sensitive receptors from each individual specific on-site and off-site noise source (e.g., mechanical equipment, loading docks, trash compactors, outdoor spaces, emergency generators, and off-site traffic), an evaluation of potential composite noise level increases (i.e., noise levels from all on-site noise sources combined) at the analyzed sensitive receptor locations was performed. The evaluation of composite noise levels from all proposed Project-related noise sources, evaluated using the CNEL noise metric, was conducted to determine the total contributions at the noise-sensitive receptor locations. Table 20 presents the estimated composite noise levels in terms of CNEL at the seven off-site sensitive receptor locations resulting from proposed Project-related noise sources. As shown, the proposed Project would result in an increase in composite noise levels ranging from 0.4 dBA at receptor location R7 to 4.8 dBA at receptor location R5. The composite noise level from Project operation at all seven receptor locations would be below the 5-dBA significance criterion, as the ambient plus Project composite noise level falls within the conditionally acceptable (55 to 70 CNEL) range for residential land use categories. Therefore, the Project composite noise impacts would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

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

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

Discussion

Per the FTA, groundborne noise occurs when ground vibration causes building surfaces to radiate low frequency sound, often perceived as a rumble, such as when a train passes. The proposed Project does not include any uses that would generate excessive groundborne noise during construction or operation. Furthermore, given the vibration-sensitive nature of some of the scientific research activities that would occur on-site, the Project would be designed to minimize any potential vibration effects. Therefore, no impact related to groundborne noise would result.

UCLA does not have an adopted significance threshold to assess vibration impacts with respect to construction and thus has elected to utilize the FTA's adopted vibration criteria Based on FTA guidance, impacts relative to ground-borne vibration associated with potential building damage would be considered significant if any of the following future events were to occur:

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

For purposes of this analysis, construction vibration impacts associated with human annoyance would be significant if the following were to occur:

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

<u>Construction-related Vibration Impacts</u>

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

TABLE 20 COMPOSITE NOISE IMPACTS

Receptor Location	Existing Ambient Noise Levels CNEL (dBA)	Calculated Project-Related Noise Sources CNEL (dBA)					Project Composite Noise Levels CNEL (dBA)	Ambient + Project Composite Noise Levels CNEL (dBA)	Increase in Noise Levels due to Project CNEL (dBA)	Significance Threshold[1] CNEL (dBA)	Significant Impact?
		Traffic	Mechanical	Loading	Outdoor Spaces	Emergency Generators					
R1	62.9	46.5	63.4	47.8	48.8	42.9	63.8	66.4	3.5	67.9	No
R2	66.3	53.5	59.2	48.1	49.5	42.6	60.9	67.4	1.1	71.3	No
R3	57.1	34.9	48.2	47.3	34.7	51.6	54.3	58.9	1.8	62.1	No
R4	60.4	40.3	53.7	20.1	24.3	26.6	53.9	61.3	0.9	65.4	No
R5	59.2	42.5	62.2	19.8	30.9	33.3	62.2	64.0	4.8	64.2	No
R6	58.4	42.3	52.7	14.6	24.3	34.4	53.1	59.5	1.1	63.4	No
R7	56.9	14.4	46.1	18.4	25.8	28.6	46.2	57.3	0.4	61.9	No

[1] Significance thresholds are equivalent to the existing ambient noise levels plus 3 dBA if the estimated noise levels (ambient plus Project) fall within the "normally unacceptable" or "clearly unacceptable" land use categories (see Table 3 on page 16); or ambient noise levels plus 5 dBA if the estimated noise levels fall within the "normally acceptable" or "conditionally acceptable" land use categories, per the City of Los Angeles Noise Element. If the estimated noise levels exceed those significance thresholds, a potentially significant noise impact is identified.

Source: (AES, 2026).

Building Damage Impacts from On-Site Construction

With regard to potential building damage, the proposed Project would generate groundborne vibration during demolition and trenching activities when heavy construction equipment, such as jackhammers and loaded trucks, would be used. Table 21 provides the estimated ground vibration velocity levels (in terms of inch per second PPV) at the nearest off-site structures to the Project site. The assessment of construction vibration for potential building damage due to on-site construction compares the estimated vibration levels generated during construction of the proposed Project to the 0.2 PPV significance criterion for the nearest residential uses to the south and west and the single-story commercial building to the west, and to the 0.5 PPV significance criterion for the nearest multi-family residential buildings to the north and southeast, and the commercial building to the east. As shown in Table 21, the estimated vibration levels at the off-site buildings would be well below both the 0.2 and 0.5 PPV building damage significance criteria. Therefore, vibration impacts (pursuant to the significance criteria for building damage) from on-site construction activities would be less than significant.

Human Annoyance Impacts from On-Site Construction

Table 22 provides the estimated vibration levels at the off-site sensitive uses due to the operation of construction equipment and compares those levels to the specified significance criteria for human annoyance. As shown, the estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at all off-site sensitive receptor locations. Therefore, vibration impacts related to human annoyance during construction of the proposed Project would be less than significant.

Building Damage from Off-Site Construction Traffic and Off-Site Improvements

The proposed Project includes construction activities associated with limited off-site improvements, including a new pedestrian crosswalk across Westwood Boulevard at the Project site driveways, which includes relocation of streetlights plus new ADA ramps. The nearest off-site structure to the off-site improvements includes the residential buildings located at the intersection of Westwood Boulevard and Ayres Avenue, approximately 30 feet to the south. The estimated maximum vibration due to off-site improvements construction at a distance of 30 feet would be 0.029 PPV, which would be well below the 0.2 PPV significance threshold for the nearest single-story residential buildings. Therefore, temporary vibration impacts from the construction of the required off-site improvements with respect to building damage would be less than significant.

As described above, construction delivery/haul trucks would travel between the Project site and I-10 via Westwood Boulevard, Pico Boulevard, and Overland Avenue. Heavy-duty construction trucks would generate groundborne vibration as they travel along the proposed Project's anticipated haul route. Based on FTA data, the vibration level generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at 50 feet from the truck. According to the FTA, "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are existing buildings along the proposed Project's anticipated haul route that are situated approximately 20 feet from the right-of-way and would be exposed to groundborne vibration levels of approximately 0.022 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route would be well below the more stringent building damage criteria of 0.12 PPV for historic buildings. Therefore, vibration impacts with respect to building damage from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant.

TABLE 21 CONSTRUCTION VIBRATION IMPACTS – BUILDING DAMAGE

Receptor Location[1]	Estimated Vibration Velocity Levels at the Off-Site Buildings (PPV [inch/second])[2]				Significance Criteria (PPV [inch/second])	Significant Impact?
	Large Bulldozer	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.076	0.076	0.035	0.003	—	—
Commercial buildings on the north side of Pico Boulevard, to the north	0.019	0.017	0.008	0.001	0.5[4]	No
Residential buildings on the south side of Ayres Avenue, to the south	0.047	0.040	0.018	0.002	0.2[3]	No
Multi-level parking structure to the east	0.244	0.208	0.096	0.008	0.5[4]	No
Residential building on north side of Ayres Avenue, adjacent to the Project site to the west	0.114	0.097	0.045	0.004	0.2[3]	No
Commercial building on the south side of Pico Boulevard, adjacent to the Project site to the west.	0.018	0.016	0.007	0.001	0.2[3]	No
Multi-level residential building at the northwest corner of Overland Avenue and Ayres Avenue, southeast of the Project site	0.017	0.014	0.007	0.001	0.5[4]	No

[1] Represents nearby off-site structures located nearest to the Project site to the north, south, east, and west.
[2] Vibration level calculated based on Caltrans reference vibration level at 25-foot distance.
[3] FTA criterion for non-engineered timber and masonry buildings (applicable for the existing residential and commercial buildings to the north, south, and west).
[4] FTA criterion for reinforced-concrete, steel, or timber buildings (applicable for the multi-level parking structure to the east).
Source: (AES, 2026)

TABLE 22 CONSTRUCTION VIBRATION IMPACTS – HUMAN ANNOYANCE

Receptor Location[1]	Estimated Vibration Velocity Levels at the Off-Site Receptors (VdB)[2]				Significance Criteria (VdB)	Significant Impact?
	Large Bulldozer	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	87	86	79	58	—	—
R1	72	71	64	43	80	No
R2	76	75	68	47	80	No
R3	78	77	70	49	80	No
R4	58	57	50	29	80	No
R5	58	57	50	29	80	No
R6	54	53	46	25	80	No
R7	66	65	58	37	80	No

[1] Represents nearby off-site sensitive receptors.
[2] Vibration level calculated based on FTA reference vibration level at 25-foot distance.
Source: (AES, 2026)

Human Annoyance from Off-Site Construction Traffic and Off-Site Improvements

The nearest off-site residential building is approximately 30 feet from the off-site improvements. The estimated maximum vibration due to off-site construction at a distance of 30 feet would be approximately 77 VdB, which would be below the 80 VdB significance threshold for the nearest residential buildings. Therefore, temporary vibration impacts from the construction of the required off-site improvements with respect to human annoyance would be less than significant.

Further, construction delivery/haul trucks would travel between the Project site and I-10 via Westwood Boulevard, Pico Boulevard, and Overland Avenue. The nearest residential uses are located along the Overland Avenue segment, approximately 20 feet from the roadway. Construction trucks would generate groundborne vibration of approximately 74.9 VdB at a distance of 20 feet, which would be below the 80 VdB significance threshold. Therefore, vibration impacts with respect to human annoyance from off-site construction trucks traveling on public roadways would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

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

As previously discussed in Section V.9, Hazards and Hazardous Materials, of this Initial Study, the Project site is located approximately 1.5 miles northeast of the Santa Monica Airport; however, it is located outside of the Santa Monica Airport Planning Boundary/AIA and the associated noise contours. In addition, as previously discussed, the Santa Monica Airport is anticipated to be closed in 2028. The Project site is located approximately 6.0 miles northeast of the Los Angeles International Airport (LAX) and is not located within the LAX noise contours. Accordingly, the proposed Project would not expose people residing or working in the Project area to excessive noise levels from airport operations. There would be no impact.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

There would be no impact related to exposure of people residing or working in the Project area to excessive noise levels from airport operations.

14. POPULATION AND HOUSING

The proposed Project is estimated to generate a net increase in employment at the Project site (compared to the shopping center) ranging from approximately 1,690 employees to 2,340 employees. Temporary jobs would also be generated during construction. The proposed Project does not involve the development of residential uses.

There are no relevant PPs or MMs adopted as part of the LRDP Final SEIR relating to population or housing.

Project Impact Analysis

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

Discussion

The proposed Project involves improvements to existing buildings that were originally developed and operated as a shopping center. No new housing or infrastructure is proposed that would induce population growth. Proposed Project construction activities would require contractors and laborers. It is anticipated that general construction personnel would be available from the existing local and regional labor pool and would not result in substantial population growth because the construction workers would commute from their respective homes for such temporary employment opportunities.

Project employment levels at full occupancy will depend upon future tenants, not all of which have been identified. As such, employment estimates were calculated using various standard, published generation rates to present an anticipated employment range and compared to estimates for the shopping center. As shown on

Table 23, based on employment generation factors presented in the Los Angeles Unified School District (LAUSD) 2018 Developer Fee Justification Study (Schoolworks, 2018), the prior shopping center is estimated to have generated between approximately 850 and 1,500 employees, while the proposed Project (with primarily research and development and office uses) is estimated to generate approximately 3,190 employees, for a net increase of between approximately 1,690 and 2,340 employees. Based on employment generation factors presented in the SCAG Employment Density Study Summary Report (Natelson, 2001), the shopping center is estimated to have generated approximately 640 employees and the proposed Project would generate approximately 2,590 employees, for a net increase of approximately 1,950 employees. Therefore, based on the referenced generation factors, the proposed Project is estimated to generate a net increase in

employment at the Project site ranging from approximately 1,690 employees to up to 2,340 employees compared to baseline conditions.[53]

TABLE 23 ESTIMATED EMPLOYMENT GENERATION

Land Use	Building Area	Employment Rate (sf/employee)	Employment Estimate
Baseline Uses (Shopping Center)			
Regional Retail[1]	552,077 GLSF	857	640 employees
Community Shopping Center[2]	552,077 GLSF	652	850 employees
Neighborhood Commercial Shopping Center[2]	552,077 GLSF	369	1,500 employees
Project Uses (Office Park and Research & Development)			
Low-Rise Office[1]	413,300 GSF	288	1,435 employees
R&D Flex Space[1]	398,100 GSF	344	1,155 employees
Total			*2,590 employees*
Standard Commercial Office[2]	413,300 GSF	209	1,980 employees
Scientific R&D[2]	398,100 GSF	329	1,210 employees
Total			*3,190 employees*
Net Increase			
Based on SCAG Rates			**1,950 employees**
Based on LAUSD Rates			**1,690 to 2,340 employees**

[1] Based on employment generation factors presented in the SCAG 2001 Employment Density Report (Natelson, 2001).
[2] Based on employment generation factors presented in the LAUSD 2018 Developer Fee Justification Study (Schoolworks, 2018)

According to the Demographic & Growth Forecast technical report included in SCAG's Connect SoCal 2024, the number of employees in Los Angeles County is estimated to increase from approximately 5,131,000 in 2025 to 5,386,000 in 2035 (an increase of approximately 255,000 employees) (SCAG, 2024). Conservatively assuming that all Project employees would be new to the region, the estimated Project-related employment represents approximately 0.7 percent to 0.9 percent of the anticipated employment growth in Los Angeles County between 2025 and 2035. Therefore, the proposed Project would not induce substantial unplanned population growth in the area due to an increase in employment.

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

Project-Level Mitigation Measures

No mitigation measures are required.

[53] These employment estimates provide a conservative analysis as they exceed estimates from the Project architect, Flad, whose experience designing scientific laboratory and research projects indicates recent employment rates trending at roughly 450 SF/employee, which would equate to approximately 1,800 employees at the Project site and a net increase ranging from approximately 110 to 1,160 employees based on the shopping center employment calculations herein.

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 developed with commercial buildings and would not displace housing or people. The construction of replacement housing elsewhere, even on a temporary basis, would not be required. No impact would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

15. PUBLIC SERVICES

The proposed Project involves interior and exterior improvements to the existing commercial buildings and limited new construction. The proposed building improvements would include upgrades to the fire sprinkler system, fire alarm system, and other life/safety systems as needed for the proposed uses and/or to comply with current regulations. The proposed Project would maintain existing access to the Project site from Pico Boulevard and Westwood Boulevard.

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

LAFD provides fire suppression and rescue operations for the Project site. Fire Station 92 is located at 10556 West Pico Boulevard, approximately 0.4 mile northeast of the Project site, and would have primary responsibility for a first alarm call to the Project site. Within the West Los Angeles community from January to June 2025, Fire Station 92 had initial response times of 8 minutes and 21 seconds for emergency medical services (EMS) calls; 7 minutes and 50 seconds for non-EMS calls; 7 minutes and 5 seconds for critical ALS calls; and 7 minutes and 45 seconds for structure fires (LAFD, 2025). In cases where there is a need for backup support, additional LAFD fire stations provide the necessary assistance.

The proposed Project does not involve the development of residential uses and would not increase the residential population served by existing fire protection facilities. While employment levels at the site are expected to be greater under the proposed Project than at the shopping center, the total daytime population on-site would be substantially less without the visitor population (i.e., shoppers) of the shopping center. In terms of structural considerations, the proposed Project involves interior and exterior improvements to the existing buildings and limited new construction. The proposed Project would meet current CBC and California Fire Code requirements. Consistent with the campus' standard procedures, the Campus Fire Marshal would review and approve all Project plans to ensure that adequate fire flows are maintained and that the proposed renovations adhere to applicable building and fire codes, including fire sprinkler systems, alarm systems, and emergency lighting and signage. In addition, the proposed Project would adhere to all relevant UCLA safety standards for laboratories, including programs administered by EH&S that reduce hazard conditions in the workplace and maintain compliance with applicable local, state, and federal environmental regulations. Further, the proposed Project would not alter emergency access to the Project site, which would continue to be provided from Pico Boulevard and Westwood Boulevard.

No new or physically altered fire protection facilities would be required to serve the proposed Project. Therefore, no physical environmental impacts related to the provision of these services would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

Discussion

While the University of California Police Department (UCPD) has primary responsibility for police protection services on campus, the off-campus Project site is within the jurisdiction of LAPD. LAPD provides police protection to the Project site from the West Los Angeles Community Police Station, located at 1663 Butler Avenue, approximately 1.2 miles northwest of the Project site.

The proposed Project does not involve the development of residential uses and would not increase the residential population served by existing police protection facilities. While employment levels at the site are expected to be greater under the proposed Project than at the shopping center, the total daytime population on-site would be substantially less without the visitor population (i.e., shoppers) of the shopping center. There would be security staff on-site 24 hours per day, seven days per week to monitor the buildings and property. The lobbies would be staffed with security personnel, visitors would be required to check in to gain authorized access to the buildings, and staffed security kiosks would be located at the Westwood Boulevard driveways. Additionally, the proposed Project would incorporate crime prevention-related design features including, but not limited to: security cameras, electronic access/controls, appropriate wayfinding and security lighting, and other environmental design features to help prevent or deter criminal activity. Therefore, it is expected that the demand for police service at the Project site would be reduced with the proposed Project compared to operation of the shopping center.

No new or physically altered police protection facilities would be required to serve the proposed Project. Therefore, no physical environmental impacts related to the provision of these services would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

Discussion

The Project site is located within the Los Angeles Unified School District (LAUSD); however, the proposed Project does not involve the development of residential uses and would not directly result in elementary, middle, or high school student generation. Any indirect student generation resulting from Project employees who relocate to the region is anticipated to be limited; to the extent indirect student generation results from new employees relocating to the area, such growth would likely occur over various neighboring school districts or private schools within the region. Therefore, a negligible increase in demand for school services and facilities is anticipated. The proposed Project would not result in a need for the construction of new or altered school facilities, and no physical environmental impacts would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

The proposed Project would not involve new housing or generate a direct increase in the residential population that would increase the demand for nearby parks or other public services.

As discussed above, any indirect demand for parks or other public facilities resulting from Project employees who relocate to the region is anticipated to be minimal. Additionally, employee use of nearby parks or other facilities during the workday is anticipated to be limited due the provision of on-site amenities and open space, scheduling constraints, and commute considerations. Accordingly, no new or physically altered park or other public facilities would be required to serve the proposed Project. Therefore, no physical environmental impacts would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

16. RECREATION

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

Project Impact Analysis

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

Discussion

As discussed above, the proposed Project would not involve new housing or generate a direct increase in residential population that would increase the demand for recreational facilities such that substantial physical deterioration of neighborhood or regional recreational facilities would occur or be accelerated. Any indirect demand resulting from Project employees who relocate to the region is anticipated to be minimal. Employee use of nearby recreational facilities during the workday is anticipated to be limited due the provision of on-site amenities and open space, scheduling constraints, and commute considerations. Construction of ancillary recreational amenities on-site has been incorporated into the Project impact analyses throughout this Initial Study; therefore, any physical impact on the environment of such amenities would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact related to an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The proposed Project would have a less than significant impact related to the construction of recreational facilities which might have an adverse physical effect on the environment.

17. TRANSPORTATION

Relevant elements of the proposed Project related to transportation include construction activities that would generate a limited number of truck trips on a temporary basis. The maximum number of truck trips per day would occur when the grading and demolition activities overlap (estimated to be approximately 56 trucks per day and up to approximately 10 trucks per hour based on an even distribution of trucks over a six-hour period). Other construction phases would require fewer daily truck trips. Relative to operations, consistent with existing conditions, vehicular access to Research Park East and West would be provided from signalized driveways along Westwood Boulevard and Pico Boulevard (refer to Figure 14). The Westwood Boulevard driveways would be open during daytime hours, with access control gates for after-hours entry. On-site pedestrian facilities would connect to existing sidewalks along the roadways surrounding the Project site, and a new crosswalk is proposed across Westwood Boulevard immediately north of the existing driveways to facilitate safe pedestrian flows between Research Park East and West. To encourage bicycle travel, bicycle facilities would be provided on-site, as described further in Section II.6, Proposed Project Components.

The UCLA Research Park VMT Screening Assessment (VMT Assessment) prepared by Fehr & Peers, included in Appendix E of this Initial Study (Fehr & Peers, 2026), provides the trip generation estimates for the proposed Project based on the current edition (12th Edition) of the Institute of Transportation Engineers (ITE) Trip Generation Manual. The VMT Assessment applies trip reductions for walk, bike, and transit modes due to proximity of the Project site to the existing Metro E Line Westwood/Rancho Park and Expo/Sepulveda stations (approximately 0.25 and 0.5 mile from the Project site, respectively). The trip generation methodology and detailed trip generation information is provided therein. Table 24 provides a summary of the estimated trip generation associated with operation of the shopping center (Westside Pavilion), and the trip generation resulting from the proposed Project. As shown, the proposed Project would result in a net decrease of 10,659 daily vehicle trips, with a net increase of 174 AM peak hour trips and a net decrease of 1,077 PM peak hour trips. Although trip generation is not used as the basis for the VMT Assessment discussed under Threshold (b), this trip generation information has been included as it is used to estimate air pollutant and GHG mobile-source emissions and traffic-related noise impacts resulting from operation of the proposed Project.

TABLE 24 AVERAGE DAILY TRIP GENERATION ESTIMATES

Land Use[1]	Size	Daily[2]	AM Peak Hour[2]	PM Peak Hour[2]
Proposed Uses				
Office Park[3]	413.3 KSF	4,450	437	309
Research and Development Center[4]	398.1 KSF	3,867	178	170
Proposed Use Trip Generation		*8,317*	*615*	*479*
Baseline Use				
Shopping Center (>150KSF)[5]	552.1 GLSF[6]	18,976	441	1,556
Total Proposed Project Net Trip Generation		**-10,659**	**174**	**-1,077**

Notes: KSF = thousand square feet, GLSF = gross leasable square footage

[1] The ITE Land Use Codes and associated trip generation rates were selected for the proposed uses based on land use descriptions provided in the ITE 12th Edition Trip Generation Manual, unless other noted.

[2] Includes trip reductions for walk, bike, and transit modes which were applied using the Mixed-Use Development (MXD) methodology to reflect the share of trips made by non-auto travel.

[3] Office Park includes the proposed Office, Meeting/Assembly, Food Service uses and a proportionate amount of associated Common/Circulation gross square footage. Based on the ITE Land Use description, an office park (Code 750) is typically a subdivision or planned unit development that contains general office buildings and support services, such as banks, restaurants, and service stations, arranged in a park- or campus-like atmosphere. ITE Trip Generation 12th Edition does not have a Daily Trip Rate for Office Park; therefore, the 11th Edition Daily Rate was applied.

[4] Research and Development Center includes the proposed Wet and Dry Laboratories and a proportionate amount of associated Common/Circulation gross square footage. The ITE description for a Research and Development Center is a facility or group of facilities devoted almost exclusively to research and development activities. The types of businesses included in this land use category vary significantly. ITE Trip Generation 12th Edition Daily Trip Rate only has one study for this land use with a lower rate that the 11th Edition; therefore, the 11th Daily Rate was applied.

[5] Based on the ITE Land Use description, a shopping center (Code 820) is an integrated group of commercial establishments planned, developed, owned, and managed as a unit. Each study site in this land use has at least 150,000 square feet of gross leasable area (GLA). The vehicle trips generated at a shopping center are based upon the total GLA of the center.

[6] GLSF is used based on the ITE Trip Generation rates for large shopping centers.

Source: (Fehr & Peers, 2026)

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP 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. Minor clarifying changes have been made, as needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

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

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

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

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, **LAPD** and the LAFD to disclose temporary lane or roadway closures and alternative travel routes.*

Project Impact Analysis

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

Discussion

Transit

As discussed in Section V.8, Greenhouse Gas Emissions, of this Initial Study, the UC Policy on Sustainable Practices and the UCLA CAP address reducing dependency on the use of single occupancy vehicles to reduce emissions from mobile sources. As previously discussed in Section V.1, Aesthetics, of this Initial Study, the proposed Project is located in a TPA, which is defined as an area that is within 0.5 mile of an existing or planned major transit stop. The Project site is located within approximately one-half mile of two existing Metro E Line stations, Westwood/Rancho Park and Expo/Sepulveda (refer to Figure 19). Metro's E Line provides light rail service between East Los Angeles and Santa Monica, and the stations are considered major transit stops. The City of Santa Monica's Big Blue Bus is the primary bus transit provider with the largest number of bus routes and stops in close proximity to the Project site. LA Metro, Culver CityBus, and the LADOT also provide transit service within the Project vicinity. There are bus stops located adjacent to the Project site at the intersection of Pico Boulevard and Westwood Boulevard and less than 0.1 mile east of the Project site at the intersection of Pico Boulevard and Overland Avenue. Therefore, the proposed Project would be well-served by public transit. Further, as discussed below, TDM programs would be implemented to encourage the use of alternative modes of transportation. Therefore, the proposed Project would have a less than significant impact related to transit.

Roadways

The Project site and surrounding uses are well-served by freeways and local streets. Consistent with existing conditions, vehicular access to Research Park East and West would be provided from signalized driveways along Westwood Boulevard, which divides the two portions of the Project site, and Pico Boulevard, which extends along the northern site boundary (refer to Figure 14). According to the City of Los Angeles Mobility Plan 2035, in the Project vicinity Pico Boulevard



Bus Routes

- Metro Bus
- Culver CityBus
- Santa Monica Big Blue Bus
- LADOT Commuter Express

- Bus Stop
- Metro Rail Station
- Metro E Line
- Project Site
- Half-Mile Station Radius

Source(s): Fehr & Peers (April 2026)

Figure 19

Not to Scale

Transit Service in Project Vicinity

is designated as Avenue I and Westwood Boulevard is designated as Avenue II[54] (City of Los Angeles, 2016). The proposed Project would not require modifications to the existing roadways serving the Project site. In addition, I-10 and I-405 are located approximately 0.5 mile south and west of the Project site, respectively, and are easily accessible from both Pico Boulevard and Westwood Boulevard. These freeways are part of and provide access to the broader regional roadway network. Further, as discussed below, UCLA Research Park employees would have access to a range of TDM programs required by LRDP PP 4.13-1(d) to reduce vehicle trips.

With respect to construction activities, although implementation of the proposed Project would be phased over an approximately 10-year time frame, for purposes of analysis in this Initial Study, construction is conservatively assumed to occur in a single phase beginning in 2026 and concluding in 2030. As it relates to the circulation system, Project construction traffic would primarily be associated with construction workers commuting to and from the Project site; removal of demolition materials; delivery of building materials; and transport of construction equipment. Construction workers do not typically commute during peak commute hours as they generally arrive prior to morning (AM) peak hour and leave prior to the evening (PM) peak hour. The use of heavy trucks for the transport and disposal of demolition materials, building materials and equipment would occur periodically throughout the workday but largely outside of peak hours.

The peak days for construction-related heavy truck traffic would occur when the grading and demolition activities overlap. For purposes of analysis in this Initial Study, it is estimated that a maximum of 56 daily truck trips spread out over the workday would occur, with an estimated 10 truck trips per hour. Other stages of construction would require fewer daily truck trips. It is anticipated that construction truck traffic would travel north along Westwood Boulevard, head east on Pico Boulevard to Overland Avenue, and then south to the I-10 and regional transportation network, providing access to the Sunshine Canyon Landfill, Vulcan Landfill in Sun Valley, or other similarly proximate permitted regional facilities.

Except for the proposed addition of a pedestrian crossing along Westwood Boulevard and minor related driveway improvements, as discussed below, the proposed Project would not involve or require modifications to the off-site circulation system along Westwood or Pico Boulevards. 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. If lane closures are needed, appropriate coordination with and permitting by the City of Los Angeles would also occur. Implementation of LRDP PP 4.13-5 and permit compliance, if necessary, would reduce potential circulation impacts during construction to a less than significant level.

Bicycle and Pedestrian Facilities

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. Under Vision Zero, development projects proposed on a roadway identified as part of the City's High Injury Network (HIN) should be designed to enhance safety. The section of Pico Boulevard adjacent to the Project site and Westwood Boulevard north of Pico Boulevard are identified as HIN roadways (LADOT, 2025). The proposed Project would incorporate measures to align with Vision Zero policies.

[54] Avenue I is defined as an arterial road with a 100-foot right-of-way and 70-foot-wide roadway, and Avenue II is an arterial road with an 86-foot right-of-way and 56-foot-wide roadway (City of Los Angeles, 2016).

As mentioned above, there are existing sidewalks along Pico Boulevard and Westwood Boulevard adjacent to the Project site, which would be retained under the proposed Project. As shown on Figure 14, pedestrian access to Research Park East would occur via: (1) a Westwood Boulevard entry gate (access controlled after-hours); (2) Pico Boulevard via the paseo located between Blocks 1 and 2; (3) the parking area within Block 3; and (4) the adjacent GPI parking structure. Pedestrian access to Research Park West would occur via: (1) the subterranean parking garage; (2) the new amenity pavilion on the south side of the building near Westwood Boulevard; and (3) an entrance from Pico Boulevard along the north side of the building. Additionally, a new mid-block pedestrian crossing across Westwood Boulevard is proposed at the existing signal at the site driveways (between Pico Boulevard and Ayres Avenue) to improve safety and connectivity between Research Park East and West. The existing enclosed pedestrian bridge across Westwood Boulevard at Level 3 would also remain. Therefore, consistent with Vision Zero policies, the proposed Project would preserve and enhance pedestrian safety.

There are no existing bicycle facilities along the roadways adjacent to the Project site; however, to encourage bicycle travel, short-term bike parking, long-term bike storage, showers, and locker facilities would be provided on-site. Depending on final program requirements, an estimated 21 short-term and 136 long-term bike parking spaces would be provided throughout the site, plus 14 showers with lockers. These improvements would promote use of the existing local bicycle network, including the City's planned bike lane extension along Westwood Boulevard which will facilitate connectivity to the UCLA main campus.

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

UCLA Transportation Demand Management Strategies

With respect to UCLA transportation programs, as previously discussed in Section V.8, Greenhouse Gas Emissions, the proposed Project is consistent with transportation policies outlined in the UC Policy on Sustainable Practices and the UCLA CAP. These polices address, among other items, reducing the percentage of employees and students commuting by single-occupancy vehicles. Notably, consistent with the UC Policy on Sustainable Practices, the proposed Project would strive to have no more than 40 percent of its employees commuting to the location by SOV. As required by LRDP PP 4.13-1(d), and in addition to the pedestrian and bicycle facility improvements discussed above, the following TDM strategies would be implemented as part of the proposed Project to reduce vehicle trips.

- **Subsidized Transit Passes.** Many UCLA Research Park employees would be eligible for UCLA Transportation's Bruin Commuter Transit Benefit program (or an equivalent benefit program), which currently offers one free quarterly transit pass and subsequent discounted passes for seven transit agencies, including Los Angeles Metro bus and rail lines.
- **Carpooling.** The UCLA Transportation Trip Planner would assist employees in forming carpools based on similar commute patterns (travel areas and working hours). Carpool groups would be able to apply for a Staff Carpool Permit to reduce parking costs at the Project site.

Additionally, bus routes 8 and Rapid 12 (R12) provided by the City of Santa Monica's Big Blue Bus provide direct service between UCLA Research Park and Westwood, thus facilitating non-SOV travel between the Project site and the UCLA campus. Route 8 has headways of 20 to 35 minutes during weekdays and 25 to 35 minutes on weekends, and route R12 has headways of 11 to 23 minutes during weekdays and 20 to 35 minutes on weekends.

In summary, the proposed Project would incorporate LRDP PP 4.13-1(d), PP 4.13-5, and PP 4.13-6, which require implementation of TDM programs to reduce reliance on single vehicle occupancy trips and measures to minimize impacts to the circulation system during construction. Further, the Project site is located within a TPA with access to multiple transit facilities. The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. No impact would result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

SB 743, codified in PRC Section 21099, directed the State to adopt new guidelines for evaluating transportation impacts. In response to SB 743, the 2019 updates to the CEQA Guidelines included the addition of CEQA Guidelines Section 15064.3(b). Section 15064.3(b) establishes criteria for evaluating a project's transportation impacts based on project type and using automobile vehicle miles traveled (VMT) as the metric. To help lead agencies with SB 743 implementation, the Governor's Office of LCI produced a Technical Advisory on Evaluating Transportation Impacts in California Environmental Quality Act (CEQA) (December 2018).[55] LCI's Technical Advisory provides recommendations on VMT impact thresholds and considerations on the level of VMT analysis that is required based on Project characteristics, which was used as a guide for the Project's VMT Assessment, included in Appendix E of this Initial Study.

As described in the VMT Assessment, LCI's Technical Advisory suggests three screening criteria that agencies can use to identify if a proposed project is expected to cause a less than significant impact without conducting a detailed study: project size, project accessibility to transit, and project location in a low VMT area. The project size criterion identifies a small project threshold of 110 daily vehicle trips, which is not applicable to the proposed Project because it is anticipated to generate approximately 8,317 daily vehicle trips (conservatively not taking into consideration the Project's net reduction in trips compared to operation of the shopping center). The latter two

[55] Effective July 1, 2024, the Governor's Office of Planning and Research was renamed the Governor's Office of LCI.

screening criteria are relevant to assessing whether a detailed VMT analysis is required for the proposed Project. These applicable screening criteria are detailed below and applied to each component of the proposed Project to determine if there would be a potential to result in a VMT impact.

Transit Priority Area Screening

As noted above, a project can generally be presumed to have a less than significant impact if it satisfies CEQA Guidelines Section 15064.3(b)(1) by being located within one-half mile of a major transit stop or an existing stop along a high-quality transit corridor. However, as further discussed in the Project's VMT Assessment, included in Appendix E of this Initial Study, LCI's Technical Advisory states that this presumption does not apply to certain types of projects if the project does not meet additional considerations recommended by the LCI Technical Advisory related to floor area ratio (FAR), parking, consistency with the applicable Sustainable Communities Strategy, and replacement of affordable housing. As previously discussed, the Project site is located approximately 0.25 mile from the Metro E Line Westwood/Rancho Park Metro Station and approximately 0.5 mile from the Metro E Line Expo/Sepulveda Metro Station, both within the one-half mile threshold. Thus, the Project site is located within a TPA. The additional Project-specific characteristics that the LCI Technical Advisory recommends for consideration for transit proximity screening are documented in Table 25. As shown, the proposed Project characteristics meet the guidance provided in CEQA Guidelines Section 15064.3 for a project to be screened out from further VMT analysis due to location within a TPA. Therefore, the proposed Project is presumed to have a less than significant VMT impact under the TPA screening criteria and can be screened out from further VMT analysis.

TABLE 25 ADDITIONAL CONSIDERATIONS FOR TRANSIT PROXIMITY SCREENING

LCI Considerations	Project Site Characteristics	LCI Guidance Met?
Has a Floor Area Ratio (FAR) above 0.75	The Project has a FAR of 2.0.[1]	Yes
Does not provide more parking than required by jurisdiction	Although UCLA does not have established parking requirements, the Project would provide less parking than specified by standard ITE parking rates for the proposed uses. The Project would provide 1,129 parking spaces compared to 2,015 spaces specified by standard ITE parking rates.[2]	Yes
Is consistent with applicable Sustainable Communities Strategy	Although as a State constitutional entity the UC is not subject to the regional planning process, the Project site is located within a Priority Development Area (PDA) (i.e., an area targeted for future growth) in Connect SoCal 2024, SCAG's 2024-2050 RTP/SCS.	Yes
Does not replace affordable housing units with smaller number of moderate- or high-income units	The Project would not replace affordable housing units, as none exist on-site.	Yes

[1] FAR calculated based on 9.3-acre site and 811,400 gross square feet of program uses (i.e., excluding parking, the central loading dock, and major service/mechanical areas).
[2] The 2,015 parking spaces were estimated using applicable parking generation rates for Office Park and Research and Development land uses from the ITE Parking Generation Manual, 6th Edition.
Source: (Fehr & Peers, 2026)

Low VMT Area Screening

LCI's Technical Advisory states that projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. A low VMT-generating area generally has higher density, a mix of land uses, and provides opportunities for people to walk to nearby uses instead of driving. Low VMT areas are defined as areas that currently generate VMT below specified VMT thresholds. Based on the VMT impact threshold recommended by LCI, low VMT is defined as an area that generates VMT on a per capita or per employee basis that is 15 percent or more below the baseline VMT.

To determine if the Project site is located within a low VMT area, VMT data from the 2024 SCAG Regional Travel Demand Forecasting Model (SCAG Model) was obtained for the Project area and for the SCAG region. Given the Project's non-residential land uses, Home-Based Work VMT per Employee is the appropriate VMT metric and was obtained from the SCAG model. In the SCAG region, a low VMT area for non-residential uses generates no more than 10.77 daily Home-Based Work VMT per Employee (i.e., 15 percent below the regional baseline of 12.67 daily Home-Based Work VMT per Employee). For non-residential uses in the SCAG traffic analysis zone (TAZ) that represents the Project site, the daily Home-Based Work VMT per Employee is 7.23, which is 43 percent below the regional baseline. Therefore, the Project site qualifies as a low VMT area. As such, the proposed Project is presumed to have a less than significant VMT impact under the low VMT screening criteria and can be screened out from further VMT analysis.

In summary, the proposed Project meets the VMT screening criteria for TPAs and low VMT areas. Therefore, the proposed Project would have a less than significant VMT impact.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

As described above, consistent with existing conditions, access to the site would be provided from Pico Boulevard and Westwood Boulevard. The proposed Project would include installation of the Westwood Boulevard mid-block pedestrian crosswalk and associated minor driveway improvements. With the exception of the new crosswalk, the proposed Project does not involve any permanent changes to public roadways, sidewalks, or other circulation routes.

Construction activities associated with these improvements could result in the temporary closure of traffic lanes and/or sidewalk segments near the driveways. Any potential reduction of roadway

capacity, narrowing of traffic lanes, or the occasional interruption of traffic flow on streets associated with Project-related construction activities could pose hazards to vehicular traffic and pedestrians due to localized traffic congestion, decreased turning radii, or temporary conditions of the roadway surfaces. To minimize traffic disruption, implementation of LRDP PP 4.13-5, which requires maintenance of one travel lane in each direction and/or the provision of signal carriers (i.e., flagpersons), would ensure that impacts associated with a construction-related traffic lane closure remain less than significant. If lane closures are needed, appropriate coordination with and permitting by the City of Los Angeles would occur. Additionally, the use of any crane during construction would comply with UCLA and Cal/OSHA requirements, with oversight by EH&S.

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

Fire and other emergency vehicular access would continue to be provided from Pico Boulevard and Westwood Boulevard, as discussed further below under Threshold (d). Therefore, operation of the proposed Project would result in a less than significant impact related to vehicular hazards.

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

As identified above, construction of the Westwood Boulevard mid-block pedestrian crosswalk and associated minor driveway improvements may result in temporary closure of traffic lanes along Pico Boulevard and Westwood Boulevard. Any potential reduction of roadway capacity, narrowing of traffic lanes, or the occasional interruption of traffic flow could temporarily impair emergency access. Construction activities would be planned such that access for emergency vehicles is maintained at all times. 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. Further, any lane closures, if needed, would include appropriate coordination with and permitting by the City of Los Angeles. Therefore, there would be less than significant impacts related to emergency access during construction of the proposed Project.

Relative to long-term operations, emergency access to the Project site would continue to be provided from Pico Boulevard and Westwood Boulevard. Consistent with UCLA standard procedures, the Campus Fire Marshal would review and approve the proposed Project plans to ensure that circulation and design features allow adequate emergency vehicle access in compliance with Fire Code requirements. Therefore, there would be less than significant impacts related to emergency access during operation of the proposed Project.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

18. TRIBAL CULTURAL RESOURCES

Relevant elements of the proposed Project related to tribal cultural resources include limited excavation in specific areas where new construction is proposed and around the Research Park West building perimeter for foundation improvements, as well as limited shallow grading for the new Westwood Boulevard crosswalk and utility installations. The maximum depth of excavation would be approximately 10 feet for most components, and a depth of approximately 3.75 feet below the finished floor of parking Level P5 at Research Park West for seismic retrofits.

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

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 cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☐	☒

Discussion

The tribal village of Kuruvungna, a recognized sacred site and registered California landmark that is generally marked by the current location of Kuruvungna Sacred Springs and Cultural Center, is located approximately two miles northeast of the Project site. However, no tribal cultural resources either listed or eligible for listing at the state or local level were identified in the SCCIC records search included in Appendix C of this Initial Study (SCCIC, 2026), nor are any known to

occur within the Project site based on the Native American consultation conducted for the proposed Project, which is discussed further under Threshold (b), below. No impact is anticipated.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

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

AB 52 establishes requirements for consultation with California Native American tribes regarding projects that may affect a tribal cultural resource; emphasizes a broad definition of what may be considered to be a tribal cultural resource; and includes a list of recommended mitigation measures. Recognizing that local tribes may have expertise regarding their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and

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

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

UCLA, acting as Lead Agency, sent formal notification of the proposed Project on December 23, 2025, providing a 30-day response period in compliance with the requirements of AB 52. Letters were sent via U.S. Postal Service Certified Mail (with tracking) to the following Native American Tribes that are included on UCLA's AB 52 contact list and have ancestral ties to the southern and coastal portions of Los Angeles County:

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

The letters contained a Project Description including basic information regarding Project construction and earthwork, a summary of AB 52-prescribed timelines, an invitation to consult, and contact information for the Lead Agency representative. On January 8, 2026, UCLA received a request for consultation via email from the Gabrieleno Band of Mission Indians—Kizh Nation (Kizh Nation). On January 27, 2026, UCLA received a request for consultation via email from the Gabrielino Tongva Indians of California Tribal Council (Gabrielino Tongva Council). Additionally, on April 14, 2026, UCLA received a late request for consultation via email from the Gabrielino Tongva San Gabriel Band of Mission Indians (San Gabriel Band). No other requests for consultation were received.

On February 25, 2026, UCLA hosted a virtual meeting with a Tribal Representative for the Gabrielino Tongva Council, during which UCLA representatives gave a brief Project presentation. Among the topics of discussion were UCLA's initial proposed Project-specific mitigation measures, including but not limited to the retention of a monitor from each consulting Tribe during earthwork and the treatment of any unanticipated discovery of tribal cultural resources, as well as UCLA's previously adopted LRDP measures regarding archaeological resources and human remains, which would be implemented for this off-campus Project. Based on the discussion, it is UCLA's understanding that the Gabrielino Tongva Council Tribal Representative confirmed the adequacy of the proposed and previously adopted measures.

On April 1, 2026, UCLA sent a copy of the Project presentation via email to Tribal Representatives for Kizh Nation in advance of a virtual consultation meeting on April 2. This meeting was cancelled by Kizh Nation due to a scheduling conflict and later rescheduled to April 28, 2026. During the April 28 meeting, a variety of topics were discussed, including but not limited to the proposed Project-specific mitigation. Consultation is ongoing.

On April 23, 2026, UCLA sent a copy of the Project presentation via email to Tribal Representatives of the San Gabriel Band in preparation for a virtual consultation meeting on April 24. After UCLA presented the Project during the April 24 meeting, the topics of discussion included the proposed tribal monitoring and the evaluation of any finds. Consultation is ongoing.

Additionally, based on the results of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, provided in Appendix F of this Initial Study, there are no sacred sites located within the Project site (NAHC, 2025). Further, based on the records search conducted by the SCCIC for the proposed Project, included in Appendix C of this Initial Study, there are no known archaeological resources within the Project site; three known archaeological resources are located within a 0.5-mile radius of the Project site (SCCIC, 2026).

The Project site has been disturbed by previous development. It is estimated that the maximum depth of excavation for new foundations at Research Park East would be up to approximately 10 feet below the ground surface (bgs). At Research Park West, limited fill materials occur above the existing subterranean parking structure which underlies nearly the entire site area. Thus, any excavation needed for new construction or landscaping would be limited to fill soils. However, seismic improvements at Research Park West would involve subterranean retrofits of the existing footings around the building perimeter and at the existing concrete columns, at a maximum depth of approximately 3.75 feet below the finished floor of parking Level P5.

Nonetheless, there is a remote potential for disturbance of native soils during excavation activities, which could potentially impact previously unidentified tribal cultural resources. This would be considered a potentially significant impact. Based on the information received during consultation, UCLA proposes Project-specific MM RP TCR-1 through MM RP TCR-5 below. Additional mitigation regarding the unanticipated discovery of human remains is included and expands on the requirements identified in LRDP PP 4.4-5, detailed above in Section V.5, Cultural Resources, of this Initial Study. With implementation of the identified MMs, potentially significant impacts to tribal cultural resources would be reduced to a less than significant level.

Consultation with the Tribes is ongoing.

Project-Level Mitigation Measures

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

MM RP TCR -1 *Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities: Gabrieleño Band of Mission Indians—Kizh Nation*

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

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

C. The monitor will be present on-site on a rotating monthly basis during ground-disturbing activities (i.e., an alternating monthly schedule for each tribal monitor from the three consulting tribes shall be established by the University), and the University shall provide the schedule in writing to the monitor.

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

E. In consultation with the Kizh Nation regarding project construction scheduling, on-site tribal monitoring shall be temporarily suspended once subsurface work within the project site is complete and vertical building construction begins, until such time as trenching or other ground-disturbing activities recommence.

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

MM RP TCR-2 *Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities: Gabrielino Tongva Indians of California Tribal Council and Gabrielino Tongva San Gabriel Band of Mission Indians*

The University shall retain and compensate for the services of a Tribal Monitor from the Gabrielino Tongva Indians of California Tribal Council and a Tribal Monitor from the Gabrielino Tongva San Gabriel Band of Mission Indians, each of whom will be present on-site on a rotating monthly basis (i.e., an alternating monthly schedule for each tribal monitor from the three consulting tribes shall be established by the University) during the construction phases that involve ground-disturbing activities. Each Tribal Monitor will complete daily monitoring logs that summarize earthwork

activities, locations, soil, and any cultural materials identified. In consultation with the Tribes regarding project construction scheduling, on-site tribal monitoring shall be temporarily suspended once subsurface work within the project site is complete and vertical building construction begins, until such time as trenching or other ground-disturbing activities recommence. On-site monitoring shall end when all ground-disturbing activities are complete, or sooner if the Tribal Monitors and associated Tribal Representatives indicate the site has a low potential to impact tribal cultural resources.

MM RP TCR-3 *Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial): Gabrieleño Band of Mission Indians—Kizh Nation*

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist.

MM RP TCR-4 *If any discovered non-funerary/non-remains resources are determined to be Native American in origin, work within a 50-foot radius shall cease and the University shall allow all consulting Tribes to evaluate the resources and determine appropriate treatment and curation. The consulting Tribes shall work in good faith to come to agreement on treatment and curation, in consultation with the University who shall implement the agreement. If consensus cannot be reached, the University shall use best efforts to facilitate a resolution. In the event resolution cannot be reached, the University shall consult with the University's Qualified Archaeologist regarding appropriate treatment, in most cases reburial in place. Work may continue on other parts of the Project site while evaluation and, if necessary, treatment takes place.*

MM RP TCR-5 *Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects*

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

Level of Significance

With implementation of MM RP TCR-1 through MM RP TCR-5, as well as LRDP PP 4.4-5, the proposed Project would have a less than significant impact related to a substantial adverse change in the significance of a tribal cultural resource.

19. UTILITIES AND SERVICE SYSTEMS

Relevant elements of the proposed Project related to utilities and service systems include adaptive reuse of the existing buildings on-site and limited new construction. The proposed Project would continue to be served by existing utility infrastructure located within and adjacent to the Project site. No off-site upgrades to the existing public utility infrastructure would be required. The proposed Project would involve modifications to the on-site water, sewer, storm drain, and dry utility systems, as described further below.

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and SEIR (see the Introduction section of this Initial Study), the following adopted PPs from the LRDP MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP MMRP 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. Minor clarifying changes have been made, as needed, so the stated requirements reflect the proposed Project's off-campus location and specific characteristics.

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

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

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

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

PP 4.14-2(g) *The ~~campus~~ **University** shall educate the ~~campus~~ **Project** community on the importance of water conservation measures.*

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

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

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

Project Impact Analysis

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

Discussion

As previously described in Section II.6, Proposed Project Components, of this Initial Study, there is existing utility infrastructure on- and off-site to serve the existing buildings, and the off-site utility infrastructure has sufficient capacity to accommodate the demands associated with the proposed uses. Utility infrastructure would be replaced or relocated, as needed, to serve the proposed uses and accommodate new structures, as summarized below. As the proposed Project would not involve the use of natural gas, the existing gas service to the Project site would be capped.

- **Water.** LADWP provides domestic water service to the Project site. As shown on Figure 15, at Research Park East, one existing 2-inch domestic water line would be upsized to a 4-inch line, and five existing 2-inch domestic water lines would be replaced with one 4-inch domestic water line. Additionally, one existing underground fire protection line as well as the irrigation lines located at Research Park East would be rerouted. One on-site private fire hydrant may be relocated. At Research Park West, one existing 4-inch domestic water line would be upsized to a 6-inch line.

  Further, based on the Fire Service Pressure Flow Report prepared by the LADWP, the results of which are included in Appendix G of this Initial Study, the existing water infrastructure serving the Project site has sufficient water pressure to support the fire flows for the proposed Project (2,500 gallons per minute [gpm] with residual pressure of 93 pounds per square inch [psi], well in excess of 20 psi typically required) (LADWP, 2026).

- **Wastewater.** LASAN provides sewer service to the Project site. The Sewer Capacity Analysis Requests (SCARs) for Research Park East and West approved by the City BOE and included in Appendix H of this Initial Study concluded that the wastewater discharge generated by the proposed Project could be accommodated in the downstream sewer lines, and no off-site improvements would be necessary (City of LA BOE, 2026a; City of LA BOE, 2026b). As shown on Figure 15, at Research Park East, the two easternmost 6-inch sewer laterals would be rerouted around the proposed central loading dock facility, and a sample box would be required for one of the rerouted laterals. The existing 6-inch service located west of the proposed conference center would have a sample box added and a new 6-inch sewer point of connection. The westernmost 6-inch service would remain, and a new 4-inch service with a sample box would be added. This 6-inch service would be rerouted to a new connection to the City main in Ayres Avenue. At Research Park West, an additional 6-inch sewer lateral is proposed and would discharge to the Westwood Boulevard main.

The proposed Project may incorporate the use of greywater (i.e., non-contaminated wastewater from sinks, showers, etc.) for landscape irrigation and toilet flushing purposes. Appropriate supportive infrastructure, including separate piping, filters, and treatment facilities, would be included as part of such a system.

- **Drainage and Water Quality.** Stormwater runoff from Research Park East would be routed to catch basins with filter inserts and hydrodynamic separators for pre-treatment, and then to the existing stormwater system that includes four drywells and an approximately 131,600-gallon underground storage tank. An additional underground storage tank with a capacity of approximately 14,500 gallons is proposed within the driveway near Westwood Boulevard. Stored water would be used for landscape irrigation. As shown on Figure 15, the proposed Project would also involve rerouting segments of a 15-inch and two 10-inch storm drain lines to accommodate the new conference center and central loading dock at Research Park East.

  Stormwater runoff from Research Park West would likewise be routed to catch basins with filter inserts and hydrodynamic separators for pre-treatment, and then to a new approximately 75,000-gallon underground storage tank located at Basement Level 5. Stored water would be used for landscape irrigation.

- **Electricity and Telecommunications.** Electricity service is currently provided by LADWP via four on-site electrical vaults (three at Research Park East and one at Research Park West). The three vaults serving the East building are located adjacent to Westwood Boulevard, with one each serving Block 1, 2, and 3, which are identified by LADWP as A, B, and C. Depending on the precise programming for Block 3 (which would be developed in a later construction phase) once tenant needs are identified, Vault C may be upgraded to provide additional capacity to support full buildout of the proposed Project. Vault access for maintenance is from the sidewalk along Pico Boulevard. The LADWP vault in Research Park West is located on the second floor and would be maintained. Any related service transformer upgrade, if necessary, would be coordinated with LADWP.

As utility considerations are included in the overall master plan 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 Initial Study and would be less than significant. No additional impacts would occur, and no additional mitigation is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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. 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 LADWP included the water demands from existing development, which includes the existing buildings, in its 2020 UWMP. It is conservatively estimated that the proposed Project would consume a net increase of approximately 0.15 million gallons per day (MGD) of water compared to operation of the shopping center.[56] This is equivalent to approximately 168.1 acre-feet per year (AFY) and represents approximately 0.02 percent of the City's 746,000 AFY total projected water demand without planned additional City water conservation measures, as presented in the 2020 UWMP.[57] LRDP PPs 4.14-2(a) through 4.14-2(d) from the LRDP Final SEIR are incorporated into the proposed Project and require using low-flow water fixtures, reducing irrigation needs, promptly detecting and repairing water and irrigation pipe leaks, and minimizing the use of water to clean walkways and other hardscape, which would serve to reduce water demands. Additionally, as required by LRDP PP 4.14-2(g), building occupants would be educated on the importance of water conservation measures. Therefore, water usage for the proposed Project would be within LADWP's demand projections, as outlined in the current 2020 UWMP. There would be sufficient water supplies for implementation of the proposed Project, particularly in light of improved water conservation and efficiency with implementation of the proposed Project.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

[56] Based on LASAN sewage generation factors for retail uses greater than 100,000 sf (50 gallons per 1,000 sf) (LASAN, 2012), it is estimated that operation of the shopping center generates, when fully leased, approximately 27,604 gallons per day (GPD) of wastewater. Conservatively assuming that the water demand is 20 percent more than wastewater generation, this indicates actual water usage of approximately 33,125 GPD of water. Based on the SCARs for Research Park East and West, included in Appendix G of this Initial Study, it is estimated that the proposed Project would generate 156,646 GPD of wastewater (City of LA BOE, 2026a; City of LA BOE, 2026b). Conservatively assuming that the water demand is 20 percent more than wastewater generation, it is estimated that the proposed Project would consume approximately 187,975 GPD of water, which represents a net increase in water demand of approximately 154,850 GPD (0.15 million gallons per day [MGD]).

[57] (56,378,112 gallons per year / 325,851 = 173.02 acre-feet per year)

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

LASAN provides wastewater (or sewer) conveyance facilities from the Project site to the City's Hyperion Water Reclamation Plan (HWRP) located in Playa del Rey directly west of the Los Angeles World Airport. HWRP treats wastewater from most of the City of Los Angeles and various contracting cities and agencies. Wastewater generated by the proposed Project would be treated by the HWRP, consistent with the existing buildings at 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 (LASAN, 2025). Therefore, HWRP currently operates at approximately 61 percent of its capacity, with approximately 175 mgd of available dry weather capacity. Conservatively assuming that water used at the Project site, not including water used for irrigation, would ultimately flow into the local sewer system, the proposed Project's would result in an estimated net increase in wastewater generation of approximately 129,042 GPD (0.13 MGD); this would represent approximately 0.07 percent of the HWRP's remaining daily capacity. Therefore, there would be a less than significant impact related to adequate wastewater treatment capacity to serve the proposed Project's projected demand in addition to the provider's existing commitments.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

UCLA currently contracts with a private waste disposal company (Athens Services) to collect, recycle, and dispose of solid waste generated by UCLA facilities located both on and off campus. Following waste separation, sorting, and recycling activities, municipal waste is transported to any of five landfills in San Bernardino County operated by Athens Services: Barstow Landfill, Landers Landfill, Mid-Valley Landfill in Rialto, San Timoteo Landfill in Redlands, and Victorville Landfill. Based on the County of San Bernardino Countywide Integrated Waste Management Plan (IWMP), the total maximum daily capacity for all five landfills is 14,200 tons per day, the average daily rate of disposal is 5,316 tons per day, and the estimated remaining site life ranges from 8 to 47 years, as shown in Table 26 (County of San Bernardino, 2018).

TABLE 26 SAN BERNARDINO LANDFILL SUMMARY

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

Source: (County of San Bernardino, 2018)

UCLA's recyclable materials are transported to Athens Material Recovery Facility in Sun Valley located in the San Fernando Valley, and compostable organics are sent to American Organics in Victorville. It is expected that construction debris and limited soils export would be transported to Sunshine Canyon Landfill, Vulcan Landfill in Sun Valley, or other similarly proximate permitted regional facilities.

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

a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator, the per capita disposal rate, which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. Additionally, the CALGreen Code requires all new developments to divert 65 percent of non-hazardous construction and demolition (C&D) debris.

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

UCLA's extensive multi-stream waste diversion is accomplished through various recycling and waste management programs, including but not limited to programs for food and beverage containers, plastics, paper, metals, green waste, food waste, construction waste, and electronics. UCLA is able to monitor and enforce compliance with established diversion requirements through review of waste hauler data.

Solid waste would be generated during construction activities. Based on compliance with the CALGreen Code, at least 65 percent of non-hazardous C&D debris would be diverted from landfills. Additionally, as with shopping center operations at the site, the proposed Project would generate solid waste during operation. However, based on solid waste generation factors published by the California Department of Resources Recycling and Recovery (CalRecycle) and UCLA's stringent waste reduction policies, solid waste generated by the proposed Project requiring disposal in the landfill system would be less than the solid waste generated by operation of the shopping center, due in part to the substantial number of patrons as well as the amount of waste generated by specific retail uses within the shopping center, such as the food court and movie theater (CalRecycle, 2026). Additionally, waste compactors would be located in the proposed service yards and would serve to reduce the number of haul trips needed for waste disposal.

As at other UCLA facilities, regulated medical waste and universal hazardous waste would be processed at a transfer station and transported out of state for incineration. Biohazardous waste generated by the proposed Project would be sterilized using self-contained, enclosed sterilization units and stored on-site until it is transported and treated off-site prior to landfill disposal. Further, the proposed Project reflects continued implementation of the provisions of the UC Policy on Sustainable Practices, as required by LRDP PP 4.15-1. With the University's diversion requirements that would be effective during construction and operation of the proposed Project, the waste stream for the proposed Project would not exceed the permitted daily capacity of landfills serving the proposed Project, nor otherwise impair the attainment of solid waste reduction goals. Additionally, as indicated above, the proposed Project would comply with applicable management and reduction statutes and regulations related to solid waste.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

With the incorporation of LRDP PPs, the proposed Project would have less than significant impacts related to: (1) solid waste generation in excess of landfill capacity; and (2) compliance

with applicable federal, state, and local management and reduction statutes and regulations related to solid waste.

20. WILDFIRE

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

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

Discussion

The Project site is located within the limits of the City of Los Angeles and is therefore not within a State Responsibility Area where CAL FIRE is responsible for fire suppression. Based on review of the City of Los Angeles 2024 Local Hazard Mitigation Plan (LHMP), Figure 18-7, Wildfire Severity Zones in West Los Angeles APC, the Project site is not located within or near a Wildfire Severity Zone (City of Los Angeles, 2024). Additionally, according to the CAL FIRE, the Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ); the nearest VHFHZA is approximately 2.1 miles to the northwest (CAL FIRE, 2025). Therefore, the proposed Project would have no impacts related to wildfires or the associated issues identified in Thresholds (a) through (d), above. No impacts would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact related to wildfires.

21. MANDATORY FINDINGS OF SIGNIFICANCE

Project Impact Analysis

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

Discussion

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

As discussed under Section V.5, Cultural Resources, of this Initial Study, the proposed Project would have no impact on historic resources. Seismic improvements at Research Park West may involve limited excavation in native sediments and, although unlikely, there is a potential for previously unknown archaeological, tribal cultural, 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), as well as Project-specific MM RP TCR-1 through MM RP TCR-5, into the proposed Project would ensure that potential impacts would be reduced to a less than significant level.

Project-Level Mitigation Measures

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

Level of Significance

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

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

Discussion

As defined in CEQA Guidelines Section 15355, cumulative impacts refer to two or more individual effects, which, when considered together, are considerable or which compound or increase other environmental impacts. Per CEQA Guidelines Section 15130(b)(1), the analysis of cumulative impacts may be based on a list of past, present, and probable future projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency. The proposed Project involves adaptive reuse of the existing buildings on-site originally developed and operated as a shopping center, plus limited new construction to provide a total of up to approximately 1.35 million GSF of research park uses, with over 800,000 GSF of scientific program space, approximately 30,900 SF of open space and outdoor amenity areas, and approximately 1,100 parking spaces on-site.

Based on review of the City of Los Angeles Case Reports and Mapping tool (City of Los Angeles, 2026) and information provided by the Los Angeles Department of Transportation (LADOT, 2026),

there are 10 approved infill development projects within approximately 0.75 mile of the Project site. Nine of the projects involve the development of residential uses, and one is a mixed-use (residential and retail) project. The City filed categorical exemptions pursuant to CEQA or conducted ministerial review for these projects. Construction has not yet been initiated for eight of these projects. The closest project is a 30-unit residential project located at 10942-10948 W. Pico Boulevard approximately 0.06 mile west of the Project site. This project was approved in 2023, and construction has not been initiated.

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

Project-Level Mitigation Measures

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

Level of Significance

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

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

Discussion

As described in the analyses presented in Sections V.1 through V.20 of this Initial Study, potential impacts of the proposed Project would be less than significant with incorporation of relevant LRDP PPs and MMs. No significant and unavoidable adverse environmental effects to human beings would occur as a result of the proposed Project.

Project-Level Mitigation Measures

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

Level of Significance

With the incorporation of LRDP PPs and MMs and Project-specific MMs, the proposed Project would have a less than significant impact related to environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly.

Fish and Wildlife Determination

Based on consultation with the California Department of Fish and Wildlife, there is no evidence that the Project has a potential for a change that would adversely affect wildlife resources or the habitat upon which the wildlife depends.

___ Yes (No Effect)

_X_ No (Pay Fee)

VI. SUPPORTING INFORMATION SOURCES

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