

901 Levering Student Housing Project

Final Initial Study/Mitigated Negative Declaration State Clearinghouse No. 2025110587

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

Prepared By: T&B Planning, Inc.
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February 2026

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Attachment

- A Comment Letters Received
- B Transcript of the November 20, 2025 Public Meeting
- C 901 Levering Study Housing Project Draft Initial Study, as Revised

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 901 Levering Student Housing Project (proposed Project) have been analyzed in a Draft Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse [SCH] No. 2025111040) dated November 2025. Because the Project site is off campus, the IS/MND was 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 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); (2) the incorporation of Project Design Feature (PDF) 901 Levering AQ-1, which identifies the use of Tier IV construction equipment to reduce construction-related air pollutant emissions; and (3) the proposed adoption of the identified Project-specific MMs related to (a) geology and soils (MM 901 Levering GEO-1) to ensure the incorporation of geotechnical recommendations into the final Project design, (b) vibration (MM 901 Levering NSE-1) to reduce vibration impacts to adjacent sensitive receptors during construction, and (c) tribal cultural resources (MMs 901 Levering TCR-1 through TCR-5) to reduce impacts to any resources encountered during construction. After incorporation of the identified LRDP MMRP MMs and PPs, as well as the Project-specific PDF and MMs, the proposed Project would not result in any significant and unavoidable impacts. Therefore, in accordance with the CEQA Guidelines, a mitigated negative declaration (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 were released on November 12, 2025 for a 30-day public review period that concluded on December 12, 2025. 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 for review by State agencies and the NOI was distributed directly to 37 public agencies, community organizations, and interested individuals. The NOI and Draft IS/MND were also made available on the UCLA Capital Programs website and at the Charles E. Young Research Library located on campus. The NOI was also posted at the Project site and published in the UCLA Daily Bruin (both print and online editions) on November 12, 2025. Three written comments were received and are provided in Attachment A to this Final IS/MND. Responses to these comments are provided in Section 2.0 of this Final IS/MND.

A virtual public meeting was held on November 20, 2025, during which the public was given the opportunity to provide comments on the proposed Project and the Draft IS/MND. The public meeting was attended by 12 members of the public plus UCLA staff and other consultants affiliated with the proposed Project; public comments were provided by two individuals at the meeting. A transcript of the public meeting is provided in Attachment B to this Final IS/MND.

This document is the Final Initial Study for the UCLA 901 Levering Study Housing Project. The document includes:

- The comments received and the University's responses to these comments (Section 2.0);

- The Project-specific MMRP including relevant LRDP PPs and MMs included as part of the 901 Levering Student Housing Project, PDF 901 Levering AQ-1, and Project-specific mitigation measures MM 901 Levering GEO-1, MM 901 Levering NSE-1, and MMs 901 Levering TCR-1 through TCR-5 (Section 3.0);
- Copies of the three written comment letters received (included in Attachment A);
- The transcript of the November 20, 2025, public meeting (included in Attachment B);
- The Draft Initial Study as revised to reflect refined Project-specific tribal cultural resources mitigation measures based on tribal consultation that continued following preparation of the Draft IS/MND (included in Attachment C). Tribal consultation with the Gabrieleno Band of Mission Indians—Kizh Nation was concluded on February 9, 2026, and tribal consultation with the Gabrieleno Tongva Indians of California Tribal Council was concluded on February 19, 2026.

SECTION 2.0 PUBLIC COMMENTS AND UNIVERSITY RESPONSES

2.1 RESPONSES TO COMMENTS RECEIVED

CEQA Guidelines Section 15074(b) states that prior to approving a project, the lead agency must consider the proposed Mitigated Negative Declaration 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 of California’s standard practice to provide responses to comments.

The University received three written comment letters from the public on the Draft Initial Study, which are included in Attachment A of this Final IS/MND. Additionally, a virtual public meeting for the 901 Levering Student Housing Project was held by UCLA on November 20, 2025. The transcript of the public meeting, which includes the University’s presentation of Project information, an overview of the CEQA process, the results of the environmental analysis presented in the Draft IS/MND, and the public comments, is provided in Attachment B of this Final IS/MND.

Below are the comments received in writing and at the public meeting, and the University’s responses to these comments.

Commenter Letter (Email) A – Jacob Wasserman (North Westwood Neighborhood Council)

Comment A-1: In my personal capacity, I am forwarding the following Community Impact Statement passed by the North Westwood Neighborhood Council—the most local level of Los Angeles city government, elected by and representing the tens of thousands of stakeholders on UCLA’s campus and surrounding areas—in support of the 901 Levering student housing project, as my comment on the draft initial study and notice of intent to adopt a mitigated negative declaration.

Response: This comment indicates support for the proposed Project 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.

Comment A-2: The North Westwood Neighborhood Council (NWWNC) strongly supports UCLA’s proposed 901 Levering Student Housing Project and urges swift approval and advancement of this development. UCLA’s recent progress on student housing has been significant, but demand has consistently outpaced the supply of beds. If UCLA is to maintain and strengthen its housing guarantees, support enrollment growth, and protect students from the extreme pressures of the rental market in West LA, the University must continue to add substantial numbers of units in close proximity to campus. In short, student housing projects like 901 Levering are not optional luxuries; they are essential academic infrastructure.

The 901 Levering Student Housing Project directly responds to this need by providing a modern residence with beds for over 1,100 students within easy walking distance of classrooms, labs, and transit. It includes important features such as bicycle and micromobility storage, indoor and outdoor common spaces, and significant greenery. The location offers synergistic benefits to Westwood Village and UCLA students, bringing students in close proximity to amenities

like Broxton Plaza, entertainment, retail, and groceries, while simultaneously supporting those businesses in Westwood.

Response: This comment indicates support for the proposed Project 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.

Comment A-3: However, due to Westwood’s essential role in the 2028 Olympics serving as the Olympic Village, we recommend that construction activities are briefly paused during the games to avoid excessive disruption.

Response: This comment requests that the University consider pausing construction activities at the Project site, which is located in Westwood, during the 2028 Summer Olympics (referred to as LA28). The LA28 Olympic Village will include UCLA Housing facilities on campus in the Westwood community. At this time, it is too early to determine whether the proposed Project’s construction activities would conflict with LA28 activities on or near the campus. If a pause in construction becomes warranted, the details of that action would be determined based on coordination between the University and the LA28 Olympic Committee.

Comment A-4: With this project, UCLA can significantly alleviate housing pressure on the Westwood community and help to ensure that admitted students can afford to live near campus. For these reasons, the NWWNC strongly supports the 901 Levering Student Housing project. We urge Los Angeles City leadership to take a position in support of the project and otherwise support the findings of the environmental review: the draft initial study and mitigated negative declaration.

Response: This comment indicates support for the proposed Project 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.

Comment Letter (Email) B – Jacob Wasserman

Comment B-1: In my personal capacity, I also submit as comment on the draft initial study and notice of intent to adopt a mitigated negative declaration for the 901 Levering student housing project that the original, higher height for the building should have been studied as part of this study. Indeed, the original 22-story design, as I understand it, would have housed more students and done more to alleviate the housing crisis, and I hope it can still be considered and implemented.

Response: This comment requests that the University reconsider an earlier 22-story building design for the proposed Project, which could house more students. This comment provides an opinion about the design of the proposed Project 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.

Notwithstanding, CEQA requires that alternatives to a project be considered to avoid or substantially lessen any significant impacts of a project. As identified in the Draft IS/MND and summarized in Section 1 of this Final IS/MND, after

incorporation of the identified LRDP MMRP MMs and PPs, as well as the Project-specific PDF and MMs, the proposed Project would not result in any significant and unavoidable impacts. Therefore, analysis of an alternative to the proposed Project is not required and has not been evaluated pursuant to CEQA.

It should be noted that the design of the proposed Project evolved over time based on UCLA Housing's projections regarding demand for on-campus housing, site constraints, building constructability issues, financial considerations, and input from the community. With respect to design, the University considered development options ranging from 8 levels to up to 24 levels, with the initial contemplated designs reflecting fewer stories and far fewer student beds. The currently proposed 19-level design was selected for analysis in the Draft IS/MND and consideration by The Regents primarily because it balances the physical development and financial considerations while meeting the established Project objectives, including, but not limited to, providing needed undergraduate student housing while remaining sensitive to the surrounding neighborhood context. The proposed Project's design, including height and density, takes architectural cues from surrounding development, such as the Gayley Heights student housing building across the street, in order to promote visual compatibility within an area of dense mid- to high-rise residential development. Notably, the proposed Project would have a similar building elevation as Gayley Heights. Further, a building with additional floor area and/or additional beds could result in increased physical environmental impacts that have not been addressed in the Draft IS/MND. For example, there would be an increase in trip generation and an associated increase in air quality and GHG emissions. Taller buildings are also subject to additional fire and life safety requirements, which have cost and physical space implications. As such, the proposed design at 19 stories has been selected as it best meets a complex variety of needs and considerations.

Comment Letter C – Wendy Shane

Comment C-1 I am writing this letter in reference to the above captioned project. My family and I have resided in Westwood Hills for nearly 50 years, owned and operated Shane's Jewelry Store on Broxton Avenue in Westwood Village for most of that time, and have owned and managed an apartment building on Roebling Avenue in the North Village not far from the project site, which has been in our family for three generations. Westwood has been our home for nearly a half century.

Response: This comment provides introductory information about the commenter 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.

Comment C-2: I am very concerned about the new 19-story student dorm tower UCLA is proposing at 901 Levering Avenue, based on the significant negative environmental impacts that our property on Roebling Avenue has already suffered from the construction of UCLA's nearby 17-story Gayley Heights dorm tower, 10995 Le Conte Avenue, due to the height, shade, shadow, noise, and amount of traffic and congestion in that area caused by that project. My tenants on Roebling constantly complain of these impacts from UCLA's recently completed Gayley Heights.

UCLA's 17-story Gayley Heights tower has already caused significantly more noise, congestion, traffic, and unsafe pedestrian crossings in an area where In-N-Out, Chevron gas station, and cars, ambulances, and scooters already are significant traffic, safety, congestion, and noise concerns.

Response: This comment identifies concerns about the proposed Project based on operations at the nearby Gayley Heights and does not pertain to the environmental analysis or conclusions presented in the Draft IS/MND for the proposed Project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. The environmental impacts of the proposed Project have been evaluated in the Draft IS/MND, and as summarized in Section 1 of this Final IS/MND, after incorporation of the identified LRDP MMRP MMs and PPs, as well as the Project-specific PDF and MMs, the proposed Project would not result in any significant and unavoidable impacts. It is further noted that UCLA Housing and UCLA Transportation have not received substantial complaints regarding operations at Gayley Heights.^{1,2}

Comment C-3: I know from my experience that many students living in Gayley Heights rent offsite parking either in the Village or on campus. Simply because UCLA does not build on-site parking for residents of your dorm towers does NOT mean that students do not bring cars to campus, which of course they must park. Based on this actual experience, we can predict many tenants at 901 Levering will also bring cars to campus. They need cars to drive to their internships, to work, to socialize, and to drive home. Additionally, as UCLA Housing officials are well aware, thousands of students living on The Hill make extensive daily use of Uber, Lyft, taxis and other ride sharing services, as well as Door Dash, Uber Eats, Postmates, and other food delivery services. There is no off-street cueing area provided for these ride share or food delivery services.

Response: This comment addresses the adequacy of parking associated with the proposed Project. As identified in Section V.17, Transportation, of the Draft IS/MND, pursuant to Senate Bill 743, the parking impacts of a residential, mixed-used residential, or employment center project located on an infill site within a designated Transit Priority Area (such as the Project area) shall not be considered significant impacts on the environment. Therefore, the proposed Project, which has been intentionally designed without on-site parking in an effort to actively promote alternative modes of transportation, would not result in significant transportation impacts related to parking. A detailed discussion of existing and planned transit services available within walking distance of the Project site is provided in Section V.17, Transportation, of the Draft IS/MND.

Further, as identified in Section II.5, Project Description, of the Draft IS/MND, should future residents need parking, parking permits would be available for existing spaces on the UCLA campus. The Project site is located within walking distance of the UCLA campus. Project residents would have access to a full range of existing campus Transportation Demand Management (TDM) programs offered by UCLA, including campus transit and the on-campus car share program. Additionally, bicycle storage facilities would be provided on-site.

¹ Erika Fujitani, Assistant Director, Housing Operations & Safety, UCLA Housing. Email message to E. Sumner, Senior Environmental Planner, UCLA Capital Programs. December 10, 2025.

² Zenia Chamorro, Senior Transportation Planner, UCLA Transportation. Email message to E. Sumner, Senior Environmental Planner, UCLA Capital Programs. December 10, 2025.

As identified in Section V.17, Transportation, of the Draft IS/MND, the proposed Project would have a less than significant impact related to Transportation.

With respect to the use of ride-sharing, food delivery and other similar services, on-street parking spaces are available along Levering Avenue in front of the Project site, and UCLA Housing and UCLA Transportation continuously monitor the need to accommodate additional transportation-related needs associated with the on- and off-campus residential facilities.

Comment C-4 The impacts from the proposed height will significantly impact sound and increase disturbing noise levels, lack of peace and quiet enjoyment, and sound intrusion at our building. Students scream, shout, yell across the street, play loud music, host loud parties, and generally make a lot of noise. Extremely tall towers such as 901 Levering significantly amplify and bounce this sound throughout the neighborhood. With operable windows, and even just general student activity, the noise levels can become unbearable, not only during “Midnight Yell,” but on a daily basis.

Response: This comment describes hypothetical noise generated by students and does not pertain to the environmental analysis or conclusions presented in the Draft IS/MND. The potential noise impacts resulting from operations of the proposed Project are addressed in Section V.13, Noise, of the Draft IS/MND. As discussed therein, existing ambient daytime and nighttime noise levels were measured at five locations around the Project site in order to identify representative noise levels in the area during the regular academic session. The ambient noise levels are considered characteristic of a high-density urban residential environment. It was observed during the site visit that the dominant source of noise in the area was traffic on the adjacent streets; a secondary noise source was construction activities on surrounding properties.

As also discussed in Section V.13, Noise, of the Draft IS/MND, any gatherings at the Project site are anticipated to be similar in nature to the gatherings that currently occur at the site and at the surrounding high-density residential uses. Despite the increased number of student residents on-site with the proposed Project, the limited size of the exterior spaces (courtyard and terrace) would restrict the number of students congregating outdoors at any given time. Other outdoor spaces such as the exterior covered fitness area in the rear courtyard and bicycle parking area would also be limited in size such that large gatherings could not occur in those areas. Furthermore, all of the residential units would be occupied based on current student enrollment at UCLA (i.e., there would be no enrollment increase associated with the proposed Project). Thus, the presence of Project residents is not anticipated to result in a substantial increase in ambient noise levels in the surrounding neighborhood. Additionally, UCPD would continue to be available to respond to any noise complaints at the Project site, and the Los Angeles Police Department (LAPD) would continue to enforce the local noise ordinance through its joint jurisdiction within one mile of campus. As such, operational noise associated with future residents would not result in a Project impact under CEQA. It is further noted that building heights do not produce noise impacts, as inferred in the comment.

Comment C-5: I strongly feel in that in this highly congested area of Westwood Village, your proposed building at 901 Levering needs to be almost half the height, offer sufficient on-site parking, provide sufficient off-street cuing areas for ride share

vehicles and food delivery services, and mitigate the negative environmental impacts of excessive and unhealthy levels of noise.

Response: This comment summarizes comments C-2 through C-4 above. Refer to the responses to these comments above.

Public Meeting Commenter 1 – Stephen Resnick

Comment 1-1: Good evening, and thanks to everyone for the presentation. My question involves two former dorm buildings, one in UCLA in the village that's now a luxury senior care, and the other is over on Hilgard, which is now the W Hotel. So if student housing is such an issue, why have we sold off these two buildings? And what's in the future for this building? What's to prevent it from being sold off, and then UCLA seeking out other construction projects to house students? Thank you.

Response: This comment is referring to the conversion of apartment buildings to senior care and hotel uses and does not pertain to the environmental analysis or conclusions presented in the Draft IS/MND. Further, the "former dorm buildings" referenced by the commenter were not owned or operated by UCLA Housing.

Public Meeting Commenter 2 – Steve Sann

Comment 2-1 Yes. Good evening. Thank you so much. Far be it from me, I'm not here to speak on behalf of UCLA at all. But relative to the question that was just asked, I just would note for the record that the two buildings that were referenced were never owned by UCLA. Those were private developments, privately owned and operated. So that's one very significant difference. This obviously would be -- this 901 building would be owned by The Regents, whereas the building that was the W Hotel, that was La Mancha that was privately developed, and Weyburn Hall, which is today the Calligraphy Senior Housing that was also privately developed.

Response: This comment provides clarification about the ownership of the apartment buildings referenced in comment 1-1 and does not pertain to the environmental analysis or conclusions presented in the Draft IS/MND. No response is required.

Comment 2-2 As to my questions, I want to first thank you for the presentation. I do want to state for the record that and this is a similar comment I made with Gayley Heights, you know, we treasure and love the village. It's such a one of a kind resource in the community. It's a massive resource for UCLA. It's the front door to the campus. And I would just urge that in this project and in everything that UCLA does, you realize the impact that this has on the scale of the village and its character. You know, the Fox Westwood Village Theater for almost 80 or 90 years was the tallest icon in Westwood, and as you now drive up from Wilshire Boulevard, you don't see that anymore because it's basically hidden by the backdrop of the Gayley Heights building. So when buildings are built at a scale of 19 stories it has a very, very significant impact when it is so close to the village. That's Number 1.

Response: This comment provides an opinion about the design of the proposed Project and potential impact to the visual character of Westwood Village. 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 due to the residential nature of proposed development. 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 for the proposed Project, and no impact would result. No further analysis of this issue is required.

In addition, Section V.5, Cultural Resources, of the Draft IS/MND addresses the proposed Project's potential impacts to historic resources in the surrounding area based on the Historical Resource Assessment Report prepared by Teresa Grimes Historic Preservation, included in Appendix D of the Draft IS/MND. As indicated, distance and/or intervening high density development would preclude the Project from having potential direct or indirect historic impacts to off-site properties, which would include the Fox Westwood Village Theater. Furthermore, any impacts related to other UCLA projects are outside of the scope of this IS/MND.

Comment 2-3: Number 2, I'm really concerned about the two on-site loading or parking spaces. We know that students take Ubers all the time when they want to go to West Hollywood for a night out or whatever it is, and I'm questioning where the Ubers and Lyfts would queue up to pick up students? When you have 1,150 beds, we can expect a large volume of Uber and Lyfts throughout the day and especially evening hours. What's that going to do to the traffic on Levering? Also, food delivery trucks, even though it's in the village, students order huge amounts of DoorDash and Postmates and Uber Eats and then the little robots. So I'm just really concerned that I don't think two on-site spaces, forgetting the fact that there's no parking for students, and we know students, some of them will still have cars, they all will not live without cars in LA. But putting that to the side, just the daily delivery of food and pickups and so on, I think is inadequate. I also made this comment I know Pete Angelis heard it and thank you. Good to see you, Pete.

Response: This comment addresses the adequacy of parking associated with the proposed Project. Refer to response to comment C-3 above, which addresses this topic.

Comment 2-4: The sidewalk across the street on the gas station side, it is not The Regent's property, but it is an extremely poor condition. It's a major ADA hazard and as part of this project I think it's extremely important that you work with the city to get that replaced because you do not want your students tripping and students who have ADA issues, wheelchairs, etc., should not have to navigate a sidewalk directly across from this building that is in such massively poor shape.

Response: This comment addresses the condition of a sidewalk on the east side of Levering Avenue and does not pertain to the environmental analysis or conclusions presented in the Draft IS/MND. As noted by the commenter, this sidewalk is not owned by the University. Therefore, the sidewalk is outside the University's jurisdiction.

Comment 2-5 And I had one last comment I wanted to make, oh my gosh, in my remaining time. Oh, construction during the Olympics and also whether or not your construction fence is going to impede the sidewalk access on Levering as well. Hopefully you're not going to have a construction fence that will intrude into the street. That would be deeply problematic. And I know you heard comments from the Northwest Neighborhood Council that there are concerns since this project will be being constructed during the Olympics. How that is going to work, or whether or not there will be a pause in the construction during the Olympic period.

Response: This comment addresses construction activities during the Olympics and construction fencing. With respect to construction activities during the Olympics, refer to response to comment A-3 above, which addresses this topic. With respect to construction fencing, as identified in Section II.5, Proposed Project Components, of the Draft IS/MND, a staging area is needed to receive, lay down, and prepare materials for use during construction. The construction staging area would be fenced and would be limited to a single lane of Levering Avenue. This would require closure of the sidewalk adjacent to the Project site. However, as identified in Section V.17, Transportation, of the Draft IS/MND, the proposed Project incorporates LRDP PP 4.13-5, which requires one travel lane in each direction and notification actions to take when lane closures are needed, as well as LRDP PP 4.13-6, which requires signage for alternate pedestrian routes when closure of a pedestrian route is required during construction. Implementation of these PPs would reduce potential circulation impacts during construction to a less than significant level.

Comment 2-6: So I may have further comments that I'll put in a letter. By the way, I'm speaking as an individual. I am the chairman of the Westwood Community Council. However, our council has not had a chance to see this project. So my comments are my own personal comments and I thank you very much. Thank you.

Response: This comment clarifies that the commenter is providing personal comments and is not representing the Westwood Community Council 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. Notwithstanding, it is noted that the Notice of Intent to Adopt an MND for the proposed Project, which included a web link to the Draft IS/MND, was transmitted to the Westwood Community Council for review, and no comments on the Draft IS/MND were received from this organization.

SECTION 3.0 MITIGATION MONITORING AND REPORTING PROGRAM

3.1 INTRODUCTION

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code 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.

The Final Initial Study/MND for the 901 Levering Study Housing Project (SCH No. 2025110587) 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; PDF 901 Levering AQ-1, which identifies the use of Tier IV construction equipment to reduce construction-related air pollutant emissions; and Project-specific MMs related to geology and soils (MM 901 Levering GEO-1) to ensure the incorporation of geotechnical recommendations into the final Project design, vibration (MM 901 Levering NSE-1) to reduce vibration impacts to adjacent sensitive receptors during construction, and tribal cultural resources (MMs 901 Levering TCR-1 through TCR-5) to reduce impacts to any resources encountered during construction. The University is required to implement the identified PPs, MMs, and PDF, and this MMRP will be reviewed by the University of California in conjunction with consideration of Project approval and adoption of the MND.

3.1.1 PURPOSE

The purpose of this MMRP is to ensure compliance with the PPs, MMs, and PDF to avoid or reduce adverse environmental impacts resulting from construction and operation of the proposed UCLA 901 Levering Student Housing Project, which are identified in the Final IS/MND. The implementation of the identified MMs, PPs, and PDF 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

3.1.2 MONITORING PROCEDURES

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

In general, monitoring will consist of demonstrating that the identified MMs, PPs and PDF 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

3.1.3 REPORTING PROCEDURES

Monitoring of LRDP PPs and MMs included as part of the Project as well as the Project-specific MMs and PDF 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 MMs and PDF and describe their implementation status for each phase of project development, including design, construction, landscaping and operation.

3.2 LIST OF CAMPUS 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 901 Levering Student Housing Project, as well as the Project-specific MMs and PDF as identified in the Final Initial Study/MND. Note that there are seven Project-specific MMs and one PDF, 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
901 LEVERING STUDENT HOUSING PROJECT APPLICABLE LRDP
MITIGATION MEASURES, PROJECT DESIGN FEATURE, AND CAMPUS
PROGRAMS, PRACTICES, AND PROCEDURES**

MM, PP, or PDF Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs), Project Design Feature (PDF), and Campus Programs, Practices, and Procedures (PPs)
Aesthetics		
PP 4.1-1(a)	Design	The design process shall evaluate and incorporate, where appropriate, factors including, but not necessarily limited to, building mass and form, building proportion, roof profile, architectural detail and fenestration, the texture, color, and quality of building materials, focal views, pedestrian and vehicular circulation and access, and the landscape setting to ensure preservation and enhancement of the visual character and quality of the campus and the surrounding area. Landscaped open space (including plazas, courts, gardens, walkways, and recreational areas) shall be integrated with development to encourage use through placement and design.
MM 4.1-3(a)	Design	Design for specific projects shall provide for the use of textured non-reflective exterior surfaces and non-reflective glass.
MM 4.1-3(b)	Design	All outdoor lighting shall be directed to the specific location intended for illumination (e.g., roads, walkways, or recreation fields) to limit stray light spillover onto adjacent residential areas. In addition, all lighting shall be shielded to minimize the production of glare and light spill onto adjacent uses.
MM 4.1-3(c)	Design	Ingress and egress from parking areas shall be designed and situated so the vehicle headlights are shielded from adjacent uses. If necessary, walls or other light barriers will be provided.
Air Quality		
PP 4.2-2(a)	Construction	<p>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:</p> <ul style="list-style-type: none"> • 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.

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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.
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.
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.
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.
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.
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.
PDF 901 Levering AQ-1	Pre-construction and Construction	The University shall require by contract specifications that the construction contractor ensure, with the exception of a drill rig, that off-road diesel construction equipment rated at 150 hp or greater complies with USEPA/CARB Tier IV off-road emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturers' specifications.
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.
MM 4.3-1(b)	Pre-construction and Construction	If active nests for avian species of concern or raptor nests are found within the construction footprint or within a 250-foot buffer zone around the construction site, exterior construction activities shall be delayed within the construction footprint and buffer zone until the young have fledged or appropriate mitigation measures responding to the specific situation have been developed and implemented in consultation with CDFW.
MM 4.3-1(c)	Design	In conjunction with CEQA documentation required for each project 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 or campus boundaries, the tree replacement plan will include the planting of native shrubs in ecologically appropriate areas within the project boundaries that would provide nesting, foraging or roosting habitat for birds so that the replacement number of trees and shrubs will result in a 1:1 replacement ratio.
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,

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		the area of the find shall be protected, and the University immediately shall notify the Los Angeles County Coroner of the find and comply with the provisions of Public Resources Code Section 5097 with respect to Native American involvement, burial treatment, and re-burial, if necessary.
MM 4.4-2(a)	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.
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.
MM 4.4-2(c)	Pre-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.
Geology and Soils		
PP 4.5-1(a)	Design	During project-specific building design, a site-specific geotechnical study shall be conducted under the direct supervision of a California Registered

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		<p>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:</p> <ul style="list-style-type: none"> • 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)	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.
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.
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.
MM 901 Levering GEO-1	Design	<p>Prior to building permit issuance for the 901 Levering Redevelopment Project, a qualified Engineer shall review the final designs and contract specifications to verify that all geotechnical recommendations provided in the site-specific geotechnical investigation(s) for the Project site have been fully and appropriately incorporated. Such recommendations shall comply with applicable provisions and standards set forth in or established by CGS Special Publication 117, the current Uniform Building Code, relevant state and code requirements, and current standards of practice designed to minimize potential geologic, geotechnical, and related impacts. The recommendations for the Project site shall include, but not be limited to, the following geotechnical engineering topics:</p> <ul style="list-style-type: none"> • General Requirements • Soil and Excavation Characteristics • Minimum Resistivity, pH, and Water-Soluble Sulfate • Temporary Dewatering • Grading

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		<ul style="list-style-type: none"> • Mat Foundation Design • Lateral Design • Miscellaneous Foundations • Exterior Concrete Slab-on-Grade • Preliminary Pavement Recommendations • Retaining Wall Design • Dynamic (Seismic) Lateral Forces • Retaining Wall Drainage • Elevator Pit Design • Elevator Piston • Temporary Excavations • Shoring (Soldier Pile Design and Installation) • Surcharge from Adjacent Structures and Improvements • Temporary Tie-Back Anchors • Anchor Installation • Anchor Testing • Internal Bracing • Stormwater Infiltration • Surface Drainage • Plan Review
MM 4.4-3(b)	Construction	<p>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.</p> <p>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.</p> <p>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.</p>
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,

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

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		<p>program. BMPs that may be implemented include, but are not limited to, the following:</p> <p>Non-Structural/Structural:</p> <ul style="list-style-type: none"> • 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 <p>Treatment Control BMPs (to minimize storm water pollutants of concern for Ballona Creek – Sediment, Bacteria/Viruses, Toxicity, Trash, and Metals):</p> <ul style="list-style-type: none"> • 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.
Land Use and Planning		
PP 4.8-1(c)	Design	Infill development shall be continued, which reduces vehicle miles traveled and energy consumption.
PP 4.8-1(d)	Design	New building projects shall be sited to ensure compatibility with existing uses and the height and massing of adjacent facilities.
PP 4.8-1(e)	Design	Facilities shall be sited and designed to enhance spatial development while maximizing use of limited land resources.
Noise		
PP 4.9-1	Design	The University shall continue to evaluate ambient noise conditions when placing new student housing near regular sources of noise such as roadways and stationary equipment, and design the new buildings to ensure that interior noise levels would be less than 45 dBA CNEL.
PP 4.9-6(a)	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.
PP 4.9-7(a)	Construction	<p>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.</p> <p><i>Project-Specific Implementing Measure: Construction activities Monday through Friday shall be limited to 7:00 AM to 7:00 PM.</i></p>

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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.
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.
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.
MM 4.9-2	Pre-construction and Construction	The University shall require by contract specifications that, to the extent feasible, large bulldozers, large heavy trucks, and other similar equipment not be used. The work shall be done with medium-sized equipment or smaller.
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. Therefore, when detailed construction plans are complete, the University shall review the locations of sensitive receptor areas in relation to the construction site. If it is determined that a 12-foot-high barrier would break the line of sight between an 11-foot-high noise source and adjacent sensitive use areas, a temporary barrier shall be erected to the extent practicable. The barrier shall be solid from the ground to the top with no openings, and shall have a weight of at least 3 pounds per square foot, such as plywood that is ½-inch thick.
MM 901 Levering NSE-1	Pre-construction and Construction	<p>The campus shall require by contractor specifications that the following measures identified in the final Project-specific Geotechnical Investigation be implemented to reduce construction-related vibration impacts:</p> <ul style="list-style-type: none"> • Vibrations shall be monitored and recorded with seismographs during pile installation to detect the magnitude of vibration and oscillation experienced by adjacent structures. If the vibrations exceed the acceptable range during installation, the shoring contractor shall modify the installation procedure to reduce the values to within the acceptable range. • Prior to excavation, the existing improvements on adjacent properties shall be inspected to document the present condition. For documentation purposes, photographs shall be taken of preconstruction distress conditions, and level surveys of adjacent grade and pavement shall be considered. During excavation activities, the adjacent structures and pavement shall be periodically inspected for signs of distress. In the event that distress or settlement is noted, an investigation shall be performed and corrective measures taken so that continued or worsened distress or settlement is minimized.
Public Services		
PP 4.11-1	Design	Fire alarm connections to the University Police Command Center shall continue to be provided in all new and renovated buildings to provide immediate location information to the Los Angeles Fire Department to reduce response times in emergency situations.
PP 4.11-2(a)	Design and Operation	Police staffing levels and equipment needs shall continue to be assessed on an ongoing basis as individual development projects are proposed and on an annual basis during the University budgeting process to ensure that the

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		appropriate service levels will be maintained to protect an increased campus population and an increased level of development.
PP 4.11-2(b)	Design and Operation	Annual meetings shall continue to be attended by the Director of UCLA Housing and the UCPD to evaluate the adequacy of police protection service for University owned housing, assess institutional priorities and budgetary requirements, and identify and implement appropriate actions to ensure the continued adequacy of police protection services for students.
Recreation		
PP 4.12-1(a)	Design and Operation	The University shall continue to provide, operate, and maintain recreational facilities for students, faculty, and staff on campus.
PP 4.12-1(b)	Design and Operation	The University shall continue to integrate landscaped open space (including plazas, courts, gardens, walkways, and recreational areas) with development to encourage use through placement and design.
Transportation		
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.
PP 4.13-2	Pre-construction and Construction	UCLA Capital Programs will assess construction schedules of major projects to determine the potential for overlapping construction activities to result in periods of heavy construction vehicle traffic on individual roadway segments, and adjust construction schedules, work hours, or access routes to reduce construction-related traffic congestion.
PP 4.13-5	Construction	The contractor 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.
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.
PP 4.13-8	Pre-construction and Construction	To ensure adequate access for emergency vehicles when construction projects would result in temporary lane or roadway closures, UCLA shall consult with the UCPD, EH&S, and the LAFD to disclose temporary lane or roadway closures and alternative travel routes.
Tribal Cultural Resources		
MM 901 Levering TCR-1	Pre-construction and Construction	<p>Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities: Gabrieleño Band of Mission Indians – Kizh Nation</p> <p>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.</p>

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		<p>B. A copy of the executed monitoring agreement shall be submitted to the Environmental Planning section of UCLA Capital Programs prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of daily monitor logs will be provided to the Environmental Planning section of UCLA Capital Programs upon completion of monitoring activities.</p> <p>D. In consultation with the Kizh 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.</p> <p>E. On-site tribal monitoring shall conclude upon either of the following (1) written confirmation to the Kizh from a designated point of contact for the University that all ground-disturbing activities and/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 to the Environmental Planning section of UCLA Capital Programs that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.</p>
<p>MM 901 Levering TCR-2</p>	<p>Pre-construction and Construction</p>	<p>Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities: Gabrielino Tongva Indians of California Tribal Council</p> <p>The University shall retain and compensate for the services of a Tribal Monitor from the Gabrielino Tongva Indians of California Tribal Council who will be present on-site on a bi-monthly basis during the construction phases that involve ground-disturbing activities. The Tribal Monitor will complete daily monitoring logs that summarize earthwork activities, locations, soil, and any cultural materials identified. In consultation with the Tribe 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 Monitor and associated Tribal Representative indicate the site has a low potential to impact tribal cultural resources.</p>
<p>MM 901 Levering TCR-3</p>	<p>Construction</p>	<p>Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial): Gabrieleño Band of Mission Indians – Kizh Nation</p>

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MM, PP, or PDF Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs), Project Design Feature (PDF), and Campus Programs, Practices, and Procedures (PPs)
		Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist.
MM 901 Levering 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.
MM 901 Levering TCR-5	Construction	<p>Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects</p> <p>A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.</p> <p>B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.</p> <p>C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).</p> <p>D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.</p> <p>E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>
Utilities and Services Systems		
PP 4.14-2(a)	Design	New facilities and renovations shall be equipped with low-flow showers, toilets, and urinals
PP 4.14-2(b)	Operation	Measures to reduce landscaping irrigation needs shall be used, such as automatic timing systems to apply irrigation water during times of the day when evaporation rates are low, installing drip irrigation systems, using mulch for landscaping, subscribing to the California Irrigation Management Information System Network for current information on weather and evaporation rates, and incorporating drought-resistant plants as appropriate.
PP 4.14-2(c)	Operation	The University shall promptly detect and repair leaks in water and irrigation pipes.
PP 4.14-2(d)	Operation	The University shall minimize the use of water to clean sidewalks, walkways, driveways and parking areas.
PP 4.4-2(g)	Operation	The University shall educate the community on the importance of water conservation measures.

**TABLE 1
901 LEVERING STUDENT HOUSING PROJECT APPLICABLE LRDP
MITIGATION MEASURES, PROJECT DESIGN FEATURE, AND CAMPUS
PROGRAMS, PRACTICES, AND PROCEDURES**

MM, PP, or PDF Number	Mitigation Timing	Project- and LRDP-level Mitigation Measures (MMs), Project Design Feature (PDF), and Campus Programs, Practices, and Procedures (PPs)
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.
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

To whom it may concern:

In my personal capacity, I am forwarding the following Community Impact Statement passed by the [North Westwood Neighborhood Council](#)—the most local level of Los Angeles city government, elected by and representing the tens of thousands of stakeholders on UCLA's campus and surrounding areas—in support of the 901 Levering student housing project, as my comment on the draft initial study and notice of intent to adopt a mitigated negative declaration. The statement is also attached and [here](#).

A-1

Jacob Wasserman

The North Westwood Neighborhood Council (NWWNC) strongly supports UCLA's proposed 901 Levering Student Housing Project and urges swift approval and advancement of this development. UCLA's recent progress on student housing has been significant, but demand has consistently outpaced the supply of beds. If UCLA is to maintain and strengthen its housing guarantees, support enrollment growth, and protect students from the extreme pressures of the rental market in West LA, the University must continue to add substantial numbers of units in close proximity to campus. In short, student housing projects like 901 Levering are not optional luxuries; they are essential academic infrastructure.

A-2

The 901 Levering Student Housing Project directly responds to this need by providing a modern residence with beds for over 1,100 students within easy walking distance of classrooms, labs, and transit. It includes important features such as bicycle and micromobility storage, indoor and outdoor common spaces, and significant greenery. The location offers synergistic benefits to Westwood Village and UCLA students, bringing students in close proximity to amenities like Broxton Plaza, entertainment, retail, and groceries, while simultaneously supporting those businesses in Westwood.

However, due to Westwood's essential role in the 2028 Olympics serving as the Olympic Village, we recommend that construction activities are briefly paused during the games to avoid excessive disruption to games-related events.

A-3

With this project, UCLA can significantly alleviate housing pressure on the Westwood community and help to ensure that admitted students can afford to live near campus. For these reasons, the NWWNC strongly supports the 901 Levering Student Housing project.

A-4

We urge Los Angeles City leadership to take a position in support of the project and otherwise support the findings of the environmental review: the draft initial study and mitigated negative declaration.



- COMMUNITY IMPACT STATEMENT -

The North Westwood Neighborhood Council (NWWNC) strongly supports UCLA's proposed 901 Levering Student Housing Project and urges swift approval and advancement of this development. UCLA's recent progress on student housing has been significant, but demand has consistently outpaced the supply of beds. If UCLA is to maintain and strengthen its housing guarantees, support enrollment growth, and protect students from the extreme pressures of the rental market in West LA, the University must continue to add substantial numbers of units in close proximity to campus. In short, student housing projects like 901 Levering are not optional luxuries; they are essential academic infrastructure.

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However, due to Westwood's essential role in the 2028 Olympics serving as the Olympic Village, we recommend that construction activities are briefly paused during the games to avoid excessive disruption to games-related events.

With this project, UCLA can significantly alleviate housing pressure on the Westwood community and help to ensure that admitted students can afford to live near campus. For these reasons, the NWWNC strongly supports the 901 Levering Student Housing project.

We urge Los Angeles City leadership to take a position in support of the project and otherwise support the findings of the environmental review: the draft initial study and mitigated negative declaration.

Council File: [03-0665](#)

Title: WESTWOOD NORTH VILLAGE / DESIGNATION

Position: For

COMMENT LETTER B

 Outlook

901 Levering Housing Project: Build to Original, Higher Height

From Jacob Wasserman <jacobwasserman@gmail.com>

Date Fri 11/21/2025 7:55 PM

To Sumner, Erica <ESumner@capnet.ucla.edu>

Cc dbryant@tbplanning.com <dbryant@tbplanning.com>; Zambrano, Carmen <czambrano@support.ucla.edu>; Poulakidas, Jennifer <jpoulakidas@support.ucla.edu>; Alpern, Leeor <lalpern@support.ucla.edu>; Brown, Julia <juliabrown@support.ucla.edu>; Muller, Duane <dmuller@support.ucla.edu>; Rogers, Ashley <ARogers@capnet.ucla.edu>; Ballentine, Christopher <CBallentine@capnet.ucla.edu>; Angelis, Peter <pangelis@ha.ucla.edu>; Dundish, Sarah <sdundish2@ha.ucla.edu>; Maloney, Alison <amaloney@ha.ucla.edu>; Brian.Harrington@ucop.edu <Brian.Harrington@ucop.edu>; Ha.Ly@ucop.edu <Ha.Ly@ucop.edu>

To whom it may concern:

In my personal capacity, I also submit as comment on the the draft initial study and notice of intent to adopt a mitigated negative declaration for the 901 Levering student housing project that the original, higher height for the building should have been studied as part of this study. Indeed, the original 22 story design, as I understand it, would have housed more students and done more to alleviate the housing crisis, and I hope it can still be considered and implemented.

←
B-1
←

Jacob Wasserman

COMMENT LETTER C

Wendy Shane
11207 Cashmere Street
Los Angeles, CA 90049
(310) 806-1982 • Email: taylor1982feb@icloud.com

Ms. Erica Sumner (Email: ESummer@capnet.ucla.edu)
Senior Environmental Planner
UCLA Capital Programs
1060 Veteran Avenue, Box 9513
Los Angeles, CA 90095

RE: 901 Levering Student Housing Project; 901 Levering Avenue, City of Los Angeles

I am writing this letter in reference to the above captioned project. My family and I have resided in Westwood Hills for nearly 50 years, owned and operated Shane’s Jewelry Store on Broxton Avenue in Westwood Village for most of that time, and have owned and managed an apartment building on Roebbling Avenue in the North Village not far from the project site, which has been in our family for three generations. Westwood has been our home for nearly a half century.

←
C-1
←

I am very concerned about the new 19-story student dorm tower UCLA is proposing at 901 Levering Avenue, based on the significant negative environmental impacts that our property on Roebbling Avenue has already suffered from the construction of UCLA’s nearby 17-story Gayley Heights dorm tower, 10995 Le Conte Avenue, due to the height, shade, shadow, noise, and amount of traffic and congestion in that area caused by that project. My tenants on Roebbling constantly complain of these impacts from UCLA’s recently completed Gayley Heights.

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C-2
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UCLA’s 17-story Gayley Heights tower has already caused significantly more noise, congestion, traffic, and unsafe pedestrian crossings in an area where In-N-Out, Chevron gas station, and cars, ambulances, and scooters already are significant traffic, safety, congestion, and noise concerns.

I know from my experience that many students living in Gayley Heights rent offsite parking either in the Village or on campus. Simply because UCLA does not build on-site parking for residents of your dorm towers does NOT mean that students do not bring cars to campus, which of course they must park. Based on this actual experience, we can predict many tenants at 901 Levering will also bring cars to campus. They need cars to drive to their internships, to work, to socialize, and to drive home. Additionally, as UCLA Housing officials are well aware, thousands of students living on The Hill make extensive daily use of Uber, Lyft, taxis and other ride sharing services, as well as Door Dash, Uber Eats, Postmates, and other food delivery services. There is no off-street cueing area provided for these ride share or food delivery services.

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C-3
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The impacts from the proposed height will significantly impact sound and increase disturbing noise levels, lack of peace and quiet enjoyment, and sound intrusion at our building. Students scream, shout, yell across the street, play loud music, host loud parties, and generally make a lot of noise. Extremely tall towers such as 901 Levering significantly amplify and bounce this sound throughout the neighborhood. With operable windows, and even just general student activity, the noise levels can become unbearable, not only during “Midnight Yell,” but on a daily basis.

←
C-4
←

I strongly feel in that in this highly congested area of Westwood Village, your proposed building at 901 Levering needs to be almost half the height, offer sufficient on-site parking, provide sufficient off-street cueing areas for ride share vehicles and food delivery services, and mitigate the negative environmental impacts of excessive and unhealthy levels of noise.

←
C-5
←

Thank you very much.

Wendy Shane
Wendy Shane

ATTACHMENT B

NOVEMBER 20, 2025 PUBLIC MEETING TRANSCRIPT

IN RE:

901 LEVERING STUDENT HOUSING PROJECT
AUDIO TRANSCRIPTION OF RECORDED PUBLIC MEETING
TH
HELD ON NOVEMBER 20 , 2025

)

SPEAKERS

ASHLEY ROGERS

JARED MEYER

CHRIS BALLENTINE

ERICA SUMNER

STEPHEN RESNICK

STEVE SANN

PETER HENDRICKSON

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(RECORDED AND TRANSCRIBED)

ASHLEY ROGERS: All right. We'll admit a few more people and we'll go ahead and get started.

Hello and welcome to this public meeting for UCLA's 901 Levering Student Housing Project. My name is Ashley Rogers, and I'm the Director of Environmental Planning with UCLA Capital Programs.

The purpose of tonight's meeting is to receive public comments on the project and the environmental analysis prepared for the project, pursuant to the California Environmental Quality Act, or CEQA.

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, please indicate that in the chat or use the raise hand function during our public comment period, and we'll call on you after the presentation. 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

1 comment received will be provided in a final Initial
2 Study to be published early next year. This meeting is
3 being recorded and a written transcript, including all
4 comments in the chat, will be appended to the final
5 Initial Study.

6 We have a number of UCLA and University of
7 California representatives here tonight. I'd like to
8 introduce Jared Meyer, Senior Director of Housing
9 Maintenance with UCLA Housing and Hospitality,
10 representing the project sponsor.

11 JARED MEYER: Good evening everybody

12 ASHLEY ROGERS: Chris Ballentine,
13 Principal Project Manager at UCLA Capital Programs.

14 CHRISTOPHER BALLENTINE: Hello everyone.

15 ASHLEY ROGERS: And Erica Sumner, senior
16 environmental planner, also in Capital Programs.

17 ERICA SUMNER: Hi, everyone.

18 ASHLEY ROGERS: And now I will turn things
19 over to Jared.

20 JARED MEYER: Thank you. Ashley.

21 So just touching on the background for the
22 project and the need. Undergraduate housing inventory
23 on and off campus is over 20,000 beds at this point.
24 Back in fall of 2022, we secured a 4-2 housing
25 guarantee, which means four years for incoming first

1 year freshman students and guaranteed housing for two
2 years for incoming transfers.

3 The site is an ideal location for
4 redevelopment. We surround the site with housing
5 buildings already owned by UCLA. It's walking distance
6 both to campus and to the new Metro Line D station
7 that's at Westwood and UCLA's -- though it is the
8 Westwood UCLA station, and that will be open in 2027.

9 We have an opportunity to increase the
10 density on the site because the current smaller
11 buildings have a smaller bed count, which I'll get into
12 in a little bit. Also, we have a seismic opportunity
13 because the existing 1940s residential buildings do not
14 meet our current UC seismic safety standards.

15 It also helps meet our student demand for
16 apartment style units with kitchens and living areas.
17 The project will also be funded from housing reserves.

18 So this is the project site. We're at the
19 intersection of Southwest Campus and the main campus up
20 to the right -- up to the upper right.

21 It's located at 901 Levering Avenue in the
22 Westwood neighborhood of the City of Los Angeles, and
23 the site is bordered, as I mentioned before, actually
24 on all three sides to the West, to the North, and to
25 the South by existing UCLA-owned buildings and/or

1 partially owned, including graduate, undergrad, and
2 faculty housing.

3 Here's an aerial view of the project site
4 outlined in red, and you can see the surrounding campus
5 housing to the North, that's Levering Terrace, North of
6 that is Faculty Levering, and then to the west we have
7 Laurel Apartments, Tipuana, to the North is Le Conte.
8 And then we have the gas station, the Chevron station,
9 and the triangle to the right.

10 South of the site is the Village Terrace
11 building.

12 It is a three-quarter acre site. There's
13 existing five low-rise buildings on the property with a
14 central pool, central courtyard, and landscaping.
15 There are 42 units with a mix of efficiency units,
16 which are the bulk of the property, which are a little
17 smaller than a studio, and then up to two-bedroom
18 apartments.

19 UCLA purchased this property back in May of
20 2024. Here's a street view looking up from Levering,
21 and you can see on the smaller two-story buildings
22 right up front of the site with the central stairway.
23 And note the relatively steep topographical gradient.

24 Under the project we'll be removing the
25 existing retaining walls and grading the site level to

1 the Levering Avenue plane, and that will be serving as
2 the main entrance, from the Levering site.

3 Here's a rendering of the proposed project.

4 On the left side of the image you can see the planned
5 new building, and Gayley Heights is in the foreground
6 to the right, that's an existing apartment building.

7 The project involves demolishing the
8 existing buildings on the project site and constructing
9 this 19-story building with 148 apartments, and this
10 will total about 310,000 square feet.

11 The project will provide 1150 undergrad
12 student beds, predominantly in the four bedroom double
13 occupancy units. This helps address the ongoing demand
14 for student housing and helps us maintain our
15 guarantee.

16 This single structure design of the project
17 includes several courtyards and a terrace to provide
18 landscape, gathering spaces, and recreational amenities
19 for the residents.

20 There are two vehicular parking spaces
21 provided for service vehicles in the Southeast of the
22 site, the lower right corner. And given the site's
23 proximity to UCLA's campus, onsite parking will not be
24 provided for residents.

25 So stepping back with my back to about

1 Gayley Heights, we can see across the corner of the
2 Chevron station to our left, this is a view and
3 rendering of the entry courtyard. There's still work
4 to be done obviously, we're just looking at concept
5 drawings.

6 And there are new street trees species not
7 specified yet, but we're working on that. But this is
8 the proposed look from the ground.

9 In the first floor we entered the first
10 floor lobby from a main entry area court, and the first
11 floor is on your left in this image.

12 The amenities on the lobby level include
13 laundry facilities, a mail, and package room, vending
14 area, apartments intended for residential life staff.
15 There will also be bike parking and an outdoor covered
16 fitness area to the rear, on the Southwest.

17 And going up to Level 2, we continue the
18 common study lounge that connects to the outdoor
19 terrace and has a couple group study rooms. Also,
20 student apartments begin on the second floor.

21 Then continuing up the building, student
22 apartments will be provided on Levels 3 through 19 with
23 eight apartments per floor. And at the fourth floor
24 there's a connection to Weyburn Place, and at that
25 entry there are a couple of group study rooms.

1 Next slide please.

2 Here's a rendering of the project as we view
3 it from the corner of Weyburn Place and Weyburn Avenue.
4 So my back is to the Weyburn Commons building, and in
5 the foreground on the left that's Weyburn Terrace
6 Sycamore. And then you can see the cruciform shaped
7 building of 901 Levering at the top right.

8 This rendering shows the view of the project
9 as we go up the Levering Avenue hill. That's the
10 Roebbling Apartments on the corner there.

11 And then there's Gayley Heights to the left,
12 and the proposed project to the right. I'll share a
13 couple renderings of the interior views of the project.

14 This is coming from the main entrance court
15 into the lobby, and as you can see, it can continue up
16 to the second floor, part of the commons group study
17 space or common study lounge.

18 And then on the left are the windows that
19 are along Levering Avenue. And as I put my back to the
20 windows you can see the lobby entry to the right, which
21 if you continue on to the right, you will go to the
22 elevator lobby on the left in that green wall with the
23 window. We have a library study space that's accessed
24 from this floor. And then our plan is potentially a TV
25 area and some open study spaces around.

1 Now I'll pass it off to Chris.

2 CHRISTOPHER BALLENTINE: Thank you, Jared.

3 So UCLA and the architectural and consultant
4 project team just finished a very rigorous detailed
5 data collection and project programming effort.

6 We currently are completing the schematic
7 design phase which we're completing this month.

8 Essentially all of the work that Jared
9 shared is being used to go out to bid for the selection
10 of a construction manager in January, we hope of next
11 year, 2026, to have them on board.

12 We're looking to have UC Regents approval in
13 March of 2026, and then completing the detailed design
14 drawings and specifications in May of 2026.

15 Construction on the site will start with the
16 demolition first of the existing buildings, and that
17 will include site preparation, and that will happen in
18 the summer of -- in fall of 2026.

19 Following that will be the construction of
20 the main building, which will commence in the fall
21 2026. And we're looking at completing all of the
22 construction in early 2030. So a little more than a
23 three-year construction process.

24 The goal and expectation is that everything
25 goes well, and we will be moving occupants into the

1 building in the fall of 2030.

2 Thank you. Now to you, Erica.

3 ERICA SUMNER: Thanks, Chris.

4 Regarding the environmental review for the
5 project, CEQA requires the lead agency, in this case
6 UCLA acting on behalf of the University of California,
7 to evaluate the potential environmental impacts that
8 may result from a new project. If there are
9 significant impacts, the lead agency is required to
10 identify mitigation measures or alternatives to reduce
11 those impacts to the extent feasible.

12 If all of the impacts can be mitigated, then
13 the lead agency may prepare a mitigated negative
14 declaration, or MND. If any significant impacts cannot
15 be fully mitigated, then an Environmental Impact
16 Report, or EIR, is prepared.

17 Next slide.

18 As most of you know, we've prepared an
19 Initial Study for the 901 Levering Student Housing
20 Project, which determined that for all environmental
21 topics, the project would result in no impact or less
22 than significant impacts with implementation of a
23 variety of programs, practices, and procedures, or PPs,
24 as well as mitigation measures or MMs.

25 The majority of these PPs and MMs mirror

1 those previously adopted by UCLA as part of its Long
2 Range Development Plan, which guides campus growth and
3 development. Plus a few project-specific measures.

4 As a standard practice, UCLA implements all
5 of the relevant LRDP, PPs, and MMs for all of its
6 projects, including for projects located off campus.

7 Based on the Initial Study's conclusion of
8 less than significant impacts with mitigation, a
9 mitigated negative declaration, or MMD, is proposed for
10 adoption by the UC Regents, and all of the projects PPs
11 and MMs will be adopted, as well as part of a
12 Mitigation Monitoring and Reporting Program, or MMRP,
13 which will ensure implementation of those measures.

14 Note that the CEQA process shown here is
15 specific to UCLA's process for MNDS and include steps
16 that go beyond CEQA requirements.

17 Next slide please.

18 Relative to the Initial Study that we
19 prepared, this list shows all of the topics required to
20 be analyzed under CEQA. Note that even for those
21 topics where impacts were determined to be less than
22 significant, UCLA's standard PPs and MMs from the Long
23 Range Development Plan have been incorporated into the
24 project.

25 As indicated, the Initial Study analysis

1 determined that there would be no impact or less than
2 significant impact for all topics, with the exception
3 of geology and soils, specifically with regard to
4 seismic ground shaking and unstable or expansive soils,
5 which is typical for most projects in Southern
6 California.

7 Noise, specifically with regard to
8 construction-related noise and vibration, which is also
9 common for construction projects in dense urban areas,
10 and tribal cultural resources, specifically with regard
11 to the potential to encounter such resources during
12 excavation of the site.

13 So in addition to all relevant LRDP PPs, and
14 MMs, project-specific mitigation is proposed to reduce
15 those identified impacts to a less than significant
16 level.

17 As I mentioned previously, with all impacts
18 being less than significant, a mitigated negative
19 declaration is proposed for adoption. The Initial
20 Study and the Notice of Intent to adopt an MND have
21 been distributed for the required 30-day public review
22 period, which extends until December 12th.

23 Public comments may be submitted until that
24 time, and all comments received will be responded to in
25 a Final Initial Study, which will be published later

1 this winter and go to the UC Board of Regents for
2 consideration.

3 And with that, I'll pass it back to you,
4 Ashley.

5 ASHLEY ROGERS: Thank you, Erica.

6 So now we're going to move on to public
7 comments. If you'd like to speak, please either enter
8 your name in the chat, although I need to pull up my
9 chat, or you can use the raise hand function. I will
10 call on names in the order that I see them.

11 Each speaker will have up to three minutes
12 to talk. As your allotted time comes to an end, I'll
13 give a gentle reminder to wrap up.

14 Please be sure to start by stating your name
15 for the record, and indicate any group or organization
16 that you're representing tonight or affiliated with.

17 Let's see, do we have any speakers?

18 Okay. I'm going to start with Stephen
19 Resnick and then move on to Steve Sann.

20 And you may need to unmute yourself, or
21 let's see. Alright. Stephen Resnick. I'm trying to
22 unmute. There we go.

23 STEPHEN RESNICK: Okay. Good evening, and
24 thanks to everyone for the presentation.

25 My question involves two former dorm

1-1

1 buildings, one in UCLA in the village that's now a
2 luxury senior care, and the other is over on Hilgard,
3 which is now the W Hotel.

4 So if student housing is such an issue, why
5 have we sold off these two buildings? And what's in
6 the future for this building? What's to prevent it
7 from being sold off, and then UCLA seeking out other
8 construction projects to house students?

9 Thank you.

10 ASHLEY ROGERS: Thank you, Stephen. We
11 will respond to that in our final Initial Study.

12 I am going to go on to Steve Sann.

13 STEVE SANN: Yes. Good evening. Thank
14 you so much.

15 Far be it from me, I'm not here to speak on
16 behalf of UCLA at all. But relative to the question
17 that was just asked, I just would note for the record
18 that the two buildings that were referenced were never
19 owned by UCLA. Those were private developments,
20 privately owned and operated. So that's one very
21 significant difference.

22 This obviously would be -- this 901 building
23 would be owned by The Regents, whereas the building
24 that was the W Hotel, that was La Mancha that was
25 privately developed, and Weyburn Hall, which is today

1-1
(CONT.)

2-1

1 the Calligraphy Senior Housing that was also privately
2 developed.

2-1
(CONT.)

3 As to my questions, I want to first thank
4 you for the presentation. I do want to state for the
5 record that and this is a similar comment I made with
6 Gayle Heights, you know, we treasure and love the
7 village. It's such a one of a kind resource in the
8 community. It's a massive resource for UCLA. It's the
9 front door to the campus.

10 And I would just urge that in this project
11 and in everything that UCLA does, you realize the
12 impact that this has on the scale of the village and
13 its character. You know, the Fox Westwood Village
14 Theater for almost 80 or 90 years was the tallest icon
15 in Westwood, and as you now drive up from Wilshire
16 Boulevard, you don't see that anymore because it's
17 basically hidden by the backdrop of the Gayley Heights
18 building.

2-2

19 So when buildings are built at a scale of 19
20 stories. It has a very, very significant impact when
21 it is so close to the village. That's Number 1.

22 Number 2, I'm really concerned about the two
23 on site loading or parking spaces. We know that
24 students take Ubers all the time when they want to go
25 to West Hollywood for a night out or whatever it is,

2-3

1 and I'm questioning where the Ubers and Lyfts would
2 queue up to pick up students? When you have 1,150
3 beds, we can expect a large volume of Uber and Lyfts
4 throughout the day and especially evening hours.
5 what's that going to do to the traffic on Levering?

6 Also, food delivery trucks, even though it's
7 in the village, students order huge amounts of DoorDash
8 and Postmates and Uber Eats and then the little robots.

9 So I'm just really concerned that I don't think two on
10 site spaces, forgetting the fact that there's no
11 parking for students, and we know students, some of
12 them will still have cars, they all will not live
13 without cars in LA.

14 But putting that to the side, just the daily
15 delivery of food and pickups and so on, I think is
16 inadequate. I also made this comment I know Pete
17 Angelis heard it and thank you.

18 Good to see you, Pete.

19 The sidewalk across the street on the gas
20 station side, it is not The Regent's property, but it
21 is an extremely poor condition. It's a major ADA
22 hazard.

23 And as part of this project, I think it's
24 extremely important that you work with the city to get
25 that replaced because you do not want your students

2-3
(CONT.)

2-4

1 tripping and students who have ADA issues, wheelchairs,
2 etc., should not have to navigate a sidewalk directly
3 across from this building that is in such massively
4 poor shape.

2-4
(CONT.)

5 And I had one last comment I wanted to make,
6 oh my gosh, in my remaining time. Oh, construction
7 during the Olympics. And also whether or not your
8 construction fence is going to impede the sidewalk
9 access on Levering as well, and hopefully you're not
10 going to have a construction fence that will intrude
11 into the street. That would be deeply problematic.

2-5

12 And I know you heard comments from the
13 Northwest Neighborhood Council that there are concerns
14 since this project will be being constructed during the
15 Olympics. How that is going to work, or whether or not
16 there will be a pause in the construction during the
17 Olympic period.

18 So I may have further comments that I'll put
19 in a letter. By the way, I'm speaking as an
20 individual. I am the chairman of the Westwood
21 Community Council. However, our council has not had a
22 chance to see this project. So my comments are my own
23 personal comments and I thank you very much. Thank
24 you.

2-6

25 ASHLEY ROGERS: Thank you, Steve.

1 I'm not seeing any other hands raised or
2 names entered into the chat. Are there any others here
3 in attendance who would like to speak tonight?

4 All right. Short, quiet night, I guess.
5 Well, in that case, I'd like to thank everyone.

6 Thank you, Stephen and Steven for your
7 comments. The public comment period will continue
8 until December 12th, and written comments may be
9 emailed to Erica at esummer -- I'm going to put it in
10 the chat, esummer@capnet.ucla.edu. That's also in the
11 Notice of Intent that you may have received both via
12 email or USPS.

13 Before we close, I'd like to acknowledge a
14 few people who are here tonight. We have Pete Angelis,
15 our Associate Vice Chancellor of Housing and
16 hospitality.

17 Sue Stanton, Associate Vice Chancellor of
18 Capital Planning and Finance, and Peter Hendrickson,
19 Associate Vice Chancellor of Capital Programs Design
20 and Construction.

21 I believe we also have Nick Wai-Poi here,
22 one of the project architects, and we'd like to thank
23 him and the entire design team at Mithun, along with
24 the many consultants and engineers who have helped get
25 us to this point.

1 We have Tina Andersen of T&B Planning, an
2 independent consultant who prepared the CEQA analysis.

3 Also, Ashley McCoy of T&B Planning. They put in a lot
4 of hard work on this document. Thank you.

5 Also to all of our UCLA and UC Office of the
6 President staff who have worked on and supported this
7 project. And finally, thank you to our community
8 members, including our students. Thanks for joining us
9 tonight and providing your comments.

10 We look forward to final written comments.
11 And that's it for tonight. Have a nice evening.

12 PETER HENDRICKSON: Thank you.

13 ASHLEY ROGERS: Good night.

14 (Recording stopped.)

15

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CERTIFICATE

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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
December 2, 2025

ATTACHMENT C
DRAFT INITIAL STUDY, AS REVISED

901 Levering Student Housing Project

Draft Initial Study/Mitigated Negative Declaration

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

November 2025

901 Levering Student Housing Project

Draft Initial Study/Mitigated Negative Declaration

Lead Agency:

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

November 2025

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APPENDICES

Appendix

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- B Tree Survey
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- D Historical Resource Assessment Report
- E Geotechnical Investigation
- F1 Environmentally-Regulated Materials Survey Report
- F2 Phase I Environmental Site Assessment Report
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- J Sewer Capacity Availability Request
- K Fire Service Pressure Flow Report

**901 LEVERING STUDENT HOUSING PROJECT
UNIVERSITY OF CALIFORNIA, LOS ANGELES**

Project No. 908067

Initial Study and Environmental Checklist Form

I. PROJECT INFORMATION

1. PROJECT TITLE

901 Levering Student Housing 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

901 Levering Avenue¹
Los Angeles, California 90024
(Refer to Figure 1 and Figure 2)

5. PROJECT SPONSOR'S NAME AND ADDRESS

Jared Meyer, Senior Director, Maintenance
UCLA Housing & Hospitality
251 De Neve Drive
Los Angeles, California 90095-1317

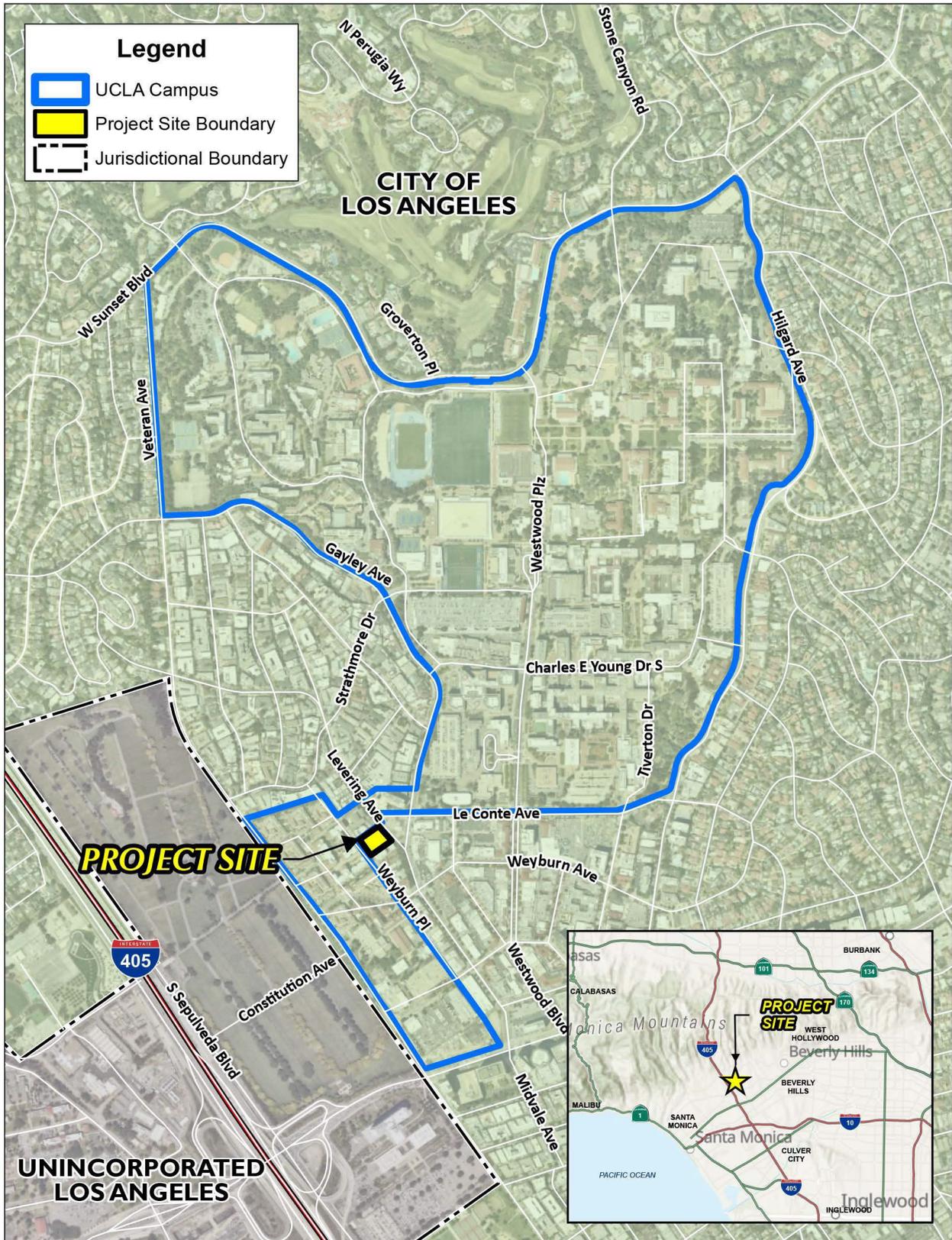
6. CUSTODIAN OF THE ADMINISTRATIVE RECORD FOR THIS PROJECT

Same as listed under No. 3 above.

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

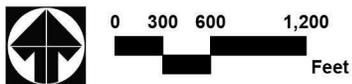
Because the Project site is located off campus, this Initial Study/Mitigated Negative Declaration is not tiered from the UCLA Long Range Development Plan Amendment (2017) and Student Housing Projects Final Subsequent Environmental Impact Report (referred to herein as the "LRDP Final SEIR") (State Clearinghouse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

¹ Assessor Parcel Number (APN) 4363-016-008

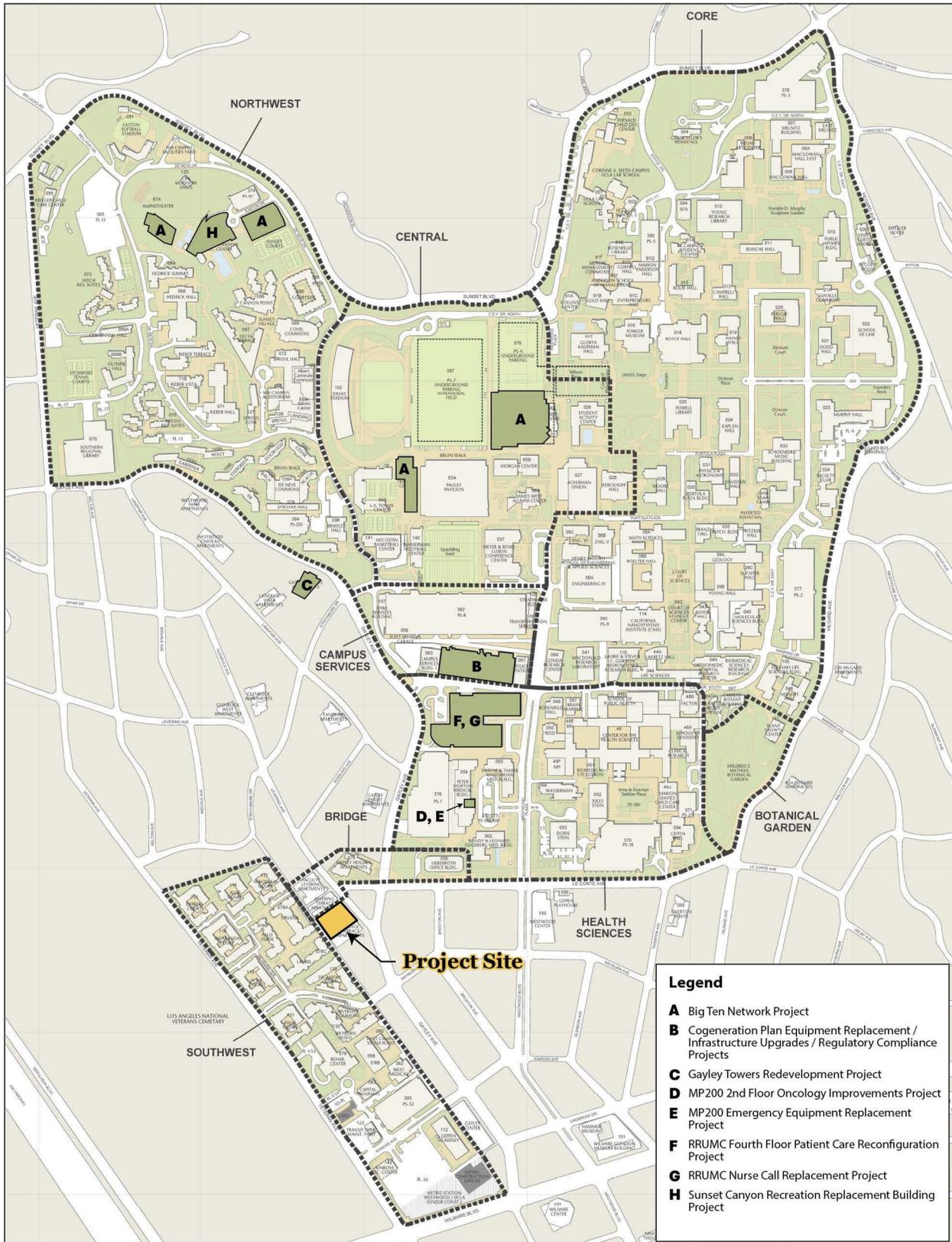


Source(s): Esri, LA County (2025)

Figure 1



Regional and Local Vicinity Map



Source(s): UCLA (April 2023)

Figure 2



Not to Scale

Campus Map and Related Projects

certified by the University of California Board of Regents (The Regents) in January 2018 (UCLA 2018).² The LRDP Final SEIR analyzed the impacts of several student housing projects and was tiered from the UCLA 2008 Northwest Housing Infill Project and Long Range Development Plan Amendment Final Environmental Impact Report (referred to herein as the “2009 LRDP EIR”) [SCH No. 2008051121]), which was certified by The Regents in March 2009 and evaluated construction and operation of the Northwest Housing Infill Project, as well as the remaining buildout of the LRDP. As the LRDP Final SEIR incorporates the 2009 Final EIR by reference, they collectively serve as the California Environmental Quality Act (CEQA) documentation for construction and operation of development on campus and are referred to herein as the “LRDP EIRs.” The LRDP EIRs are available for inspection at the address listed under No. 3 above and available online at:

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

However, pursuant to Section 15150 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines), the LRDP EIRs are 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.

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 901 Levering Student Housing Project (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 Project will not have a significant effect on the environment, and recommended mitigation measures to lessen or avoid impacts on the environment.

As noted above, pursuant to Section 15150 of the CEQA Guidelines, the LRDP EIRs are hereby incorporated by reference. In conjunction with certification of the LRDP EIRs, The Regents adopted a Mitigation Monitoring and Reporting Program (LRDP MMRP). The LRDP MMRP ensures that mitigation measures that are the responsibility of the University of California are implemented in a timely manner. Although the Project site is not located within the UCLA campus, which is subject to the LRDP, this Initial Study identifies relevant PPs and MMs from the LRDP MMRP that would reduce any potentially significant impacts of the proposed Project and includes new MMs identified to reduce Project-specific environmental impacts to a less than significant level, where applicable. The relevant LRDP PPs and MMs have been incorporated into the proposed Project and will be reflected in the Project-specific MMRP. Throughout the Initial Study, where applicable LRDP PPs or MMs have been identified, the PPs and/or MMs are referenced

² 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 of remaining development allocation from the Core zone to the Health Sciences zone.

verbatim from the LRDP EIRs, with any necessary revisions shown in ~~strikeout~~ (deletions) or **bold** and underline (additions) to better apply to the proposed Project. Use of the LRDP numbering system enables the public and other users of this document to cross reference these procedures and measures with the LRDP EIRs and align the mitigation monitoring procedures for the proposed Project with the previously adopted LRDP MMRP.

Following review of the proposed Project, it has been determined that it qualifies as a “project” under CEQA, and the University of California proposes to adopt an MND. In accordance with the CEQA Guidelines, an MND is the appropriate environmental document for the proposed Project because, after incorporation of applicable LRDP PPs and MMs and Project-specific MMs, the proposed Project would not result in any significant and unavoidable impacts. All Project impacts that are potentially significant even with incorporation of LRDP PPs and MMs, can be mitigated to a level that is considered less than significant with the incorporation of Project-specific MMs. Therefore, this Initial Study identifies and proposes for adoption Project-specific MMs to reduce Project-specific environmental impacts related to geology and soils and noise. 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 Project.

This Initial Study, along with a Notice of Intent to Adopt an MND, has been posted on the Governor’s 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 at its meeting in March 2026.

UCLA is part of the University of California (UC) system, a constitutionally created entity of the State of California with “full powers of organization and government” (California Constitution Article IX, Section 9). As a constitutionally created State entity, UC is not subject to the regulations of local agencies, such as city and county general plans, land use policies, and zoning regulations, whenever using property under its control in furtherance of its educational purposes. UCLA is not required to consider local plans, policies, and regulations in its evaluation of the environmental effects of a project unless UCLA expressly decides to use a local plan, policy, or regulation as a threshold or standard of significance or if UCLA determines that local plans, policies, or regulations provide important context for the assessment of environmental impacts.

II. PROJECT DESCRIPTION

The proposed Project would develop new student housing facilities on the approximately 0.74-acre Project site located at 901 Levering Avenue. Specifically, the proposed Project would involve the development of a 19-level, up to approximately 310,000-square-foot (sf) residential structure with external courtyards at the ground level and a terrace on the second level. There would be approximately 148 apartments and up to approximately 1,150 beds provided. To accommodate the proposed development, the proposed Project includes the demolition of five existing University-owned two- and three-level apartment buildings, totaling approximately 23,952 sf, on the Project site. More detailed information regarding the Project Description is provided in Section II.5, Proposed Project Components, below.

1. PROJECT LOCATION

The proposed Project is located at 901 Levering Avenue, which is in the community of Westwood in the City of Los Angeles (City), approximately 11 miles west of downtown Los Angeles and five miles from the Pacific Ocean (refer to Figure 1, which depicts the regional location and local vicinity). Figure 2 provides a map of the UCLA campus and specifically shows the location of the proposed Project adjacent to the campus. As shown, the Project site is adjacent to the Bridge and Southwest zones of the UCLA campus. The property is surrounded on three sides by UCLA-owned student housing.

For purposes of this Initial Study, the “Project site” is the proposed 901 Levering Student Housing Project building site, and the “Project area” includes the area that encompasses the proposed building site and the immediately surrounding areas, including off-site and adjacent areas that may be disturbed during construction, as described in Section II.5, Proposed Project Components.

2. ENVIRONMENTAL SETTING

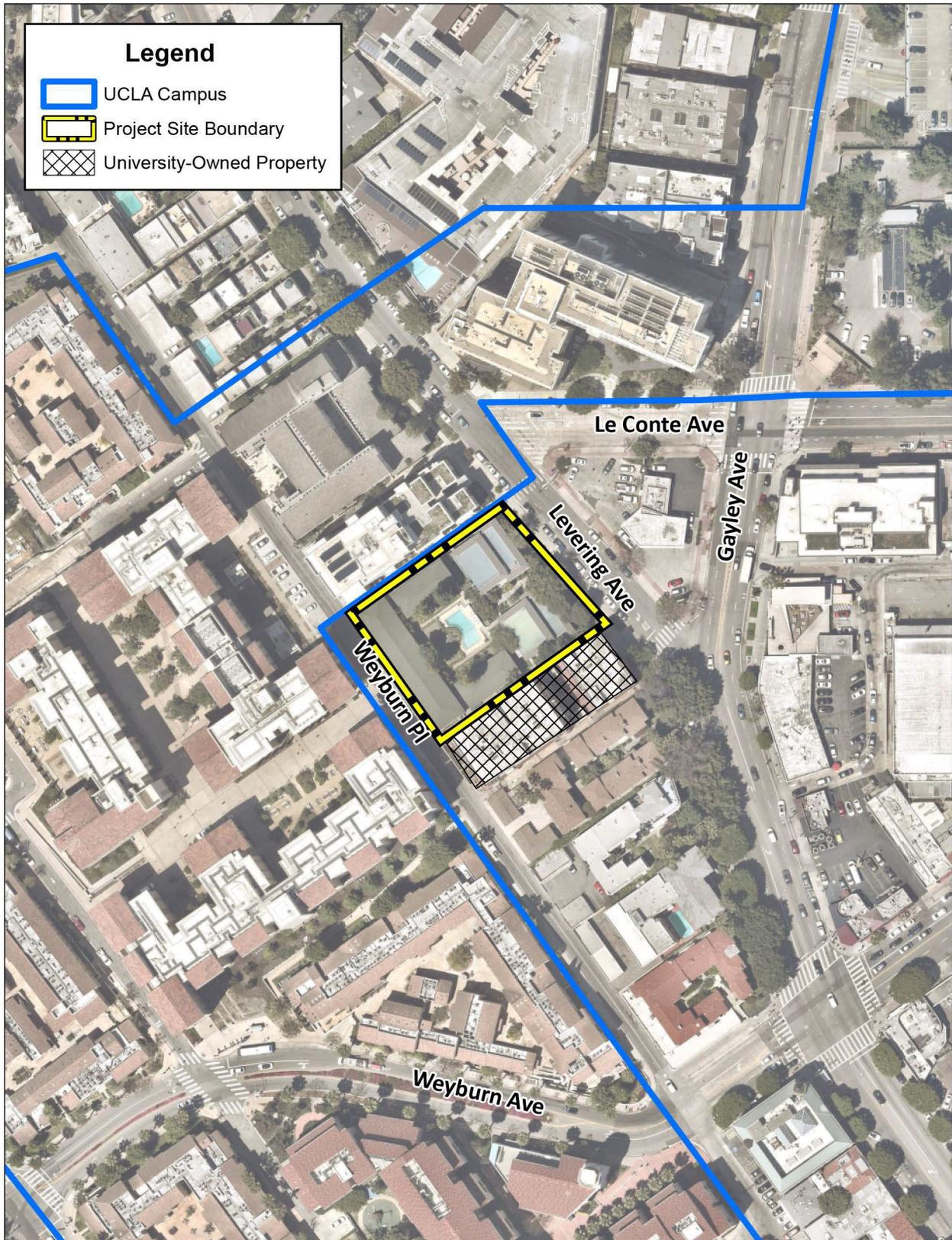
As shown on the aerial photograph provided on Figure 3 and the site survey provided on Figure 4, the approximately 0.74-acre Project site is currently developed with five existing two- and three-level apartment buildings, totaling approximately 23,952 sf. The existing buildings were constructed between 1946 and 1948 and include 42 residential units (10 two-bedroom units and 32 studio apartments), housing up to 52 residents. The existing buildings have a U-shaped configuration around a landscaped interior courtyard and a pool. On the southwest side of the site there are 14 one-car garages located on the ground level of the Project site adjacent to and accessible via Weyburn Place. There are metered street parking spaces along both sides of Levering Avenue immediately in front of the Project site. The main pedestrian entry to the existing property is along Levering Avenue, with two additional gated entrances along Weyburn Place.

The elevations of the Project site range from approximately 337 feet above mean sea level (amsl) at the southeast corner to approximately 386 feet amsl at the northwest corner. As shown on the site survey provided in Figure 4, there are existing retaining walls along the northwest, northeast, and southeast sides of the property with additional retaining walls throughout the property. Exterior concrete stairs are provided along the northwest and southeast sides of the site, as well as at the main entrance from Levering Avenue. Existing site conditions are depicted on the site photographs provided in Figure 5a through Figure 5c.

There is a dense mix of urban development in the vicinity of the Project site, with varied architectural styles, building massing, and building heights, which are predominantly occupied by students. The Project site is surrounded by existing student housing within the UCLA campus Bridge zone³ to the northwest and north. Levering Terrace, a 10-story student housing building, is adjacent to the Project site to the northwest, and the 17-story Gayley Heights building is located to the north, across Levering and Le Conte Avenues. Existing eight- and nine-story residential buildings at the Weyburn Terrace student housing complex within the Southwest zone⁴ are located to the west of the Project site across Weyburn Place (an existing alley).

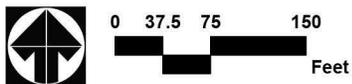
³ The Bridge zone forms a physical land connection between the main campus zones and the Southwest zone and contains the Ueberroth Building, which houses various UCLA offices; student housing; and faculty apartments.

⁴ The Southwest zone is developed with a variety of uses including, but not limited to the Geffen Academy, Kinross Recreation Center, UCLA Extension, surface and structured parking, student housing, medical research and clinical functions, administrative functions, scientific research, transit facilities, a steam plant, and Los Angeles Fire Station No. 37.

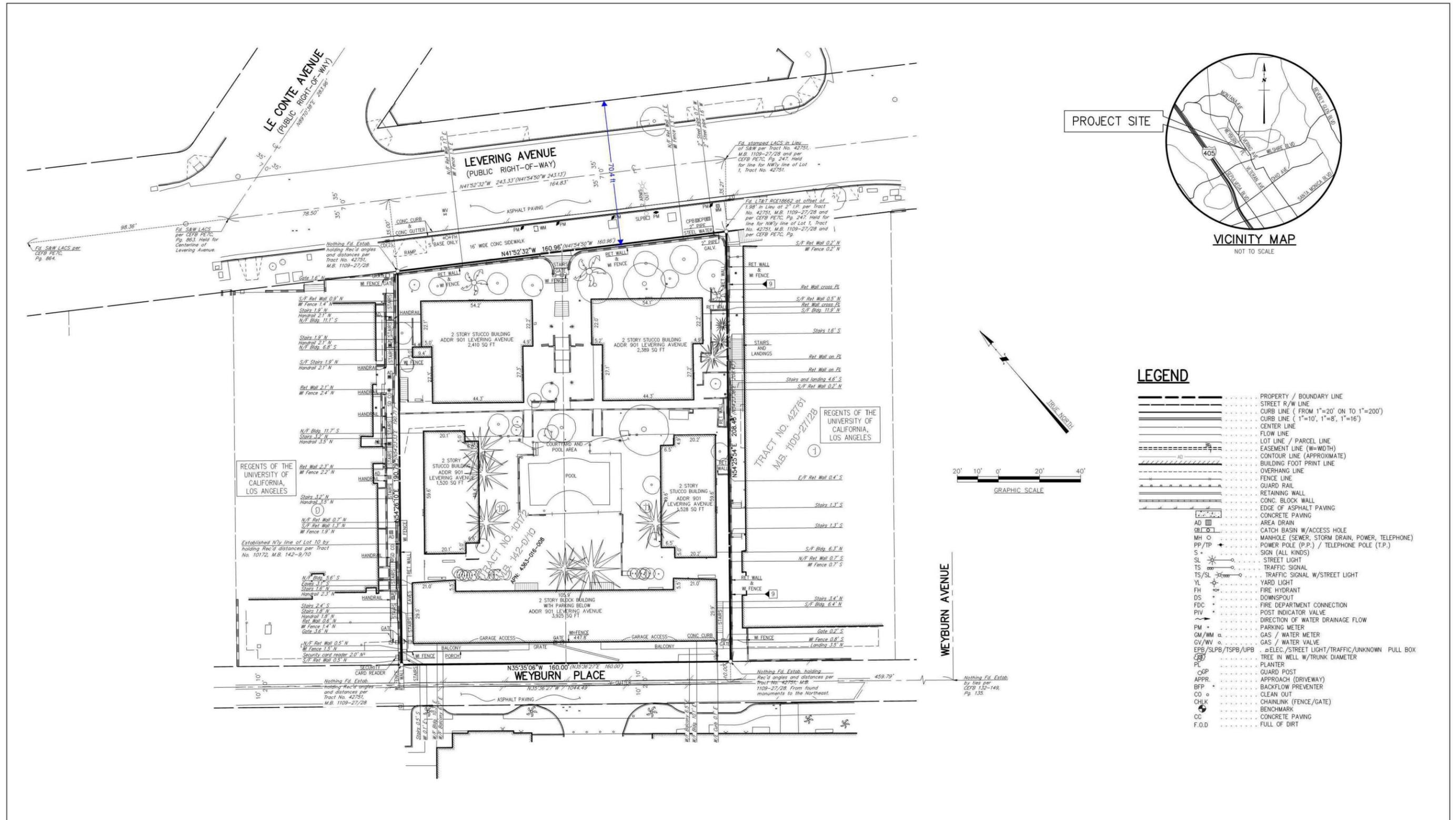


Source(s): Esri, Nearmap Imagery (April 2025)

Figure 3

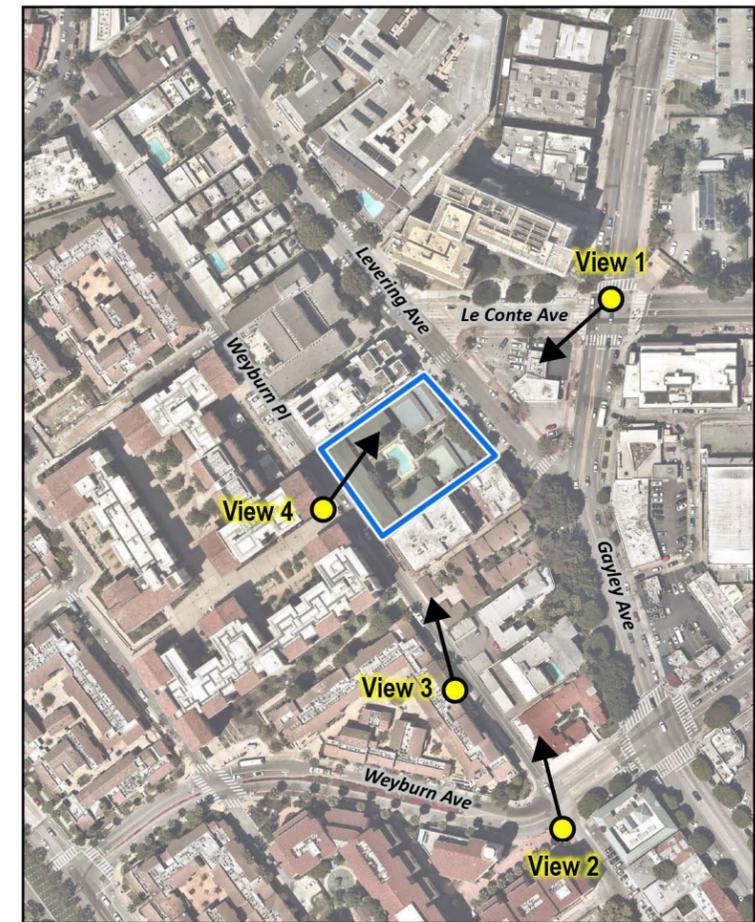


Aerial Photograph



Source(s): Mithun (01-15-2025)

Figure 4



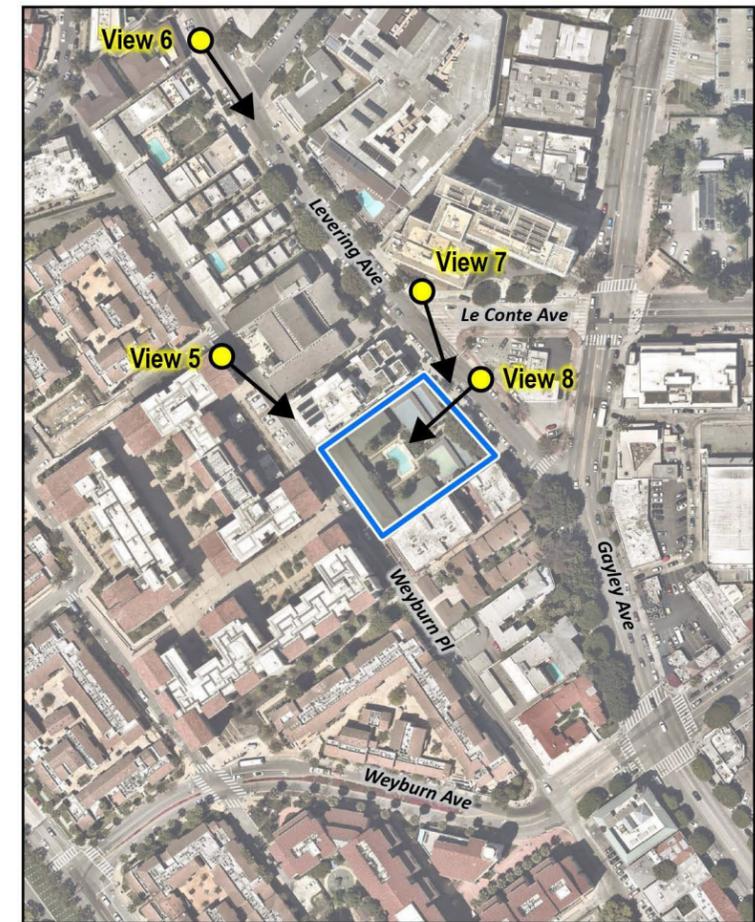
Source(s): Esri, Nearmap Imagery (April 2025)



Figure 5a

Not to Scale

Site Photographs

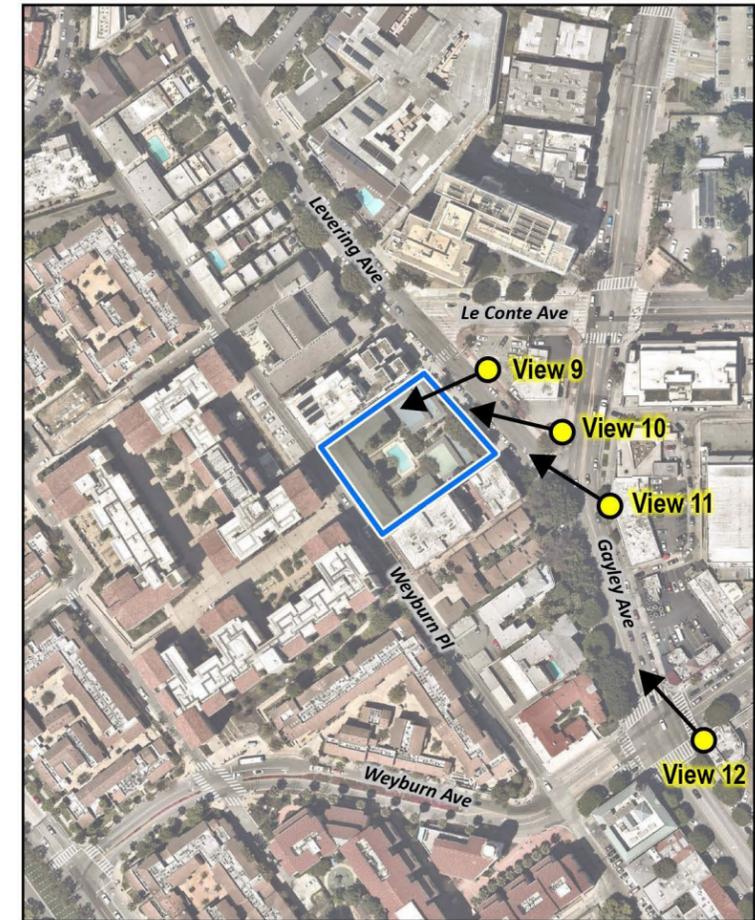


Source(s): Esri, Nearmap Imagery (April 2025)

Figure 5b

Not to Scale

Site Photographs



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

Figure 5c

Not to Scale

Site Photographs

Village Terrace, a University-owned six-story faculty housing building, is located adjacent to the Project site to the southeast. An existing Chevron gas station is located to the east across Levering Avenue, and the areas further to the east and southeast are developed with commercial uses in Westwood Village.

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

The Project site is underlain by artificial fill to a maximum depth of 6.5 feet below the ground surface (bgs) and older Pleistocene age alluvial fan deposits beneath the artificial fill to the maximum depth explored of 81 feet bgs. Regionally, the Project site is in a seismically active area; the nearest surface trace of an active fault is the Hollywood Fault, approximately 0.5-mile to the north. There are no known active or potentially active faults that underlie the Project site. Perched groundwater was encountered in two borings near the western side of the Project site at a depth of 58.5 feet bgs at an elevation of 322.5 amsl and 68 feet bgs at an elevation of 313 feet amsl, respectively, and the historically highest groundwater level in the area is approximately 30 feet bgs. (Geocon, 2025)

As further discussed in Section V.4, Biological Resources, of this Initial Study, 18 mature trees occur within the Project site limits, none of which are protected species as defined in the LRDP EIR. There are no natural vegetation, stream channels, or otherwise sensitive hydrologic or biological resources within or near the Project site. Existing water, sewer, drainage, electric, and telecommunications infrastructure is located in the roadways adjacent to the Project site, as further discussed in Section II.5, Utilities/Infrastructure, below.

Due to its constitutional autonomy, the University of California is not subject to local land use regulations. However, for contextual purposes, the Project site and adjacent parcels have City of Los Angeles General Plan land use and zoning designations for dense multi-family residential uses (City of Los Angeles, 2025).

3. BACKGROUND AND NEED FOR THE PROPOSED PROJECT

Over the past several decades, UCLA has evolved from a predominately commuter campus into a thriving residential community, and the on-campus supply of undergraduate beds has increased from approximately 4,300 to 15,302 between 1986 and 2025. Additionally, UCLA's off-campus housing supply currently includes 5,156 undergraduate beds. With the completion of recent student housing projects, UCLA has increased its housing guarantee to four years for incoming first-year students and two years for incoming transfer students. Achieving this guarantee achieves a long-held aspiration set forth in the UCLA Student Housing Master Plan 2016-2026 (UCLA, 2017) and responds to directives from The Regents to increase the student housing supply.

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

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

- Affordability and living options must be considered in developing the student housing program.
- Limited land and resources require a high-density living model in order to maximize the number of students housed, with a focus on a high-quality living experience.
- University housing helps create a supportive and cohesive student community by integrating the housing program with other aspects of campus life.
- Allocation strategies must be refined to ensure that housing resources support academic program objectives and student recruitment and retention goals.

UCLA currently houses approximately 60 percent of all undergraduates in a combination of on- and off-campus housing. Approximately 40 percent of undergraduate students opt out of UCLA housing, and it is assumed that cost is a key factor in these decisions. However, the residential community surrounding UCLA is a desirable market and supply is limited. (CBRE, 2022).

The existing 901 Levering Avenue apartment buildings, which were constructed between 1946 and 1948 and recently purchased by The Regents, accommodate 52 residents in 10 two-bedroom and 32 studio units. As of October 2025, there are two existing residents, none of whom are UCLA students. The proposed Project, with a total of 148 units and up to 1,150 beds, would increase the capacity of the Project site by up to 1,098 beds, all allocated to UCLA undergraduate students.

4. PROJECT OBJECTIVES

The objectives of the proposed 901 Levering Student Housing Project are consistent with UCLA's academic, research, and community service mission as follows:

- Provide up to 1,150 undergraduate student beds near campus to address current and anticipated demand consistent with the continued transformation of UCLA from a commuter to a residential campus.
- Maintain UCLA's housing guarantee to all undergraduate students.
- Introduce new off-campus, University-owned housing units to help relieve the demand for on-campus housing, thus reducing room occupancy densities and maintaining an optimal level of density across the on-campus community.
- Provide updated and modern student housing facilities that improve the quality of student life, support their academic experience, and encourage their personal and social development. Provide undergraduate housing that is sensitive to the surrounding neighborhood context and maintains and maximizes the use of limited land resources.
- Continue the infill development of the area adjacent to the UCLA campus, which reduces vehicle miles traveled, energy consumption, and associated greenhouse gas emissions.
- Plan, design, and implement the proposed Project in a manner consistent with the UC Policy on Sustainable Practices.
- Plan, design, and implement the proposed Project within the practical constraints of available funding sources, including the need to maintain affordable University-owned housing fees subject to the requirements of Assembly Bill (AB) 183, which implements the Higher Education Student Housing Grant Program.⁵

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

5. PROPOSED PROJECT COMPONENTS

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

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

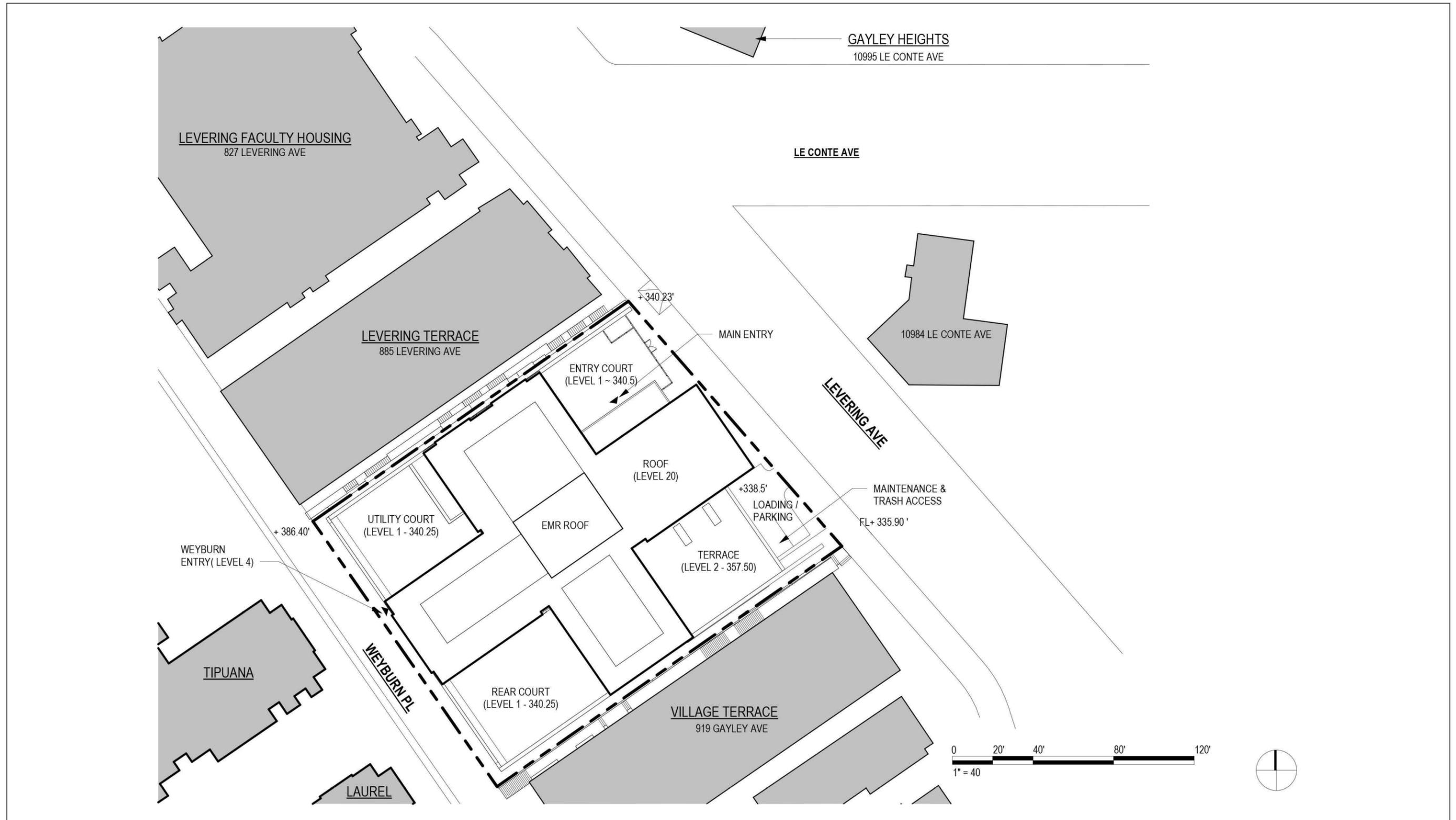
901 Levering Building and Operational Characteristics

The proposed Project involves the construction of an approximately 310,000-sf, 19-story apartment building. The proposed Project would provide up to 1,150 beds within a combination of one-, two-, three-, and four-bedroom units. Specifically, the proposed Project would include a single one-bedroom apartment, four two-bedroom townhouse-style units, four three-bedroom apartments, and the majority of units would be four-bedroom apartments. Most units would include two beds per room, while a few unit configurations would have larger bedrooms with up to four beds. When compared to the existing development, the proposed Project would result in a net increase of up to 1,098 beds (residents) and a net increase of up to 286,048 sf of development.

The conceptual site plan for the proposed Project is provided on Figure 6; the conceptual floor plans for the new structure are provided on Figure 7a through Figure 7e; and building sections are provided in Figure 8. As illustrated, the proposed building would be located in the center of the site, and common courtyard/terrace areas would be oriented toward Levering Avenue to activate the street. The elevators and stairs would be located in the center of the building. As shown in the building elevations, the roofline would be approximately 213 feet above the lowest adjacent ground level along Levering Avenue, with a total building height along Levering Avenue of approximately 238 feet to the top of the mechanical screen. The roofline would be approximately 160 feet above the lowest adjacent ground level along Weyburn Place, with a building height along Weyburn Place of approximately 184 feet to the top of the mechanical screen.

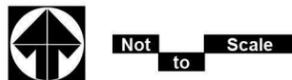
As shown on the conceptual floor plans provided in Figure 7a through Figure 7e, in addition to several of the smaller apartment units, Level 1 would include a lobby/lounge connected to the main entry court, laundry facilities, a mail/package room, housekeeping and maintenance, mechanical equipment rooms, a trash room, offices, a vending area, as well as bike parking and an outdoor covered fitness area in the rear court. Level 2 would include apartments and a common study lounge, with two small group study rooms, that would connect to the outdoor terrace. Apartments would be provided on Levels 3 through 19, with two small study rooms provided on Level 4 near the Weyburn Place (rear) entrance.

Figure 9a through Figure 9c provide conceptual building renderings that depict the proposed building massing and preliminary architectural design. The exterior material palette would be comprised of durable and timeless materials selected to respond to the existing neighborhood and campus context. Building materials and exterior finishes would potentially include ultra-high performance concrete panels, large format fiber-cement panels, metal panels, stucco, porcelain



Source(s): Mithun (05-28-2025)

Figure 6



Conceptual Site Plan

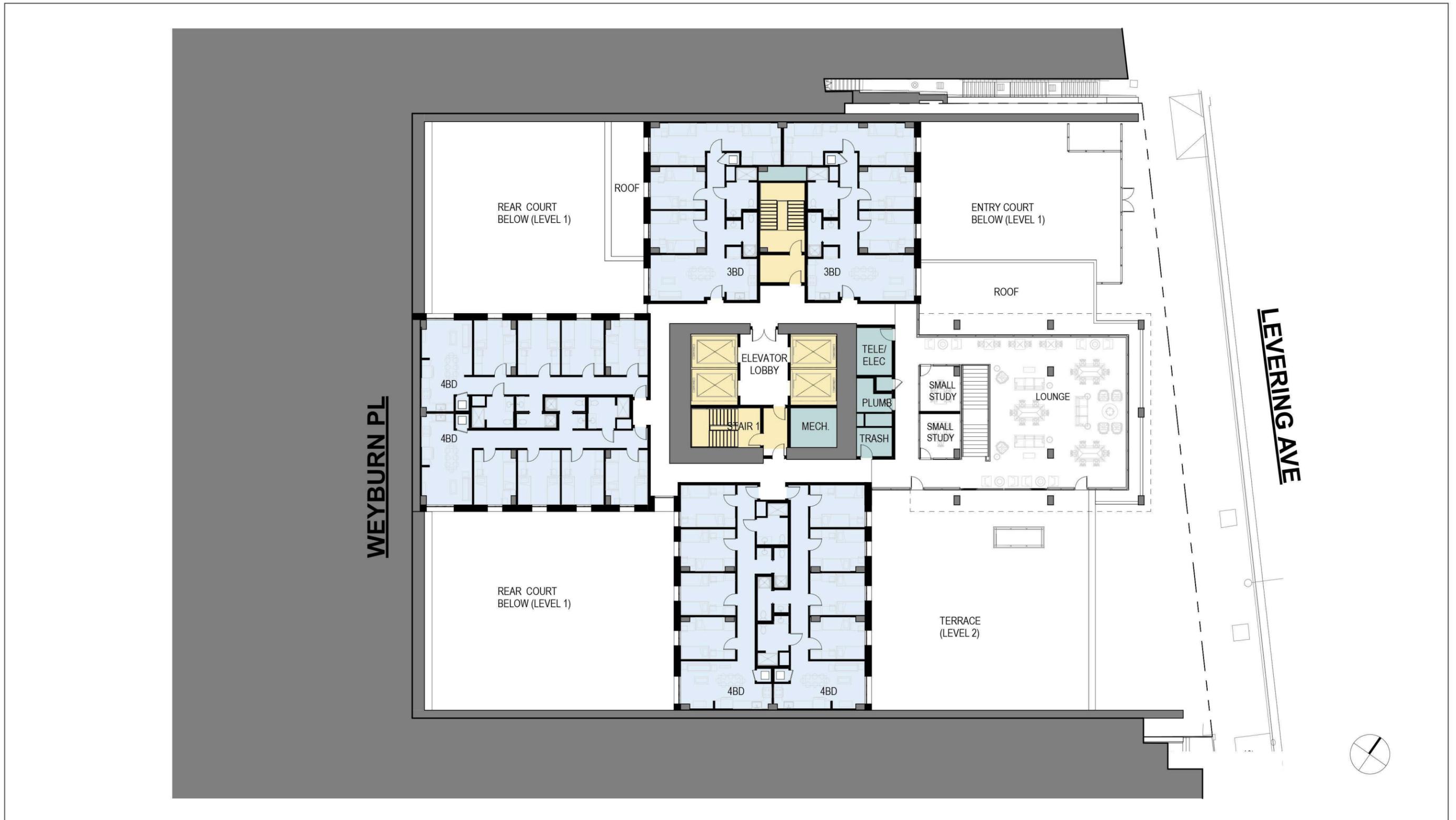


Source(s): Mithun (09-08-2025)

Figure 7a

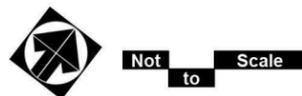
 Not to Scale

Floor Plan - Level 1

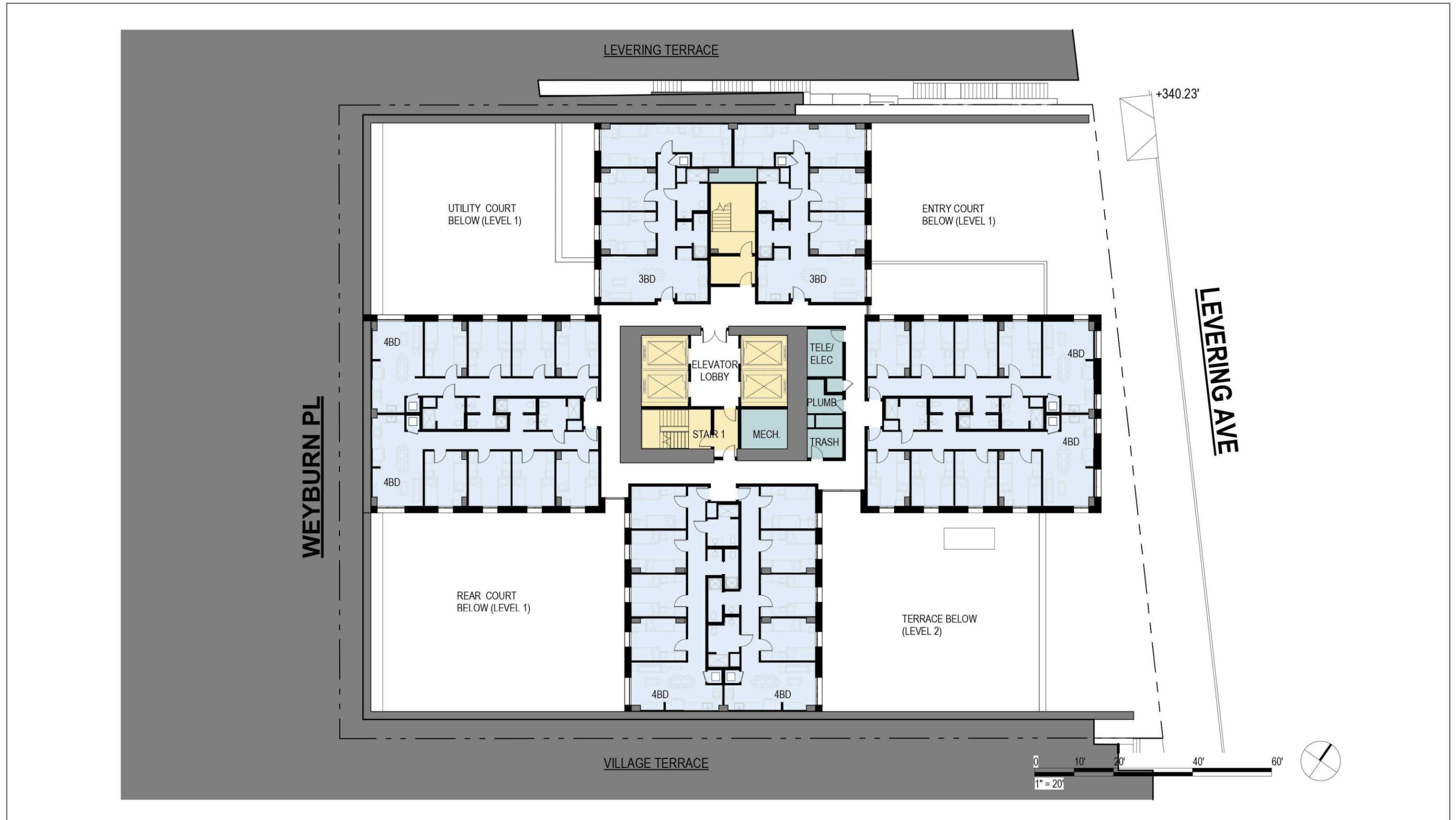


Source(s): Mithun (09-08-2025)

Figure 7b

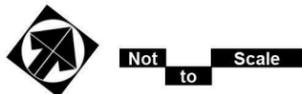


Floor Plan - Level 2



Source(s): Mithun (09-08-2025)

Figure 7c

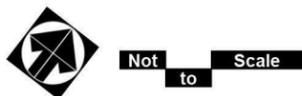


Floor Plan - Level 3



Source(s): Mithun (09-08-2025)

Figure 7d

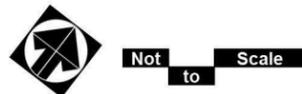


Floor Plan - Level 4

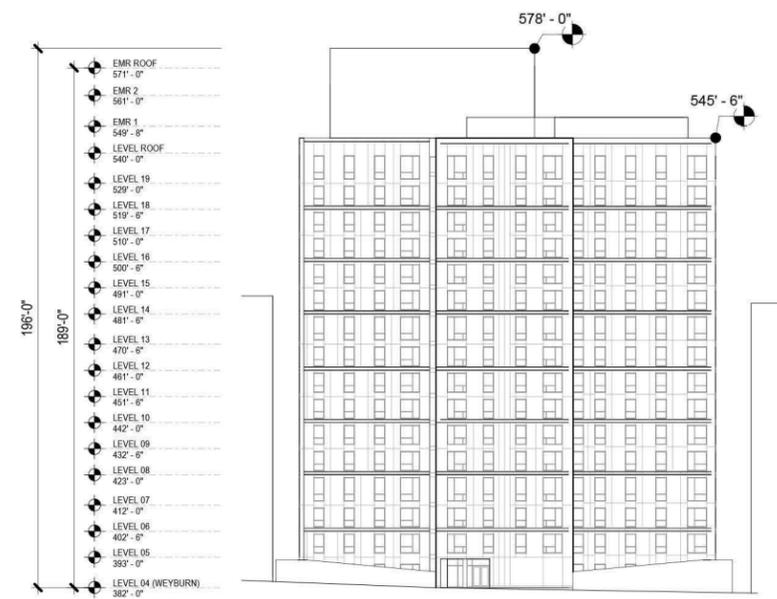


Source(s): Mithun (09-08-2025)

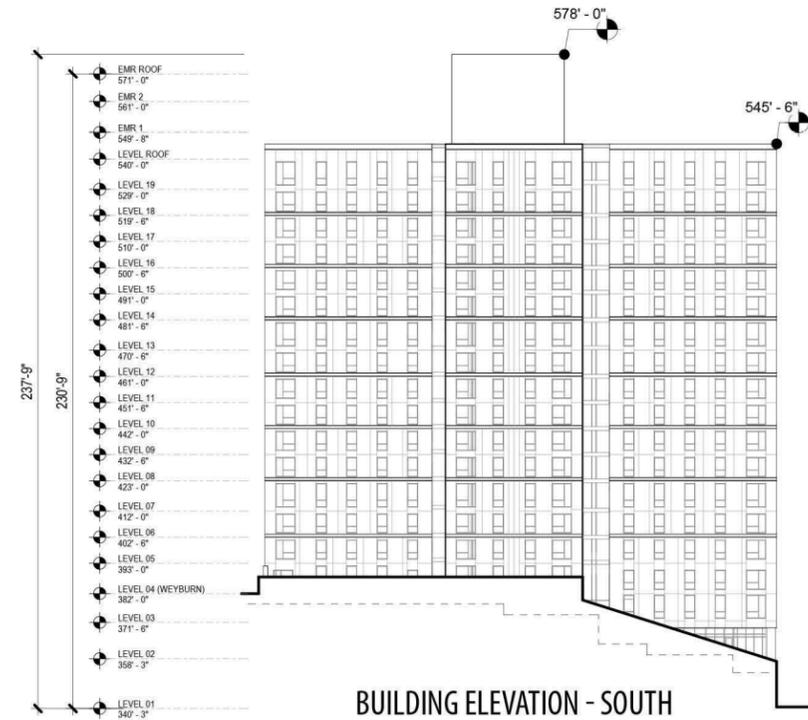
Figure 7e



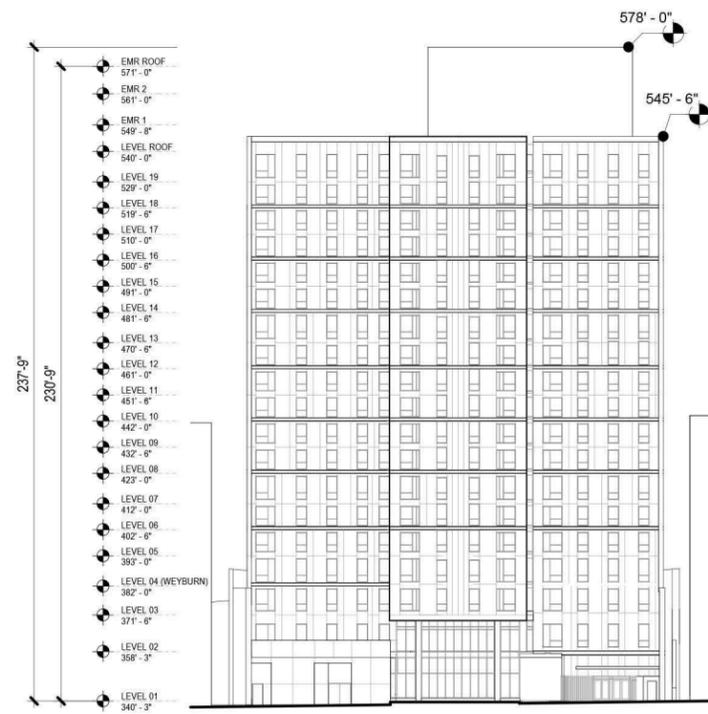
Floor Plan - Level 5-19



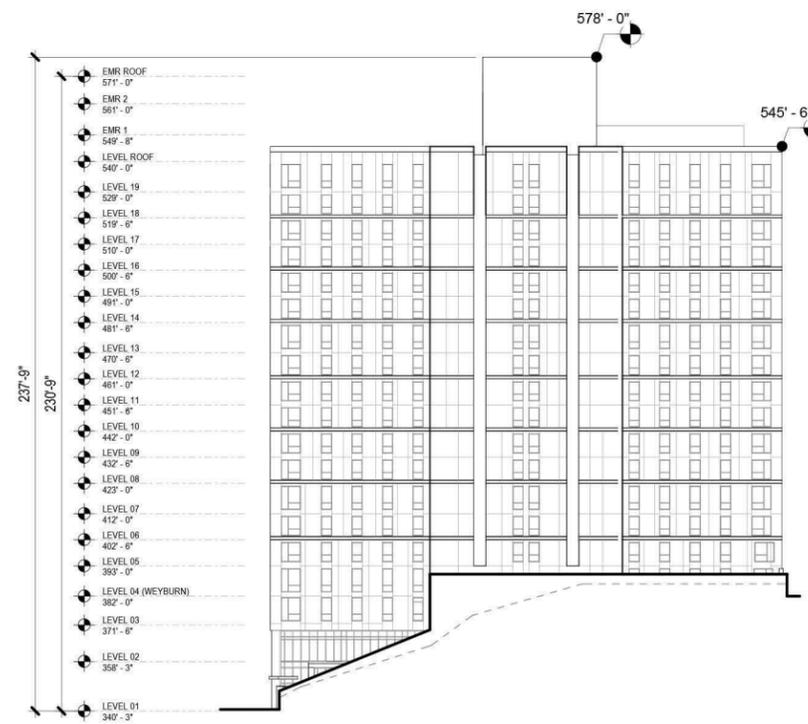
BUILDING ELEVATION - WEST-Weyburn Pl.



BUILDING ELEVATION - SOUTH



BUILDING ELEVATION - EAST-Levering Ave.



BUILDING ELEVATION - NORTH

Source(s): Mithun (08-19-2025)

Figure 8

Not to Scale



Aerial Perspective Looking West

Source(s): Mithun (09-15-2025)

Figure 9a

Not to Scale

Conceptual Building Rendering



Street Perspective Looking Toward Entry Court

Source(s): Mithun (05-12-2025)

Figure 9b

Not to Scale

Conceptual Building Rendering



Street Perspective from Weyburn Place and Weyburn Avenue

Source(s): Mithun (05-12-2025)

Figure 9c

Not to Scale

Conceptual Building Rendering

or stone tile, metal, and glass. More specifically, the base of the building would consist of stucco with tile accents, while the exterior envelope of the upper stories would consist of a blend of stucco, ultra-high performance concrete panels or large format fiber-cement panels, metal panels, and metal-clad windows.

All bedrooms would be oriented (via window openings) towards the building exterior in order to provide natural light. Window glass would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside. Energy efficient LED signs would be provided at exits, stairwells, along the paths of egress on every floor, and where required by code. In addition to low-reflective glass, the proposed building design would incorporate a mix of the following bird-safe design elements to minimize potential bird strikes: solid, opaque cladding; residential-sized windows, interior blinds, and UV-reflecting film applied to glass surfaces.

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

Circulation and Parking

The proposed Project would not include on-site vehicular parking for residents or guests. Should residents need parking, parking permits would be available for existing spaces on the UCLA campus. As shown on Figure 10, the proposed Project includes a loading/parking area on the east side of the Project site that would be accessed from a new 16-foot-wide driveway along Levering Avenue. This area would be used for maintenance and trash access and would provide a maximum of two parking spaces for service vehicles and deliveries. The proposed Project may involve the removal of up to six metered parking spaces along Levering Avenue adjacent to the Project site in order to provide a new curb cut and a new red curb at the Levering Avenue frontage, if required by the Fire Marshal; any such removals would be coordinated with the City of Los Angeles. On-site alternative transportation facilities would include 16 long-term bicycle parking spaces in a secured, large, covered cage with individual bike racks in the courtyard in the western portion of the Project site.

On-site access and stairways would comply with the Americans with Disabilities Act (ADA) requirements. An electronic key card security system would provide secure access to the building. Pedestrian access to the proposed building would be provided from the main entry courtyard on Levering Avenue and from an entryway on Level 4 at Weyburn Place (refer to the site access plan provided on Figure 10). The existing Levering Avenue sidewalk fronting the Project site would be replaced in accordance with the City's sidewalk standards, and the curb and gutter would be repaired. Additionally, the existing curb cut for the crosswalk adjacent to the northern corner of the Project site would be improved to meet current ADA requirements.

Project residents would have access to a full range of existing campus Transportation Demand Management (TDM) programs, including but not limited to: complimentary campus transit; subsidized public transit passes; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; and an on-campus car share program. Additionally, the Project site is located within a short walk of the Metro D Line Westwood/UCLA Station which is currently under construction.

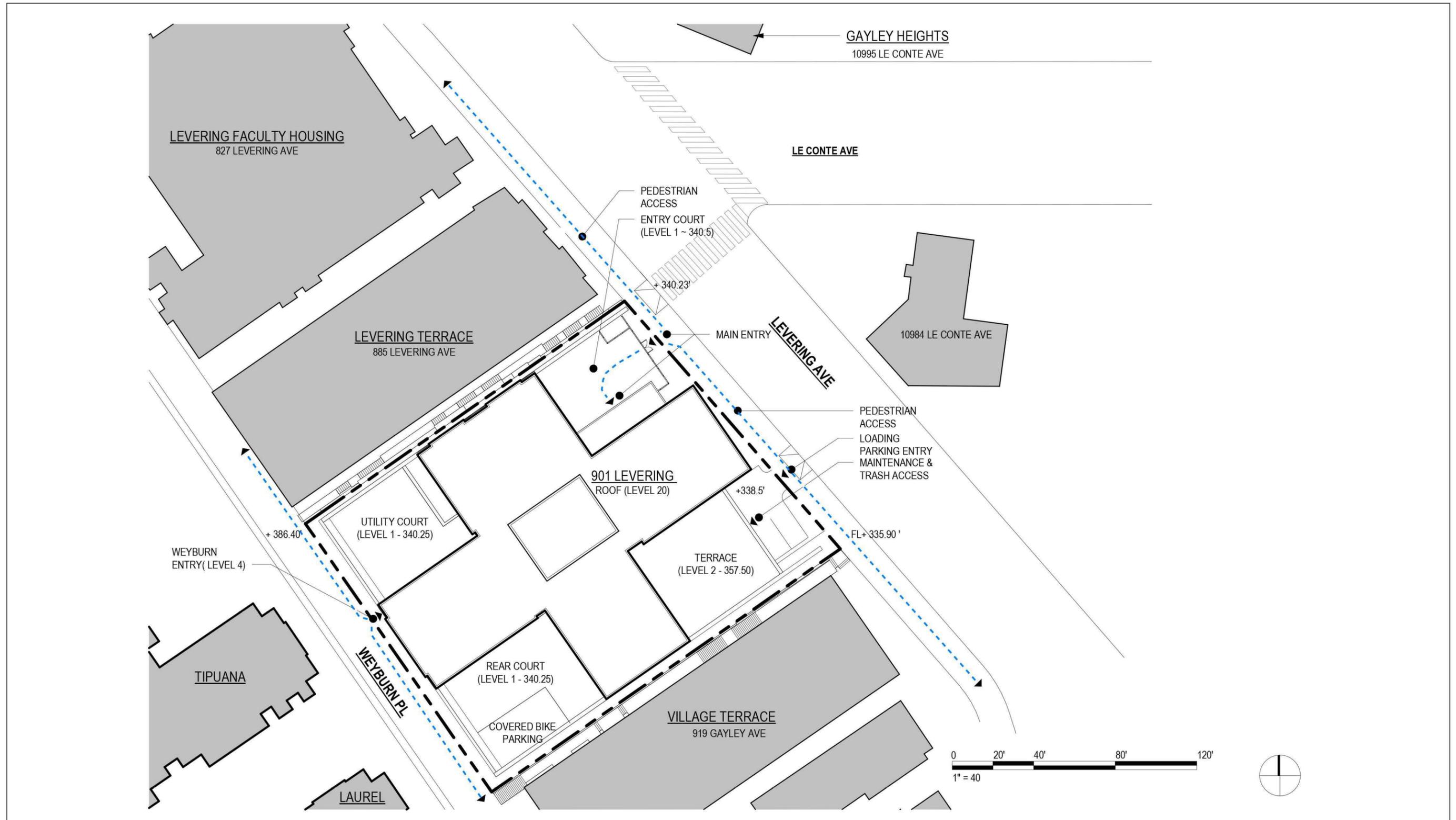


Figure 10



Outdoor Amenities, Landscape/Hardscape, and Exterior Lighting

As shown on the conceptual landscape plans provided on Figure 11, the proposed Project would include three courtyards on the ground level: an approximately 2,150-sf landscaped entry courtyard with custom seating in the northern corner of the Project site, an approximately 2,250-sf partially landscaped utility courtyard containing a fire water storage tank and a generator in the western corner of the Project site, and an approximately 3,050-sf rear courtyard with a covered fitness area, landscape planters, and bicycle parking in the southern corner of the Project site.

An approximately 3,150-sf outdoor terrace would be provided in the southeastern corner of Level 2, which would include landscaped planters as well as tables, chairs, and other seating elements. These courtyards would provide opportunities for formal and informal interaction, socialization, and study activities. Landscaping on-site would include native and drought-tolerant plant species.

Implementation of the proposed Project would require the removal of the limited existing ornamental vegetation on-site, including 18 mature trees (refer to the discussion of Biological Resources in Section V.4). The proposed Project would provide one new tree for every one mature tree removed. As shown on Figure 11, in addition to landscaping within the proposed courtyards, landscaping would be installed along Levering Avenue and Weyburn Place. There would be a total of approximately 4,200 sf of landscaped area within the Project site. The new landscape palette would include trees, shrubs, groundcovers, and vines, with an emphasis on California native and climate-adapted plants that thrive well with low water use and minimal maintenance. Plantings within the public right-of-way would include new street trees along Levering Avenue and would be consistent with City of Los Angeles standards. Controlled irrigation systems would be provided to ensure water efficiency.

Low-level outdoor lighting would be used for security, wayfinding, and aesthetic purposes and would comply with UC energy use standards, which are generally more stringent than Title 24 requirements. Additionally, any outdoor lighting would be shielded and/or directed toward the Project site to minimize light spillover.

Utilities

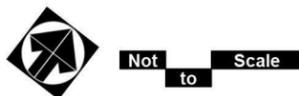
The proposed Project would require connections to existing utilities (domestic water, sewer, telecommunications, and electrical systems) that are currently located along Levering Avenue, Weyburn Place, and within the Levering Terrace Apartments property to the immediate northwest. The proposed Project would not involve the use of natural gas; therefore, existing natural gas service to the site would be capped prior to demolition of the existing buildings. The following is a description of proposed utility systems, including drainage facilities and water quality Best Management Practices (BMPs), which are shown on Figure 12:

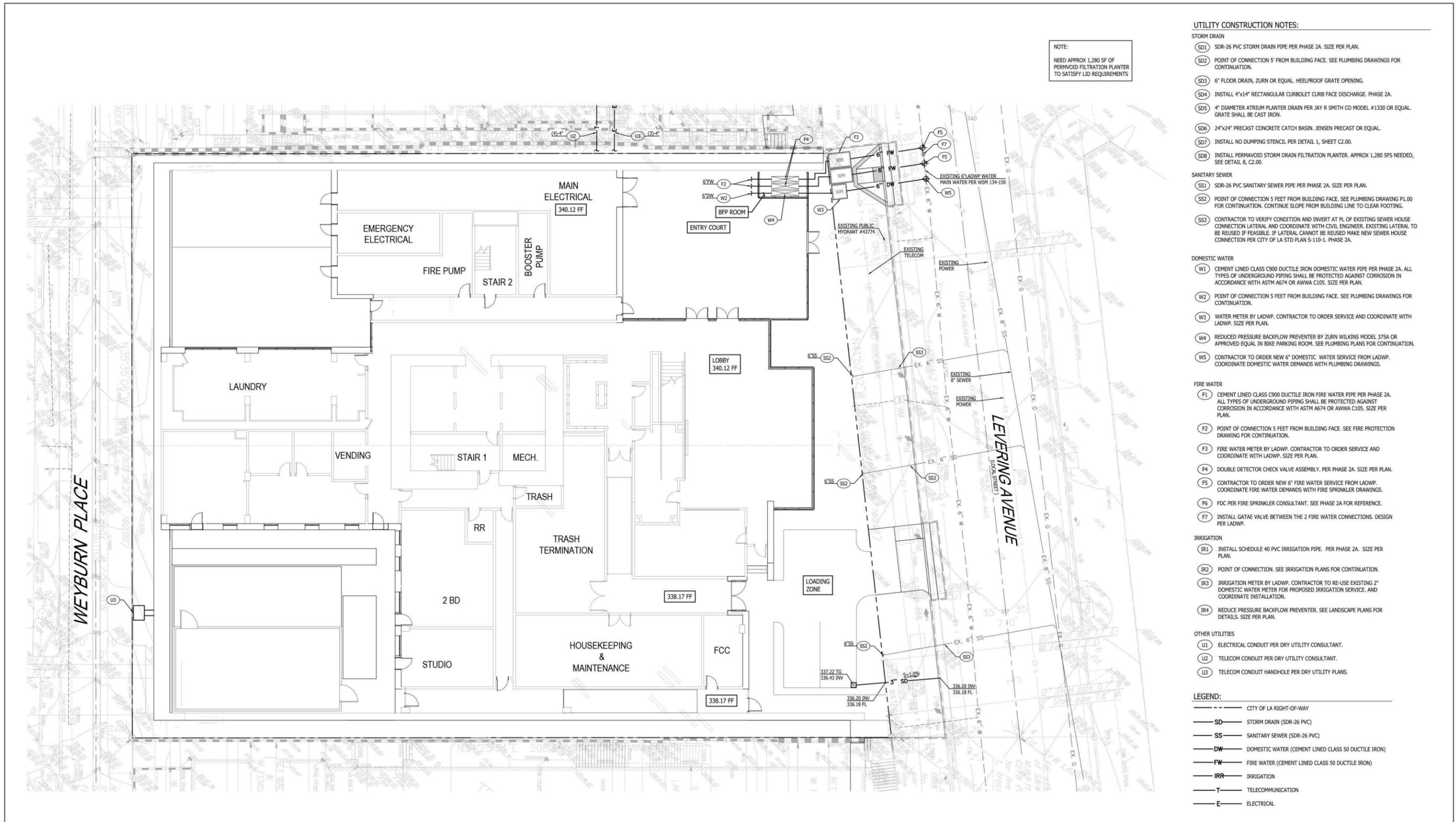
- **Water** – Domestic, irrigation, and fire water needs of the proposed Project would be served via the installation of lateral connections to an existing 6-inch Los Angeles Department of Water and Power (LADWP) domestic water main located within Levering Avenue. These would include a 6-inch lateral for domestic water, two 6-inch laterals for fire water, and a 1.5-inch lateral for irrigation. The two fire water connections would fill the fire water storage tank located by the proposed utility courtyard in the western portion of the Project site.
- **Sewer** – The proposed Project would include the installation of 6-inch sewer laterals that would connect to the existing 8-inch City of Los Angeles sewer main within Levering Avenue. Based on the Sewer Capacity Availability Request (SCAR) approved by the City of Los Angeles Bureau of Engineering (BOE) and included in Appendix J of this Initial



Source(s): Mithun (06-09-2025)

Figure 11





Source(s): Mithun (06-03-2025)

Figure 12



Conceptual Utility and LID Plan

Study, the proposed Project's estimated maximum discharge of 80,500 gallons per day (gpd) could be accommodated in the downstream sewer lines and no off-site improvements would be necessary (City of LA BOE, 2025).⁶

- **Drainage and Water Quality** – No storm drains exist in Levering Avenue or Weyburn Place or in the vicinity of the Project site. New site area drains would be installed, and storm drain pipes would be sized to convey the peak runoff from a 25-year storm event, with pipes flowing no greater than 75 percent full in compliance with City requirements. Additionally, Low Impact Development (LID) design elements would satisfy current City of Los Angeles requirements to capture and treat the 85th percentile runoff volume. Due to site conditions, infiltration is not considered feasible. Roof drain downspouts would be routed to Permavoid filtration planters; it is estimated that 1,275 sf of Permavoid filtration planters are required to treat the 85th percentile runoff volume. The on-grade hardscape, including the proposed courtyards, would include permeable pavers in some areas which would also serve to treat stormwater. All excess runoff would be routed to the street through storm drain lines and through the curb to Levering Avenue, consistent with existing conditions. As further discussed in Section V.10, Hydrology and Water Quality, of this Initial Study, although pervious area on-site would be reduced, the amount of storm water runoff entering the public storm drain system would remain consistent with existing conditions due to the filtration planters. The required final sizing of structural BMPs would be determined as part of the site-specific hydrology evaluation and would be based on the regulatory requirements of the applicable National Pollutant Discharge Elimination System (NPDES) permit at the time of construction.

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

- **Electricity and Telecommunications** – Electricity would be supplied to the proposed building by LADWP via connections to existing lines located within Levering Avenue. The main electrical room for the proposed Project would be located on Level 1 and would include electrical distribution for the proposed building. The electrical system would connect to the campus loop inside the University-owned Levering Terrace Apartments building adjacent to the Project site to the northwest. One diesel emergency generator would be installed in the utility courtyard to support the life safety loads and legally required stand-by loads for the proposed building. While monthly testing would only require 30 minutes of generator usage, for purposes of analysis, it is conservatively assumed that the generator would operate for a total of 50 hours per year to reflect possible emergency use.

Telecommunications services to the proposed building would be provided by a local internet provider with distribution by UCLA Digital & Technology Solutions. The telecommunication system would connect to the campus loop inside the Levering Terrace Apartments building adjacent to the Project site to the northwest. Conduit would also be installed to allow for a future connection to the telecommunication manhole within Weyburn Place.

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

Sustainable Building 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. 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 Project. The proposed Project would incorporate a series of green building strategies including, but not limited to, the following:

- Provide high-density student housing that is adjacent to existing amenities, public transportation, and existing urban infrastructure;
- Encourage alternative transportation by precluding on-site parking for students and providing bicycle racks on-site;
- Incorporate rainwater management strategies that retain on-site the runoff from the developed site for, at minimum, the 80th percentile of regional or local rainfall events;
- Utilize native and drought-tolerant plant species to reduce landscape irrigation demands and install a high-efficiency irrigation system;
- Select water fixtures (lavatory faucets, showers, toilets, etc.) to achieve at least a 36 percent reduction in per capita water demand (compared to the Fiscal Year 2005-2008 average baseline), in line with UC and UCLA goals to reduce potable water demand;
- Outperform CBC Title 24 energy efficiency requirements by at least 20 percent;
- Provide an all-electric building;
- Incorporate 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;
- Incorporate environmentally preferred and healthy materials that have environmental product declarations, recycled content, and health product declarations to earn specific LEED credits;
- Using low, ultra-low, and zero volatile organic compound (VOC)-emitting adhesives, sealants, paints, coatings, and carpets in order to reduce air quality emissions, at minimum consistent with SCAQMD Rule 1113;
- Create healthy indoor air quality by increasing outdoor airflow values by at least 15 percent over ASHRAE 62.1-2016 and installing MERV 13 filtration media; and
- Divert a minimum of 75 percent of construction waste from landfills to reduce solid waste disposal.

Population

The proposed Project is intended to serve the existing UCLA student population. There are no UCLA students currently housed in the existing apartment buildings. The proposed Project would create housing to accommodate up to 1,150 undergraduate students, representing a net increase of 1,098 residents at the Project site compared to the existing buildings at previous capacity. It is assumed that most of these students currently live in on-campus housing and would select these apartments during the annual “Returning Resident Sign-Up” process. No increase in student enrollment or UCLA faculty would result from the proposed Project. However, the proposed Project anticipates the employment of seven new Full Time Equivalent (FTE) staff members, which would slightly increase the number of UCLA staff.

Demolition and Construction Activities

For purposes of analysis in this Initial Study, construction of the proposed Project is anticipated to begin in 2026 with completion in 2030. Construction phases are generalized as follows and may overlap:

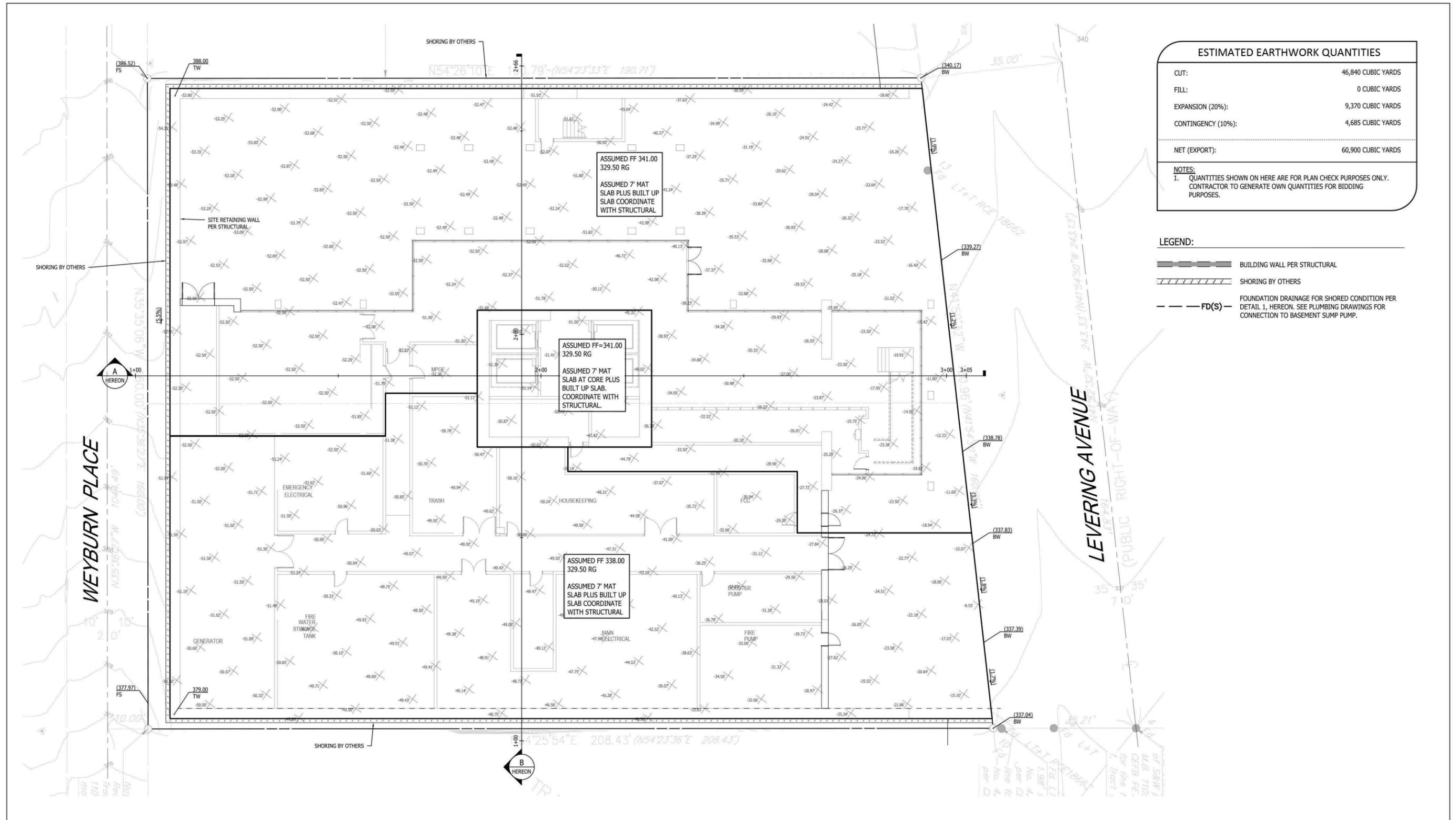
- Demolition, site preparation, and grading (8 months);
- Building construction (35 months);
- Trenching (3 months);
- Architectural coating (16 months); and
- Paving (3 months).

The entirety of the Project site (32,234 sf or approximately 0.74 gross acres) would be directly impacted by construction, as analyzed in this Initial Study. Site demolition would involve removal of the existing buildings, driveways, stairs, walkways, and landscaping, as well as the existing retaining walls. As required and as further discussed in Section V.7 of this Initial Study, soil erosion from the Project site during construction would be controlled through the use of BMPs, including, but not limited to: street sweeping and vacuuming, installation of sandbag barriers, stabilized driveways at construction entrances and exits, and entrance/exit tire wash. Fiber rolls would be installed at the Project site boundary along Levering Avenue and Weyburn Place, and existing catch basins would be protected with appropriate BMPs to minimize sediment entering the storm drain system. Dust, waste management, and materials pollution control BMPs would also be employed.

Earthwork necessary for building construction would require excavation to a maximum depth of approximately 52.5 feet bgs, as measured from the Weyburn Place elevation. It is estimated that grading activities would require the net export of approximately 60,900 cubic yards (cy) of soil from the Project site (refer to the conceptual grading plan provided in Figure 13a and Figure 13b). Grading is estimated to occur over an approximate 117-workday period, with soil materials hauled using 10-cy trucks. Therefore, for purposes of analysis, it is assumed that the soil export would require a total of approximately 6,090 round truck trips, which would represent an average of 52 round truck trips per day (104 one-way truck trips) over the total period of 117 workdays.⁷

Depending on the construction phase, implementation of the proposed Project would require common construction equipment. Because of the limited size of the site, the number of pieces of equipment on-site at any given time would be limited. With the exception of the drill rig, United States Environmental Protection Agency (USEPA) Tier IV construction equipment would be used

⁷ These represent conservative assumptions and an even distribution of trips throughout the work period. Should larger haul trucks be utilized, the total and daily number of truck trips would be reduced accordingly.



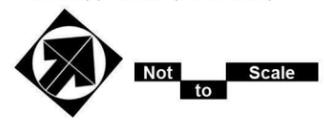
ESTIMATED EARTHWORK QUANTITIES	
CUT:	46,840 CUBIC YARDS
FILL:	0 CUBIC YARDS
EXPANSION (20%):	9,370 CUBIC YARDS
CONTINGENCY (10%):	4,685 CUBIC YARDS
NET (EXPORT):	60,900 CUBIC YARDS

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

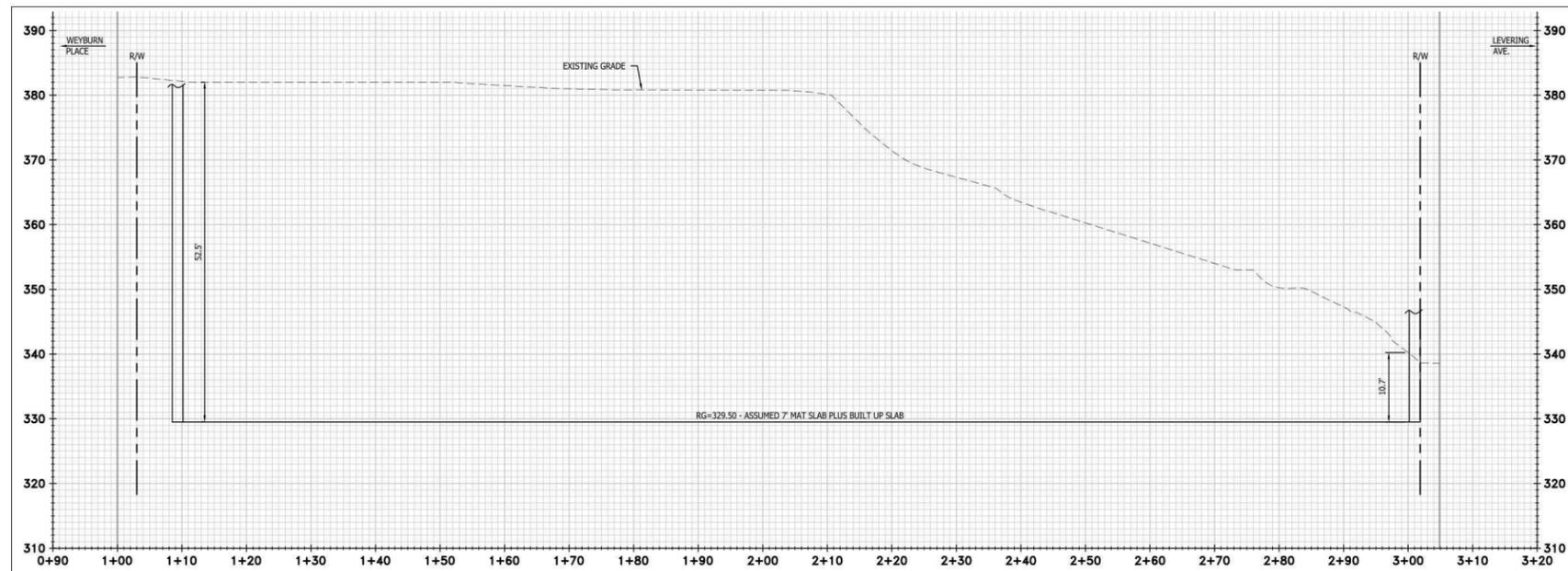
- LEGEND:**
- BUILDING WALL PER STRUCTURAL
 - SHORING BY OTHERS
 - FOUNDATION DRAINAGE FOR SHORED CONDITION PER DETAIL 1, HEREON. SEE PLUMBING DRAWINGS FOR CONNECTION TO BASEMENT SUMP PUMP.

Source(s): Mithun (06-03-2025)

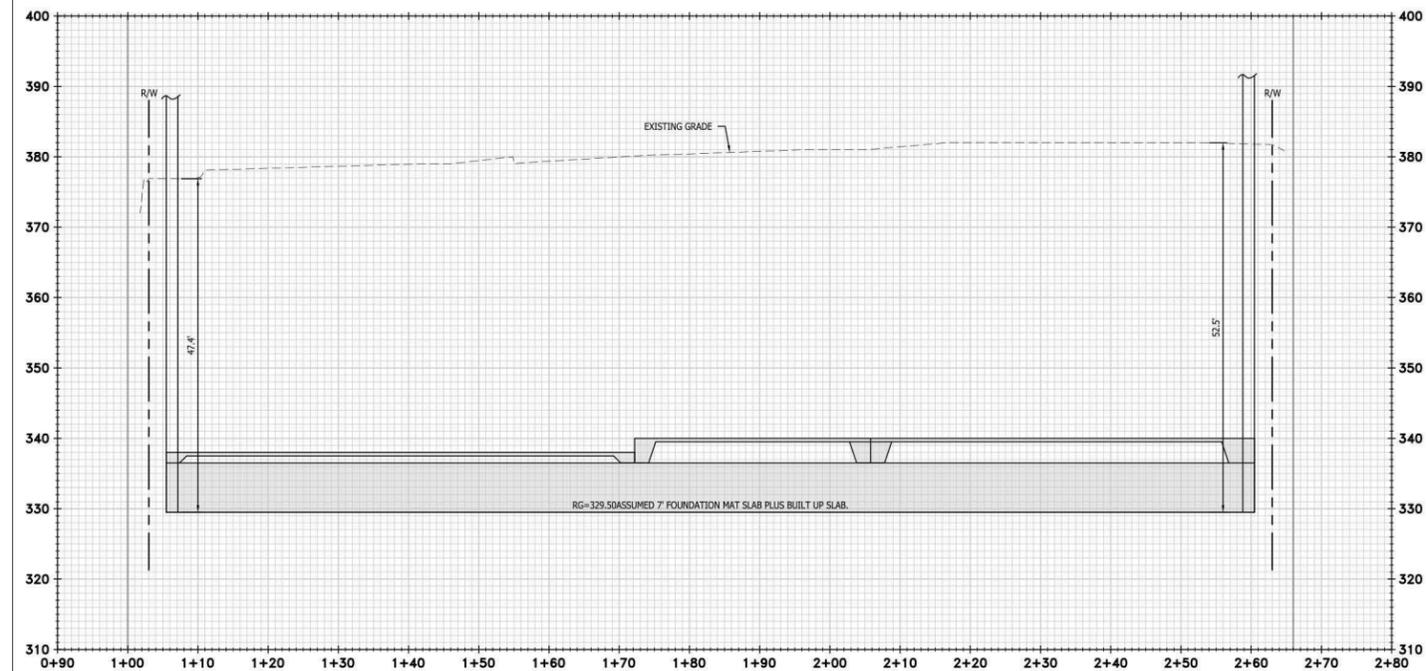
Figure 13a



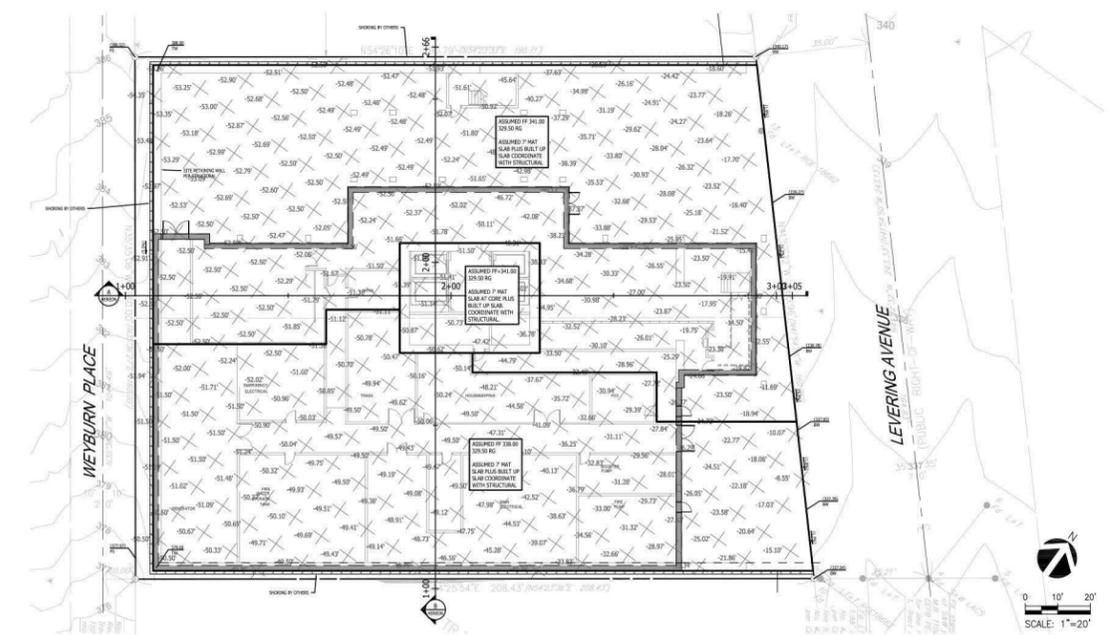
Conceptual Grading Plan



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

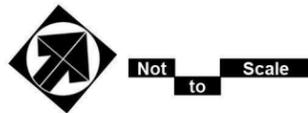


SECTION B
 HORIZONTAL SCALE: 1"=10'
 VERTICAL SCALE: 1"=10'



Source(s): Mithun (06-03-2025)

Figure 13b



for construction of the proposed Project. Construction equipment assumptions are outlined in the air quality analysis included in Appendix A of this Initial Study.

In addition to the identified construction area, a staging area is needed to receive, lay down, and prepare materials for use during construction. The construction staging area would be limited to a single lane of Levering Avenue and a portion of Weyburn Place adjacent to the Project site. Weyburn Place would not be fully obstructed during staging activities, and safe access would be maintained for pedestrians, bicyclists, and cars. Construction workers would park at UCLA Parking Lot 32 in Westwood.

Vehicular and Pedestrian Circulation During Construction

A construction traffic route has been designated to efficiently move construction vehicles to minimize traffic from other UCLA projects under construction at the same time, to the extent feasible.⁸ Pursuant to LRDP PP 4.13-2 from the LRDP EIRs, the construction of these major projects would be coordinated to adjust construction schedules, work hours, and access routes to the extent feasible in order to reduce construction-related traffic congestion. The following is the planned route for construction traffic for the proposed Project:

Approach: I-405 exit to eastbound Wilshire Boulevard; left turn on Veteran Avenue; right turn on Weyburn Avenue; left turn on Gayley Avenue; left onto Le Conte Avenue (north of Chevron station); left onto Levering Avenue to Project site.

An alternative delivery approach for smaller equipment that could back out from the Project site to Weyburn Avenue would be: I-405 exit to eastbound Wilshire Boulevard; left turn on Veteran Avenue; right turn on Weyburn Avenue; left turn on Weyburn Place (alley) to Project site.

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

An alternative delivery departure would be: southbound on Weyburn Place from the Project site (back out only) to Weyburn Avenue; west on Weyburn Avenue; left turn on Veteran Avenue; right turn on Wilshire Boulevard; on-ramp to I-405 north or south.

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

6. ANTICIPATED DISCRETIONARY APPROVALS

The Regents or its designee and the responsible agencies identified below are expected to use the information contained in this Initial Study for consideration of approvals related to and involved in the implementation of the proposed 901 Levering Student Housing Project. This Initial Study has been prepared to inform all state, regional, and local government approvals needed for construction and/or operation of the proposed Project, whether or not such actions are known or

⁸ Current projects on campus or in close proximity that may be under construction at the same time as the proposed Project are identified on Figure 2, Campus Map and Related Projects, of this Initial Study, and are described in Section V.21, Mandatory Findings of Significance.

are explicitly listed. Anticipated approvals required to implement the proposed Project include, but are not limited to, those listed below.

University of California Board of Regents

- Adoption of the Final Initial Study and MND
- Approval of the 901 Levering Student Housing Project

Responsible Agencies

- **State Water Resources Control Board.** UCLA, or its designee, shall comply with requirements of the applicable NPDES Phase II Small Municipal Separate Storm Sewer Systems (MS4) General Permit.
- **City of Los Angeles.** Coordination and compliance with applicable standards, design requirements, and guidelines for construction activities, including construction staging, utility connection(s), removal of metered parking spaces, curb cuts, and tree planting, as well as any permanent improvements such as paving, lighting, or landscaping within City rights-of-way.
- **South Coast Air Quality Management District.** UCLA, or its designee, shall obtain any required permits to construct and/or operate new stationary sources of equipment that emit or control air contaminants (e.g., heating, ventilation, and air conditioning units and diesel emergency generators).

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|----------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> 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.	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>
The University of California finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>



Signature

11/7/25

Date

Ashley Rogers, Director, Environmental Planning

UCLA Capital Programs

V. EVALUATION OF ENVIRONMENTAL IMPACTS

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

- A) **“Potentially Significant Impact”** is appropriate if there is substantial evidence that the project’s effect may be significant even with the incorporation of LRDP mitigation measures and campus programs, practices, and procedures identified in the LRDP EIR. If there are one or more “Potentially Significant Impacts” a Project EIR will be prepared.
- B) **“Less Than Significant With Project-level Mitigation Incorporated”** applies where the incorporation of project-specific mitigation measures will reduce an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” All project-level mitigation measures must be described, including a brief explanation of how the measures reduce the effect to a less than significant level.
- C) **“Less Than Significant Impact”** applies where the proposed Project will not result in any significant effects. The project impact is less than significant without the incorporation of project-level mitigation.
- D) **“No Impact”** applies where a project would not result in any impact in the category or the category does not apply. “No Impact” answers need to be adequately supported by the information sources cited, which show that the impact does not apply to projects like the one involved. A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards.

IMPACT QUESTIONS AND RESPONSES

1. AESTHETICS

The Project site is currently developed with five existing University-owned two- and three-level apartment buildings, totaling approximately 23,952 sf. As described previously in Section II, Project Description, of this Initial Study, relevant elements of the proposed Project related to aesthetics/visual character include the redevelopment of the Project site with one new 19-level residential building totaling up to 310,000-sf. As shown on the conceptual building renderings provided in Figure 9a through Figure 9c, the exterior material palette would be comprised of durable and timeless materials selected to respond to the existing neighborhood and campus context. Building materials and exterior finishes would potentially include ultra-high performance concrete panels, large format fiber-cement panels, metal panels, stucco, porcelain or stone tile, metal, and glass. More specifically, the base of the building would consist of stucco with tile accents, while the exterior envelope of the upper stories would consist of a blend of stucco, ultra-high performance concrete panels or large format fiber-cement panels, metal panels, and metal-clad windows. Window glass would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside. Low-level outdoor lighting may be used for security, wayfinding, and aesthetic purposes and would comply with UC energy standards, which are generally more stringent than Title 24 requirements. Additionally, any outdoor lighting would be shielded and/or directed toward the Project site to minimize light spillover.

As shown in Figure 11, landscape and hardscape features would be provided in exterior areas throughout the Project site. As discussed in Section V.4, Biological Resources, of this Initial Study, existing ornamental vegetation and mature trees on-site would be removed. None of the trees are protected species and all trees would be replaced as required by the LRDP EIR mitigation measures.

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

While the proposed Project is located off campus and therefore outside of the scope of the LRDP and LRDP SEIR (see the Introduction section of this Initial Study for further 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.

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

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

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

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

1. The project is a residential, mixed-use residential, or employment center project.
2. The project is located on an infill site⁹ within a transit priority area.¹⁰

The proposed Project meets these criteria. Criterion 1 is met due to the residential nature of proposed development. Criterion 2 is met because the Project site is an infill site located in a transit priority area (TPA). As described in Section 2, Environmental Setting, of this Initial Study, the Project site is surrounded by existing high-density housing to the north, south, and west, with an existing Chevron gas station to the east (across Levering Avenue). Based on consistency with the SB 743 criteria, potential aesthetic impacts are not considered to be impacts under CEQA for the proposed Project, and no impact would result. No further analysis of this issue is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

2. AGRICULTURAL RESOURCES

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

⁹ 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.

¹⁰ 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 20 minutes or less during the morning and afternoon peak commute periods (this definition was amended from 15 minutes to 20 minutes as of January 2025). As discussed in Section V.17, Transportation, of this Initial Study, the Project site meets these criteria.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The Project site is within an area that is mapped as Urban and Built-Up Land by the California Department of Conservation’s (DOC) Farmland Mapping and Monitoring Program (FMMP), as confirmed by review of the most recent 2020 FMMP Important Farmland Map for Los Angeles County (DOC, 2025). 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 is not under a Williamson Act Contract. Therefore, there would be no impact to agricultural or forest land resources with implementation of the proposed Project, and the proposed Project would not result in the conversion of agricultural or forest land.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

3. AIR QUALITY

Relevant elements of the proposed Project related to air quality include the demolition of the existing 23,952 sf apartment buildings; excavation and removal/export of an estimated 60,900 cy of soil; and construction and operation of a new up to 310,000-sf residential structure, which would provide up to 1,150 beds. The use of diesel-powered construction equipment would contribute to

local and regional emissions (refer to discussion of “Construction Activities” in Section II.5, Proposed Project Components, of this Initial Study). Long-term operational emissions of the proposed Project would primarily include emissions from vehicles used by the residents, consumer products, energy (electricity), and stationary sources. No natural gas would be used for operation of the proposed Project including the building, equipment and appliances. The proposed Project would also include a single emergency generator that would operate only during power outages to provide backup electricity.

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 necessary changes in the text from the LRDP EIRs are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

PP 4.2-2(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.*

The University would exceed the requirements outlined in MM 4.2-2(c). With the exception of a drill rig, Project construction equipment would meet United States Environmental Protection Agency (USEPA) Tier IV certification requirements (CARB, 2025).¹¹ The following project design feature (PDF) would be included in the Project-specific MMRP to ensure implementation of this measure.

- PDF 901 Levering AQ-1** *The University shall require by contract specifications that the construction contractor ensure, with the exception of a drill rig, that off-road diesel construction equipment rated at 150 hp or greater complies with USEPA/CARB Tier IV off-road emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturers' specifications.*

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

¹¹ The USEPA has adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines by integrating engine and fuel controls as a system to gain the greatest emission reductions. To meet these Tier IV emission standards, engine manufacturers now produce engines with advanced emission control technologies. Tier IV emission standards as defined by CARB are provided at <https://ww2.arb.ca.gov/resources/documents/non-road-diesel-engine-certification-tier-chart>.

Air Quality Background

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

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

Regulatory Framework

A discussion of the regulatory framework for assessing air quality impacts is provided in the LRDP EIRs and is incorporated by reference. Regulations addressed in the LRDP EIRs include, but are not limited to, the following, which have been updated since preparation of the LRDP EIRs and/or provide context for the environmental analysis 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 and additional standards for atmospheric sulfates, vinyl chloride, hydrogen sulfide, and visibility. Specific geographic areas are classified as either “attainment” or “nonattainment” areas for each pollutant based on the comparison of measured data with federal and state standards. NAAQS and CAAQS currently in effect and the associated attainment status for the SCAB are presented in Appendix A of this Initial Study and summarized below (CARB, 2024). The criteria pollutants for which federal standards have been promulgated and which are most relevant to this air quality impact analysis are discussed below and include: ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter (PM₁₀ and PM_{2.5}), and sulfur oxides (SO_x). O₃ is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Thus, VOCs and NO_x are precursors to O₃.

As part of its enforcement responsibilities, the USEPA requires each state with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and maintain the federal standards. The California Clean Air Act (CCAA) also

requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the CAAQS. The AQMPs from each district are compiled into the California SIP. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

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

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

Criteria Pollutants and Health Effects

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

- **O₃** 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.
- **PM₁₀** 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 (haze) which is caused by the scattering of light and consequently the significant reduction air clarity.
- **PM_{2.5}** is a subgroup of PM₁₀ 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 (PM₁₀ and PM_{2.5}) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. Daily fluctuations

in PM_{2.5} concentration levels have also been related to hospital admissions for acute respiratory conditions in children and to school and kindergarten absences.

- **NO₂** is typically created during combustion processes and is a major contributor to smog formation and acid deposition. NO₂ 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 NO₂, stem from the results of controlled human exposure studies that show that NO₂ exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO₂ 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 vegetation, such as that which burns during 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, which include 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 may be toxic. Compounds that include carbon (also known as organic compounds) have different levels of reactivity—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, such as gasoline, alcohol, and solvents used in paints. Exceptions to the VOC designation, as defined by SCAQMD, include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. Because VOCs are a precursor to O₃, a criteria pollutant, they are also designated as a criteria pollutant. The SCAQMD uses the terms VOC and Reactive Organic Gases (ROG) interchangeably.
- **NO_x** includes nitric oxide (NO), nitrogen dioxide (NO₂) and nitrous oxide (N₂O), which are formed when nitrogen (N₂) combines with oxygen (O₂). Their lifespan in the atmosphere ranges from one to seven days for NO and NO₂, to 170 years for N₂O. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition.

Existing Air Quality Setting

As previously indicated, specific geographic areas are classified as either “attainment” or “nonattainment” areas for each pollutant based on the comparison of measured data with federal and state standards. The USEPA and CalEPA have established NAAQS and CAAQS, respectively, for six of the most common criteria air pollutants: CO, Pb, O₃, particulate matter (PM₁₀ and PM_{2.5}), NO₂, and SO₂. The attainment designations for the SCAB are presented in Table 1 (CARB, 2024).

TABLE 1 ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SCAB

Criteria Pollutant	State Designation	Federal Designation
O ₃ – 1-hour standard	Nonattainment	--
O ₃ – 8-hour standard	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO ₂	Attainment	Unclassifiable/Attainment
SO ₂	Attainment	Unclassifiable/Attainment
Pb	Attainment	Unclassifiable/Attainment
Note: See Appendix A for a detailed map of State/National Area Designations within the SCAB. Source: (CARB, 2024)		

As previously discussed, the Project site is occupied by five existing apartment buildings, which accommodate approximately 52 beds. As further discussed in Section V.17, Transportation, of this Initial Study, it is estimated that the existing buildings generate approximately 261 daily trips. Estimated air pollutant emissions generated by operations at the existing buildings are presented in Table 2.¹²

TABLE 2 OPERATIONAL EMISSIONS FROM EXISTING DEVELOPMENT

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
Mobile	0.75	0.56	7.10	0.02	1.87	0.48
Area	11.70	0.89	23.80	0.05	3.00	2.94
Energy	0.01	0.11	0.04	< 0.005	0.01	0.01
Total Maximum Daily Emissions	12.46	1.56	30.94	0.07	4.88	3.43
Winter						
Mobile	0.75	0.62	6.49	0.02	1.87	0.48
Area	11.50	0.87	21.40	0.05	3.00	2.94
Energy	0.01	0.11	0.04	< 0.005	0.01	0.01
Total Maximum Daily Emissions	12.26	1.60	27.93	0.07	4.88	3.43
Source: (Urban Crossroads, 2025a)						

¹² In May 2022 California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of California Emissions Estimator Model (CalEEMod). The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in the Air Quality and GHG Assessment included in Appendix A of this Initial Study. It should be noted that O₃ is a byproduct/chemical reaction in the atmosphere, and there are no directly emitted ozone emissions from any project that are quantifiable. Pb emissions are not calculated, as most projects would result in a negligible amount of Pb. This is underscored by the fact that CalEEMod does not calculate any Pb emissions from construction or operational activities.

Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather are defined as “sensitive receptors.” Sensitive receptors also typically include residences, hotels, hospitals, etc. as they are known to be locations where an individual can remain for 24 consecutive hours. As the surrounding residential land uses are located closer to the Project site than any school with young children (e.g., Geffen Academy) or hospital uses (e.g., Ronald Regan UCLA Medical Center, the nearest sensitive receptors are the Village Terrace apartment building located at 919-923 Levering Avenue (Air Quality Receptor R4), adjacent to and southeast of the Project site; followed by the Levering Terrace apartment building located at 885 Levering Avenue (Air Quality Receptor R1) to the immediate northwest, as shown on Figure 14. Potential impacts to sensitive receptors are assessed under the analysis of Threshold (c) below.

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

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

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

With respect to Criterion No. 2, the 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the SCAQMD are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections for the City of Los Angeles is considered consistent with the AQMP. The proposed Project would provide up to 1,150 beds for UCLA undergraduate students. This represents an increase of 1,098 residents/beds



Source(s): Urban Crossroads (10-10-2025)

Figure 14



Air Quality Receptor Locations

compared to the existing apartments. The proposed Project would not directly result in new students attending UCLA. As further discussed in Section V.14, Population and Housing, of this Initial Study, the proposed Project would not conflict with the local or regional growth assumptions, such as the growth assumptions in Connect SoCal 2024 which are used in the 2022 AQMP. Therefore, the proposed Project is determined to be consistent with Criterion No. 2. Thus, the proposed Project would not conflict with or obstruct implementation of the applicable air quality plan.

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. No impact would result.

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

Discussion

Land uses such as the proposed Project affect air quality through construction-source and operational-source emissions. As discussed in the Regulatory Framework section above, the SCAB is a federal nonattainment area for O₃ and PM_{2.5} and a state nonattainment area for O₃, PM₁₀, and PM_{2.5}. The proposed Project would generate PM₁₀, PM_{2.5}, and O₃ precursors (NO_x and VOC) during short-term construction and long-term operations. The proposed Project would have an incremental, cumulative contribution to O₃, PM₁₀, and PM_{2.5} levels in the region. SCAQMD's policy with respect to cumulative impacts associated with criteria pollutants and their precursors is that Project-specific impacts which are less than significant would also be cumulatively less than significant (SCAQMD, 2003).

Thresholds of Significance

The SCAQMD recommends that projects under their jurisdiction be evaluated in terms of their quantitative thresholds, which have been established to assess both the regional and localized impacts of project-related air pollutant emissions. The significance thresholds are updated, as needed, to appropriately represent current ambient air quality standards and attainment statuses. UCLA utilizes the SCAQMD-recommended thresholds that are in place at the time development projects are proposed to assess the significance of quantifiable emissions. The current SCAQMD thresholds for regional emissions are identified in Table 3.

TABLE 3 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: (Urban Crossroads, 2025a)		

Regional Construction Impacts

Air pollutant emissions during construction activities would primarily occur from construction equipment exhaust; fugitive dust from demolition and site grading; exhaust and particulate emissions from trucks hauling soil and building materials to and from the Project site and from vehicles driven to and from the Project site by construction workers; and VOCs from painting and asphalt paving operations. The CalEEMod input for construction emissions was based on the proposed Project’s construction parameters and default assumptions from CalEEMod, as further discussed in the 901 Levering Avenue Air Quality and Greenhouse Gas Assessment (Air Quality and GHG Assessment) included in Appendix A of this Initial Study. As identified in PDF 901 Levering AQ-1, Tier IV equipment would be used during construction, with the exception of the drill rig. The estimated maximum daily emissions account for use of Tier IV equipment.

Table 4 presents the estimated maximum daily emissions during construction of the proposed Project and compares the estimated emissions with the SCAQMD’s daily regional emission thresholds. The emissions estimates include reductions associated with adherence to SCAQMD Rule 403 (refer to LRDP PP 4.2-2[a]). Compliance with LRDP PPs 4.2-2(b), 4.2-2(c), 4.2-2(d), and LRDP MMs 4.2-2(a), 4.2-2(b), and 4.2-2(c) and Project-specific PDF 901 Levering AQ-1 would further reduce construction-related emissions; however, these reductions are not quantified in order to present a conservative analysis. As shown, emissions resulting from construction of the proposed Project would not exceed thresholds established by the SCAQMD for emissions of any criteria pollutant, and no additional mitigation is required.

Operations

Operational related emissions are expected from the following primary sources: area source emissions, energy source emissions, and mobile source emissions. Area source emissions are the result of consumer products, architectural coatings (maintenance repainting), and landscape maintenance equipment. For the purpose of analysis, the emissions associated with area sources were calculated based on default assumptions provided in CalEEMod. Energy source emissions are associated with building electricity; no natural gas would be used at the proposed Project. However, because LADWP’s electrical generating facilities that serve the Project area are located outside the region (State) or offset through the use of pollution credits (RECLAIM) for generation that occurs within the SCAB, criteria pollutant emissions from off-site generation of electricity are

generally excluded from CalEEMod and project-specific evaluations of significance.¹³ Therefore, the proposed Project would not generate any emissions from direct energy consumption. Mobile source emissions are related to emissions from vehicular trips and vehicle miles traveled (VMT) associated with on-road vehicles, which would be the primary emission source from the proposed Project. The calculation of mobile source emissions was based on the vehicle trip generation rates provided in the 901 Levering Avenue Student Housing VMT Screening Assessment (VMT Assessment) prepared for the proposed Project (Fehr & Peers, 2025) and included in Appendix H of this Initial Study. Stationary source emissions are associated with operation of the emergency generator, which would only operate during power outages to provide backup electricity.

TABLE 4 ESTIMATED DAILY REGIONAL CONSTRUCTION EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
2026	0.98	24.30	40.70	0.06	1.01	0.42
2027	0.80	10.90	23.20	0.03	1.64	0.48
2028	1.60	12.40	25.30	0.03	1.96	0.59
2029	1.77	16.60	31.30	0.04	2.29	0.69
Winter						
2026	0.98	24.40	40.30	0.09	6.29	2.57
2027	0.79	22.80	30.40	0.09	6.29	2.57
2028	1.59	12.40	24.20	0.03	1.96	0.59
2029	1.76	16.00	30.00	0.04	2.29	0.69
2030	1.55	12.30	23.40	0.03	1.95	0.58
Maximum Daily Emissions	1.77	24.40	40.70	0.09	6.29	2.57
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
¹ Detailed construction model outputs are presented in Appendix 1 of the Air Quality and GHG Assessment. Source: (Urban Crossroads, 2025a)						

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

¹³ Based on CalEEMod methodology, criteria pollutant emissions associated with a project's on-site energy usage are only calculated for natural gas consumption. While criteria pollutants are also emitted during the generation of electricity, this activity typically takes place at off-site power plants which are permitted by air districts and/or the USEPA. Thus, criteria pollutant emissions are generally associated with the power plants themselves, not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which are considered to be the maximum feasible level of mitigation for emissions associated with combustion-based power generation. Therefore, CalEEMod does not calculate criteria pollutant emissions from regional power plants associated with individual building electricity use.

TABLE 5 ESTIMATED MAXIMUM DAILY REGIONAL OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
Mobile	4.36	3.25	41.10	0.11	10.80	2.79
Area	7.44	0.08	8.43	0.00	0.00	0.00
Stationary	0.86	3.86	2.20	0.00	0.13	0.13
Total Maximum Daily Emissions	12.66	7.19	51.73	0.11	10.93	2.92
Winter						
Mobile	4.32	3.56	37.50	0.10	10.80	2.79
Area	6.71	0.00	0.00	0.00	0.00	0.00
Stationary	0.86	3.86	2.20	0.00	0.13	0.13
Total Maximum Daily Emissions	11.89	7.42	39.70	0.10	10.93	2.92
Source: (Urban Crossroads, 2025a)						

TABLE 6 PROJECT NET CHANGE IN REGIONAL OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
Proposed Project	12.66	7.19	51.73	0.11	10.93	2.92
Existing Development	12.46	1.56	30.94	0.07	4.88	3.43
Net Emissions (Proposed–Existing)	0.20	5.63	20.79	0.04	6.05	-0.51
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Proposed Project	11.89	7.42	39.70	0.10	10.93	2.92
Existing Development	12.26	1.60	27.93	0.07	4.88	3.43
Net Emissions (Proposed–Existing)	-0.37	5.82	11.77	0.03	6.05	-0.51
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Source: (Urban Crossroads, 2025a)						

As shown in Table 4, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Localized Impacts

As described in the Air Quality and GHG Assessment provided in Appendix A of this Initial Study, as part of the SCAQMD’s environmental justice program, attention has focused on local air quality impacts from nearby sources. The SCAQMD has promulgated exposure standards and a conservative, simple Localized Significance Thresholds (LST) screening method for construction sites less than five acres in area. The LST method provides tables of emissions limits based on the location of a project in the SCAB, the area of the Project site, and distance to the sensitive receptors. The LSTs used in this analysis are specific to SCAQMD Source Receptor Area (SRA) 2, Northwest Coastal Los Angeles County, in which the Project site is located. The emissions limits are then compared to the on-site emissions from the proposed Project. Localized impacts during construction are assessed for NO_x and CO at receptors where persons could be present for eight hours or less; and, for PM₁₀ and PM_{2.5}, where persons could be present for 24 hours. As discussed above, the closest receptor to the Project site is the adjacent residential building to the southeast (Village Terrace), and this receptor has been used for the evaluation of NO_x, CO, PM₁₀, and PM_{2.5}. Emissions at other receptors located at a further distance would be less than at this location.

LST emissions and thresholds for the proposed Project’s construction activities are shown in Table 7. Outputs from the model runs for construction LSTs are provided in Appendix 1 of the Air Quality and GHG Assessment. As shown in Table 7, the proposed Project’s estimated construction emissions would not exceed the SCAQMD’s LSTs for any criteria pollutant, and the impact from exposure to these emissions at the adjacent and nearby sensitive receptors would be less than significant. No additional mitigation is required.

LST emissions and thresholds for the proposed Project’s operations are shown in Table 8. For purposes of analysis of operation-related emissions, to establish a maximum potential impact scenario, the emissions shown in Table 8 represent all on-site Project-related area, stationary, and mobile sources. The analysis accounts for the longest on-site distance that a vehicle could theoretically travel, which is conservatively assumed to be 0.05 mile (i.e., the distance on the Project site from one edge of the site boundary to the farthest edge of the site boundary, although such a path of travel is not planned as part of the proposed Project).¹⁴ Outputs from the model runs for operational LSTs are provided in Appendix 3 of the Air Quality and GHG Assessment. As

¹⁴ The on-site distance was conservatively interpolated by measuring the distance on the Project site from one edge of the site boundary to the farthest edge of the site boundary, a distance of approximately 0.05 mile. Although the driveway length where a vehicle can pull in is only 16 feet in length (approximately 0.003 mile) a larger distance of 0.05 mile was used to ensure a conservative estimate since there will be no on-site parking.

shown below in Table 8, the proposed Project's estimated operational emissions would not exceed the SCAQMD's LSTs, and the impact from exposure to these emissions at the adjacent and nearby sensitive receptors would be less than significant. No additional mitigation is required.

TABLE 7 PROJECT LOCALIZED CONSTRUCTION IMPACTS

On-Site Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Demolition				
Maximum Daily Emissions	23.90	38.30	0.47	0.29
SCAQMD Regional Threshold	103	562	4	3
Threshold Exceeded?	NO	NO	NO	NO
Site Preparation/Grading				
Maximum Daily Emissions	10.10	16.60	0.13	0.12
SCAQMD Regional Threshold	146	1,062	8	5
Threshold Exceeded?	NO	NO	NO	NO
Building Construction				
Maximum Daily Emissions	10.10	16.60	0.13	0.12
SCAQMD Regional Threshold	103	562	4	3
Threshold Exceeded?	NO	NO	NO	NO
Paving				
Maximum Daily Emissions	3.57	5.24	0.04	0.04
SCAQMD Regional Threshold	103	562	4	3
Threshold Exceeded?	NO	NO	NO	NO
Architectural Coating				
Maximum Daily Emissions	1.43	1.28	0.04	0.04
SCAQMD Regional Threshold	103	562	4	3
Threshold Exceeded?	NO	NO	NO	NO
Trenching				
Maximum Daily Emissions	4.29	5.80	0.07	0.06
SCAQMD Regional Threshold	103	562	4	3
Threshold Exceeded?	NO	NO	NO	NO
Source: (Urban Crossroads, 2025a)				

TABLE 8 PROJECT LOCALIZED OPERATIONAL IMPACTS

On-Site Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	4.86	17.80	0.19	0.15
SCAQMD Regional Threshold	103	562	1	1
Threshold Exceeded?	NO	NO	NO	NO
Source: (Urban Crossroads, 2025a)				

CO Hotspot Analysis

A CO hotspot is defined as a localized concentration of carbon monoxide exceeding the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm. At the time the most recent CEQA Air Quality Handbook (1993) was published by SCAQMD, the air basin was designated as non-attainment, requiring projects to perform hotspot analyses to ensure they did not worsen the existing conditions. Over the last two decades, background CO concentrations have been significantly reduced due to regulatory controls on tailpipe emissions, which have culminated in the air basin achieving attainment status for CO.

In 2003, the SCAQMD as part of its AQMP development process prepared modeling to determine the potential for CO Hotspots at the four busiest intersections in the air basin. As summarized in the 2003 AQMP, even at one of the busiest intersections at that time, only 0.7 ppm of CO is attributable to vehicular traffic, and the remaining 7.7 ppm were due to ambient background conditions. Background 1-hour and 8-hour concentrations are well below the applicable AAQS.

The 2003 AQMP's findings underscore that CO hotspots are highly unlikely due to the reduced background concentrations and the effectiveness of California's air quality management strategies. The substantial reduction in CO levels from the vehicle fleet and the State's attainment status for CO further diminish the need for detailed microscale hotspot analyses, reinforcing the position that existing monitoring and regulatory frameworks adequately address potential air quality concerns.

As such, Project-related traffic at any intersections within the Project area would not cause or contribute to a CO hotspot since the background concentrations are low and any contribution from Project traffic would be negligible. Therefore, implementation of the proposed Project would not cause or contribute to a CO hot spot (Urban Crossroads, 2025a). There would be a less than significant impact.

Toxic Air Contaminant (TAC) Emissions

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

Proposed Project construction would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. The proposed Project would result in the generation of diesel PM emissions from the use of off-road diesel equipment required for construction activities and from on-road diesel equipment used to transport materials to and from the Project site. Exposure is a function of both the emissions rate and the duration of exposure. The total Project construction period is anticipated to last approximately 43 months. However, the proposed Project would use relatively little diesel construction equipment, and with the potential exception of the drill rig, Tier IV equipment would be used, which meets the most stringent regulatory standards and therefore results in the least amount of diesel exhaust TAC emissions. The maximum amount of diesel equipment use would occur during an eight-month site preparation/grading phase on the Project site, which is expected to involve two graders, two rubber-tired dozers, and two crawler tractors. Diesel trucks would also arrive at and leave the site throughout the day.

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

not result in exposure of sensitive receptors to substantial concentrations of TACs. There would be a less than significant impact.

Project-Level Mitigation Measures

No 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

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

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

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 removal of existing ornamental vegetation within the Project site, including up to 18 mature trees, which 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 for further 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 EIRs are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

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

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

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

Regulatory Framework

As previously discussed, the Project site is located within an urban area and is developed with existing residential uses. The LRDP Final SEIR, which has been incorporated by reference, includes a detailed discussion of the federal, state, and local regulatory framework for biological resources, as relevant to an urban campus setting. While the regulations applicable to the proposed Project generally have not changed since certification of the LRDP Final SEIR, certain regulations that provide context for the environmental analysis that follows are summarized below.

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

Pursuant to the MBTA of 1918, as amended in 1972, federal law prohibits the taking of migratory birds, their nests, or their eggs (16 United States Code [U.S.C.] Section 703), except as allowed

by permit (pursuant to 50 CFR Section 21). Also, Section 3503.5 of the California Fish and Game Code specifically protects birds of prey and states:

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

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

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

Project Impact Analysis

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

Discussion

The Project site is within an urbanized area that is currently developed and disturbed and has limited natural (unpaved/undeveloped) ground surfaces. Limited ornamental vegetation and trees are present on-site. As discussed under Threshold (e), 18 trees are considered mature trees none of which are considered protected species as defined in the LRDP EIRs (i.e., coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel). The level of human activity and lack of natural habitat on the Project site and surrounding area results in a wildlife population typical of that found in an urban environment. As such, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The Project site is in an urban area and is 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 wetland. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 site and surrounding area, the Project site does not provide a connection between any open space areas, contain suitable habitat that could be used as a wildlife corridor, or 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.

As discussed in Section II.5, Proposed Project Components, of this Initial Study, the proposed building design would incorporate a mix of bird-safe design elements to minimize the potential for bird strikes. Therefore, impacts associated with bird strikes would be less than significant.

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

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project conflict with any applicable policies protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The University of California is not subject to local zoning and planning ordinances, including the City of Los Angeles Native Tree Protection Ordinance (LANTPO, Ordinance No. 186873).¹⁵ Therefore, for the Project site which is not within the LRDP area, UCLA may mitigate the loss of trees at its discretion, including by applying LRDP policies. UCLA’s currently adopted tree replacement mitigation 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

¹⁵ The current LANTPO requires the replacement of “protected species,” defined as any tree of the oak genus (*Quercus* spp., excluding the scrub oak [*Quercus berberidifolia*]), Southern California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), California bay laurel (*Umbellularia californica*), toyon (*Heteromeles arbutifolia*) and Mexican elderberry (*Sambucus nigra* ssp. *caerulea*). Tree replacement mitigation is determined on a case-by-case basis by the Urban Forestry Division of the Bureau of Street Services, typically at a ratio of 4:1.

Angeles tree replacement requirements.¹⁶

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 trees that are within the proposed Project construction limits and those that are immediately adjacent to the work limits to account for any potential indirect impacts. The LRDP EIRs identify “mature” trees as those with a trunk diameter at breast height (dbh) measuring at least 12 inches and require the replacement of any removed mature trees at a 1:1 ratio, as stated in LRDP MM 4.2-1[c]. The LRDP EIRs also identify “protected tree” species (coast live oak, valley oak, western sycamore, Southern California black walnut, and California bay laurel), which must be replaced at a 2:1 ratio, as stated in LRDP MM 4.3-4. Accordingly, all trees whose trunk measures at least 12 inches dbh were included in the survey, as well as any protected species greater than four inches dbh, for consistency with the LANTPO. The field survey assessed the size, height, canopy width, aesthetic value, and overall health of each tree, and their locations were mapped using a hand-held Geographic Positioning System unit. Trees or shrubs listed on the plan design but not meeting regulatory requirements were noted on the map. Tree data is provided in Appendix B of this Initial Study (Psomas, 2025).

Mature trees occur within the proposed Project work limits. Eighteen (18) mature trees, as defined in the LRDP EIRs, were documented during the field survey. These consist of 2 blackwood acacia (*Acacia melanoxylon*), 3 Norfolk Island pine (*Araucaria heterophylla*), 2 Italian cypress (*Cupressus sempervirens*), 1 weeping fig (*Ficus benjamina*), 3 date palm (*Phoenix dactylifera*), 1 Canary Island palm (*Pinus canariensis*), 1 Aleppo pine (*Pinus halepensis*), 3 scarlet firethorn (*Pyracantha coccinea*), 1 Brazilian pepper tree (*Schinus terebinthifolia*), and 1 brush cherry (*Sygyium paniculatum*) as shown on Figure 15.

As shown on Figure 15, the proposed Project is expected to result in the removal of all 18 non-protected trees on-site. Pursuant to LRDP MM 4.3-1(c), mature trees (greater than 12 inches dbh) would be replaced at a 1:1 ratio. Therefore, a total of 18 replacement trees is needed to mitigate the proposed Project’s impacts related to tree removals. A summary of trees to be impacted and associated requirements regarding replacement is provided in Table 9.

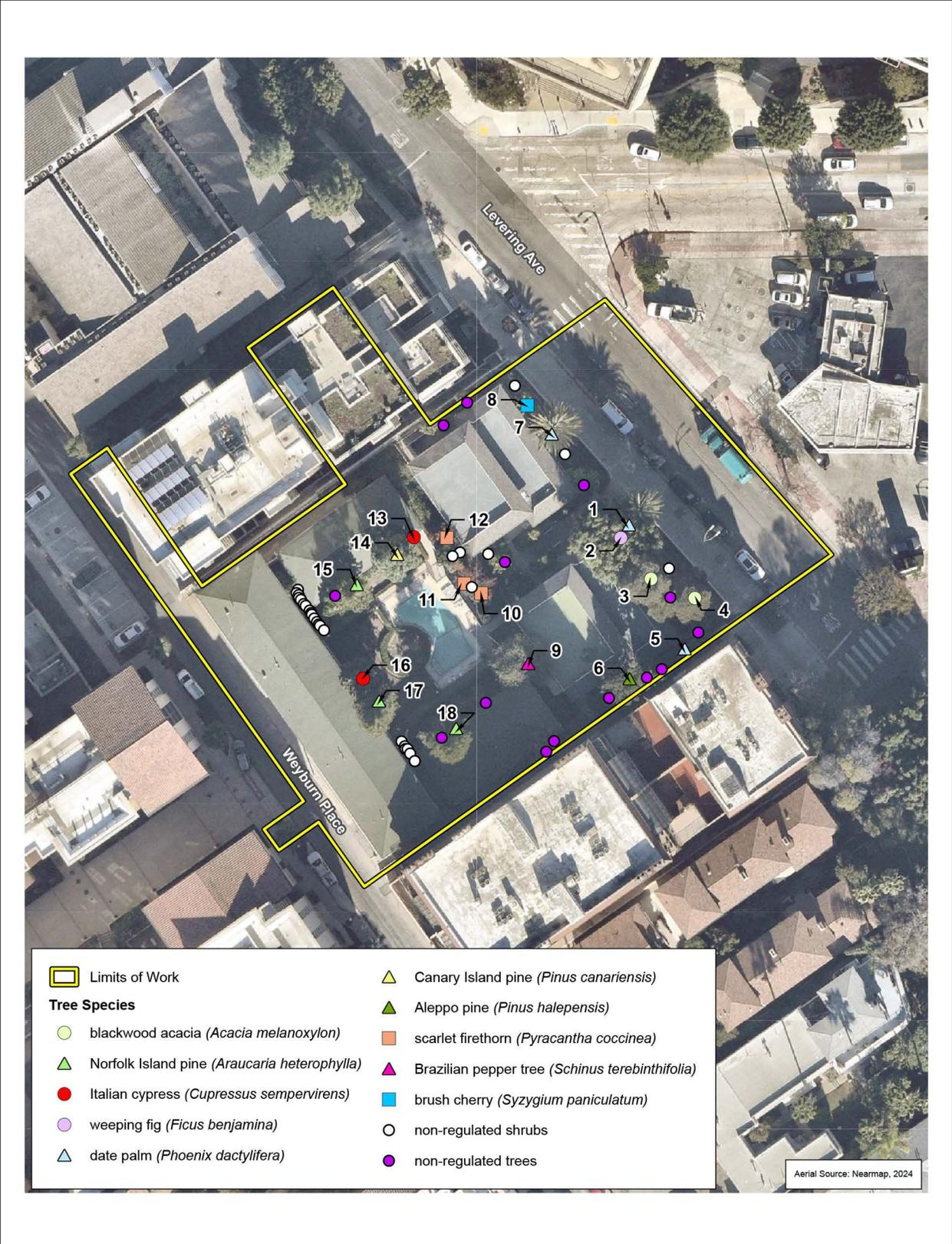
Trees would be replaced within the Project site to the extent feasible. If it is not feasible to plant all replacement trees within the proposed Project boundary, the Tree Replacement Plan required by LRDP MM 4.3-1(c) would include the planting of trees or native shrubs in ecologically appropriate areas within the campus boundaries in order to provide nesting, foraging or roosting habitat for birds such that the replacement number of trees and shrubs would comply with the required replacement ratios for mature and protected trees.

With implementation of the required tree replacements consistent with LRDP MM 4.3-1(c), impacts to trees would be less than significant. The required tree replacement for the proposed Project pursuant to the LRDP MMs (replacement of mature trees at a 1:1 ratio) would reduce potential impacts to a level considered less than significant. No additional mitigation is required.

Project-Level Mitigation Measures

No additional mitigation measures are required.

¹⁶ City of Los Angeles Ordinance No. 186873 became effective on February 4, 2021. Prior to that, Ordinance No. 177404 required the replacement of protected trees at a 2:1 ratio; additionally, toyon and Mexican elderberry were not included as protected shrubs.



Source(s): Psomas (08-11-2025)

Figure 15



Not to Scale

Tree Survey

TABLE 9 TREE REPLACEMENT SUMMARY

Species		Total in Survey Area	Proposed Removals	Replacement Ratio ¹	Replacement Requirement
Common Name	Scientific name				
blackwood acacia	<i>Acacia melanoxylon</i>	2	2	1:1	2
Norfolk Island pine	<i>Araucaria heterophylla</i>	3	3	1:1	3
Italian cypress	<i>Cupressus sempervirens</i>	2	2	1:1	2
weeping fig	<i>Ficus benjamina</i>	1	1	1:1	1
date palm	<i>Phoenix dactylifera</i>	3	3	1:1	3
Canary Island pine	<i>Pinus canariensis</i>	1	1	1:1	1
Aleppo pine	<i>Pinus halepensis</i>	1	1	1:1	1
scarlet firethorn	<i>Pyracantha coccinea</i>	3	3	1:1	3
Brazilian pepper tree	<i>Schinus terebinthifolia</i>	1	1	1:1	1
brush cherry	<i>Syzygium paniculatum</i>	1	1	1:1	1
Total		18	18		18

¹ The LRDP does not require in-kind tree replacement. All trees subject to regulation by the LRDP are mitigated at a 1:1 ratio.
Source: (Psomas, 2025)

Level of Significance

The proposed Project would not conflict with any applicable policies protecting biological resources.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

5. CULTURAL RESOURCES

Relevant elements of the proposed Project related to cultural resources include excavation of 60,900 cy of soil to a depth of up to 52.5 feet bgs, which would extend into native sediment.

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 EIRs 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.

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

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

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

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Records Search

The South Central Coastal Information Center (SCCIC) conducted a records search for the Project site on August 20, 2025 (SCCIC, 2025), which is included in Appendix C of this Initial Study. The search included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest, the California Historical Landmarks, the California Register of Historical Resources (California Register), the National Register of Historic Places (National Register), the California State Built Environment Resources Directory (BERD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the Project site and a 0.25-mile radius. The results of the records search show that seven built-environment resources have been recorded within the Project site, and 37 are recorded within 0.5 mile of the Project site. The records search notes that there are no historic resources within the Project site and seven historic resources within 0.25 mile of the Project site that are either listed or eligible for listing at the federal or state level. There are nine resources included in the LAHCM.

Regulatory Framework

Section 4.4, Cultural and Tribal Cultural Resources, of the LRDP Final SEIR, which is incorporated by reference, and the 901 Levering Avenue, Los Angeles, California, Historical Resource Assessment Report (Historical Resource Assessment Report) prepared by Teresa Grimes Historic Preservation for the proposed Project (TGHP, 2025) and included in Appendix D of this Initial Study, include a detailed discussion of the regulatory framework for cultural and historic resources, including categories of historic resources, as outlined in Section 15064.5(a) of the CEQA Guidelines, and the thresholds for significant impacts to historic resources as outlined in Section 15064.5(b) of the CEQA Guidelines. In summary, Section 15064.5(a)(2) of the CEQA

Guidelines identifies that “[a] resource included in a local register of historical resources...shall be presumed to be historically or culturally significant.”

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

- (1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- (2) The significance of an historical resource is materially impaired when a project:
 - (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
 - (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
 - (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.
- (3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Grimmer and Weeks, shall be considered as mitigated to a level of less than a significant impact on the historical resource.”

Environmental Setting and Area of Potential Impact

The existing apartment buildings located at 901 Levering Avenue were constructed between 1946 and 1948 and are therefore more than 50 years old. A discussion of the existing buildings, including physical characteristics and site history, is provided in the Historical Resource Assessment Report included in Appendix D of this Initial Study. A preliminary field inspection of the Project site and surrounding area was conducted by TGHP to determine the geographic scope, or Area of Potential Impact (API), for the Historical Resource Assessment Report. The API is the geographic area within which a project may directly or indirectly impact the character of historical resources. In determining the API, three factors were considered: the existing setting of the Project site; the scale and nature of the proposed development relative to the existing setting;

and the impacts the proposed Project could have on historical resources identified within the API. The API for the Historical Resource Assessment Report was limited to the Project site. As the nearest historical resource is approximately 450 feet away, resources beyond the Project site were eliminated from inclusion within the API because distance and intervening high density development would preclude the proposed Project from having potential direct or indirect impacts to off-site properties.

Direct Impacts

Consistent with the SCCIC records search discussed above and based on review of the BERD, which is managed and maintained by the State Office of Historic Preservation (OHP); the Los Angeles Historic Resources Inventory website, HistoricPlacesLA.org, which is managed and maintained by the Los Angeles Office of Historic Resources (OHR); and SurveyLA, the citywide historic resource survey of Los Angeles, the Project site is not currently listed under federal, state, or local landmark or historic district programs. Additionally, it has not been identified in any previous historic resource surveys of the area.

TGHP reviewed the Project site to determine if the property qualifies as a historical resource under CEQA. To be eligible for listing in the National Register, a property must be at least 50 years of age, unless the property is of “exceptional importance,” and possess significance in American history and culture, architecture, or archaeology. Additionally, a property must be significant within a historic context and must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register. National Register Bulletin #15 defines integrity as “the ability of a property to convey its significance.” The California Register consists of automatically listed properties and those that must be nominated through an application and public hearing process. For properties not automatically listed as eligible under the California Register, the eligibility criteria are based on the criteria for listing under the National Register; however, properties that do not retain sufficient integrity to meet the criteria for listing in the National Register may still be eligible for listing in the California Register. Further, the City of Los Angeles Cultural Heritage Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). A monument is any site, building, or structure of particular historic or cultural significance to the City of Los Angeles and may be designated if it meets at least one of the specified criteria.

Based on review of the Project site, TGHP concluded that the existing buildings are ineligible for listing in the National Register and California Register, as well as ineligible for designation as a LAHCM due to the lack of historical significance and architectural distinction. Specifically, the property’s 1940s Courtyard Apartment design is neither an excellent example of its type, nor does it express aesthetic ideals or design concepts more fully than other properties of its type; the property was part of an existing trend in the area and was not a catalyst for other development; the property is neither associated with a historically significant person, nor associated with a specific architect and therefore not with the work of a master; and the property is not part of a historic district. As such, TGHP recommended a Status Code is 6Z: ineligible for listing in federal, state, and local registers of historical resources through survey evaluation. Thus, the property does not qualify as a historical resource as defined by CEQA. Therefore, there would be no direct impact to historic resources as a result of removal of the existing buildings as part of the proposed Project (TGHP, 2025). No additional mitigation is required.

Indirect Impacts

Based on the CEQA Guidelines, a proposed project can have a significant adverse impact if it changes the immediate surroundings of a historic resource so that the significance of the resource is “materially impaired.” A historic resource’s significance is materially impaired when it can no

longer convey its significance that justifies its eligibility as a historic resource; in other words, when it has lost its integrity. Based on these factors, the Historical Resource Assessment Report determined that the API would be limited to the Project site. There are no historical resources within the Project site, and the nearest historical resource is approximately 450 feet away with intervening high-density development, as discussed above. Additionally, none of the properties adjacent to the Project site are designated under federal, state, or local landmark or historic district programs or previously evaluated as potential historical resources in SurveyLA. (TGHP, 2025) Furthermore, the proposed Project's design, including height and density, takes architectural cues from surrounding development such as the Gayley Heights student housing building in order to promote visual compatibility within an area of dense mid- to high-rise residential development.

Therefore, the proposed Project would have no indirect impacts on historic resources.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Based on a records search conducted by the SCCIC for the Project site discussed above under Threshold (a), there are no archaeological resources recorded on or within 0.5-mile of the Project site.

Excavations of up to 52.5 feet bgs would be required for construction of the proposed Project. Therefore, disturbance of native alluvial sediments would occur during grading and excavation activities and would have the potential to impact previously unidentified archaeological resources. This would be considered a potentially significant impact. The proposed Project therefore incorporates LRDP MM 4.4-2(a), which requires an instructional program to assist construction personnel in identifying archaeological resources; MM 4.4-2(b), which describes procedures to be followed in the event that cultural resources are discovered; and MM 4.4-2(c), which requires that projects that would occur on a site with native sediments/soils have a qualified Archaeological Monitor present during earth-disturbing activities and that additional provisions be made for any project where archaeological resources are identified. With incorporation of these LRDP MMs, the proposed Project would result in a less than significant impact.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

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

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment set forth in Section 5097 of the California Public Resources Code. 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 MM 901 Levering TCR-3 5 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.

Level of Significance

The proposed Project would have a less than significant potential to disturb any human remains, including those interred outside of formal cemeteries.

6. ENERGY

Relevant elements of the proposed Project related to energy include the use of construction equipment for demolition, site excavation, and grading followed by building construction. The proposed Project consists of replacement of the five existing apartment buildings, which consist of approximately 23,952 sf with 52 beds, with a new up to 310,000-sf residential structure, which would provide up to 1,150 beds. Operation of the proposed Project would require the direct use of electrical energy for heating and air conditioning (HVAC), lighting, and typical household appliances. No natural gas service would be provided to the building for operation of the proposed

Project. As described in Section II.5, Proposed Project Components, under the discussion of “Sustainable Building Features” and discussed below, the proposed Project would comply with the UC Policy on Sustainable Practices, and the proposed Project would achieve a minimum LEED BD+C Gold rating.

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Construction

Construction of the proposed Project would consume energy in the use of fossil-fueled and electric-powered construction equipment, fossil-fueled haul trucks, and fossil-fueled and electric-powered construction worker commute vehicles. LRDP PPs and MMs adopted for the purpose of reducing construction phase air pollutant or greenhouse gas (GHG) emissions also result in positive energy use benefits. Notably, LRDP MM 4.2-2(a) limits the idle time on equipment and delivery trucks, which would reduce energy consumption; MM 4.2-2(b) addresses the use of alternative fuel construction equipment; MM 4.2-2(c) requires that diesel construction equipment be rated as Tier III or better¹⁷; and PP 4.15-1 requires adherence to the UC Policy on Sustainable Practices.

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

¹⁷ However, the proposed Project is committed to using Tier IV construction equipment, with the exception of any drill rig, thus further improving performance.

than five minutes (as identified in LRDP MM 4.2-2[a]), thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Idling limitations are enforced through periodic site inspections conducted by the UCLA Office of the Environment, Health & Safety (EH&S).

Construction worker and vendor trips would also result in the consumption of fuel. Diesel fuel would be supplied by commercial vendors; however, fuel efficiencies for on- and off-road vehicle engines continue to improve due to more stringent government requirements. Additionally, efficient use of fuel offers an important financial incentive for contractors/vendors.

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

Operations

The proposed Project would include direct use of electricity for the HVAC system, lighting, and appliances; indirect energy use for the processing and distribution of water and wastewater; and fossil-fueled and electric-powered vehicles used by residents. There are no aspects of the proposed Project that would contribute to wasteful, inefficient, or unnecessary energy consumption. Conversely, the proposed Project would involve the redevelopment of the Project site at a higher density, making use of existing infrastructure and improving energy efficiency. Specifically, the existing buildings on-site were constructed in the 1940s and thus neither meet current energy conservation requirements, nor the more stringent energy conservation requirements of the UC Policy on Sustainable Practices. The proposed new building would achieve a minimum LEED BD+C Gold rating. To achieve this rating, the design, construction, and operation of the proposed Project would incorporate a series of green building strategies including, but not limited to, the following, which would serve to reduce energy demand:

- Provide high-density student housing that is adjacent to existing amenities, public transportation, and existing urban infrastructure;
- Encourage alternative transportation by precluding on-site parking for students and providing bicycle racks on-site;
- Outperform CBC Title 24 energy efficiency requirements by at least 20 percent;
- Provide an all-electric building;
- Incorporate rainwater management strategies that retain on-site the runoff from the developed site for, at minimum, the 80th percentile of regional or local rainfall events;
- Utilize native and drought-tolerant plant species to reduce landscape irrigation demands and install a high-efficiency irrigation system;
- Select water fixtures (lavatory faucets, showers, toilets, etc.) to achieve at least a 36 percent reduction in per capita water demand (compared to the Fiscal Year 2005-2008 average baseline), in line with UC and UCLA goals to reduce potable water demand;
- Incorporate construction materials that have a lower embodied carbon in line with 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;

- Incorporate environmentally preferred and healthy materials that have environmental product declarations, recycled content, and health product declarations to earn a minimum of two points under LEED credit Building Product Disclosure and Optimization – Environmental Product Declarations, one point under LEED credit Building Product Disclosure and Optimization – Sourcing of Raw Materials, and one point under LEED credit Building Product Disclosure and Optimization – Material Ingredients;
- Divert a minimum of 75 percent of construction waste from landfills to reduce solid waste disposal.

With regard to vehicular energy use, as described in Section V.17, Transportation, of this Initial Study, a VMT Assessment was performed for the proposed Project. The proposed Project would have a less than significant VMT impact because it is located in a transit-rich area that qualifies as a TPA and is within a low VMT area. Further, the proposed Project would provide off-campus student housing adjacent to the UCLA campus, the optimal location for siting such housing and reducing the need for automobile-related travel by Project residents. In addition, pursuant to LRDP PP 4.13-1(d) (discussed in Section V.17, Transportation, of this Initial Study), which is incorporated into the proposed Project, Project residents would have access to a full range of existing campus TDM programs including, but not limited to, complimentary campus transit; accommodations for the use of other modes of transportation, including walking, bicycles, motorcycles, and scooters; an on-campus car share program; and public transit incentives.

In summary, the proposed Project would conserve energy through the provision of highly efficient building and mechanical systems designed to reduce direct and indirect electricity use; a prohibition on the use of natural gas; and a location adjacent to campus and Westwood, resulting in reduced vehicle energy use. Thus, the proposed 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

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Regulatory Framework

Energy is addressed in Section 6.7, Energy Conservation, and Section 4.6, Greenhouse Gas Emissions, of the LRDP Final SEIR, which is incorporated by reference. Various state and/or University regulations, plans, and policies aimed at GHG emissions reduction focus on energy

efficiency and renewable energy. While state and University regulations related to energy are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided below to identify new or updated regulations, as appropriate, or to provide context for the analysis that follows:

- **Executive Order B-30-15.** On April 29, 2015, Governor Edmund Brown signed EO B-30-15, which orders “A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050.” Three of the five key goals for reducing GHG emissions through 2030 relate to energy: (1) increasing renewable electricity to 50 percent; (2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; and (3) reducing petroleum use in cars and trucks by up to 50 percent.
- **Senate Bill 350.** SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of EO B-30-15. The objectives of SB 350 are:
 - (1) To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.
 - (2) To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

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

- **Senate Bill 100.** In September 2018, the Governor signed into law the California Clean Energy Act (SB 100), which accelerated the State Renewables Portfolio Standard (RPS)¹⁸ to 60 percent by 2030. The bill also requires that 100 percent of all retail sales of electricity come from eligible renewable energy and zero-carbon resources by 2045.
- **California Code of Regulations Title 24.** CCR Title 24, Part 6, California’s Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Energy Code), was first adopted in 1976 in response to a legislative mandate to reduce California’s energy consumption. The standards are updated every three years 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. 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 proposed Project will be subject to the 2025 California Title 24 Energy Standards which will go 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

¹⁸ 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.

administered by the California Building Standards Commission (CBSC). CALGreen improves public health, safety, and general welfare through enhanced design and sustainable construction of buildings while conserving natural resources. The CBC provides the minimum standard that buildings must meet in order to be certified for occupancy. CALGreen is updated on a regular basis, with the most recently approved update consisting of the 2025 CALGreen code that goes into effect on January 1, 2026. The proposed Project will be required to comply with the 2025 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, most recently in April 2024. The 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 new building construction meet a minimum rating of LEED Gold and outperform Title 24 Energy Efficiency Standards by at least 20 percent (UC, 2024).
- **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.¹⁹ 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, the proposed Project is consistent with the renewable energy elements of EO B-30-15, SB 350, SB 100, and AB 1279.

As discussed in Section II.5, Proposed Project Components, and further discussed in Section V.8, Greenhouse Gas Emissions, of this Initial Study, the proposed Project would meet the requirements and intent of the UC Policy on Sustainable Practices as it pertains to energy efficiency, green building, design, and sustainable transportation. The proposed Project, which would replace existing residential buildings that do not meet current UC or state energy conservation requirements, would achieve a minimum LEED BD+C Gold rating, and would outperform the required provisions of Title 24 Energy Efficiency Standards by at least 20 percent. Further, the proposed Project would comply with CALGreen Code Mandatory Measures. Notable features of the proposed Project to address improving energy efficiency are described in the

¹⁹ The Project site would connect to the University's campus electrical loop, which is powered by the current energy mix from LADWP (41 percent renewables per LADWP's 2024 Power Content Label). In order to ensure compliance with the UC Policy on Sustainable Practices, the University would purchase Renewable Energy Credits (RECs) as outlined in the policy procedures.

response to Threshold (a) above. Therefore, the proposed Project would be implemented in compliance with the UC Policy on Sustainable Practices, Title 24 Energy Efficiency Standards, and CALGreen.

In summary, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

7. GEOLOGY AND SOILS

Relevant elements of the proposed Project related to geology and soils include proposed excavation of approximately 60,900 cy of soil up to 52.5 feet bgs during earth-moving activities; construction of a new residential building up to 19 stories in height; and installation of landscape and utility improvements.

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 EIRs are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

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

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

PP 4.5-1(c) *The ~~campus~~ **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.²⁰

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 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.

The Geology and Soils sections of the LRDP EIRs include a detailed discussion of the federal, state, and University regulatory framework related to geology and soils and are hereby incorporated by reference. While federal, state and University regulations relative to geology and soils are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided in this section to identify updated regulations, as appropriate, or to provide context for this analysis. As identified, the national model code standards (i.e., the International Building Code) adopted into Title 24, Part 2, apply to all occupancies in California except for modifications adopted by state agencies and local governing bodies. The version of the CBC that will be applicable to the

²⁰ As the UC Seismic Safety Policy was updated on November 12, 2024, the proposed Project would be subject to this revision.

proposed Project is the 2025 edition, which will become effective in January 2026 and supersedes the 2016 CBC discussed in the LRDP Final SEIR.

Consistent with LRDP PP 4.5-1(a), a site-specific geotechnical study (Geotechnical Investigation) was prepared for the proposed Project by Geocon West, Inc. (Geocon, 2025) and is included in Appendix E of this Initial Study. The Geotechnical Investigation involved the excavation of three 3.5-inch diameter borings (B1 through B3) excavated to depths between 18 and 20 feet bgs, and one 8-inch diameter boring excavated to a depth of 81 feet bgs (B4) as measured from Weyburn Place. Laboratory testing of representative soil samples collected from the borings, a review of public geologic data and available geotechnical engineering information, and a geotechnical engineering analysis of the proposed Project based on the collected data was conducted. The results of the Geotechnical Investigation are summarized in the analysis below, as applicable.

Project Impact Analysis

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

Discussion

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

Other seismic-related hazards investigated include the potential for liquefaction and slope instability (i.e., landslides). Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be sufficient to induce liquefaction. The soils encountered at the site are Pleistocene age older alluvial fan deposits, which are generally dense to very dense or firm to hard, and are not likely susceptible

to liquefaction. Additionally, the Project site is not identified as susceptible to liquefaction on the CGS' Seismic Hazards Zone Map for the Beverly Hills Quadrangle. The proposed Project would not directly or indirectly cause potential substantial adverse effects related to seismically induced liquefaction or settlement.

Regarding landslides, the topography at the Project site consists of relatively level terraces built into a steeply sloped hillside. The topography in the immediate vicinity of the site slopes to the south away from the topographic high that the site is located on. The Project site is not within an area identified as having a potential for seismic slope instability. Moreover, there are no known landslides near the Project site, and the Project site is not in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the proposed Project is considered low. The proposed Project would not directly or indirectly cause potential substantial adverse effects related to landslides.

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

The Project site is in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake occurring at one of the many active Southern California faults. The closest surface trace of an active fault to the site is the Hollywood Fault located approximately 0.5 mile to the north. The nearest surface trace of an active fault mapped by CGS is the Santa Monica Fault located approximately 1 mile to the south. Other nearby active faults are the Hollywood Fault, the north Los Angeles Basin Section of the Newport-Inglewood-Rose Canyon fault zone, and the Raymond fault located approximately 3.1 miles east, 3.8 miles southeast, and 14 miles east of the Project site, respectively. The active San Andreas Fault Zone is located approximately 33 miles northeast of the Project site. Several buried thrust faults, commonly referred to as blind thrusts, underlie the Southern California area at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers (approximately 1.8 miles). Thrust faults in the Los Angeles area are not exposed at the surface and do not present a potential surface fault rupture hazard at the Project site. The Project site could be subjected to strong ground shaking in the event of earthquake.

The Project site is classified as Site Class C; this classification is used as the basis for seismic design parameters to be implemented for the proposed Project. Another measure of seismic activity calculated in the Geotechnical Investigation is the Maximum Considered Earthquake

(MCE), which is the level of ground motion (i.e., peak ground acceleration [PGA]) that has a 1 percent chance of exceedance in 50 years. The MCE is utilized for the evaluation of liquefaction, lateral spreading, and seismic settlement; and to develop seismic design criteria to maintain “Life Safety” during an MCE event. For the Project site, the Geotechnical Investigation calculated a PGA of 0.97g (approximately 97 percent the force of gravity) for the MCE.

Potential impacts related to strong seismic ground shaking would be less than significant with implementation of: (1) recommendations from the Project-specific Geotechnical Investigation as required by LRDP PP 4.5-1(a); (2) compliance with the current CBC (required by PP 4.5-1[a]); (3) incorporation of LRDP PP 4.5-1(c), which requires compliance with the current University Policy on Seismic Safety; and (4) incorporation of LRDP PP 4.5-1(d), which requires structural peer review and incorporation of peer review recommendations into project design.²¹ Although there would be less than significant impacts with incorporation of identified LRDP PPs, additional Project-level MM 901 Levering GEO-1, presented below, would further ensure that potential impacts resulting from implementation of the proposed Project remain less than significant.

In summary, the primary geologic hazard on the Project site is moderate to strong ground shaking as a result of an earthquake. Neither soil nor geologic conditions were encountered during the Geotechnical Investigation that would preclude the construction of the proposed Project, provided the recommendations presented therein (and required by MM 901 Levering GEO-1) are followed and implemented during design and construction. As discussed above, there would be no impact related to liquefaction or landslides, and there would be less than significant impacts related to strong seismic ground shaking with incorporation of LRDP PPs 4.5-1(a), 4.5-1(c), and 4.5-1(d). MM 901 Levering GEO-1 would be required to ensure that recommendations from the site-specific Geotechnical Investigation are included in the Project design.

Project-Level Mitigation Measures

MM 901 Levering GEO-1 would be required to ensure that potential impacts resulting from implementation of the proposed Project remain less than significant by requiring any recommendations from the Project-specific Geotechnical Investigation to be incorporated into the Project design, as required by LRDP PP 4.5-1(a).

MM 901 Levering GEO-1 *Prior to building permit issuance for the 901 Levering Redevelopment Project, a qualified Engineer shall review the final designs and contract specifications to verify that all geotechnical recommendations provided in the site-specific geotechnical investigation(s) for the Project site have been fully and appropriately incorporated. Such recommendations shall comply with applicable provisions and standards set forth in or established by CGS Special Publication 117, the current Uniform Building Code, relevant state and code requirements, and current standards of practice designed to minimize potential geologic, geotechnical, and related impacts. The recommendations for the Project site shall include, but not be limited to, the following geotechnical engineering topics:*

- *General Requirements*
- *Soil and Excavation Characteristics*
- *Minimum Resistivity, pH, and Water-Soluble Sulfate*

²¹ 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.

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

Level of Significance after Mitigation

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

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

Earth-disturbance associated with construction of the proposed Project would include the removal of existing site improvements and vegetation and excavation to a depth of approximately 52.5 feet bgs. During construction activities, soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. Erosion can occur due to, and can be accelerated by, site preparation activities associated with development. Vegetation removal in landscaped, pervious areas could reduce soil cohesion and reduce the protection from wind,

water, and surface disturbance, which could render exposed soils more susceptible to erosive forces. Additionally, during a storm event, soil erosion could occur at an accelerated rate.

Construction activities would comply with all provisions of the CBC related to excavation activities, grading activities, erosion control, and construction of foundations and retaining walls to minimize or eliminate soil erosion or loss of topsoil. In addition, the proposed Project would minimize or eliminate soil erosion through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) as required by LRDP PP 4.7-1 and incorporation of LRDP MM 4.7-1, which requires implementation of structural, nonstructural, and treatment control BMPs. LRDP PP 4.7-1 and MM 4.7-1 are included in Section V.10, Hydrology and Water Quality, of this Initial Study and incorporated into the proposed Project. The SWPPP would incorporate erosion control BMPs which significantly reduce the erosion potential of any project development to negligible amounts. Temporary erosion control BMPs implemented during construction would include but would not be limited to: street sweeping and vacuuming, installation of sandbag barriers, stabilized driveways at construction entrances and exits, and an entrance/exit tire wash. Fiber rolls would be installed at the Project site boundary along Levering Avenue and Weyburn Place, and existing catch basins would also be protected with appropriate BMPs to minimize sedimentation entering the storm drain system. Incorporation of LRDP PP 4.7-1 and MM 4.7-1, as identified in Section V.10, Hydrology and Water Quality, would ensure that potential erosion impacts remain less than significant during construction.

In the long term, under Project conditions, the proposed Project would decrease the pervious area (landscaping or permeable paving) on-site. Soil transported off site (by wind or water erosion) would be reduced by the presence of development and landscaping. Areas of exposed soils would be minimal following construction of the proposed Project, and potential erosion impacts would be less than significant during operation.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

As further described in the site-specific Geotechnical Investigation, the Project site is underlain by artificial fill materials to a maximum depth of 6.5 feet bgs and Pleistocene-age old alluvial fan deposits. The artificial fill generally consists of silty sand that can be characterized as loose to medium dense or firm, dry, and brown. The Pleistocene-age sediments underlying the artificial fill generally consists of well-defined layers of sandy clay, silty gravel, and silty sand that can be characterized as medium dense to very dense or firm to hard, slightly moist to wet, and brown, yellow brown, and reddish brown.

Review of the CGS Seismic Hazard Zone Report of the Beverly Hills Quadrangle indicates the historically highest groundwater level in the Project area is approximately 30 feet bgs. However, as discussed in the Geotechnical Investigation prepared for the proposed Project, the nearest groundwater measurements were collected from wells located within the younger alluvial filled valleys to the east and west of the site that are located at lower elevations than the site. Therefore, the groundwater measurements from the wells may not be representative of depth to water at the Project site. Perched groundwater was encountered in the borings conducted at the Project site and stabilized groundwater was encountered in boring B4 at a depth of 68 feet bgs (approximately 313 feet amsl). During the methane study performed for the Project site, groundwater was encountered in the geoprobe exploration designated as B4. This boring was drilled on Weyburn Place at an approximate elevation of 381 amsl. Groundwater was encountered at a depth of 58.5 feet, corresponding to an elevation of 322.5 amsl. Based on these considerations, the Geotechnical Investigation recommends that a design high groundwater elevation of 330 amsl be used for design purposes. Based on the groundwater measurements, the reported historic high groundwater levels in the immediate area, and the depth of proposed construction (approximately 340 amsl), static groundwater is neither expected to be encountered during construction, nor have a detrimental effect on the proposed Project. However, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. Groundwater seepage levels encountered during construction may be higher than those encountered during the investigation. In addition, recent requirements for storm water infiltration could result in shallower seepage conditions in the immediate site vicinity.

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

Laboratory testing indicates that soils at the Project site are considered corrosive to severely corrosive to ferrous metals on-site. The Geotechnical Investigation recommends the use of corrosion-resistant polyvinyl chloride (PVC), acrylonitrile butadiene styrene (ABS), or other approved plastic in lieu of cast-iron for piping that would be in direct contact with soils on-site. There would be a less than significant impact related to corrosive soils with implementation of MM 901 Levering GEO-1, which ensures that recommendations from the Geotechnical Investigation are included in the Project design.

The Geotechnical Investigation determined that the soils encountered at the existing foundation level have a low expansion potential and are classified as non-expansive. However, soils encountered in boring B4 near the upper Weyburn Place elevation are considered to have a

medium expansion potential and are classified as expansive. The recommendations presented in the Geotechnical Investigation indicate that the building foundations and slabs would derive support in low expansive materials and retaining walls may retain medium expansive materials. As such, there would be a less than significant impact related to expansive soils with implementation of MM 901 Levering GEO-1, which ensures that recommendations from the Geotechnical Investigation are included in the Project design.

The Geotechnical Investigation concluded that the proposed Project would be feasible with implementation of the recommendations outlined in the Project-specific Geotechnical Investigation, as required by LRDP PP 4.5-1(a). Therefore, because the proposed Project incorporates LRDP PP 4.5-1(a), PP 4.5-1(c), and PP 4.5-1(d), and with the implementation of MM 901 Levering GEO-1 to ensure implementation of recommendations from the Geotechnical Investigation, there would be less than significant impacts related to unstable or expansive soils.

Project-Level Mitigation Measures

MM 901 Levering GEO-1 provided above would be implemented, as required by LRDP PP 4.5-1(d); no additional mitigation measures are required.

Level of Significance

With implementation of MM 901 Levering GEO-1, the proposed Project would result in less than significant impacts related to unstable geologic units or soils and expansive soils.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

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

As discussed above, the Project site is underlain by artificial fill materials to a maximum depth of 6.5 feet bgs and Pleistocene-age old alluvial fan deposits. Excavations of up to approximately 52.5 feet bgs would be required during construction of the proposed Project and would extend into the native alluvial sediments. As such, excavation activities in native alluvium could damage or destroy unknown fossils, should they exist, resulting in a potentially significant impact. The proposed Project would incorporate LRDP MM 4.4-3(a), which requires an instructional program to assist construction personnel in identifying paleontological resources, and LRDP MM 4.4-3(b), which defines the requirements for review and recordation by a qualified Paleontologist of any paleontological resources encountered on a site. With implementation of LRDP MM 4.4-3(a) and MM 4.4-3(b), potential impacts related to paleontological resources would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

8. GREENHOUSE GAS EMISSIONS

Relevant elements of the proposed Project related to GHG emissions include the demolition of the five existing apartment buildings (approximately 23,952 sf and 52 beds); excavation and net export of an estimated 60,900 cy of soil; and construction and operation of a new up to 310,000-sf residential structure, which would provide up to 1,150 beds. For purposes of this analysis, the primary contributors of operational GHG emissions would be mobile emissions and energy

consumption related to Project operations.²² As previously indicated, the proposed Project would achieve a minimum LEED BD+C Gold rating.

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 are assumed in the analysis presented in this section. Changes in the text from the LRDP EIRs are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

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

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

Greenhouse Gas Background

Global Climate Change

Increasing GHG emissions have led to an anthropogenic warming trend of the earth's average temperature, which is causing changes in the Earth's climate.²³ GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activities; and (4) solid waste decomposition. This increasing temperature phenomenon is known as "global warming," and the climatic effect is known as "climate change" or "global climate change" (GCC).

GCC is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

²² The proposed Project would not use natural gas for the building envelope or for Project-related equipment and appliances. The Project site would connect to the University's campus electrical loop, which is powered by the current energy mix from LADWP (41 percent renewables per LADWP's 2024 Power Content Label). In order to ensure compliance with the UC Policy on Sustainable Practices, the University would purchase Renewable Energy Credits (RECs) as outlined in the policy procedures. To provide a conservative analysis, this analysis quantifies the Project's full electrical usage without applying REC offsets.

²³ 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.

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

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

Human influence on the climate system is clear. This is evident from the increasing greenhouse gas concentrations in the atmosphere, positive radiative forcing, observed warming, and understanding of the climate system. Human influence has been detected in warming of the atmosphere and the ocean, in changes in the global water cycle, in reductions in snow and ice, in global mean sea level rise, and in changes in some climate extremes. It is extremely likely that human influence has been the dominant cause of the observed warming since the mid-20th century.²⁴

Greenhouse Gases

GHGs are comprised of atmospheric gases and clouds in the atmosphere that influence the Earth's temperature by absorbing most of the infrared radiation that rises from the sun-warmed surface and that would otherwise escape into space. This process is commonly known as the "Greenhouse Effect." GHGs are emitted by natural processes and human activities. The Earth's surface temperature averages about 58°F because of the Greenhouse Effect. Without it, the Earth's average surface temperature would be somewhere around an uninhabitable 0°F. The resulting balance between incoming solar radiation and outgoing radiation from both the Earth's surface and the atmosphere maintains the planet's habitability.

GHGs, as defined under the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). General discussions on climate change often include water vapor, atmospheric ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not formed directly in the construction or operation of development projects, nor can they be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies (such as CARB) or climate change groups (such as the California Climate Action Registry [CCAR]) as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided.

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

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

²⁴ "Extremely likely" is defined as the 95 to 100 percent confidence level (IPCC, 2013).

Regulatory Framework

A discussion of the regulatory framework for assessing climate change impacts is provided in Section 4.15, Greenhouse Gas Emissions, of the LRDP Final SEIR and is incorporated by reference. While federal, state, regional, and University regulations relative to GHG emissions are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided below to identify new or updated regulations, as appropriate, or to provide context for this analysis.

Federal

- **SAFE Vehicles Rule and CAFE Standards.** The USEPA and the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) have issued rules to reduce GHG emissions and to improve fuel economy for new cars and trucks sold in the United States. On April 2, 2018, the USEPA signed the Mid-term Evaluation Final Determination, which declared that the model year (MY) 2022-2025 GHG standards are not appropriate and should be revised (Federal Register, 2018). This Final Determination serves to initiate a notice to further consider appropriate standards for MY 2022-2025 light-duty vehicles. On August 2, 2018, the NHTSA in conjunction with the USEPA, released a notice of proposed rulemaking, the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend existing Corporate Average Fuel Economy (CAFE) and tailpipe CO₂ standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and USEPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO₂ emissions standards by 1.5 percent each year through model year 2026 (NHTSA, 2020). However, on March 14, 2022, the USEPA rescinded the SAFE Vehicles Rule, once again allowing California to enforce its own GHG emissions standards.

State

- **Executive Order (EO) S-3-05**, which establishes a goal of a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.
- **AB 32**, the California Global Warming Solutions Act of 2006, is the original primary state regulation relative to GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020.
- **SB 375** provides for a planning process to coordinate land use planning and regional transportation plans (RTPs) and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 requires Metropolitan Planning Organizations (MPOs), including SCAG, to incorporate a Sustainable Communities Strategy (SCS) in their RTPs that will achieve GHG emission reduction targets set by CARB. There are two mutually important facets to SB 375: reducing VMT and encouraging more compact, complete, and efficient communities for the future. Pursuant to SB 375, SCAG adopted the 2024-2050 RTP/SCS (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 a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 be established in order to ensure

California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. EO B-30-15 also directs CARB to update the *Climate Change Scoping Plan* to express the 2030 target in terms of million metric tons of carbon dioxide equivalent (MMTCO_{2e}).

- **SB 350** is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of EO B-30-15. The text of SB 350 sets a December 31, 2030 target for 50 percent of electricity to be generated from renewable sources.
- **SB 32** implements a goal of EO B-30-15. Under SB 32, in "adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions," CARB must ensure that statewide greenhouse gas emissions are reduced to 40 percent below the 1990 level by 2030. SB 32's findings state that CARB will "achieve the state's more stringent greenhouse gas emission reductions in a manner that benefits the state's most disadvantaged communities and is transparent and accountable to the public and the Legislature."
- **AB 197**, a companion to SB 32, adds two members to the CARB and requires measures to increase transparency about GHG emissions, climate policies, and GHG reduction actions.
- **Assembly Bill 1279**. In September 2022, Governor Newsom signed into law AB 1279, or the California Climate Crisis Act.²⁵ 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.²⁶ 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.²⁷ In its latest 2022 Scoping Plan Update, 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, 2022a).²⁸ Before the passage of AB 1279, California had already indicated it was headed in the direction of net-zero emissions by 2045 after Governor Brown signed Executive Order (EO) B-55-18 in 2018, which established an additional statewide goal of achieving carbon neutrality by 2045 (State of California, 2018).
- **The CARB Scoping Plan**, required by AB 32, proposes a comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health. In November 2017, CARB released the Final 2017 Scoping Plan Update, which identifies the state's post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. The 2017 Scoping Plan established a new emissions limit of 260 MMTCO_{2e} for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

²⁵ California Health and Safety Code Section 38562.2

²⁶ *Id.*

²⁷ *Id.*

²⁸ CARB's Scoping Plan 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.

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

- **SB 100** requires renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045.
- **EO B-55-18** sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045, and achieve net negative emissions thereafter.

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

State CEQA Guidelines Regarding Greenhouse Gas Emissions

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

- (a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
 - (1) Quantify greenhouse gas emissions resulting from a project; and/or
 - (2) Rely on a qualitative analysis or performance-based standards.
- (b) In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate

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

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

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

California Code of Regulations Title 24

CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24 Energy Code) was first adopted in 1976 in response to a legislative mandate to reduce California's energy consumption. The standards are updated every three years 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 are set to take effect on January 1, 2026.

CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is

administered by the 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 is set to take effect on January 1, 2026.

The proposed Project would be required to comply with the 2025 Title 24 standards.

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, 2024).

The 2024 update to 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 intended to minimize its impact on the environment and reduce its dependence on nonrenewable energy.

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 include UC facilities, these eligible materials must have a GWP that does not exceed the limit set by DGS.

UCLA Climate Action Plan

The UC Policy on Sustainable Practices also calls for each UC campus to draft a Climate Action Plan (CAP) that examines the feasibility of meeting the climate change goals identified in the UC Policy on Sustainable Practices. The UCLA CAP was completed in December 2008 (UCLA, 2008). The CAP outlines a comprehensive range of initiatives to promote sustainable practices and reduce UCLA's carbon footprint. An updated CAP is currently underway and will reflect both the latest goals established in the UC Policy on Sustainable Practices and UCLA's recently completed Decarbonization Study (UCLA, 2024) which identifies pathways for the campus to achieve a 90 percent reduction in Scope 1 emissions.

Regional

South Coast Air Quality Management District

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions. In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold (Guidance Document), that could be applied by lead agencies. The working group has not provided additional guidance since the release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to determine the significance of GHG emissions that can be considered by the lead agency in adopting its own threshold.

At Tier 1, GHG emissions impacts would be less than significant if the project qualifies under a categorical or statutory CEQA exemption. At Tier 2, for projects that do not meet the Tier 1 criteria, the GHG emissions impact would be less than significant if the project is consistent with a previously adopted GHG reduction plan that meets specific requirements. At Tier 3, the following Tier 3 screening values are identified: either (1) a single 3,000 MTCO₂e/yr threshold for all residential and commercial uses; or (2) separate thresholds of 3,500 MTCO₂e/yr for residential projects, 1,400 MTCO₂e/yr for commercial projects, and 3,000 MTCO₂e/yr for mixed-use projects. The screening thresholds are based on estimates that projects with emissions greater than the thresholds would emit 90 percent of the region's GHGs. Therefore, a project with emissions less than the applicable screening value would be presumed to have less than significant GHG emissions. SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate change.

Projects with emissions greater than the Tier 3 screening values would be analyzed at Tier 4 by one of the three methods. Projects with GHG emissions not meeting the Tier 4 targets would be required to provide mitigation in the form of real, quantifiable, and verifiable offsets to achieve the target thresholds. The offsets may be achieved through project design features, other on-site methods, or by off-site actions, such as energy efficiency upgrade of existing buildings.

Existing Emissions

The Project site is developed with residential apartment buildings, which have existing sources of GHG emissions. The estimated annual GHG emissions are summarized in Table 10 for the existing buildings (approximately 378.88 MTCO₂e/yr). Detailed model outputs are presented in Appendix 2 of the Air Quality and GHG Assessment included in Appendix A of this Initial Study.

TABLE 10 EXISTING DEVELOPMENT ESTIMATED GREENHOUSE GAS EMISSIONS

Source	Emissions (MT/year)				
	CO ₂ T	CH ₄	N ₂ O	R	Total CO ₂ e
Mobile	280.00	0.01	0.01	0.28	284.00
Area	13.70	0.01	< 0.005	0.00	14.10
Energy	65.30	0.01	< 0.005	0.00	65.60
Water	3.83	0.05	< 0.005	0.00	5.48
Waste	2.76	0.28	0.00	0.00	9.67
Refrigeration	0.00	0.00	0.00	0.03	0.03
Total CO₂e (All Sources)	378.88				
Source: (Urban Crossroads, 2025a)					

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Construction-related GHG emissions were calculated using CalEEMod version 2022.1, as described in Section V.3, Air Quality, of this Initial Study. Construction assumptions are also described in Section V.3 and in the Air Quality and GHG Assessment included in Appendix A of this Initial Study. Construction emissions would be associated with vehicle engine exhaust from construction equipment, soil haul truck trips, vendor trips, and worker commuting trips. The estimated construction emissions for the proposed Project would be approximately 2,872.89 MTCO₂e/year. To estimate annual GHG emissions, the SCAQMD recommends amortizing construction emissions over a project’s 30-year lifespan. Therefore, the proposed Project’s 30-year amortized construction emissions would be approximately 95.76 MTCO₂e/year.

Operational GHG emissions attributed to the proposed Project would include mobile sources; area sources; energy sources; water supply, treatment, and distribution sources; solid waste sources; refrigerant sources; and stationary source. UCLA has committed to achieving a minimum LEED BD+C Gold rating for the proposed Project, with a goal to try to achieve a LEED BD+C Platinum rating. The proposed Project would also implement energy- and water-efficiency measures that would result in increased energy and water efficiency; these measures are described in LRDP PPs 4.14-2(a) through 4.14-2(d), PP 4.14-2(g), PP 4.14-3, and PP 4.14-9 in Section V.19, Utilities and Service Systems. Estimated operational GHG emissions for the proposed Project are shown in Table 11 and conservatively do not include emission reductions resulting from implementation of the energy and water efficiency measures. As shown in Table 11, the net increase in estimated annual operational GHG emissions for the proposed Project, when taking into consideration the GHG emissions from the existing buildings, is approximately 2,065.43 MTCO₂e/yr.

TABLE 11 ESTIMATED ANNUAL OPERATIONAL GREENHOUSE GAS EMISSIONS

Source	Emissions (MT/year)				
	CO ₂	CH ₄	N ₂ O	R	Total CO ₂ e
Annual construction-related emissions amortized over 30 years ^a	94.46	3.33E-03	4.00E-03	0.04	95.76
Mobile	1,593.00	0.07	0.06	1.59	1,615.00
Area	15.10	0.00	0.00	0.00	15.20
Energy	581.00	0.04	0.01	0.00	584.00
Water	17.10	0.23	0.01	0.00	24.50
Waste	25.60	2.56	0.00	0.00	89.70
Refrigerants	0.00	0.00	0.00	0.05	0.05
Stationary	20.00	0.00	0.00	0.00	20.10
Total Project CO₂e (All Sources)	2,444.31				
Emissions from Existing Buildings	(378.88)				
Net Increase in Emissions (Proposed—Existing)	2,065.43				
^a The total annual construction-related emissions for the proposed Project are 2,872.89 MTCO ₂ e per year. Source: (Urban Crossroads, 2025a)					

As discussed above, a numerical threshold for determining the significance of GHG emissions in the SCAB has not been established by the SCAQMD for projects where it is not the lead agency. Based on guidance provided in the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change handbook, UCLA has opted to use a non-zero threshold based on Approach 2 of the CAPCOA handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD using this method is 3,000 MTCO₂e/yr for all land use types. The proposed Project would not exceed the SCAQMD’s Tier 3 screening threshold of 3,000 MTCO₂e/yr for all land use types, which UCLA uses as a numeric threshold for GHG emissions, nor SCAQMD’s screening threshold of 3,500 MTCO₂e/yr for residential uses. Thus, the direct and indirect GHG emissions of the proposed Project would not be cumulatively considerable and would result in a less than significant impact.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project’s estimated annual GHG emissions would be substantially below the SCAQMD Tier 3 screening threshold of 3,000 MTCO₂e/yr for residential uses, the most conservative threshold applicable to residential uses within that tier 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

University of California Plans, Policies, and Regulations

The proposed Project incorporates LRDP PP 4.15-1, which ensures implementation of applicable provisions of the UC Policy on Sustainable Practices last updated in 2024 (UC, 2024) and the UCLA Climate Action Plan prepared in 2008 (UCLA, 2008). The majority of the sustainable practices policies and CAP initiatives are applicable at the UC-wide or campus-wide level and are not applicable to individual projects. Examples of inapplicable provisions include systemwide targets for emissions reductions, electric vehicle (EV) commuting goals, procedures for campus fleet vehicles, and campus outreach programs. Additional policies are applicable to certain types of projects, but not the proposed Project, such as criteria for renovations to existing buildings. The UC Policy on Sustainable Practices and UCLA policies applicable to the proposed Project are discussed below.

UC Policy on Sustainable Practices and UCLA Climate Action Plan

The Green Building Design section of the UC Policy on Sustainable Practices includes the following goals applicable to new buildings, including the proposed Project:

- All new building projects, other than acute care facilities, will be designed, constructed, and commissioned to outperform the CBC energy-efficiency standards by at least 20 percent or meet the whole-building energy performance targets listed in Table 1 of Section V.A.1 of the UC Policy on Sustainable Practices. The University will strive to design, construct, and commission buildings that outperform CBC energy efficiency standards by 30 percent or more or meet the stretch whole-building energy performance targets listed in Table 1 of Section V.A.1, whenever possible within the constraints of program needs and standard budget parameters.
- New building or major renovation projects may not use on-site fossil fuel combustion (e.g., natural gas) for space and water heating (except those projects connected to an existing campus central thermal infrastructure). Projects unable to meet this requirement will document the rationale for this decision.
- All new buildings will achieve a USGBC LEED Gold certification at a minimum. All new buildings will strive to achieve certification at a USGBC LEED Platinum rating, whenever possible within the constraints of program needs and standard budget parameters.
- All new building projects will achieve at least five points within the available credits in LEED BD+C’s Water Efficiency and Sustainable Sites: Rainwater Management categories and prioritize earning waste reduction and recycling credits.
- Projects will utilize the versions of the UC Policy on Sustainable Practices, CBC energy efficiency standards, and LEED BD+C that are in effect at the time of the first submittal of Preliminary Drawings (at the end of the Design Development Phase).

As discussed in Section II.5 of this Initial Study, the proposed Project would be an all-electric development designed to achieve a minimum LEED Gold rating and exceed Title 24 requirements by 20 percent. The proposed Project would also comply with CALGreen mandatory requirements for residential uses. Moreover, the proposed Project would incorporate previously adopted water conservation measures (LRDP PP 4.14 2[a] through PP 4.14-2[d]), solid waste conservation measures (LRDP PP 4.14-3), and energy conservation measures (LRDP PP 4.14-9).

In addition, the following requirement set forth in the Clean Energy section of the UC Policy on Sustainable Practices applies to off-campus properties, including the proposed Project:

- Clean electricity will be procured through the following methods and reported on annually:
 - A location may opt-in to a utility-provided green power program for its purchased electricity that meets the definition of clean electricity specified in V.B.3.a.
 - The UC Clean Power Program, which will procure and supply to participating campuses 100 percent clean electricity.
 - Those locations without access to a green power program may purchase Renewable Energy Credits (REC) to offset purchased electricity. To be counted, such RECs will be transferred to UC or retired on behalf of UC.

As previously discussed, the Project site would connect to the University's campus electrical loop, which is powered by the current energy mix from LADWP (41 percent renewables per LADWP's 2024 Power Content Label) (LADWP, 2024). In order to ensure compliance with the UC Policy on Sustainable Practices, the University would purchase RECs as outlined in the policy procedures.

Relevant to the proposed Project, the Sustainable Transportation section of the UC Policy on Sustainable Practices includes mechanisms for reducing commute emissions, which are also discussed in the UCLA Climate Action Plan. The Sustainable Transportation policy includes goals to: (1) reduce the percentage of employees and students commuting by single-occupancy vehicles (SOV) by 10 percent relative to the 2015 SOV commute rates by 2025, and (2) have no more than 40 percent of employees and no more than 30 percent of all employees and students commuting to each campus by SOV by 2050. The Commute Emissions Reduction Initiative 8.2 in the UCLA CAP identifies that reductions in commute emissions would be attained by reducing single occupant vehicle trips to and from campus. The campus offers a range of alternative mode programs designed to encourage both employee and student commuters to travel to and from campus by means other than driving alone. This Initiative also identifies that "...housing students and employees on campus brings these commuters to the doorstep of the campus and largely eliminates their commute carbon footprint." By adding up to 1,098 new beds adjacent to the campus, which would reduce dependency on vehicles and reduce the SOV rate, the proposed Project is consistent with this Initiative. As further discussed in Section V.17, Transportation, of this Initial Study, the proposed Project is located within a TPA and a low VMT area and, therefore, is screened out from further VMT analysis.

The UCLA CAP Commute Emissions Reduction Initiative also acknowledges the planned extension of the Metropolitan Transportation Authority's (Metro) rail system to Westwood, providing subway service in proximity to campus and potentially providing significant further reductions in the drive alone rate. The Metro Purple (D) Line extension to Westwood has been initiated and is expected to be completed by 2027 (Metro, 2025). The Westwood/UCLA Station is approximately 0.3 mile from the Project site and would be easily accessible to Project residents, reducing the drive-alone rate.

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

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

State Plans, Policies and Regulations

As discussed previously, California's major initiative for reducing GHG emissions is SB 32. EO B-30-15 added the target of reducing GHG emissions to 40 percent below 1990 levels by 2030. SB 32 builds on AB 32 and keeps California on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. The CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by SB 32, and the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. Further, AB 1279 requires the State to achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter.

As previously identified, the 2024 update to the UC 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. The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure and indicates that in almost all sectors, electrification will play an important role. In addition, Appendix D, Local Actions, of the 2022 Scoping Plan includes key project attributes that reduce operational GHG emissions (CARB, 2022b). The proposed Project includes applicable key attributes for residential projects from Appendix D, including: a location on an infill site surrounded by existing urban uses and reuse or redevelopment of previously undeveloped or underutilized land that is served by existing utilities and essential public services (e.g., transit, streets, water, sewer); no loss or conversion of natural and working lands; development of transit-supportive densities (minimum of 20 residential dwelling units per acre) or proximity to existing transit stops (within one-half mile); reduced parking requirements (no resident parking would be provided as part of the proposed Project); and use of all-electric appliances without any natural gas connections, propane, or other fossil fuels for space heating, water heating, or indoor cooking.

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

In summary, the proposed Project would not conflict with AB 32, EO S-3-05, EO B-30-15, SB 32, or AB 1279.

Senate Bill 375 and SCAG Connect SoCal

A primary goal of SB 375 and SCAG's Connect SoCal 2024 is to reduce GHG emissions by reducing vehicle trips and associated VMT. Methods to reduce VMT include locating residents closer to where they work and play; designing walkable environments; and providing access to high-quality transit service. Although not subject to Connect SoCal 2024, the proposed Project would contribute to the VMT reduction goals by providing the following benefits:

- The Project site is located within walking distance to the main campus, numerous public bus lines, the extensive commercial business district in Westwood Village, and the future Metro subway station at Wilshire Boulevard between Veteran Avenue and Westwood Boulevard. The Project site is also located in an existing TPA, which is defined as an area within 0.5 mile of a major transit stop.
- The proposed Project would provide long-term bicycle parking.
- Pursuant to LRDP PP 4.13-1(d) (discussed in Section V.17, Transportation), which is incorporated into the proposed Project, UCLA actively provides and promotes alternative modes of transportation, including complimentary campus transit; discounted public transit passes; accommodations for bicycles, motorcycles, and scooters; a car share program; and parking control management.

Therefore, implementation of the proposed Project would align with SB 375 and SCAG's Connect SoCal 2024.

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

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

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 EIRs are signified by ~~strikeout (strikeout)~~ where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

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

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

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Construction-Related Hazards

Building Materials

Based on the age of the existing apartment buildings, which were constructed between 1946 and 1948, UCLA directed the preparation of an Environmentally-Regulated Materials Survey Report (ERM Report) by Citadel EHS (Citadel) (Citadel, 2025a), which is included in Appendix F1 of this Initial Study.

The ERM Report identified asbestos-containing materials (ACMs) and asbestos-containing construction materials (ACCMs) in interior and/or exterior materials within all five existing buildings. Additionally, the ERM Report has identified various interior materials within occupied units that were not surveyed as presumed asbestos-containing materials (PACMs) Materials coated with lead-based paint (LBP) and lead-containing paint (LCP) were also identified throughout the existing buildings during the survey.

Any proposed Project construction-related activity, including demolition or the relocation of underground utilities, that involves cutting, grinding, or drilling where these materials are present could release friable asbestos fibers or lead dust and expose construction personnel unless proper precautions are taken. Because exposure to such materials can result in adverse health effects in uncontrolled situations, several regulations pertaining to abatement, handling, and disposal of ACMs/ACCMs and LCP/LBP have been developed. Per LRDP PP 4.6-1, the UCLA EH&S procedures require that all applicable federal, state, and local regulations as well as UCLA’s Asbestos Management Program and Lead Compliance Program be implemented during construction activities. The Asbestos Management Program ensures safe work practices involving asbestos, including notification of applicable government agencies prior to beginning any renovation or demolition that could disturb asbestos and using safe work practices to eliminate or reduce the potential for release of asbestos fibers. This program also requires medical examinations and monitoring of employees engaged in activities that could disturb asbestos. Similarly, the campus Lead Compliance Program is directed at reducing lead exposure through education, inspection, testing, and removal.

The ERM Report also identified Polychlorinated Biphenyl (PCB)- and Diethylhexyl Phthalate (DEHP)-containing equipment in light fixture ballasts and transformers throughout the existing buildings. These materials would require special handling during removal to ensure the regulated substances are not released into the environment, as discussed below. Universal, electronic, and radioactive wastes identified or assumed to be present throughout the existing buildings include thermostats, smoke detectors, light bulbs and fixtures, batteries, and lamps. During demolition activities, the contractor will typically dismantle the fluorescent light fixtures, the primary material identified, by removing the tubes and then the ballasts and packaging them for recycling and disposal, regardless of the ballast labeling (i.e., whether or not PCBs/DEHPs are known to be

present). The recommended disposal method for ballasts is recycling/incarceration whereby the PCB/DEHP-containing components are removed and incinerated, and the metal carcasses are cleaned and sent to a metal recycler.

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

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

The Project site was also visually inspected for the following suspect ozone depleting substances (ODS)-containing equipment and appliances: refrigerators, freezers, dehumidifiers, window-mounted air-cooling units, and forced-air furnaces with cooling units, as well as propellants in fire suppression equipment. These materials were detected in each of the buildings and are required to be removed by a trained technician for recovery or recycling prior to demolition.

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

Construction Activities

The transport, use, and handling of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk than would occur on any other similar construction site. Construction equipment anticipated to operate on the Project site during construction is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. Construction contractors would be required to comply with all applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous

construction-related materials, including but not limited to requirements imposed by the USEPA, California Department of Toxic Substances Control (DTSC), SCAQMD, Regional Water Quality Control Board (RWQCB), and University of California. With mandatory adherence to applicable hazardous materials regulations and with oversight by UCLA's EH&S office, the proposed Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

Contaminated Soil and/or Groundwater

There are no known current or historical hazardous materials spills at the Project site. Additionally, based on the Phase I Environmental Site Assessment Report prepared by Citadel for the Project site (Citadel, 2024) and included in Appendix F2 of this Initial Study, no historical releases of petroleum products from a leaking underground storage tank (LUST) occurred within 0.25-mile and upgradient of the Project site. Chevron #9-3100, located at 10984 Le Conte Avenue (approximately 119 feet northeast and downgradient of the Project site), is listed as a leaking underground storage tank (LUST) site. However, the gasoline leak was discovered in April 1991 during tank and dispenser removal, and the case was completed and closed by the Los Angeles Regional Water Quality Control Board (LARWQCB) on July 1, 2014. Based on case closure and downgradient location, this former release is not expected to represent a significant environmental concern for the proposed Project. Therefore, no hazardous materials are anticipated to be encountered in the soils underlying the site during excavation activities, and there would be no significant hazard to the public through reasonably foreseeable upset and accident conditions of construction of the proposed Project.

Notwithstanding, there is the potential for previously undiscovered underground storage tanks (USTs) or other undetected soil or groundwater contamination to be exposed during earthwork activities. In the event that previously undiscovered USTs are uncovered or disturbed, they would be closed in place or removed in accordance with applicable state regulations.

Groundwater was encountered in Boring B4 at a depth of 68 feet bgs (Geocon, 2025). Considering the depth to groundwater encountered during investigation, stabilized groundwater is not anticipated to be encountered during excavation activities, which are expected to extend to a depth of approximately 52.5 feet bgs. However, if any contaminated soil and/or groundwater is discovered, all construction activities shall stop, and an assessment would be made of the nature and extent of contamination and the type of remediation that is required, if any. The primary purpose of LRDP PP 4.6-4 is to ensure that the exposure of contaminated soil and/or groundwater or the remediation activities, if necessary, would not expose the public or construction workers to hazardous conditions. Continued compliance with all applicable federal, state, and local laws and regulations, as well as incorporation of LRDP PPs 4.6-1 and 4.6-4, would ensure that impacts associated with the potential exposure of contaminated soil or groundwater are less than significant.

Radon Gas and Methane

Based on the Radon Gas Survey Report prepared by Citadel (Citadel, 2025b) and included in Appendix F3 of this Initial Study, radon does not represent an environmental concern for the proposed Project. Additionally, based on the Methane Survey Report prepared by Citadel (Citadel, 2025c) and included in Appendix F4 of this Initial Study, methane was not detected at the Project site. Therefore, a methane mitigation system is not required.

Operational Hazards

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

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 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The UCLA campus, which is located adjacent to the Project site to the northwest, is the nearest school to the Project site. There are existing schools on campus (i.e., the UCLA Lab School [previously Corinne A. Seeds University Elementary School or UES], Fernald Child Development Center, the Infant Development Program, Krieger Childcare Center, and Geffen Academy at UCLA), which are further away than on-campus uses adjacent to the Project site. Marymount High School is located north of Sunset Boulevard, approximately 0.8 mile northeast of the Project site. As discussed under Threshold (a) above, the proposed Project includes student housing, consistent with existing uses on-site and surrounding the Project site, which would not involve hazardous emissions or the handling of hazardous or acutely hazardous materials in quantities

significant enough to pose a risk to the campus or existing schools. With continued compliance with federal, state, and local regulations pertaining to hazardous materials and with existing (or equivalent) campus programs and procedures, as required by LRDP PP 4.6-1, this impact would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to handling hazardous materials within 0.25-mile of a school.

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

Discussion

Based on review of the California Environmental Protection Agency (CalEPA) Cortese List Data Resources (CalEPA, 2025), and the Phase I Environmental Site Assessment Report prepared by Citadel (Citadel, 2024) and included in Appendix F2 of this Initial Study, the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur, and no mitigation is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

The Project site is not located within two miles of a public airport or public use airport and has not been included in an airport land use plan. The nearest public-use airport is the Santa Monica Municipal Airport located approximately 2.9 miles south of the Project site, and the nearest public airport is Los Angeles International Airport (LAX), located approximately 7.8 miles to the south. While there are no public or public use airports in the vicinity of the Project site, the Ronald Reagan UCLA Medical Center (RRUMC) located on campus operates a helistop with two helipads under a California Department of Transportation (Caltrans) Aeronautics Heliport Permit. The proposed Project involves development of off-campus student housing and would not directly increase the number or frequency of medical helicopter operations at the RRUMC.

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

The Project site is located approximately 0.26 mile to the southwest of the RRUMC helistop. The elevation of the Project site ranges from approximately 337 feet amsl at the southeast corner to approximately 386 feet amsl at the northwest corner and slightly higher than the RRUMC, which lies at an elevation of approximately 355 feet amsl. However, the RRUMC helipads are located on top of the 10-story building from which the 8:1 approach/departure surface (8 feet horizontal to 1 foot vertical) is determined; the elevation at the helipad is approximately 150 feet above ground level, or at an elevation of approximately 505 feet amsl. Therefore, a building would have to be approximately 640 feet amsl to encroach the 8:1 approach/departure surface. The proposed new development would have a maximum elevation of approximately 437 feet amsl at the roofline and approximately 468 feet amsl at the top of the mechanical screen. Based on the proposed building height, the proposed new building would not penetrate the established 8:1 approach/departure surface, consistent with the requirements of the Caltrans Aeronautics Heliport Permit. Also, implementation of the proposed Project would not increase the number or frequency of medical helicopter operations at the RRUMC. The provisions of the existing Caltrans Aeronautics Heliport Permit ensure that potential safety hazards associated with operations of the helistop are less than significant.

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

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

According to the Los Angeles County Public Works Department City of Los Angeles – West Area Disaster Route Map, Gayley Avenue, Levering Avenue, and Weyburn Place are not designated as disaster routes (LA County Public Works, 2008). The nearest disaster routes to the Project site are South Sepulveda Boulevard (secondary disaster route) and I-405 (primary disaster route), which are located approximately 0.4 miles to the west.

Although construction activity associated with implementation of the proposed Project is anticipated to occur within the boundaries of the Project site and most staging would also occur on-site, some construction staging (e.g., short-term construction vehicle parking at the curb and dumpsters) and utility infrastructure improvements (e.g., pipeline connections) for the proposed Project would occur along Levering Avenue and Weyburn Place, which could require periodic single-lane closures. However, this limited encroachment into the public roadway would not impede access to RRUMC, identified as a “Health and Medical Lifeline” on the West Los Angeles APC, Health and Medical Lifelines figure in Appendix C of the City of Los Angeles 2024 Local Hazard Mitigation Plan (LHMP) (City of Los Angeles, 2024a) and located approximately 0.2-mile northeast of the Project site. Also, UCLA would be required to obtain all necessary encroachment permits from the City of Los Angeles Department of Transportation prior to any construction activity occurring in the Levering Avenue right-of-way. Ongoing coordination between the University of California Police Department, the City of Los Angeles Fire Department, 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 incorporates LRDP PP 4.13-8, which ensures that required emergency access to and surrounding the Project site would be maintained during construction. Therefore, there would be a less than significant impact.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The Project site is not located in a Wildfire Severity Zone as shown in Figure 18-7 of the City of Los Angeles LHMP (City of Los Angeles, 2024a). The nearest wildland area is in the Santa Monica Mountains and associated foothills, located approximately 1.5 miles to the northwest of the Project site, with intervening urban development. Additionally, according to the California Department of Forestry and Fire Protection (CalFire), the Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE, 2025). 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 an increase in impervious surfaces on the Project site. Structural and non-structural BMPs would be used to capture and treat runoff as described in Section II.5, Proposed Project Components, and per LRDP MM 4.7-1, which would manage the post-development hydrology in compliance with all applicable regulations. The captured runoff would be discharged to the street through curb drains, similar to the existing condition.

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 EIRs are signified by strikeout (~~strikeout~~) where non-applicable text has been removed; such changes have been made so the stated requirement better applies to the proposed Project.

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

PP 4.7-5 *Site-specific hydrologic evaluation shall be conducted for each proposed development project based on the project-specific grading plan and site design of each individual project. This evaluation shall include, but not be limited to: (1) an*

assessment of runoff quality, volume and flow rate from the proposed Project site; (2) identification of project-specific BMPs (structural and non-structural) to reduce the runoff rate and volume to appropriate levels, including but not limited to the BMPs listed in MM 4.7-1; and (3) identification of the need for new or upgraded storm drain infrastructure (on and off campus) to serve the project. Project design shall include measures to upgrade and expand campus storm drain capacity where necessary, as identified through the project-specific hydrologic evaluation. Design of future projects shall include measures to reduce runoff, including, but not limited to, the provision of permeable landscaped areas adjacent to structures to absorb runoff and the use of pervious or semi-pervious paving materials.

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

Non-Structural/Structural:

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

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

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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. While federal and state regulations relative to water quality are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided here to identify updated regulations, as appropriate, or to provide context for this analysis. 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 LARWQCB. The SWRCB establishes statewide policies and regulations for implementing water quality control programs mandated by federal and state water quality statutes and regulations. The RWQCBs develop and implement Water Quality Control Plans (Basin Plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which is further discussed under Threshold (e), below, implements a number of federal and state laws for the proposed Project area, the most important of which are the State Porter-Cologne Water Quality Control Act and the Federal Clean Water Act (CWA).

Pursuant to CWA Section 402(p), which requires regulations for permitting of certain storm water discharges, the SWRCB issued a statewide general NPDES Permit for storm water discharges from construction sites, herein referred to as the “Construction General Permit.”²⁹ Under this Construction General Permit, discharges of storm water from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit.

Phase II of the NPDES program regulates storm water discharges from small Municipal Separate Storm Sewer Systems (MS4s). As part of Phase II, the SWRCB adopted a General Permit for the Discharge of Storm Water from Small MS4s (WQ Order No. 2003-0005-DWQ) to provide permit coverage for smaller municipalities, including non-traditional Small MS4s, which include public campuses. The Phase II Small MS4 General Permit covers Phase II Permittees statewide.³⁰ UCLA was approved for coverage under the Phase II MS4 permit program on July 12, 2013, and was assigned a Water Discharge identification (ID) number (WDID 4 19M2000037). UCLA is required to comply with the requirements of the MS4 permit and the campus’ Storm Water Management Program (refer to LRDP PP 4.7-1).

²⁹ The SWRCB adopted a revised Statewide construction stormwater general permit on September 8, 2022 (Order WQ 2022-0057-DWQ) (NPDES No. CAS000002), which supersedes Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and 2012-0006-DWQ, with certain exceptions.

³⁰ On February 5, 2013, the Phase II Small MS4 General Permit was adopted and became effective on July 1, 2013 (WQ Order No. 2013-0001-DWQ) and subsequently amended.

Construction-Related Water Quality Impacts

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

The proposed Project site is 0.74 acre in size. As such, it would not involve construction activities on more than 1.0 acre and therefore would not be required to comply with requirements and water quality standards set forth in the current NPDES permit regulations (i.e., processing through the SWRCB is not required). However, the proposed Project would comply with the campus' MS4 permit, which requires the contractor to prepare a Storm Water Pollution Prevention Plan (SWPPP), as required by LRDP PP 4.7-1. The SWPPP incorporates BMPs for reducing or eliminating construction-related pollutants in runoff from the site. The MS4 permit also requires incorporation of Low Impact Development (LID) standards for post-construction design, as further discussed under Operational Water Quality Impacts, below. The SWPPP would include both source control and treatment control BMPs to reduce water quality impacts. Temporary erosion control BMPs that would be implemented during construction include, but are not limited to, street sweeping and vacuuming, installation of sandbag barriers, stabilized driveways at construction entrances and exits, and an entrance/exit tire wash. Fiber rolls would be installed at the Project site boundary along Levering Avenue and Weyburn Place, and existing catch basins would also be protected with appropriate BMPs to minimize sedimentation entering the storm drain system. Compliance with these requirements would reduce short-term construction related water quality impacts to a less than significant level.

Operational Water Quality Impacts

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

The proposed Project involves redevelopment of the Project site with a new student housing building. Under the proposed Project, the impervious area would increase from approximately 68 percent under existing conditions to 87 percent. The proposed Project would comply with applicable requirements at the time of construction, per LRDP PP 4.7-1 and MM 4.7-1, to ensure that discharges of post-construction pollutants remain less than significant. This includes the implementation of structural and non-structural BMPs. Storm water management BMPs in compliance with the Phase II MS4 General Permit, including LID requirements, would be designed and constructed within the Project site to treat storm water, remove pollutants, and control the discharge flow rate. The Phase II Small MS4 General Permit prioritizes BMP types as follows: infiltration, storage and reuse, and biofiltration. Based on the results of the percolation test conducted during preparation of the Geotechnical Investigation, a storm water infiltration system is not feasible (Geocon, 2025). Pursuant to LRDP PP 4.7-5, a site-specific hydrologic evaluation would be conducted for the proposed Project and would include identification of Project-specific BMPs (structural and non-structural), including the BMPs listed in LRDP MM 4.7-1. The proposed Project would include roof drain downspouts routed to Permavoid filtration planters that would reduce the overall volume of runoff leaving the Project site; it is estimated that 1,275 sf of Permavoid filtration planters are required to treat the 85th percentile runoff volume. In addition to structural BMPs, non-structural BMPs at the Project site related to maintenance and use of

parking areas; education and training; landscaping; and monitoring and maintenance of structural BMPs would be implemented.

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

Groundwater

As previously discussed, stabilized groundwater beneath the Project site was encountered at a depth of 68 feet bgs at Weyburn Place along the western Project site boundary. Considering the depth to groundwater encountered, groundwater is not anticipated to be encountered during excavation activities, which are expected to a depth of approximately 52.5 feet bgs. Therefore, the proposed Project would not degrade groundwater quality.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The Project site is located within the Santa Monica Basin. No potable groundwater wells are located on the Project site or are proposed by the Project.

As previously discussed in Section V.7, Geology and Soils, based on estimated groundwater levels at the Project site, it is not expected that static groundwater would be encountered during construction. However, as discussed in the Geotechnical Investigation prepared for the proposed Project, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. Groundwater seepage levels encountered during construction may be higher than those encountered during the Geotechnical Investigation. Therefore, it is possible that groundwater may be encountered during excavation and short-term dewatering may be necessary; however, long-term groundwater extraction is not required. The amount of groundwater removed during construction, if any, would be minimal and would not substantially decrease groundwater supplies during construction.

Potable water for the proposed Project would be obtained from the LADWP, and the proposed Project would not involve direct withdrawal of groundwater. While water sources for the LADWP include groundwater supplies, the LADWP currently has adequate water supplies to serve the proposed Project (refer to analysis of Threshold (b) in Section V.19, Utilities and Service Systems, of this Initial Study). Therefore, the proposed Project would not substantially decrease groundwater supplies during operation.

As discussed above, development of the proposed Project would increase the amount of impervious surface coverage on the property as compared to existing conditions from approximately 68 percent to 87 percent. Therefore, the Project site would decrease the pervious areas available for natural recharge; however, the area covered by the proposed development is negligible from a regional recharge perspective. Additionally, the Project site does not accept run on from adjacent properties; only direct precipitation, providing little overall opportunity for recharge under existing conditions. Furthermore, the Project site is not a designated groundwater recharge area for the Santa Monica Basin.

As such, implementation of the proposed Project would not substantially decrease groundwater supplies or substantially interfere with groundwater recharge such that the proposed Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to 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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

Erosion and Siltation

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

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

Site Drainage and Storm Water Runoff

No storm drains exist in Levering Avenue or Weyburn Place or in the vicinity of the Project site. As discussed above, development of the proposed Project would increase the amount of impervious surface at the Project site compared to existing conditions (an increase from approximately 68 percent to 87 percent). New site area drains would be installed, and storm drain pipes would be sized to convey the peak runoff from a 25-year storm event, with pipes flowing no greater than 75 percent full in compliance with City requirements. Additionally, LID design elements would satisfy current City of Los Angeles requirements to capture and treat the 85th percentile runoff volume. Due to site conditions, infiltration is not considered feasible. Roof drain downspouts would be routed to Permavoid filtration planters that would reduce the overall volume of runoff leaving the Project site; it is estimated that 1,275 sf of Permavoid filtration planters are required to treat the 85th percentile runoff volume. All excess runoff would be routed to the street through storm drain lines and through the curb to Levering Avenue, consistent with existing conditions. As discussed above, although pervious area on-site would be decreased, the amount of storm water runoff entering the public storm drain system would be reduced as compared to existing conditions due to the use of filtration planters. Pursuant to LRDP PP 4.7-5, a site-specific hydrologic evaluation would be conducted during design of the proposed Project to confirm the volume and flow rate from the Project site and Project-specific BMPs to reduce the runoff rate and volume to appropriate levels. With adherence to applicable storm water management regulations and incorporation of LRDP PP 4.7-5, the proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site and would not exceed the capacity of the existing storm drain system.

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

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have less than significant impacts related to: (1) substantial erosion or siltation on or off the site; (2) substantial increase in the rate or amount of surface runoff in a manner that would result in flooding on or off the site; (3) creation or contribution to runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; and (4) impeding or redirecting flood flows.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In a flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The Project site is within Federal Emergency Management Agency (FEMA) “Zone X,” which is identified as an area of minimal flood hazard (FEMA, 2008). As such, the proposed Project would not risk the release of pollutants due to inundation resulting from a flood. Based on review of Figure 17-4 of the City of Los Angeles 2024 LHMP, the Project site is not within a mapped tsunami inundation area in the West Los Angeles Area Planning Commission area (City of Los Angeles, 2024a). Further, the Project site is not near a body of water and would not be subject to a seiche. The eastern portion of the Project site is within the mapped dam inundation area for Stone Canyon Reservoir dam, which is located approximately 2.9 miles to the north (DSOD, 2025). However, as discussed in Section V.9 of this Initial Study, as with the existing residential building at the Project site, hazardous materials that would be used during construction activities (e.g., chemical agents, solvents, paints, and fuel for equipment) and operation (e.g., for cleaning and maintenance) are common and would not be used in quantities that pose a significant hazard to the public or environment. Therefore, the proposed Project would have a less than significant impact related to the release of pollutants due to Project 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 Project inundation.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

The 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in “high-” and “medium-priority” basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long-term sustainability. The California Department of Water Resources (DWR) currently categorizes the Santa Monica Basin as a “medium-priority” basin; therefore, the Santa Monica Basin is subject to the requirements of the SGMA (DWR, 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 the regulations issued in accordance therewith. The GSP for the Santa Monica Basin was adopted by the SMBGSA in January 2022. As previously discussed, the proposed Project would not entail the extraction of groundwater located beneath the site during Project operation, would not impact groundwater quality, and the Project site is not within a groundwater recharge area. Therefore, the proposed Project would not obstruct or conflict with a sustainable groundwater management plan.

As discussed above, although temporary dewatering may be required during construction if groundwater is unexpectedly encountered, this is not anticipated to occur, and the proposed Project would not include the installation or use of groundwater wells. Additionally, there would be limited potential for groundwater recharge at the Project site due to the size of the Project site and primarily impervious site conditions. Therefore, the proposed Project would not degrade groundwater quality, would not decrease groundwater supplies or interfere with groundwater recharge, and would not conflict with groundwater management activities.

The proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, 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 potential conflicts with, or obstruction of, implementation of a water quality control plan or sustainable groundwater management plan.

11. LAND USE AND PLANNING

Relevant elements of the proposed Project related to land use include the redevelopment of the Project site with a new residential building for undergraduate students. The proposed Project consists of a new apartment building up to 310,000 sf, which would include up to 148 apartments (up to 1,150 beds). When compared to the existing apartment buildings which total 23,952 sf and include 42 units (52 beds), the proposed Project would result in a net increase of up to 106 apartments (1,098 beds/residents), and a net increase of up to 286,048 sf of development.

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 change in the text from the LRDP EIRs are signified by ~~strikeout~~ where text has been removed; such changes have been made so the stated requirement better applies to the proposed Project.

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

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

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

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

As shown on the aerial photograph provided in Figure 3, the community surrounding the UCLA campus, including the Project site, is fully developed and established. The Project site is currently

developed with five apartment buildings, and the proposed Project would involve redevelopment of the Project site with new student housing facilities. The proposed student housing is consistent with existing residential development to the north, south, and west of the Project site and would specifically house students enrolled at UCLA. The main UCLA campus is immediately adjacent to the Project site. Thus, the proposed Project would not divide an established community, and 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Regional Planning Programs

With respect to regional planning, SCAG is the MPO for Los Angeles, Riverside, Orange, San Bernardino, Ventura, and Imperial Counties. The federal government mandates SCAG, as the designated MPO, to prepare plans for growth management, transportation, air quality, and hazardous waste management. In addition, SCAG reviews EIRs for projects of regional significance for consistency with its regional plans (SCAG, 2025). The policies and strategies of SCAG’s regional planning programs, including Connect SoCal 2024, are not applicable to the proposed Project because the proposed Project is not of statewide, regional, or areawide significance based on the established criteria in Section 15206 of the CEQA Guidelines, which are applied by SCAG to determine regional significance. Residential projects of more than 500 dwelling units are considered regionally significant; the proposed Project would include a net increase of 106 apartments and is therefore not regionally significant.

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

UCLA Plans

The UCLA 2002 LRDP, as amended through 2017, guides the physical development of the UCLA campus to serve its teaching, research, and public service mission. The Project site is not located

on campus (i.e., within the area addressed in the LRDP) and therefore is not considered in relation to the remaining building square footage allocation for campus uses or parking and trip generation limits identified in the LRDP. Nonetheless, the proposed Project would not conflict with the provisions of the LRDP. The proposed Project would support UCLA's goals to provide additional student housing (a net increase of up to 1,098 beds) adjacent to campus to address current and anticipated demands. The proposed Project would also support the retention of students by providing quality housing in the Westwood community that is priced below market rates. The proposed Project would not increase student enrollment at UCLA; rather, it would accommodate the existing student population.

City of Los Angeles Plans

As described in the Introduction section, UCLA is part of the University of California, a constitutionally created entity of the State of California. As a constitutional entity, the University of California is not subject to municipal regulations, including general plans, specific plans, and zoning regulations. Westwood and other surrounding communities are part of the City of Los Angeles, and although this jurisdictional separation provides no formal mechanism for joint planning or the exchange of ideas, UCLA may consider, for coordination purposes, aspects of local plans and policies governing the communities surrounding the campus, but it is not bound by those plans and policies in its planning efforts. The campus seeks to maintain an ongoing exchange of ideas and information and to pursue mutually acceptable solutions for issues that confront both the campus and the broader community. To foster this process, UCLA participates in, and communicates with, City and community organizations and sponsors various meetings and briefings to keep local organizations, associations, and elected representatives apprised of ongoing planning efforts. The following discussion of the proposed Project's relationship to local plans and regulations is provided for informational purposes only.

While the provisions of the City's General Plan and Zoning Code are not applicable to UCLA, the Project site is located within the Westwood Community Plan area (City of Los Angeles, 1999) and the North Westwood Village Specific Plan area (City of Los Angeles, 1988). The Westwood Community Plan identifies areas within one mile of the UCLA campus where rental housing is available for students and faculty, and the Specific Plan encourages the provision of such housing. As previously indicated, the Project site and adjacent parcels have General Plan land use and zoning designations for dense multi-family residential uses. Although the proposed Project would exceed the density range and height limitations established for properties subject to General Plan and zoning requirements, with implementation of the identified LRDP PPs and MMs and Project-specific MMs, the proposed Project would not result in any significant environmental impacts as a result of the density of the proposed development, as demonstrated through the analyses presented throughout this Initial Study. Furthermore, as previously discussed, the proposed Project is a residential development on an infill site within a TPA. The Project site is surrounded by dense University housing, including the 10-story UCLA Levering Terrace building to the immediate northwest, the 17-story UCLA Gayley Heights building to the north across Le Conte Avenue, the 6-story Village Terrace faculty housing building to the southeast, and 8- and 9-story residential buildings at the Weyburn Terrace student housing complex to the west across Weyburn Place. As such, the proposed Project is considered appropriate for the location and compatible with surrounding development.

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

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

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

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 potential conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed Project.

12. MINERAL RESOURCES

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

There are neither mineral resources of value to the state or region, nor mineral resource sites defined by the City of Los Angeles General Plan on the Project site; thus, there would be no impact due to 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 the use of diesel-powered equipment during construction and operational noise that may be generated by mechanical equipment, outdoor social or recreational activities on the Project site, and associated vehicle traffic.

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 Final LRDP SEIR MMRP have been incorporated into the proposed Project and are assumed in the analysis presented in this section. Changes in the text from the LRDP Final SEIR are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed; and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project and to ensure implementation of the mitigation.

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

PP 4.9-6(a) *The ~~campus~~ **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: 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 **University** shall review the locations of sensitive receptor areas in relation to the construction site. If it is determined that a 12-foot-high barrier would break the line of sight between an 11-foot-high noise source and adjacent sensitive use areas, a temporary barrier shall be erected to the extent practicable. The barrier shall be solid from the ground to the top with no openings, and shall have a weight of at least 3 pounds per square foot, such as plywood that is ½-inch thick.*

Fundamentals of Sound and Environmental Noise

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

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

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

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

- **L_{eq}** , the equivalent energy noise level, is the average acoustic energy content of noise for a stated time period. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. This rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- **CNEL**, the Community Noise Equivalent Level, is a 24-hour average L_{eq} with a 10 dBA “weighting” added to the hours between 10:00 PM and 7:00 AM and an additional 5 dBA

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

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

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

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

Fundamentals of Environmental Vibration

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

In contrast to airborne noise, ground-borne vibration outdoors is not a common environmental problem, and annoyance from ground-borne vibration is almost exclusively an indoor

phenomenon. Therefore, the effects of vibrations should only be evaluated at a structure, and any potential dampening effects of the building structure on the vibration levels should be considered. Wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings. In contrast, large masonry buildings with spread footings have a low response to ground vibration. In general, the heavier a building is, the lower the response will be to the incident vibration energy. Additionally, historic buildings constructed in accordance with older building codes may be more fragile or susceptible to building damage from vibration. However, all structures reduce vibration levels due to the coupling of the building to the soil (FTA, 2018).

The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans, 2020) establishes building damage vibration criteria that can be used to assess potential temporary construction-related impacts at adjacent building locations. Table 12 describes the maximum acceptable transient and continuous vibration building damage potential levels by structure type and condition as identified by Caltrans. The existing buildings adjacent to the Project site can best be described as “new residential structures” with a maximum acceptable continuous vibration threshold of 0.5 peak particle velocity in inches per second (PPV [in/sec]).

TABLE 12 BUILDING DAMAGE VIBRATION CRITERIA

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

Source: (California Department of Transportation, April 2020)

For vibration sensitive receiver locations, potential disturbance due to construction-related vibration levels is evaluated also based on the Caltrans perception criteria outlined in the Caltrans Transportation and Construction Vibration Guidance Manual. Table 13 describes the maximum acceptable criteria used to describe the transient and continuous sources of vibration.

TABLE 13 HUMAN PERCEPTION VIBRATION CRITERIA

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

Source: (California Department of Transportation, April 2020)

Vibration of building components can also take the form of an audible low-frequency rumbling noise, which is referred to as groundborne noise. Typically, groundborne noise is a concern that occurs with railroad and similar transit sources. As there are no railroad or transit noise and

vibration sources in the vicinity of the Project site, the impact of groundborne noise is not addressed in this analysis.

Noise-Sensitive Receptors

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

Existing Ambient Daytime Noise Levels

Existing ambient daytime noise levels were measured at five locations within the Project site on Tuesday, April 8, 2025, in order to identify representative noise levels during the regular academic session; the noise measurement data is included in Appendix G of this Initial Study (Urban Crossroads, 2025b). The noise measurement locations are identified in Figure 16 and described in Table 14. Field tests were conducted to ensure that the onsite noise measurement locations were acoustically equivalent to the identified representative sensitive receiver locations, which are shown on Figure 17. The noise levels were measured using a Piccolo II sound level meter. The sound level meter and microphone were mounted on a tripod five feet above the ground and equipped with a windscreen during all measurements. The sound level meter was programmed in “slow” mode to record noise levels in “A” weighted form. Meteorological conditions during the measurement periods were favorable and representative of typical conditions, with clear skies, daytime temperatures of approximately 65 to 70°F, and variable winds. Noise measurement information is provided in Appendix G of this Initial Study.

TABLE 14 EXISTING AMBIENT NOISE LEVELS

Location ¹	Description	Energy Average Noise Level (dBA L _{eq}) ²	
		Daytime	Nighttime
L1	Located near the northwestern boundary of the site, near the UCLA Levering Terrace Apartments (885 Levering Ave.)	61.1	56.3
L2	Located near the northeastern boundary of the site along Levering Avenue	65.7	59.3
L3	Located near the southeastern boundary of the site, near the UCLA Village Terrace faculty housing building at 919-923 Levering Avenue	62.5	58.7
L4	Located near the southwestern boundary of the site, near the UCLA Laurel and Tipuana Apartments (900 and 920 Weyburn Avenue)	55.5	51.5

¹ See Figure 16 for the noise level measurement locations.
² Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix G of this Initial Study.
 "Daytime" = 7:00 AM to 10:00 PM; "Nighttime" = 10:00 PM to 7:00 AM
 Source: (Urban Crossroads, 2025b)

The average, maximum, and minimum noise levels and sources of noise measured at each location are identified in Table 14. These ambient noise levels are characteristic of a high-density urban residential environment. Measurement Location L1 is intended to represent typical noise



Source(s): Urban Crossroads (October 2025)

Figure 16



Noise Measurement Locations



Source(s): Urban Crossroads (August 2025)

Figure 17



Not to Scale

Noise Receiver Locations

levels experienced by residents at the UCLA Levering Terrace Apartments located at 885 Levering Avenue to the immediate northwest (Noise Receiver R1). Measurement Location L2 is used to describe the existing ambient noise environment at the outdoor pool area of Oscar's Summit Apartment Building located at 10982 Roebing Avenue to the north (Noise Receiver R2)³¹ and at the UCLA Gayley Heights Apartments located at 10995 Le Conte Avenue (Noise Receiver R3). Measurement Location L3 is used to characterize the ambient noise environment of the UCLA Village Terrace residential building located at 919-923 Levering Avenue to the immediate southeast (Noise Receiver R4). Measurement Location L4 is used to characterize the ambient noise environment at the UCLA Laurel Apartments located at 920 Weyburn Place and the UCLA Tipuana Apartments located at 900 Weyburn Place, both to the west (Noise Receiver R5). It was observed during the site visit that the dominant source of noise in the area was traffic on the adjacent streets; a secondary noise source was construction activities on surrounding properties.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Construction

During construction, nearby noise-sensitive receptors would be exposed to occasional high noise levels associated with the operation of heavy equipment, such as loaders, dozers, and excavators, primarily during the subterranean excavation phase. However, construction equipment noise would not be constant because of the variations of power, cycles, and equipment location. In the absence of established noise standards, UCLA may elect to utilize relevant standards established by other agencies for purposes of analysis. As previously discussed, UCLA has adopted a number of PPs and MMs that align with City of Los Angeles requirements. Relative to noise, LRDP PP 4.9-7(a) reflects the hourly restrictions set forth in LAMC Section 41.40, which prohibits construction activities that generate noise between the hours of 9:00 PM and 7:00 AM Monday through Friday (i.e., during weekday late evening/nighttime and early morning hours when people are typically more sensitive to noise effects), and before 8:00 AM or after 6:00 PM on any Saturday or national holiday. Additionally, construction activities are prohibited on Sundays. Further, as identified previously, a Project-specific implementing measure would be applied to construction activities for the proposed Project further limiting construction hours Monday through Friday from 7:00 AM to 7:00 PM, which is more stringent than identified in LRDP PP 4.9-7(a).

To describe construction noise activities, this construction noise analysis was prepared using reference construction equipment noise levels from the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) (FHWA, 2006). The RCNM equipment database

³¹ While the physical address of this apartment building is on Roebing Avenue, the outdoor swimming pool is located along Levering Avenue, immediately northwest of the UCLA Gayley Heights Apartments.

provides a comprehensive list of noise-generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a typical construction operation. The anticipated construction stages and loudest pieces of equipment by stage are provided in Table 15.

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the proposed Project's construction noise levels at the nearest sensitive receiver locations were completed. To assess a reasonable worst-case construction scenario and account for the dynamic nature of construction activities, this construction noise analysis models the equipment combination with the highest reference level as a moving point source within the construction area (i.e., within the Project site boundaries). This is simulated by modeling multiple pieces of construction as moving point sources. As shown on Table 16, the proposed Project's construction noise levels are expected to range from 50.1 to 74.1 dBA L_{eq} , and the highest construction levels by phase are expected to range 57.5 to 74.1 dBA L_{eq} at the nearest receiver locations (shown on Figure 17). Detailed CadnaA construction noise model inputs are provided in Appendix G of this Initial Study.

TABLE 15 REFERENCE NOISE LEVELS OF CONSTRUCTION EQUIPMENT BY STAGE

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

¹ (FHWA, 2006)

TABLE 16 PROJECT CONSTRUCTION NOISE LEVEL SUMMARY

Receiver Location ¹	Construction Noise Levels (dBA L_{eq})					
	Demolition	Grading/Site Preparation	Building Construction	Paving	Architectural Coating	Highest Levels ²
R1	73.1	73.2	65.8	67.2	66.0	73.2
R2	57.4	57.5	50.1	51.5	50.3	57.5
R3	60.6	60.7	53.3	54.7	53.5	60.7
R4	74.0	74.1	66.7	68.1	66.9	74.1
R5	68.4	68.5	61.1	62.5	61.3	68.5

¹ Noise receiver locations are shown on Figure 17.
² Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix G of this Initial Study.

In the absence of a formally adopted threshold of significance for construction noise, Lead Agencies such as UCLA may elect to utilize relevant thresholds of significance established by other agencies. The FTA uses an 80 dBA_{Leq} absolute threshold for construction noise near residential uses during daytime hours of 7:00 AM to 10:00 PM. Consistent with the FTA daytime threshold, the City of Los Angeles has established an absolute threshold of 80 dBA_{Leq} at sensitive uses (at the property line or at the exterior of the building) for construction activity that occurs between 7:00 AM and 7:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on Saturdays (City of Los Angeles, 2024b).³² The City's threshold was developed based on input from technical experts, including a Technical Advisory Committee consisting of noise consultants and experts with decades of experience in preparing noise studies, included a public process and review of noise thresholds used by other state and local agencies, and is supported by substantial evidence. UCLA has elected to utilize this absolute threshold for construction noise adopted by other public agencies. Additionally, as identified previously, construction activities for the proposed Project would be limited to these hours. As identified above, the proposed Project's construction noise levels would not exceed 80 dBA_{Leq}. Therefore, construction noise levels generated by the Project during daytime hours would be less than significant.

For construction activities that may occur during evening or nighttime hours (7:00 PM to 7:00 AM Monday through Friday or 6:00 PM to 8:00 AM on Saturdays), the City specifies that construction noise levels at sensitive uses are not to exceed 5 dBA above the ambient noise level. However, the proposed Project incorporates LRDP PP 4.9-7(a) (consistent with LAMC Section 41.40) and an associated Project-specific implementing measure that further restricts daytime construction to Monday through Friday from 7:00 AM to 7:00 PM. These restrictions on construction noise hours prohibit construction activities to occur during late evening and recognized sleep hours for residents. Therefore, construction noise would not occur during these hours/days and no construction-related noise impacts associated with evening or nighttime activities would occur.

While not included in the construction noise modeling, and notwithstanding the less than significant construction-related noise impact, in accordance with previously adopted LRDP MM 4.9-7, which is incorporated into the proposed Project, solid temporary noise barriers would be built along the northwest, southeast, and southwest Project site boundaries to reduce noise levels at the nearby residences. The temporary noise barriers are estimated to achieve a 10- to 11-dBA reduction at the nearest receivers. However, it should be noted that the barriers would be effective only where they break the line of sight between noise sources and receptors. Thus, as building construction proceeds vertically above the noise barriers, construction noise experienced at higher stories of the adjacent receptors would be consistent with the levels cited in Table 15. Typical noise sources during the vertical building phase include hand power tools, hammering, intermittent use of a crane and forklifts for materials handling, and concrete delivery and pumping equipment. This phase of construction is generally less noisy than the demolition and site preparation/grading phases. Additionally, once the building shell is complete, interior construction activities would generate substantially reduced noise levels at the neighboring receptors.

Noise attenuation would also be provided with the proposed Project's incorporation of LRDP PP 4.9-7(b), which requires the muffling or shielding of equipment; and LRDP PP 4.9 7(c), which requires that stationary construction equipment material and vehicle staging be placed to direct noise away from sensitive receptors. Even with the required noise attenuation measures, construction activities would be heard at neighboring residences above the existing noise levels and would create temporary annoyance. The Project incorporates LRDP PP 4.9-8, which requires the campus to conduct regular meetings with off-campus constituents to provide notice of

³² Construction Noise and Vibration Updates to Thresholds and Methodology (City of Los Angeles, 2024b). 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.

construction activities. With adherence to established construction hours and incorporation of LRPD PPs and MMs described above, the construction activities associated with the proposed Project would not conflict with standards established to reduce construction-related noise and this impact would be less than significant.

With respect to construction vehicle noise impacts, for purposes of this analysis it is estimated that up to 104 one-way hauling trips per day during the 117-day site preparation and grading phase would occur. This would be a small number of trips compared to the existing traffic along the construction haul route for the proposed Project that would be used, which includes I-405, Wilshire Boulevard, Veteran Avenue, Weyburn Avenue, Gayley Avenue, Le Conte Avenue, Levering Avenue, and Weyburn Place (alley) (refer to the discussion of construction activities in Section II.5, Proposed Project Components, of this Initial Study). The haul route does not include the segments of Gayley or Levering Avenues north of Le Conte Avenue. While any single truck passing may be audible, it is expected that the noise from Project-related construction truck traffic would be indistinguishable from typical traffic. A doubling of traffic volumes is required to increase average traffic noise levels by 3 dBA, a change which is barely discernable to human hearing. In addition, it is estimated that there may be up to 30 daily worker trips and six vendor trips during construction that may take alternative routes through the road network. These increases also would not generate a doubling of traffic nor generate a discernible noise level increase of 3 dBA along roadways and thus would be considered less than significant. The quantitative increase in hourly noise level would be negligible at sensitive uses adjacent to the roadways along the construction traffic route and, thus, would be less than significant. No mitigation measures would be required for mobile noise during construction.

Operations

The Project's primary operational noise sources that could potentially impact nearby sensitive receptors include an emergency generator located in the utility courtyard, roof-mounted mechanical equipment, outdoor gathering areas, and vehicle operations.

Although UCLA is not subject to municipal requirements, for context, LAMC Section 112.02, part of the City of Los Angeles Noise Ordinance, states, "[i]t shall be unlawful for any person, within any zone of the city to operate any ...[equipment] for any residence or other structure ...in such manner as to create any noise which would cause the noise level on the premises of any other occupied property . . .to exceed the ambient noise level by more than five (5) decibels." Additionally, LRDP PP 4.9-6(a) requires shielding of all new stationary sources of noise that would be located in close proximity to noise-sensitive buildings and uses. With adherence to LRDP PP 4.9-6(a), the noise increase from rooftop equipment would not result in a substantial permanent increase of ambient noise levels.

The proposed Project's emergency generator would generally be exempt from noise regulations since it would only be used in emergencies. However, the generator would require regular testing, which typically involves operating the equipment for 15 minutes regularly to maintain readiness. A typical generator of the size required to serve the proposed Project could generate uncontrolled noise levels on the order of 85 dBA at a distance of 50 feet. However, the short duration of the testing would reduce the reference noise level by 6 dBA to 79 dBA at 50 feet. Additionally, the emergency generator would be enclosed in a weatherproof enclosure that would provide at least 15 dBA reduction in noise levels at 50 feet. As shown on Figure 7a, the generator would be located on Level 1 approximately 15 feet from the property wall and approximately 42 feet below Weyburn Place. While the shorter distance would increase the reference noise level by approximately 9 dBA, the difference in elevation would provide 18 dBA reduction in noise levels at the adjacent Levering Terrace building facade. Additionally, in accordance with LRDP PP 4.9-6(a), which requires shielding of all new stationary sources of noise that would be located in close proximity

to noise-sensitive buildings and uses, the emergency generator would be enclosed in a weatherproof enclosure that would provide up to 15 dBA reduction in noise levels. Thus, the resultant noise level during testing would be reduced to below 60 dBA L_{eq} . Therefore, the generator would not generate substantial noise levels at the nearest receiver (the Levering Terrace Apartments adjacent to the Project site to the northwest), which has an existing daytime ambient noise level of approximately 61.1 dBA.

Relative to operational noise associated with future residents, the proposed Project represents the continuation of a residential use, consistent with the surrounding uses within a high-density student housing area. Similar to the existing buildings on-site, the proposed Project would allow for gatherings of people in outdoor areas. This includes the approximately 2,045-sf entry courtyard and the approximately 3,050-sf second level terrace, both of which face Levering Avenue. Any gatherings at the Project site are anticipated to be similar in nature to the gatherings that currently occur at the site and at the surrounding high-density residential uses. Despite the increased number of student residents on-site with the proposed Project, the limited size of the courtyard and terrace would restrict the number of students congregating at any given time. Other outdoor spaces such as the exterior covered fitness area in the rear courtyard and bicycle parking area would also be limited in size such that large gatherings could not occur in those areas. Furthermore, all of the residential units would be occupied based on current student enrollment at UCLA (i.e., there would be no enrollment increase associated with the proposed Project). Thus, the presence of Project residents is not anticipated to result in a substantial increase in ambient noise levels in the surrounding neighborhood. Additionally, the University of California Police Department (UCPD) would continue to be available to respond to any noise complaints at the Project site, and the Los Angeles Police Department (LAPD) would continue to enforce the local noise ordinance through its joint jurisdiction within one mile of campus. As such, operational noise associated with future residents would not result in a Project impact under CEQA.

As discussed in the VMT Assessment included in Appendix H of this Initial Study, it is conservatively estimated that the proposed Project would generate an estimated 1,249 net new daily trips (Fehr and Peers 2025). This is considered conservative since the Project would provide student housing in close walking distance from the UCLA campus and would not provide resident automobile parking. According to traffic count data collected by Fehr & Peers, Levering Avenue had an average daily traffic (ADT) volume of 4,642 in May 2025, the most recent year data is available. Based on that traffic volume, the proposed Project would increase traffic on Levering Avenue approximately 27 percent and generate a noise level increase of approximately 1 dBA. As noted above, a doubling of traffic volumes is required to increase average traffic noise levels by 3 dBA, a change which is barely discernable to human hearing. Therefore, the change in traffic noise to residences adjacent to Levering Avenue would be less than significant. On-site parking would be limited to a small service area accessed from Levering Avenue with parking for approximately two vehicles. Due to the expected low frequency of vehicles utilizing the two parking spots, parking and engine start noise also would not be a substantial noise source to nearby sensitive receivers. This impact would be less than significant.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance after Mitigation

With implementation of the LRDP MMs and PPs 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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

UCLA has not established specific vibration level limits; however, as identified previously, in the absence of established thresholds of significance, UCLA may elect to utilize relevant thresholds of significance established by other agencies. Therefore, for analysis purposes, the Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans, 2020) is used to assess potential temporary construction-related impacts at adjacent building locations. This is also consistent with the City of Los Angeles vibration thresholds for building damage (City of Los Angeles, 2024b). As previously identified, the existing buildings adjacent to the Project site can best be described as “new residential structures” with a maximum acceptable continuous vibration threshold of 0.5 PPV in/sec (refer to Table 12).

Construction activities that could produce measurable vibration would be associated with the demolition and site preparation/grading phases at the Project site. On-site construction-related vibration sources include the operation of excavation and grading equipment and installation of soldier piles. The potential vibration impact associated with excavation and grading equipment would be reduced to a level considered less than significant with implementation of LRDP MM 4.9-2, which requires the use of medium-sized or smaller equipment. This impact would be further reduced with implementation of MM 901 Levering NSE-1, which implements recommendations from the Project-specific Geotechnical Investigation (included in Appendix E of this Initial Study) related to construction activities, and requires a structural survey of adjacent structures before and during construction for signs of distress or settlement and corrective action be taken to address any distress or settlement identified during construction that could result in building damage.

While impact pile driving, which is an activity that generates substantial vibration levels, would not occur during Project construction, the Project-specific Geotechnical Investigation notes that soldier piles would be necessary, and these piles would be drilled or vibrated into place to limit potential vibration levels. Even with incorporation of these techniques for installation of soldier piles, vibration levels at adjacent properties could potentially exceed the building damage vibration criteria identified in Table 12 for new residential structures resulting in a potentially significant impact. The Geotechnical Investigation recommends mitigation for potential vibration impacts to adjacent structures, including continuous observation of pile installation while vibration levels are continuously monitored and recorded with seismographs to detect the magnitude of vibration and oscillation experienced by adjacent structures. MM 901 Levering GEO-1 presented in Section V.7, Geology and Soils, requires that the recommendations from the final Project-specific Geotechnical Investigation be incorporated into the Project, including recommendations related to vibration during the installation of steel soldier piles for shoring. MM 901 Levering NSE-1, which implements the recommendations in the Geotechnical Investigation related to vibration

from construction activities, requires that if the vibrations exceed the acceptable level for adjacent structures during installation, all pile installation activities should cease until the shoring contractor provides a plan to modify the installation procedure to reduce the values to within the acceptable range. Further, a structural survey of adjacent structures before and during construction for signs of distress or settlement would be required and corrective action would be taken to address any distress or settlement identified during construction. With incorporation of MM 901 Levering GEO-1 and MM 901 Levering NSE-1, potential vibration impacts to adjacent buildings during installation of soldier piles would be less than significant. Vibration during the installation of piles may also exceed the established human perception thresholds for building occupants, as identified in Table 13 (0.25 PPV in/sec). However, implementation of MM 901 Levering NSE-1 would reduce this impact to a less than significant level.

Heavy trucks would transport debris from the Project site during the site demolition and site preparation/grading stages of construction, with an average of approximately 104 one-way truck trips per day over the total period of 117 days. The access route for haul trucks and most construction vehicles would include I-405, Wilshire Boulevard, Veteran Avenue, Weyburn Avenue, Weyburn Place, Gayley Avenue, Le Conte Avenue, and Levering Avenue. These are all paved, generally smooth roads, and, as previously noted, groundborne vibration from traffic on smooth roadways is rarely perceptible. Haul trucks typically generate groundborne vibration velocity levels of 0.036 PPV (in/sec) at 50 feet; this level of vibration may be perceptible but would not be a strong or annoying vibration and would be well below the 0.25 PPV (in/sec) threshold for distinctly perceptible. As such, the use of heavy trucks during construction would not expose buildings adjacent to haul truck routes to excessive groundborne vibration levels that could cause annoyance to nearby residents, and this impact would be less than significant. No additional mitigation would be required.

Project-Level Mitigation Measures

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

MM 901 Levering NSE-1 *The campus shall require by contractor specifications that the following measures identified in the final Project-specific Geotechnical Investigation be implemented to reduce construction-related vibration impacts:*

- *Vibrations shall be monitored and recorded with seismographs during pile installation to detect the magnitude of vibration and oscillation experienced by adjacent structures. If the vibrations exceed the acceptable range during installation, the shoring contractor shall modify the installation procedure to reduce the values to within the acceptable range.*
- *Prior to excavation, the existing improvements on adjacent properties shall be inspected to document the present condition. For documentation purposes, photographs shall be taken of preconstruction distress conditions, and level surveys of adjacent grade and pavement shall be considered. During excavation activities, the adjacent structures and pavement shall be periodically inspected for signs of distress. In the event that distress or settlement is noted, an investigation shall be performed and corrective measures taken so that continued or worsened distress or settlement is minimized.*

Level of Significance

With implementation of LRDP MMs and MM 901 Levering NSE-1, the proposed Project would have a less than significant impact related to generation of excessive groundborne vibration or groundborne noise levels.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

14. POPULATION AND HOUSING

Relevant elements of the proposed Project related to population and housing include the redevelopment of the Project site with additional student housing for undergraduate students. When compared to existing conditions, the proposed Project would result in a net increase of up to 1,098 beds (residents) on the Project site. The proposed Project would not involve an increase in UCLA student enrollment or faculty; however, there would be a net increase of seven UCLA staff members.

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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Demand for UCLA student housing is consistently high and exceeds the available supply. The proposed Project would accommodate up to 1,150 undergraduate students (residents), which represents an increase of up to 1,098 residents housed on the Project site compared to the existing apartment buildings (52 residents). The proposed Project is intended to accommodate existing high demand for housing on and near the UCLA campus; it would not directly generate student enrollment growth. Also, the proposed Project would not increase the number of UCLA faculty but would result in a net increase of seven UCLA staff members. The proposed Project would be served by existing roadways and utility infrastructure adjacent to the Project site. Therefore, the proposed Project would not result in notable population growth, either directly or indirectly, and would be consistent with area growth projections. There would be virtually no impact, and no mitigation is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The Project site is currently developed with five residential apartment buildings owned and operated by UCLA, which include 42 units with 52 beds (residents). As of October 2025, the existing apartments have two remaining tenants. The existing tenants are currently on month-to-month leases and would be transitioned out of the existing apartments in 2026 prior to construction of the proposed Project. If any of the remaining residents are eligible, UCLA will provide relocation assistance under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (California Government Code Section 7260, *et seq.*). Therefore, the proposed Project would not result in permanent displacement of existing

people that would necessitate the construction of replacement housing elsewhere. After completion of the proposed Project, there would be additional housing available to students compared to existing conditions and there would be no impact.

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

Relevant elements of the proposed Project related to public services include the redevelopment of the Project site with a new 19-story residential building for UCLA undergraduate students. The new building would consist of up to 1,150 beds. When compared to existing conditions (52 beds), the proposed Project would result in a net increase of up to 1,098 beds. The proposed Project would not involve an increase in UCLA student enrollment or faculty; however, there would be a net increase of seven UCLA staff members. The proposed new building would be designed and constructed in compliance with applicable requirements pertaining to fire protection systems. An electronic key card security system would provide secure access to the building's entries.

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 EIRs 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.

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

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

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

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

Project Impact Analysis

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

Discussion

The proposed Project involves the redevelopment of the Project site with a new student housing building that would accommodate up to 1,150 beds, an increase of 1,098 beds compared to the existing apartment buildings on-site. The types of service calls are anticipated to be similar to those associated with the existing use and surrounding residential uses in the Project area, including, but not limited to, structural fires and emergency medical and rescue services.

The Los Angeles Fire Department (LAFD) provides fire suppression and rescue operations for the UCLA campus and the surrounding area, including the Project site. Fire alarm calls on campus are received by the UCLA Police Department (UCPD) command center staff members, who screen calls, determine the call location, and then alert the LAFD. Fire Station No. 37 is located at 1090 Veteran Avenue, approximately 0.2-mile south of the Project site, and would have primary responsibility for a first alarm call to the Project site. In cases where there is a need for backup support, additional LAFD fire stations would provide the necessary assistance. Fire Station No. 37 includes a task force consisting of an Assessment Light Force (a truck and engine with a paramedic on duty) and an accompanying engine; Basic Life Support (BLS) and Advanced Life Support (ALS) ambulances staffed 24 hours per day, 7 days per week; and a Fire Chief command car. The station is staffed daily by 16 fire personnel at any given time, including a battalion command with battalion chief, staff assistant and 3 paramedics, including 2 for ALS rescue and one for the Assessment Light Force. On a community-wide (Westwood Community) basis from January to December 2024, Fire Station No. 37 had operational response times of 8 minutes for emergency medical services (EMS) calls; 7 minutes and 55 seconds for non-EMS calls; 6 minutes and 46 seconds for critical ALS calls; and 5 minutes and 42 seconds for structure fires (LAFD, 2025). In addition to LAFD paramedics, UCLA paramedics and ambulances from the RRUMC respond to emergency calls both on and off campus.

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

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

regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California, including at UCLA.

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

The proposed Project incorporates LRDP PP 4.11-1, which requires direct fire alarm connection to the University Police command center to facilitate emergency response by providing immediate location information. UCLA Fire would be the first responder to all fire alarms initiated from the proposed new building and would request backup support from LAFD only as needed. Given that the proposed Project involves redevelopment of existing housing with new student housing, as well as compliance with updated Fire Code requirements and safety measures and the proximity of Fire Station No. 37 to the Project site, the proposed Project would not increase the demand for fire protection services to the extent that new or physically altered fire protection facilities would be required to serve the proposed Project or to maintain acceptable response times and fire flows. No physical environmental impacts related to the provision of fire protection services would result, and impacts related to maintaining acceptable performance metrics would be less than significant.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would not require new or altered fire protection services, and no associated 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The proposed Project involves the redevelopment of the Project site with a new student housing building that would accommodate up to 1,150 beds, an increase of 1,098 beds compared to the existing apartment buildings on-site. The types of service calls are anticipated to be similar to those associated with existing residential uses on-site and surrounding the Project site. The types of crimes typically associated with residential uses are “crimes against persons,” such as assault and robberies.

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

As the Project site, which is owned by UCLA, is adjacent to campus, it falls within the zone in which UCPD and LAPD concurrently provide police protection. UCPD personnel are used in crime prevention, investigations, and administration. In addition, UCPD personnel are instrumental in providing training to staff and faculty on leadership in emergency situations, observation tactics, active shooter scenarios, and use of safety equipment and technology. All sworn officers are available on an on-call basis to respond in emergency situations. On a part-time basis, students are employed as Community Service Officers (CSOs) to provide escort services, equipment security services, and patrol assistance. UCPD currently employs 65 sworn officers, 41 non-sworn personnel, and 130 students employed as CSOs (UCPD, 2025). The University evaluates police protection needs on an ongoing basis and considers the need to augment UCPD and CSO staffing levels as institutional priorities. Consistent with LRDP PP 4.11-2(a) and PP 4.11-2(b), which have been incorporated into the proposed Project, the University would continue to assess police staffing levels as individual development projects are proposed.

Additionally, to ensure adequate response to life-safety issues and as required by LRDP PP 4.11-1, the proposed building would have direct fire alarm connections to the UCPD command center to facilitate emergency response by providing immediate location information. In addition, the UCPD would continue its current practice of cooperating with the LAPD, the Santa Monica Police Department, and the California Highway Patrol to help ensure the adequacy of police protection services across the campus and surrounding area.

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The proposed Project involves the redevelopment of the Project site to provide additional housing for undergraduate students (an increase of up to 1,098 beds compared to the existing buildings). The proposed Project would not include new student family, faculty, or staff housing. Additionally, there would be no increase in student enrollment at UCLA and no increase in UCLA faculty as a result of the proposed Project; however, there would be a net increase of seven UCLA staff. The proposed Project would not result in direct elementary, middle, or high school student generation. Therefore, there would be no increase in demand for Los Angeles Unified School District (LAUSD) services and facilities. The proposed Project would not result in a need for the construction of new or altered school facilities, and no physical environmental impacts would occur as a 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The proposed Project involves the redevelopment of the Project site to provide additional housing for undergraduate students (an increase of up to 1,098 beds compared to the existing buildings). The proposed Project would not include new married student, faculty, or staff housing. Additionally, there would be no increase in student enrollment at UCLA and no increase in UCLA faculty as a result of the proposed Project; however, there would be a net increase of seven UCLA staff. Therefore, the proposed Project would not result in an increased demand for on- or off-campus library services or other public services, nor would new or expanded library facilities or other public facilities be required, and no physical environmental impacts would occur as a result.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

16. RECREATION

Relevant elements of the proposed Project related to recreation include the redevelopment of the Project site with a new residential building for UCLA undergraduate students (up to 1,150 beds). When compared to existing conditions, the proposed Project would result in a net increase of 1,098 beds (residents). The proposed Project would not involve an increase in UCLA student enrollment or faculty; however, there would be a net increase of seven UCLA staff members. The proposed Project would include external courtyards and amenity spaces for use by students and guests.

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 EIRs 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.

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

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The proposed Project would accommodate up to 1,150 beds (residents). The proposed Project would not increase student admissions at UCLA but rather would accommodate the existing student population.

Although Project residents may utilize a variety of recreational facilities and programs offered by the University and/or the City of Los Angeles, the majority of the campus population (students, faculty, and staff) utilizes on-campus recreational facilities. These facilities would continue to be provided and maintained for students, including Project residents, as required by LRDP PP 4.12-1(a). The UCLA Cultural Recreational Affairs Department continuously monitors the demand for recreational facilities on campus and adjusts operating hours and other program-operating procedures to ensure that the existing facilities are used as efficiently as possible. Continued review of the demand for facilities and adjustments to operating procedures and facility design (e.g., extending hours of operation) ensures that the on-campus demands are met. Additionally, LRDP PP 4.12-1(b) is incorporated into the proposed Project and requires the inclusion of open space areas at the Project site; this would be accomplished primarily through the provision of two courtyards on the ground level and a terrace on the second level. Specifically, the proposed Project would include an approximately 2,150-sf landscaped entry courtyard with custom seating in the northern corner of the Project site, and an approximately 3,050-sf rear courtyard with a covered fitness area, bike parking, and landscape planters in the southern corner of the Project site. An approximately 3,150-sf outdoor terrace would be provided at the eastern corner of Level 2, which would include landscaped planters as well as tables, chairs, and other seating elements. These courtyards would provide opportunities for formal and informal interaction, socialization, and study activities. Additionally, recreation and fitness facilities at adjacent student housing developments, including at Southwest Campus Housing to the west and Gayley Heights to the north, would be available to proposed Project residents.

Therefore, the proposed Project would not substantially increase the demand for park and recreational facilities and would not result in a substantial deterioration of existing facilities, nor

would it accelerate such deterioration, thus resulting in a less than significant impact. As such, the proposed Project would not result in a need for the construction of new or altered park or recreational facilities. Additionally, the physical impacts resulting from construction of the on-site courtyards and terrace have been evaluated throughout this Initial Study and would be less than significant. No additional physical impacts would occur with implementation 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 an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

The proposed Project would include exterior courtyards and a terrace; the physical environmental impacts of this proposed Project component are addressed throughout this Initial Study, and impacts would be less than significant.

17. TRANSPORTATION

Relevant elements of the proposed Project related to transportation include development of the Project site with housing for UCLA undergraduate students. The proposed Project would include up to 1,150 beds (residents), which is a net increase of 1,098 beds (residents) compared to the existing apartment buildings. The Project site is adjacent to the UCLA campus, and within walking distance of the campus entry at the intersection of Le Conte Avenue and Westwood Boulevard (approximately 0.2 mile east of the Project site). There is also pedestrian access from the Project site to the main campus along Gayley Avenue and to the Southwest zone via Weyburn Place. Project residents would have access to a full range of existing University TDM programs. Additionally, bicycle parking facilities would be provided on-site.

Construction activities would involve heavy trucks on the identified construction routes, as described in Section II.5, Proposed Project Components, under "Construction Activities," of this Initial Study.

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

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

PP 4.13-2 *UCLA Capital Programs will assess construction schedules of major projects to determine the potential for overlapping construction activities to result in periods of heavy construction vehicle traffic on individual roadway segments, and adjust*

construction schedules, work hours, or access routes to ~~the extent feasible to~~ reduce construction-related traffic congestion.

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

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

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

Project Impact Analysis

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

The 901 Levering Avenue Student Housing VMT Screening Assessment (VMT Assessment) was prepared by Fehr & Peers (Fehr & Peers, 2025) to evaluate potential transportation impacts resulting from operation of the proposed Project and is included in Appendix H 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 a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Transit

As discussed in Section V.8, Greenhouse Gas Emissions, of this Initial Study, the UC Policy on Sustainable Practices and UCLA CAP address the reduction of dependency on use of single occupancy vehicles to reduce emissions from mobile sources. The proposed Project is located in a TPA, which is defined as an area that is within 0.5-mile of a major transit stop that is existing or planned. An extensive transit network serves the UCLA campus and Westwood area. The

roadways in the vicinity of the Project site are served by multiple bus lines managed by the Los Angeles County Metropolitan Transportation Authority (Metro), Santa Monica Big Blue Bus (BBB), Antelope Valley Transit Authority (AVTA), City of Santa Clarita Transit, Amtrak, and Los Angeles Department of Transportation (LADOT). These bus lines provide a variety of bus services and, when transfer opportunities are considered, provide access to Metro rail services, Metrolink, and numerous other bus routes served by Metro, LADOT, and other municipal bus operators.

In support of the VMT Assessment for the proposed Project, the LA Metro bus routes and stops within one-half mile of the Project site were reviewed to determine if the service frequencies were 15 minutes or less during peak travel hours (refer to Table 17 and Figure 18).

TABLE 17 LA METRO TRANSIT SERVICE IN THE PROJECT VICINITY

Bus Stops Closest to Project Site	LA Metro Bus Routes	Headway at Weekday Peak (minutes)	Distance from Project Site (miles)
Le Conte / Gayley	2	8	0.06
	602	30	
Westwood / Le Conte	2	8	0.21
	233	NA ¹	
	602	30	
	761	15	
Wilshire / Veteran	20	10	0.35
	720	5	
¹ Overnight service in Westwood. Source: (Fehr & Peers, 2025)			

Additionally, UCLA runs its own bus network, branded as BruinBus, providing complimentary service between the UCLA campus and Westwood Village. The U1 Weyburn route serves the southwest campus with a stop on Le Conte Avenue just east of the Project site and service is provided approximately every 10 to 20 minutes. Other bus lines that use the bus stops at Gayley Avenue and Le Conte Avenue include LADOT Commuter Express Line 573, BBB Line 18, Santa Clara Transit Lines 792 and 797.

Los Angeles World Airports and Amtrak also operate bus services near the UCLA campus, which connect to air and rail facilities, respectively. The Expo/Sepulveda Light Rail Station is located approximately 2.1 miles southeast of the Project site and provides additional transfer opportunities to other regional destinations. Additionally, Metro is currently constructing the Purple Line (D Line) extension which will be adding two new stations, Westwood/UCLA and Westwood/VA Hospital, which will connect the Westside to downtown Los Angeles. The anticipated opening of these stations is in 2027 (Metro, 2025). The Westwood/UCLA station will be located on the northwest corner of the intersection of Wilshire Boulevard and Gayley Avenue, approximately 0.3-mile from the Project site. Once this transit project is completed, the rail line will provide increased access and connectivity throughout the local area and region, as well as decrease vehicular travel on area roadways. The Westwood/UCLA station would be easily accessible to Project residents, reducing the need to drive.

Therefore, as described above, the Project site and surrounding area are well-served by public transit. Further, the UCLA TDM program is a comprehensive program that offers a broad range of services to encourage and assist UCLA commuters in utilizing alternatives to a single-occupancy vehicle.



Source(s): Fehr & Peers (07-10-2025)

Figure 18



Not to Scale

LA Metro Transit Service in the Project Vicinity

Roadways

The Project site and surrounding uses in Westwood are well-served by freeways, avenues, and local streets. Freeways are located west and south of the Project site (I-405 and I-10, respectively) and provide convenient access to the larger, regional roadway network. Within the vicinity of the Project site, the primary roadways and roadway classifications according to the City of Los Angeles Mobility Plan 2035 include Gayley Avenue and Le Conte Avenue, which carry an Avenue II designation, and Levering Avenue, which is designated as a Local/Other Street (City of Los Angeles, 2016).

Construction Activities

For purposes of analysis in this Initial Study, construction of the proposed Project is expected to begin in 2026 and be completed in 2030. Construction traffic resulting from the proposed Project would primarily be associated with construction workers commuting to and from the Project site; removal of demolition materials associated with removal of the existing buildings and hardscape features; delivery of building materials; transport of construction equipment (including large equipment); and export of soil. Construction workers do not typically commute during peak hours as they generally arrive prior to morning (AM) peak hour and leave prior to the evening (PM) peak hour. The use of heavy trucks for the transport and disposal of building materials, equipment, and soil would occur periodically throughout the workday but largely outside of peak hours. For the proposed Project, the peak days for construction-related heavy truck traffic would occur when haul trucks transport soil being exported from the Project site.

As discussed in Section II, Project Description, of this Initial Study, it is conservatively estimated that on peak days there would be up to 52 round truck trips per day during the grading period. These trips would be spread out over a typical eight-hour construction day. Therefore, approximately seven round trips would be generated during an average hour. With a typical construction day starting at 7:00 AM, approximately seven round trips would be generated during the AM peak hour during the period of heaviest construction activity. Construction would typically be completed each day prior to the PM peak hour; therefore, no PM peak hour impacts are anticipated.

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

Construction of the proposed Project is anticipated to overlap with several other major UCLA construction projects, including the following: Co-Generation Plant Equipment Replacement, Infrastructure Upgrades, and Regulatory Compliance and Unforeseen Conditions Projects; Sunset Canyon Recreation Replacement Building Project; Gayley Towers Redevelopment Project; Phase 2 of the Big Ten Network Projects; Wooden Center Seismic Improvements Project; MP200 2nd Floor Oncology Improvements and Emergency Equipment Replacement Projects; and RRUMC 4th Floor Patient Care Reconfiguration and Nurse Call Replacement Projects. Refer to the Campus Map presented in Figure 2, which identifies the location of these projects. Although heavy truck trips generated by construction activities associated with the proposed Project may coincide with on- and off-campus construction activities, most of these projects would have distinct haul routes with minimal overlap, different construction sequencing with separate peak periods of truck trips, and/or be subject to City of Los Angeles permitting requirements intended to reduce overlapping haul routes. Additionally, UCLA would continue to monitor the construction schedules of major projects as they proceed and would adjust construction schedules, work

hours, or access routes as needed to reduce construction-related traffic congestion. Therefore, concurrent heavy truck traffic associated with the proposed Project and other major projects in the area would be minimized to the extent possible to avoid substantial traffic congestion on local roadways.

Operation

The proposed Project would not involve the construction of any new roadways. The existing parking garages on-site are accessed via Weyburn Place. The proposed Project would provide off-campus student housing located adjacent to the UCLA campus and would include two automobile parking spaces for maintenance purposes only accessed from one driveway along Levering Avenue. Therefore, the number of vehicles accessing the Project site would be reduced compared to the 14 vehicular parking spaces present under existing conditions, for a net reduction of 12 vehicular parking spaces.

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

Bicycle and Pedestrian Facilities

The County of Los Angeles identifies Class II bike lanes (on-street striped) in the vicinity of the proposed Project along Gayley Avenue between S. Sepulveda Boulevard and Wellworth Avenue; along Le Conte Avenue between Gayley Avenue and Hilgard Avenue; along Weyburn Avenue between Gayley Avenue and Tiverton Avenue; and along Westwood Boulevard on campus, which connects to a Class II bike lane along Charles E. Young Drive (County of Los Angeles, 2025). Additionally, adjacent to the Project site, there are sidewalks along both sides of Levering Avenue and along the west side of Weyburn Place. 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 proposed Project is not located on a HIN roadway (LADOT, 2025).

Although the proposed Project is not located within the HIN, the proposed Project would incorporate measures to align with Vision Zero policies. Specifically, the proposed Project would not provide automobile parking for residents and would provide a maximum of two automobile parking spaces for maintenance purposes only accessed from one driveway along Levering Avenue, thus reducing the potential for conflicts between vehicles entering/exiting the site. Additionally, the proposed Project would include 16 bicycle spaces, thus incentivizing Project residents and visitors to travel via bicycle to/from the Project site. Further, the proposed Project's location would provide strong pedestrian connectivity to the adjacent UCLA campus.

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

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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, using automobile VMT as the metric. With respect to transportation, PRC Section 21099(d) provides that the parking impacts of a residential, mixed-used residential, or employment center project located on an infill site within a TPA shall not be considered significant impacts on the environment. As discussed in response to Threshold (d) in Section V.1, Aesthetics, of this Initial Study, the Project site is an infill site located in a TPA. Therefore, the proposed Project, which would not provide automobile parking for residents and would include a maximum of two parking spaces for maintenance/service purposes only, would not result in significant transportation impacts related to parking.

To help lead agencies with SB 743 implementation, the Governor’s Office of Planning and Research, now referred to as the Office of Land Use and Climate Innovation (LCI), produced a Technical Advisory on Evaluating Impacts in California Environmental Quality Act (December 2018).³³ LCI’s Technical Advisory provides recommendations on VMT impact thresholds and considerations on the level of VMT analysis that is required based on project characteristics, and was used as a guide for the VMT Study for the proposed Project that is included in Appendix H of this Initial Study.

LCI’s Technical Advisory identifies 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 latter two criteria are applicable to the proposed Project as discussed below.

Transit Priority Area Screening

Projects located in proximity to a major transit stop or along a high-quality transit corridor may be screened out from conducting a VMT analysis due to their location in a TPA because they are

³³ Effective July 1, 2024, the Governor’s Office of Planning and Research was renamed the Governor’s Office of Land Use and Climate Innovation (LCI).

presumed to have a less than significant impact absent substantial evidence to the contrary. The PRC defines these two terms as follows:

- Major transit stop (PRC Section 21064.3)
 - An existing rail or bus rapid transit station.
 - A ferry terminal served by either a bus or rail transit service.
 - The intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods. (This definition was amended from 15 minutes to 20 minutes as of January 2025.)
- High-quality transit corridor (PRC Section 21155)
 - A corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

LCI’s Technical Advisory states that a project can be presumed to have a less than significant impact near transit stations if it satisfies CEQA Guidelines Section 15064.3(b)(1) of being located within one-half mile of a major transit stop or an existing stop along a high-quality transit corridor. As discussed under Threshold (a) above, multiple transit agencies provide transit service in the Project vicinity. As shown in Table 17 and Figure 18, multiple Metro bus stops are located within one-half mile of the Project site with service by six Metro bus routes. There are several major transit stops located within one-half mile of the Project site, including Westwood Boulevard and Le Conte Avenue with the intersection of Metro Bus Routes 2 and 761, with a frequency of service interval of 20 minutes or less during the peak commute periods. Additionally, the Project site is in proximity (less than one-half mile) to several bus stops on high-quality transit corridors such as Westwood Boulevard, Wilshire Boulevard, and Le Conte Avenue.

The Project-specific characteristics that the LCI Technical Advisory recommends for consideration for transit proximity screening are documented in Table 18. As shown, the characteristics of the Project site meet the guidance provided by LCI for a project to be screened from further VMT analysis if it is located in a TPA. Accordingly, the Project site qualifies as being located in a TPA. Therefore, the proposed Project would have a less than significant VMT impact and can be screened out from further VMT analysis.

TABLE 18 ADDITIONAL CONSIDERATIONS FOR TRANSIT PROXIMITY SCREENING

LCI Considerations	Project Site Characteristics	LCI Guidance Met?
Floor Area Ratio (FAR) above 0.75?	FAR of 9.6 ¹	Yes
More parking than required by the jurisdiction?	Project is not providing student parking.	Yes
Consistent with the applicable Sustainable Communities Strategy?	SCAG’s Connect SoCal 2024 plan encourages new housing and transit-oriented development. The proposed housing would be constructed within a TPA, with surrounding mixed-uses to limit vehicle trips and encourage walking, biking, and transit.	Yes
Replaces affordable residential units?	The proposed Project is not removing any affordable housing as none exists on-site.	Yes
¹ FAR calculated based on a 0.74-acre site and 310,000 sf building. Source: (Fehr & Peers, 2025)		

Low VMT Area Screening

Although the proposed Project is located in a TPA and screens out from requiring further VMT analysis, further analysis was nonetheless conducted as part of the proposed Project VMT Assessment to determine if the Project site is located in a low VMT generating area. The LCI 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 are currently generating VMT below the VMT threshold. Based on the VMT impact threshold recommended by LCI, low VMT is defined as an area that generates VMT on a per capita basis that is 15 percent or more below the baseline VMT.

To determine if the Project site is located in a low VMT area, VMT data from the 2024 SCAG Regional Travel Demand Forecasting Model was obtained for the Project site and for the SCAG region. Given that the proposed Project involves the development of student housing, Home-Based VMT per capita is the appropriate VMT metric and was obtained from the SCAG model. For residential land uses, home-based vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the residential population within the geographic area to produce Home-Based VMT per capita.

In the SCAG region, a low VMT area for residential uses generates no more than 14.92 Home-Based VMT per capita. For residential uses in the SCAG traffic analysis zone that represents the Project site, the Home-Based VMT per capita is 11.44 VMT per capita, which is 23 percent below the baseline VMT (see Attachment A of the VMT Assessment for the SCAG model TAZ boundary). Therefore, the Project site qualifies as within a low VMT area, which means that the proposed Project would also have a less than significant VMT impact under this criterion and can be screened out from further VMT analysis.

As the proposed Project screens out under both the TPA and low-VMT generating area LCI screening criteria, the proposed Project would have a less than significant impact related to VMT and no further quantitative analysis of VMT is required.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have no impact with regard to its potential to conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Vehicular and Bicycle Hazards During Construction

As described in Section II.5, Proposed Project Components, of this Initial Study, access to the Project site would be provided from I-405, Wilshire Boulevard, Veteran Avenue, Weyburn Avenue, Gayley Avenue, Le Conte Avenue, Levering Avenue, and Weyburn Place. Segments of Gayley Avenue and Le Conte Avenue that would be used as construction routes include bicycle lanes. There are no designated bicycle lanes along Levering Avenue or Weyburn Place; however, bicyclists may still use these roadways. Construction activities associated with the proposed Project could result in the temporary closure of travel lanes along Levering Avenue and/or Weyburn Place during various construction activities, including, but not limited to, accommodating the delivery of construction supplies, providing adequate site access for construction vehicles and equipment, and the installation of utility infrastructure. Additionally, construction staging, construction of a new driveway, and curb modifications and repairs would occur along Levering Avenue.

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

In addition, implementation of LRDP PP 4.13-5, which requires maintenance of one travel lane in each direction and/or the provision of signal carriers (i.e., flagpersons) when only a single lane can be maintained, would ensure that impacts associated with a construction-related traffic lane or roadway closures remain less than significant.

Pedestrian Hazards During Construction

There are existing sidewalks located along each side of Levering Avenue and along the west side of Weyburn Place adjacent to the Project site. To avoid conflicts/potential hazards to pedestrians during construction, the section of sidewalk on Levering Avenue adjacent to the Project site may be closed to pedestrians during portions of the construction period. Pedestrians would be directed to the sidewalk on the opposite side of the street. Safe pedestrian movement within and around the Project area and access to the nearby uses would be maintained with the maximum efficiency feasible. With incorporation of LRDP PP 4.13-6, which requires appropriate signage of alternate pedestrian routes around the proposed Project, there would be less than significant impacts related to pedestrian hazards during construction.

Hazards During Operation

The proposed Project does not include permanent modifications to City of Los Angeles travel lanes along Levering Avenue; however, a new driveway would be constructed to accommodate access to the loading/parking area in the eastern portion of the proposed Project, which would also include limited parking: a maximum of two spaces for services vehicles and deliveries (e.g., food deliveries and mail/package deliveries). The driveway would be constructed in accordance with City requirements, including sight distance. Along Weyburn Place, there would be no vehicular access to the Project site and the existing garages would be removed. Fire and other emergency vehicular access would continue to be provided from Levering Avenue and Weyburn Place. Therefore, implementation of the proposed Project would not increase hazards due to

design features or incompatible uses. Operation of the proposed Project would result in a less than significant impact related to vehicular hazards.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to a substantial increase in hazards due to a design feature or incompatible uses.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Emergency Access During Construction

Construction activities along Levering Avenue and Weyburn Place may result in temporary closure of travel lanes along these roadways to permit the delivery of construction materials; to transport soil; to accommodate the installation of utility infrastructure and/or other construction activities in the public right-of-way; or to provide adequate site access. The reduction of roadway capacity, the narrowing of traffic lanes, and the occasional interruption of traffic flow could impair emergency access. Construction activities would be planned so that access for emergency vehicles is maintained at all times. Additionally, implementation of LRDP PP 4.13-8 as part of the proposed Project would require consultation with emergency service providers in the event of lane or street closures. Therefore, there would be less than significant impacts related to emergency access during construction of the proposed Project.

Emergency Access During Operation

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

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 excavation of approximately 60,900 cy of soil to a depth of approximately 52.5 feet bgs that would extend into native soils. In addition, LRDP PP 4.4-5 and LRDP MMs 4.4-2(a) through (c) presented in Section V.5, Cultural Resources, of this Initial Study, are considered part of the proposed Project and are assumed in the analysis presented in this section.

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

Discussion

As discussed in Section V.5, Cultural Resources, the results of the SCCIC records search show that seven built-environment resources have been recorded within the Project site, and 37 are recorded within 0.5 mile. The records search notes that there are no historic resources within the Project site and nine built environment historic resources within 0.25 mile of the Project site that are either listed or eligible for listing at the state and/or local level. No tribal cultural resources either listed or eligible for listing at the state or local level were identified in the SCCIC records search or during the required Native American consultation conducted for the proposed Project, which is discussed under Threshold (b), below. Therefore, no impact would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance

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

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

Discussion

Assembly Bill 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 related to consultation with California Native American tribes regarding projects that may potentially affect a tribal cultural resource; emphasizes a broad definition of what may be considered 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 regarding projects proposed within that area. Specifically, AB 52 requires that the lead agency provide project notification to tribes that request such notification in writing prior to the lead agency’s release of a notice for an EIR, an MND, or a 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 regarding mitigation for any potential project impacts. 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:

Following extensive outreach to local tribes between September 2024 and July 2025 to develop an AB 52 notification list, on September 25, 2025, UCLA mailed notification of the proposed Project pursuant to AB 52 to the following tribes that have ancestral ties to areas within Los Angeles County:

- Gabrieleno Band of Mission Indians—Kizh Nation
- Yuhaaviatam of San Manuel Nation
- Fernandeño Tataviam Band of Mission Indians
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council (two separate addresses)
- Gabrielino/Tongva Tribe

On October 1, 2025, UCLA received a request for consultation via email from the Gabrielino Tongva Indians of California Tribal Council (Gabrielino Tongva Council). On October 3, 2025, UCLA received a request for consultation via email from the Gabrieleno Band of Mission Indians—Kizh Nation (Kizh Nation). No other requests for consultation were received.

On October 22, 2025, UCLA hosted a virtual meeting with a Tribal Representative for the Gabrielino Tongva Council, during which a brief Project presentation was given. Among the topics of discussion were UCLA's initial proposed Project-specific mitigation measures regarding the retention of a tribal monitor 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. As two tribes have requested to consult on the Project, a rotation among tribal monitors was also discussed. The Tribal Representative confirmed the adequacy of the proposed and previously adopted measures.

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

Additionally, a records search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed, and the results were positive (NAHC, 2025). The NAHC SLF records search is included in Appendix I of this Initial Study. The Gabrieleno/Tongva San Gabriel Band of Mission Indians was identified in the records search, and the NAHC also provided a recommended list of tribes to be contacted regarding tribal cultural resources in the area.³⁴

³⁴ Each of the tribes included on the NAHC list were contacted by UCLA and invited to request to be included on UCLA's list of tribes for Native American consultation pursuant to AB 52. The Gabrieleno/Tongva San Gabriel Band of Mission Indians in particular declined to consult on the proposed Project.

In light of the importance of the Project area to local tribes, the potential sensitivity of the Project site, and the extent of earthwork proposed as part of the Project, any unanticipated discovery of a tribal cultural resource could result in a substantial adverse change in the significance of the resource, which would be considered a potentially significant impact. Such impacts would be reduced to a less-than-significant level with mitigation, described below.

Based on the information received ~~to date~~ during consultation, UCLA proposes Project-specific mitigation measures adapted from that substantially incorporate those provided by the Kizh Nation. ~~Of note is the addition of language that specifies the need to rotate~~ **The proposed measures require shared** monitoring responsibilities among the two consulting tribes, as well as shared tribal responsibilities in the event of any unanticipated discoveries. Additional mitigation regarding the unanticipated discovery of human remains is also provided and expands on the requirements identified in LRDP PP 4.4-5 included in Section V.5, Cultural Resources, of this Initial Study. Consultation with **the Kizh Nation was concluded on February 9, 2026, and tribal consultation with the Gabrielino Tongva Council was concluded on February 19, 2026** ~~both tribes is ongoing in order to finalize the proposed mitigation.~~

Project-Level Mitigation Measures

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

MM 901 Levering TCR -1 Retain a Native American Monitors Prior to Commencement of Ground-Disturbing Activities: Gabrieleño Band of Mission Indians – Kizh Nation

- A. ~~With the cooperation of and participation by each Tribe, the~~ **The University shall retain and compensate for the reasonable and documented services of a Native American Monitor from the Gabrielino Tongva Indians of California Tribal Council and a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitors shall be retained prior to the commencement of any “ground-disturbing activity” for the proposed Project subject project at all affected project locations (i.e., both on-site and any off-site locations where Project-related work will occur that are included in the project description/definition and/or required in connection with the project, such as utility connections or public improvements work). “Ground-disturbing activity” shall include, but is not limited to, any disturbance occurring from the ground surface through the full depth of demolition of the on-site swimming pool 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. ~~An alternating monthly schedule for monitoring activities by each monitor shall be established by the University and such schedule shall be provided in writing to each monitor.~~

The assigned monitor shall **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 each **the** Tribe, ~~if any~~. Monitoring logs shall **will** identify and describe any discovered ~~tribal cultural resources~~ **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** monitoring logs shall **will** be provided to the Environmental Planning section of UCLA Capital Programs upon completion of monitoring activities.

- D. **In consultation with the Kizh 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.**

- E. On-site tribal monitoring shall conclude upon ~~one~~ **either** of the following: (1) written ~~notification~~ **confirmation** to both Tribes **the Kizh** from **a designated point of contact for** the University that all ~~Project-related~~ 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 both Tribes **the Kizh** to the Environmental Planning section of UCLA Capital Programs that no future, planned construction ~~related~~ activity **and/or development/construction phase** at the ~~Project~~ **project** site possesses the potential to impact ~~tribal cultural resources~~ **Kizh TCRs**.

MM 901 Levering TCR-2 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities: Gabrielino Tongva Indians of California Tribal Council

The University shall retain and compensate for the services of a Tribal Monitor from the Gabrielino Tongva Indians of California Tribal Council who will be present on-site on a bi-monthly basis during the construction phases that involve ground-disturbing activities. The Tribal Monitor will complete daily monitoring logs that summarize earthwork activities, locations, soil, and any cultural materials identified. In consultation with the Tribe 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 Monitor and associated Tribal Representative indicate the site has a low potential to impact tribal cultural resources.

MM 901 Levering TCR-23 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial): **Gabrieleño Band of Mission Indians – Kizh Nation**

~~Upon discovery of any tribal cultural resource **TCRs**, all ground-disturbing **construction** activities in the immediate vicinity of the discovery shall cease (i.e., within an approximately **not less than the surrounding 50 feet** foot radius, as determined in consultation with the monitor and the University's qualified Archaeologist) and shall not resume until the discovered resource **TCR** has been fully assessed by the **Kizh monitor and/or Kizh archaeologist** assigned monitor and the University's qualified Archaeologist. The University shall promptly notify the alternate tribal monitor of the discovery to allow opportunity to assess the find. The University shall coordinate with both Tribes regarding treatment and curation of the resource, with reburial or preservation in place preferred, as agreed to by all parties. Work may continue on other non-impacted parts of the Project site while evaluation and, if necessary, treatment occurs.~~

MM 901 Levering 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 901 Levering TCR-35 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 901 Levering TCR-1, MM 901 Levering TCR-2, and MM 901 Levering TCR-3, 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 the redevelopment of the Project site with approximately 310,000 sf of student housing space to accommodate 148 apartment units (up to 1,150 beds) with exterior landscaped courtyards and a second-level terrace. The proposed Project would be designed to achieve a minimum LEED Gold rating. The proposed Project would also comply with all current CALGreen mandatory requirements. The design, construction, and operation of the proposed Project would include a series of green building strategies, including exceedance of Title 24 energy efficiency requirements by 20 percent, as required by the UC Policy on Sustainable Practices.

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 EIRs are signified by strikeouts (~~strikeouts~~) where non-applicable text has been removed and by bold and underline (**bold and underline**) where text has been added. Changes have been made so the stated requirement better applies to the proposed Project.

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

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

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

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

PP 4.14-2(g) *The campus **University** shall educate the ~~campus~~ 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; and LRDP PP 4.7-1, PP 4.7-5, and MM 4.7-1, discussed in Section V.10, Hydrology and Water Quality, of this Initial Study, require the development and implementation of Best Management Practices to manage runoff, all of which are also incorporated into the proposed Project.

Project Impact Analysis

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

Discussion

As previously described in Section II.5, Project Components, of this Initial Study, under the discussion of Utilities, and as shown on Figure 12, the utility infrastructure necessary to serve the proposed Project currently exists adjacent to the Project site, primarily in Levering Avenue. The proposed Project would involve the removal of existing utility laterals on-site and the installation of new utility infrastructure that would connect to existing water, sewer, electricity, and telecommunications facilities in Levering Avenue and electricity and telecommunication facilities at the UCLA Levering Terrace site to the northwest. Conduit would also be installed to allow for a future connection to the telecommunication manhole within Weyburn Place. The existing utilities have sufficient capacity to serve the proposed Project, and the construction of new or expanded facilities off-site would not be required beyond that necessary to accommodate connections to the new development. Notably, as previously discussed, the SCAR approved by the City BOE and included in Appendix J of this Initial Study concluded that a maximum wastewater discharge of 80,500 gpd estimated for the proposed Project could be accommodated in the downstream sewer lines, and no off-site improvements would be necessary (City of LA BOE, 2025).³⁵ Further, based on a hydrant flow test, the results of which are included in Appendix K of this Initial Study (LADWP, 2025), the water supply has sufficient capacity to support the required fire flow (2,219 gallons per minute [gpm], which exceeds the required 1,500 gpm) (Cosentini, 2025).

No storm drains exist in Levering Avenue; the existing buildings outlet stormwater through curb drains along Levering Avenue. Implementation of the proposed Project would not result in an

³⁵ **An updated SCAR processed by the City of LA BOE on December 8, 2025 confirms the results of the previous SCAR and is on file with UCLA Capital Programs.**

increase in runoff entering the City of Los Angeles drainage system compared to existing conditions due to the inclusion of Permavoid planters on-site, which would both treat and reduce the overall volume of runoff leaving the site. Additionally, through compliance with the Phase II MS4 requirements, storm water drainage would be controlled such that the construction of new or expanded City of Los Angeles storm drainage facilities would not be necessary. Storm water management and water treatment facilities required for the proposed Project would be located within the construction impact footprint for the proposed Project.

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

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

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

The projected water demand for the proposed Project has been calculated at 26,745 gpd (9.76 million gallons per year [mgy]) based on per-student demand rates derived from 2024 billing records for UCLA’s Gayley Heights.³⁶ This is a conservative estimate as it does not take into consideration the water demand generated by the existing buildings at the Project site. The

³⁶ To calculate a realistic estimate of Project water demand, billing data from 2024 associated with recently constructed UCLA housing facilities were used. This resident hall is assumed to approximate the proposed Project in terms of utility efficiency and resource conservation. Total water demand also accounts for the proposed Project’s estimated Maximum Applied Water Allowance (MAWA) for irrigation, as provided by Mithun, 2025.

proposed Project’s estimated water demand includes water demand reduction associated with the following water conservation measures that would be implemented as required by LRDP PP 4.14-2(9): incorporating a high-efficiency irrigation system and native/drought-tolerant species to reduce landscape irrigation demands; and selecting water fixtures (e.g., taps, toilets, shower heads, and other fixtures) to achieve a reduction in water demand and increase water efficiency (consistent with and using recycled/reclaimed storm water for irrigation). Further, LRDP PPs 4.14-2(b) through 4.14-(d) from the LRDP EIRs are incorporated into the proposed Project and require reducing irrigation needs; promptly detecting and repairing water and irrigation pipe leaks; and minimizing the use of water to clean walkways and other hardscape, respectively.

The proposed Project estimated water demand of approximately 9.76 mgd (equivalent to approximately 29.96 acre-feet per year [afy]), which includes water used for irrigation, would represent approximately 0.004 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.³⁷ Therefore, water usage for the proposed Project would be within the established demand projections of the LADWP as outlined in the current 2020 UWMP. There would be sufficient water supplies for implementation of the proposed Project and particularly in light of improved water conservation and efficiency with implementation of the proposed Project, a less than significant impact related to water supply would occur.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

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

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The City of Los Angeles provides wastewater (or sewer) conveyance facilities from the Project area to the City’s Hyperion Water Reclamation Plan (HWRP) located in Playa del Rey directly west of the Los Angeles World Airport. 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

³⁷ (9,761,700 gallons per year / 325,851 = 29.96 acre-feet per year)

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 estimated wastewater generation of 26,585 gpd would represent a negligible amount (0.02 percent) of the HWRP's remaining daily capacity. This estimate is conservative in that it does not account for the wastewater generation from the existing uses that would be removed. There would be a less than significant impact related to adequate wastewater treatment capacity to serve the 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Would the project comply with applicable federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

UCLA contracts with a private waste disposal company (Athens Services) to collect, recycle, and dispose of solid waste generated by UCLA facilities located both on and off campus. Following waste separation, sorting, and recycling activities, trash is transported to the Mid-Valley Sanitary Landfill, located in San Bernardino County in the city of Rialto. The maximum daily capacity and remaining permitted capacity of Mid-Valley Sanitary Landfill is approximately 7,500 tons per day and, as of December 31, 2023, approximately 54.22 million tons, respectively (CalRecycle, 2025a). UCLA's recyclable materials are anticipated to be transported to Athens Material Recovery Facility in Sun Valley located in the San Fernando Valley, and compostable organics are sent to Recology Blossom Valley Organics in Lamont, Kern County.

Section 4.14, Utilities and Service Systems, of the LRDP Final SEIR, which is incorporated by reference, provides a discussion of the regulatory framework for solid waste management relevant to UCLA projects. While state and University regulations relative to solid waste management are addressed in the LRDP Final SEIR, a summary of applicable regulations is provided here to identify updates, as appropriate, or to provide context for this analysis. 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, CALGreen 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 exceeds 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. This requirement exceeds those established by AB 341 and CALGreen.

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

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

- **Construction.** Based on the USEPA new construction waste generation rate of 4.38 lbs/sf for residential structures (USEPA, 2009), the proposed approximately 310,000 sf of new construction would generate a total of approximately 678.9 tons (1,357,800 lbs) of solid waste. As discussed in Section II.5, Proposed Project Components, because the Project site is currently developed with 5 residential buildings totaling approximately 23,952 sf, the proposed Project's construction activities would include demolition. Demolition of the existing buildings and hardscape would be necessary to implement the proposed Project. Based on the USEPA demolition waste generation rate of 150 lbs/sf for residential structures, demolition of the existing buildings is calculated to generate approximately 1,796.4 tons (approximately 3.6 million lbs) of demolition waste. As such, the total construction waste generated by the proposed Project would be approximately 2,475.3 tons.

A minimum LEED Gold rating for the proposed Project has been established, consistent with the UC Sustainable Practices Policy. The UCLA campus is committed to ultimately achieving approximately 90 percent waste diversion, which includes demolition and other construction waste. This would reduce the proposed Project's total amount of construction waste to be disposed to approximately 247.5 tons, with a 90 percent waste diversion. If the FY 2019-2022 construction diversion rate of 89 percent is assumed, the proposed Project would require the disposal of approximately 272.3 tons.

Inert wastes, such as construction waste, yard trimmings, and soils, are typically disposed of at inert waste landfills.³⁸ One inert waste landfill, Simi Valley Landfill and Recycling Center in Simi Valley, has a full solid waste facility permit, although several other inert debris facilities operate in the region. As of February 3, 2020, the Simi Valley Landfill and Recycling Center has a remaining permitted capacity of approximately 79.8 million tons with a permitted weekly capacity of 64,750 tons and its current permit will expire in 2063. Combined with the other inert debris facilities in the region, adequate long-term capacity is expected to remain available. (CalRecycle, 2025b)

The proposed Project's construction waste stream would be disposed of at appropriate disposal facilities periodically over the construction period, rather than all in one day. Therefore, construction of the proposed Project, which incorporates LRDP PP 4.14-3 and PP 4.15-1, would result in a less than significant impact to landfill space.

- **Operation.** Based on per-student waste disposal information provided by UCLA Housing for UCLA's Gayley Heights, the proposed Project is estimated to require the disposal of 57.5 tons of trash per year, in addition to the generation of 11.5 tons of recyclable waste. Additionally, UCLA Housing estimates that 69.0 tons of organic materials (compost) would be generated annually. These estimates are considered conservative in that they do not account for the removal of the existing uses, which exhibit a lower level of diversion and do not receive composting services. As noted above, the proposed Project, although off campus, would be served by the same private waste disposal company as on-campus facilities and, therefore, would be provided with the same collection, diversion, and disposal programs and facilities as on-campus development.

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

To determine the proposed Project's operational impact on solid waste facilities, the projected solid waste disposal need was compared to the total remaining capacity at the anticipated receiving landfill, Mid-Valley Sanitary Landfill. This landfill has a daily maximum permitted capacity of 7,500 tons (yearly equivalent of 2.7 million tons) and has a permit expiration date of 2045 (CalRecycle, 2025a). Based on an estimated disposal need of 57.50 tons per year, the proposed Project's trash stream would represent approximately 0.002 percent of the landfill's remaining annual capacity. Thus, Mid-Valley Sanitary Landfill would have sufficient permitted capacity to accommodate the proposed Project. Therefore, with incorporation of LRDP PPs 4.14-3 and PPs 4.15-1 into the proposed Project, there would be a less than significant impact related to solid waste disposal, and no mitigation would be required.

Project-Level Mitigation Measures

No additional mitigation measures are required.

³⁸ Inert waste is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

Level of Significance

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

20. WILDFIRE

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

Project Impact Analysis

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The Project site is located within the limits of the City of Los Angeles and is, therefore, not within a State Responsibility Area where the California Department of Forestry and Fire Protection (CalFire) is responsible for fire suppression. According to CalFire, the Project site is not located within a VHFHSZ (CAL FIRE, 2025). Additionally, the Project site is not located in a Wildfire Severity Zone as shown in Figure 18-7 of the City of Los Angeles LHMP (City of Los Angeles, 2024a). The nearest wildland area is in the Santa Monica Mountains and associated foothills, located approximately 1.5 miles to the northwest of the Project site, with intervening urban development. Therefore, the proposed Project would have no impacts related to wildfires or the associated issues identified in Threshold (a) through Threshold (d), above. 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 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 EIRs and, as a result, would have a less than significant impact on nesting birds. Therefore, the potential for the proposed Project to degrade the quality of the environment related to biological resources would be less than significant.

As discussed under Section V.5, Cultural Resources, of this Initial Study, the proposed Project would have no impact on historic resources. The proposed Project would involve excavation in native sediments and, although unlikely, there is a potential for previously unknown archaeological or paleontological resources to be encountered. Incorporation of LRDP PP 4.4-5, MM 4.4-2(a) through MM 4.4-2(c), MM 4.4-3(a), and MM 4.4-3(b) into the proposed Project would ensure that potential impacts would be reduced to a less than significant level.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to the potential to degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of a Rare or

Endangered plant or animal. The proposed Project would have a less than significant impact related to the potential to eliminate important examples of the major periods of California history or prehistory.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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):</p> <p>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)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

As defined in CEQA Guidelines Section 15355, cumulative impacts refer to two or more individual effects, which, when considered together, are considerable or which compound or increase other environmental impacts. Per CEQA Guidelines Section 15130(b)(1), the analysis of cumulative impacts may be based on a list of past, present, and probable future projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency. The following known projects are proposed, approved, and/or under construction either on the UCLA campus or within the residential area surrounding the Project site. Refer to the Campus Map presented in Figure 2, which identifies the location of these projects.

- Cogeneration Plant Equipment Replacement, Infrastructure Upgrades, and Regulatory Compliance and Unforeseen Conditions Projects** – UCLA’s on-campus Co-generation Plant is an 86,000-sf building that provides electric power, chilled water, and steam to the campus. The projects involve the replacement, upgrade, and modernization of equipment and related infrastructure within and associated with the UCLA Cogeneration Plant. The projects include the replacement of the gas turbine generators and parts for the existing heat recovery steam generators; the addition of a Continuous Emissions Monitoring System to monitor emissions output in compliance with SCAQMD requirements and two purge air systems; equipment upgrades at the Cogeneration Plant’s LADWP substation; and de-rating of the new turbine generators to meet SCAQMD requirements. These activities are projected to last until December 2025.
- Sunset Canyon Recreation Replacement Building Project** – This project is located in the northwest corner of the UCLA campus and involves the replacement of a series of recreational buildings totaling approximately 7,000 sf (plus 5,800 sf of covered unenclosed space), several of which were red-tagged and no longer occupiable due to seismic and structural deficiencies, with a single approximately 11,500-sf building (plus 6,500 sf of covered unenclosed space). Similar recreational programming would be provided. Construction is estimated to end in December 2026.

- **Gayley Towers Redevelopment Project** – This project is located off campus at 565 Gayley Avenue and involves the construction of an eight story, 109,520 sf co-living style residential building. Approximately 79,900 sf of residential space and 29,962 sf of common space will be provided. The project will provide up to 545 beds in double and triple-occupancy rooms. Residential support space will include housekeeping, maintenance, communications, and trash and recyclable collections functions. In addition to the common spaces typical of each floor, the ground floor will also provide a lobby, laundry room, mail facilities, and vending space. In addition, a bike storage room on the ground level would accommodate approximately 26 bikes. Construction is estimated to end in February 2027.
- **Phase 2 of the Big Ten Network Projects** – The UCLA Department of Intercollegiate Athletics is implementing National Collegiate Athletic Association (NCAA) sports facility broadcast improvements and upgrades at multiple on-campus athletic venues, including Spieker Aquatics Center (swimming, diving, water polo), Mapes Beach at Sunset Canyon Recreation Center (beach volleyball), and the John Wooden Center (volleyball) as Phase 2 of the project. More specifically, the project involves the upgrade and installation of broadcast communication equipment and infrastructure, including new camera stations (with both dedicated broadcast cameras and replay cameras), television reception panels and input/output panels, waterproof enclosures or junction boxes, and associated broadcast cabling and electrical conduit at each of the venues. These activities are projected to last until March 2027.

As a separate but related project (Acosta Operations Center), the UCLA Department of Intercollegiate Athletics will be implementing interior renovations within the Acosta Training Center located adjacent to Pauley Pavilion to create an approximately 3,000-sf central control room/production facility. Construction for this project is estimated to start in August 2026 and end in September 2027.

- **Wooden Center Seismic Improvements Project** – The project involves the renovation of portions of the on-campus John Wooden Center in order to improve the building's Level VI seismic rating to Level IV; install a new roofing membrane; enclose an exterior loggia in the southeast corner of the Joh Wooden Center to provide 2,600 sf of additional programmable floor area; extend the utility and exterior wall systems to accommodate the new loggia enclosure; perform required building upgrades related to ADA accessibility and current CBC requirements; and reconstruct architectural finishes as needed. During construction, one or more temporary structures will be provided to house some of the displaced uses. Ground disturbance will be limited and temporary, no healthy mature trees will be removed, and the temporary staging site(s) will be restored to their existing condition following completion of construction. Construction is estimated to last from October 2026 until July 2027.
- **MP200 2nd Floor Oncology Improvements Project**– This UCLA Health Department of Oncology project involves interior renovation of the majority of the second floor of the Peter Morton Medical Building (known as MP200), located on campus at 200 Medical Plaza Driveway within the RRUMC. This project includes renovation of approximately 10,240 sf of space to expand oncology services in order to meet the demand for care. The existing Bowyer Oncology Center, currently located on the first floor of MP200, will be relocated to a newly renovated second floor space. Construction is estimated to end in July 2027.
- **MP200 Emergency Equipment Replacement Project** – This project involves the replacement of two existing rooftop emergency generators and all associated components necessary for a complete and code-compliant emergency power system for MP200. Construction is estimated to start in June 2026 and end in October 2027.

- **RRUMC 4th Floor Patient Care Reconfiguration Project** – UCLA Health will convert the west, east, and north units of the fourth floor of the on-campus RRUMC from “Behavioral Health” to “General Medical and General Surgical Acute Care” spaces to better meet current demands for acute medical care by expanding inpatient bed capacity. This project will accommodate approximately 103 beds in 90 rooms, representing a net increase of 29 beds or six percent, to alleviate ongoing over-capacity conditions along with taking a substantially similar number of behavioral health beds off-line. Construction is anticipated to last from March 2026 until February 2028.
- **RRUMC Nurse Call Replacement Project** – This project involves the replacement of the existing nurse call system in the RRUMC. The scope of work includes decommissioning of the existing nurse call system; installation of new nurse call system components in patient rooms, bathrooms, hallways, and nurse stations; integration with other hospital systems; upgrades to communication consoles within individual distribution frame rooms; testing and commissioning; and related modification of the existing electrical system, including new receptacles, network cabling, conduits, and nurse call stations. Construction is anticipated to start in September 2026 and end in January 2030.

As discussed in Section V.3, Air Quality, of this Initial Study, the proposed Project’s construction and operational emissions would be less than significant. Therefore, consistent with SCAQMD policy, the cumulative construction and operational impacts of the proposed Project would also be less than significant. The cumulative projects identified above are located at a sufficient distance from the Project site that noise and vibration from construction activities would not be perceptible to the same receptors.

With respect to historic resources, as identified in the Historic Resource Assessment Report provided in Appendix D of this Initial Study (TGHP, 2025), there are no historic resources in the vicinity of the Project site; therefore, there would be no cumulative impact to historic resources.

With respect to other topical issues, the proposed Project would have no impact, a less than significant impact, or a less than significant impact with continued implementation of applicable PPs and MMs from the LRDP EIRs and/or implementation of Project-specific mitigation measures. Therefore, the proposed Project would not result in a cumulatively considerable contribution to any potential cumulative impacts, and no additional mitigation would be required.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance

The proposed Project would have a less than significant impact related to impacts that are individually limited, but cumulatively considerable.

Threshold(s)	Potentially Significant Impact	Less Than Significant With Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

As described in the analysis presented in Sections V.1 through V.20 of this Initial Study, potential impacts of the proposed Project would be less than significant in part due to the incorporation of relevant LRDP PPs and MMs, as well as implementation of new Project-specific MMs intended to address geology/soils impacts and noise. 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

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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TERESA GRIMES | HISTORIC PRESERVATION (HISTORICAL RESOURCE ASSESSMENT)

Teresa Grimes Principal

GEOCON WEST, INC. (GEOTECHNICAL INVESTIGATION)

Joe Hicks, M.S., PE 93183..... Professional Engineer
Harry Derkalousdian, PE 79694..... Professional Engineer
Gerald A. Kasman, CEG 2251 Professional Geologist

FEHR & PEERS (VMT ASSESSMENT)

Sarah Brandenberg..... Principal
Dongyang Lin..... Senior Transportation Planner

PSOMAS (TREE INVENTORY)

David T. Hughes Senior Project Manager
Trevor Bristle Arborist

URBAN CROSSROADS (AIR QUALITY, GHG EMISSIONS, AND NOISE)

Haseeb Qureshi Principal
William Maddux, INCE Senior Associate
Alyssa Barnett..... Assistant Analyst

DRAFT IS/MND APPENDICES

Available on the UCLA Capital Programs website:

<https://www.capitalprograms.ucla.edu/EnvironmentalReview/ProjectsUnderEnvironmentalReview>